

**Government of Egypt  
Ministry of Environment**



**Greater Cairo Air Pollution Management  
and Climate Change Project**

**Labor Management Procedures**

**Update**

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**Abbreviation List**

<b>CTA</b>	Cairo Transport Authority
<b>EEAA</b>	Egyptian Environmental Affairs Agency
<b>EGP</b>	Egyptian pounds
<b>EHSG</b>	Environmental, Health and Safety Guidelines
<b>ESS</b>	Environmental and Social Standard
<b>GBV</b>	Gender Based Violence
<b>GC</b>	Greater Cairo
<b>GIIP</b>	Good International Industry Practice
<b>GM</b>	Grievance mechanism
<b>HCW</b>	Health Care Waste
<b>IPC</b>	Infection prevention and control
<b>IVA</b>	Independent Verification Agent
<b>LMP</b>	Labor Management Procedures
<b>MoE</b>	Ministry of Environment
<b>MoLD</b>	Ministry of Local Development
<b>MoT</b>	Ministry of Transport
<b>PCU</b>	Project Coordination Unit
<b>SEA</b>	Sexual Exploitation and Abuse
<b>SGBV</b>	Sexual and gender-based violence
<b>SH</b>	Sexual Harassment
<b>SWM</b>	Solid Waste Management
<b>uPOPs</b>	Unintentionally Persistent Organic Pollutants
<b>WMRA</b>	Waste Management Regulatory Authority

## 1. Introduction

This Labor Management Procedures (LMP) document is prepared by the Project Coordination Unit for the Greater Cairo Air Pollution Management and Climate Change Project, hereafter referred to as “GCCC”. It seeks to ensure that all workers involved in the project are protected and are working in safe environment. At the same time, it sets out expected behaviors from workers to ensure harmony in the communities where the project operates.

This LMP is consistent with the World Bank’s Environment and Social Framework (ESF) particularly Environment and Social Standard 2 (ESS2) “Labor and Working Conditions” and the labor national laws.

The LMP is a living document that is initiated early in the Project preparation phase. This is the third edition of the LMP. The second version, developed in 2022, was introduced following the addition of a new component to the Project “Component 6”. The current update has been undertaken to further refine and clarify the roles and responsibilities of project workers, particularly those within the Project Coordination Unit (PCU), to ensure the effective implementation and oversight of the LMP. To support this, detailed checklists have been prepared, and a code of conduct has been developed to promote adherence to the principles and guidelines outlined in the LMP.

## 2. Brief Project Description

The Greater Cairo Air Pollution Management and Climate Change Project aims at reducing air emissions from critical sectors and increasing resilience to air pollution in Greater Cairo (GC). The project focuses on the two main sources of air pollution: open burning of solid waste and vehicle emissions and is geographically covering GC (i.e., Cairo, Giza, and Qalyoubia Governorates). It includes six main components (for more details about the project, please visit the [Project Appraisal Document](#)). The six components of the project are:

- **Component 1:** Enhancing the Air Quality Management (AQM) & Response System.
- **Component 2:** Support the Operationalization of Solid Waste Management (SWM) Master Plans in Greater Cairo.
- **Component 3:** Vehicle Emission Reduction.
- **Component 4:** Enhanced Capacity, Behavioural Change and Communication.
- **Component 5:** Project Management and Monitoring & Evaluation (M&E).
- **Component 6:** Improved E-Waste and HCW management for Reduction of Unintentional Persistent Organic Pollutants (UPOPs).

### 3. Overview of Labor Use on the Project

#### 3.1 Type of Workers

ESS2 categorizes the workers into direct workers <sup>(1)</sup>, contracted workers <sup>(2)</sup>, community workers <sup>(3)</sup> and primary supply workers <sup>(4)</sup>. In this project, there are different types of workers divided into the following categories:

##### 1- Direct Workers

The Project employed Direct Workers for the Project Coordination Unit at the Ministry of Environment (MoE) and the Four Technical Implementation Units (Air Quality Management based in MoE; Solid Waste Management based in Ministry of Local Development (MoLD) and composed of MoE and Waste Management Regulatory Authority (WMRA); Vehicle Emissions based in Cairo Transport Authority (CTA) and composed of EEAA and MoLD; and Stakeholders Engagement and Awareness based in MoE).

Other Direct Workers are government civil servants involved in the project coordination and supervision, including the MoE, MoLD, WMRA, CTA, Ministry of Transport (MoT), Ministry of Health, and Population (MoHP), university hospitals waste management staff, Land Transport Regulatory Authority, and governorate management staff and workers (i.e., executive SWM units).

The government civil servants will remain subject to the terms and conditions of their existing public sector employment agreement. WB ESS2 and the Labor Management Procedures (LMPs) will not apply to such government civil servants. However, conditions of Occupational Health and Safety (OHS), and restriction on child labor and forced labor are the conditions that would still apply to the civil servants.

Direct workers also include Individual Consultants, who are assigned throughout the Project implementation. The number of Direct Workers is about 81 as of the end of November 2024. The following table presents the number of Direct Workers per each group:

Group	Number
PCU	21 (including 3 office boys, one office girl, and one driver)
TIU	30
Individual Consultants	10
Government Civil Servants	20

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<sup>(1)</sup> is a worker with whom the Borrower has a directly contracted employment relationship and specific control over the work, working conditions, and treatment of the project worker.

<sup>(2)</sup> is a worker employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third-party exercises control over the work, working conditions, and treatment of the project worker.

<sup>(3)</sup> Projects may include the use of community workers in a number of different circumstances, including where labor is provided by the community as a contribution to the project, or where projects are designed and conducted for the purpose of fostering community-driven development, providing a social safety net or providing targeted assistance in fragile and conflict-affected situations.

<sup>(4)</sup> is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person.

## **2- Contracted Workers**

The Project uses the service of consulting firm(s) for the different Environmental and Social (E&S) documents and plans, technical design, feasibility study, construction supervision, training, and compliance audits during both construction and operation phases. Upon completion of design and feasibility studies, contractors for the different sub-projects will be hired for the construction work.

The different subprojects are operated by the private sector (via a Design-Build-Operate scheme). Besides the operation staff, the Project hires contractors for maintenance work; healthcare waste management; third party auditors; and consulting firms.

The Project has hired a total of 253 Contracted Workers as of the end of November 2024. Additional workers will be hired (e.g., during civil works). It is estimated that the Project will hire a total of 550 contracted workers.

<b>Firms</b>	<b>Number</b>
<b>Cross-cutting</b>	
EcoConServ for Environmental Solutions (Implementation Support for Environmental and Social Activities)	10
<b>Component 2</b>	
Integral	6
SETS	9
Chemonics + COWI	41
AlShams For Contracting & Engineering Works (staff and casual workers, and subcontractor workers)	151
<b>Sub-component 2.2</b>	
EcoConServ for Environmental Solutions (ECS)	6
<b>Component 3</b>	
Consortium (SETC – TFC – Shaker)	23
<b>Component 4</b>	
Media Company (Adsa w Alwan)	Number of staff was not determined in the contract.
<b>Component 5</b>	
Multilingua Company	7
Car Rental Office	Non consultant services. The contract is with the office. The office provides two drivers for the project.

## **3- Primary Supply workers:**

Primary supply workers include suppliers who on an ongoing basis will be providing goods and materials that are essential for the core function of the different project components. Examples of preliminary primary suppliers include service providers of construction materials, waste collection services, etc. It is estimated that the Project will hire a total of 60 primary supply workers. Currently, the Project is hiring 20 suppliers including 18 suppliers for providing construction materials for AlShams company.

The following chart shows the types of project staff and contractors:

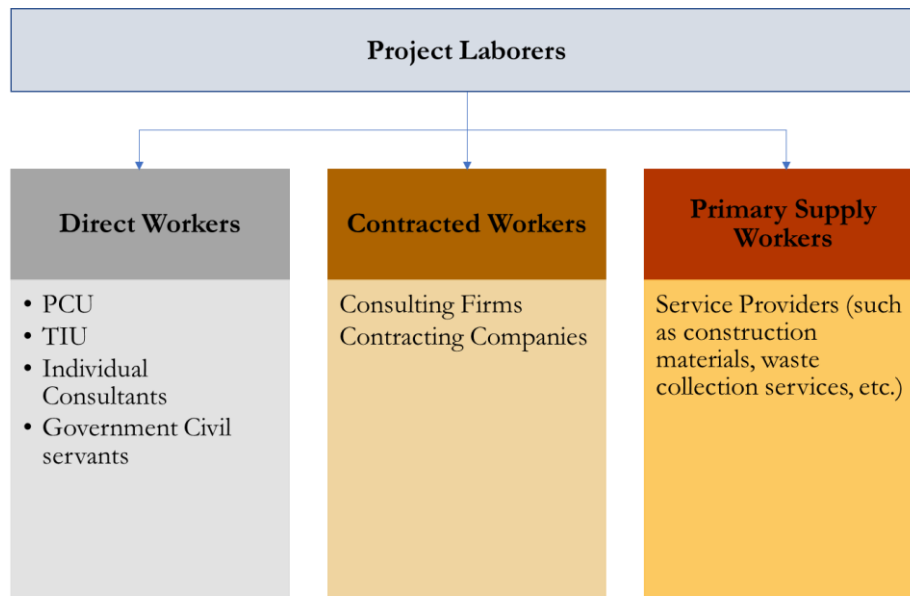


Figure 1: Project workers

### 3.2 Characteristics of Project Worker

All workers are expected to be local. Female workers are expected to constitute approximately 30% of the Direct Workers and less than 5% of the Contracted and Primary Supply Workers. It is not expected that the project will hire workers between the minimum age and 18.

## 4. Brief Overview of Labor Legislation: Terms and Conditions and OHS

This chapters illustrates the national laws related to: 1) the working terms and conditions, and 2) occupational health and safety.

### 4.1 Working Terms and Conditions

Employment matters in Egypt are primarily regulated by the following legislative sources:

- Social Security Law No. 79/1975, as amended, and its executive regulations;
- Law No. 48 for the year 1978 governing public sector employees;
- Law No. 203 for the year 1991, addressing special requirements for employees working in the public commercial (business) sector of the State;
- Child Law No 12 of 1996, amended by law No 126 of 2008.
- Law No. 12 for the year 2003 and its executive regulations, regulating relationship between employers and employees in private sector

**The different requirements relating to labor and working conditions are summarized below:**

- **Minimum Working Age**

The minimum age for hazardous work is 18 years old.

- **Minimum Wage**

As of June 2024, the minimum wage is 6,000 Egyptian pounds (EGP). The minimum obligatory annual increase is set at no less than 7% of the basic salary, which is the basis for calculation of social insurance. The minimum premiums are set at 35% of the normal pay for overtime work during daylight and 70% for work at night-time; 100% for work performed on days off and holidays.

- **Working Hours and rest periods**

According to the Labor Law, the maximum working hours per day are 8 hours, or 48 hours per week in case of a six-day work week. Worker shall receive a weekly rest of not less than 24 hours every six working days. However, an employee, occasionally may be required to work additional hours upon need. The minimum premiums are set at 35% of the normal pay for overtime work during daylight and 70% for work at night-time; 100% for work performed on days off and holidays.

The working hours shall include a rest period of minimum one hour in total and one continuous working period shall not exceed five consecutive hours whilst the total work duration should not exceed 10 hours in total. In all cases, weekly rest shall be paid.

- **Annual Leave**

Article 47 of the Labor Law stipulates that the duration of the employees' annual leave is 21 days per year provided they have worked one year for the employer. For employees who have



worked for more than 10 years, serving one or more employers, annual leave is 30 days. Employees aged more than 50 years are also entitled to an annual leave of 30 days. For employees employed less than a year and not less than 6 months, annual leave is pro-rated to the period of service.

### **– Sick Leave**

As stipulated in Article 54 of the Labor Law, in case of employee's sickness he/she is entitled to sick leave based on the report from concerned medical authority. According to Social Insurance Law, during the sick leave an employee is entitled to his/her salary. An employee with proven record of sickness is entitled to a paid sick leave at the rate of 75% of his/her salary upon which social insurance payments are calculated; for a period of 90 days, to be increased to 85% for the following 90 days. Sick leaves are payable up to 180 days. The right is reserved for the employee to benefit from his/her accumulated annual leaves as well as convert these into sick leaves if such a balance exists.

### **– Maternity Leave**

According to the Child Law No 12 of 1996, amended by law No 126 of 2008, female employees covered by social insurance are entitled to three months of paid maternity leave for each up to three times, provided they have been contributing to the social insurance for the past 10 months. Maternity benefits are paid at 75% of the last wage. Moreover, women employed in establishments with more than 50 employees are entitled to up to two years of unpaid childbearing leave per child as stipulated in the Child Law.

Women are also entitled to two half-hour nursing breaks per day, or alternatively one combined an hour-long break, for 24 months after the date of birth of each child. A woman preserves all her rights and benefits upon return to workplace from maternity leave.

### **– Work Permit Requirements for Foreign Employees**

Foreign employees are not permitted to work in Egypt unless Residency and Work Permits are obtained.

### **– Discrimination and Equal Opportunities**

Egyptian labor law includes non-discrimination clauses and complies with the International Labor Organization (ILO) conventions regulating the employment and training of women and eligible children (Egypt ratified ILO Convention 182 on combating the Worst Forms of Child Labor in April 2002). There are legal provisions that are meant to protect women against sexual harassment in the workplace.

However, there are some provisions that would not allow women to get engaged in certain types of jobs as men despite the fact that officially there is no discrimination based on gender. There is also no provision for equal pay for the same type of work that a man and a woman would do. Considering those legislative limitations, there need to be clear provisions in different contracts under various components to ensure that women are given equal labor opportunities including in jobs and pay. This is particularly valid for the types of works under the project could be classified as jobs that are not appropriate for women.

## 4.2 Occupational Health and Safety

The main national laws addressing labor and working conditions are listed below:

- **Labor Law No. 12/2003:** It is the primary source of labor law. It regulates employment, labor relations and OSH in the private sector. It devotes a specific section (Book V) to occupational safety and health and assurance of the adequacy of the working environment.
- **Law No. 48 of 1978:** it regulates employment in the civil sector
- **Law No. 18 of 2015:** concerning the Civil Service: It regulates public sector employment including working conditions for civil servants; setting the retirement age for the sector; and setting out the wage structure for civil servants. It is the most recent law on Egypt's civil service, and its scope is assumed to be similar to Law No. 48 of 1978.
- **Law No. 148 of 2019:** on social insurance pension system. The new unified program covers 26 categories of workers, including public- and private-sector employees, civil servants, and self-employed persons
- **Child Law no. 12 of 1996,** amended by Law no. 126 of 2008 and its executive regulation issued by decree no. 2075 of 2010. The Child Law is a general law for the protection of the rights of the child, introduced several amendments increasing the minimum age for children employment.
- **Decree No. 118 of 2003** concerning the employment of children in hazardous work. It sets forth a list of jobs for which children under the age of 18 shall not be employed. It does not exclude specific sectors as a whole or specific types of employment.
- **Decree No. 113 of 2003** regulates preparatory and complementary work which needs to be finished by workers before or after the end of work. Its scope is not specified in the law, however, since it is an executive decree of the Labor Law it is likely to have the same scope.
- **Decree 115 of 2003** determines the works that are intermittent by their nature and in which the worker may stay at the place of work more than 10 hours a day but maximum 12 hours a day. It covers work that is deemed intermittent by nature, including certain types of farming, transport (including land, air, and water), port work and shipping.
- **Law No. 83 of 2002** on Economic Zones of a Special Nature regulates employment relations, organization, and management in Economic Zones of a Special Nature. It sets out that in these zones, foreign nationals may only account for 25% of a firm's workforce.
- The Law on the Rights of Persons with Disabilities of 2018 regulates the social protection, training and the right to work of people with disabilities. Its specific scope is unclear.
- **Decree No. 126 of 2003** defines procedures and forms for the notification of work-related accidents, injuries, fatalities, and diseases. It replaced Decree No. 75 (1993). Sets forth that establishments must notify the authorities when accidents and diseases occur and provide statistics on workplace injuries, accidents, and diseases. Its scope is unclear.
- **Decree No. 211 of 2003** specified conditions and precautions essential for the provision of OSH measures at the workplace. It replaced Decree No.55 (1983). Its specific contents and scope are unclear.
- **Decree No. 134 of 2003** defines the committees for vocational safety and health and related OSH training institutions. Its specific contents and scope are unclear. However, since it is an executive decree of the Labor Law, it is likely to have the same scope.
- **Law 137/1981:** Labor and Workforce Safety.
- Minister of industry **Decree 91/1985** for implementing Law 2/1985.
- **Law 4/1994:** Articles 43 - 47 of its modified Executive Regulations by Decrees No.

1095/2011 and 710/2012 stipulate the provision of all necessary safety measures including protective equipment to work crew involved in construction activities. Annex 8 of the Regulations of Law no.4/1994 lists the maximum allowable limits for air contaminants within the working environment. Annex 7 of the Executive Regulations amended in 2012 of Law no.4/1994 stipulates the permissible limits for sound intensity and safe exposure times in workplaces. Article 44 of Law 4/1994 and Article 46 of its amended regulation 710/2012 stipulate conditions and requirements for temperature and humidity in the workplace. Annex 9 to the Regulations sets out the major and minor limits for temperature and humidity, exposure periods and safety precautions.

## **5. Key Potential Labor Risks**

The key labor and OHS risks which may be associated with the project are outlined below:

### **5.1 Occupational health & safety (OHS) risk**

During the Project implementation, the following key OHS risks are anticipated:

- The construction activities involving heavy machineries will be quite noisy.
- Loud, repetitive, and excessive noise could cause long-term hearing problems, such as deafness.
- Noise can also be a dangerous distraction and may distract the worker from the task at hand, which increases the risk of accidents.
- Heavy materials and equipment are expected to be constantly lifted and moved around by workers at site, which poses health and safety risks.
- Possible accidents could take place due to vehicles, loaders, and cars moving on the site internal roads.
- Collapsing of trenches or excavated areas due to the absence or defect in the implemented soil reinforcement methods represent a significant risk to all workers involved in excavation work.
- Working at height will also pose the risk of falling, as well as slippage and falling.
- With the hot and dry climate being experienced in Egypt, heat-related injuries such as heat stroke and heat exhaustion also pose a risk to the construction workers.
- Fire hazards constitute a potential risk at all project sites (construction and administration).
- Potential exposure to hazardous healthcare and electronic waste.
- Potential risks caused by electrocution from unprotected electricity cables.
- Potential risks caused by exposure to hazardous construction chemicals and waste.
- Traffic safety risks for bus drivers and waste collectors.
- Workers' lack of awareness/knowledge on the type and significance of OHS risks involved with their work.
- Waste handling and infection control and spread of infection through improper managing of wastes.
- Sprawling and spread of infectious and hazardous chemical wastes and e-waste.

### **5.2 Child Labor**

Though prohibited by Egyptian law, the common contractors' practices are suggesting potential risk of incident of child labor. Both the contractors and the children are likely in most cases to be unaware of the legislation. The child will be also likely unaware of his legal rights.

### **5.3 Forced labor**

For forced labor, it refers to any work or service that is not performed voluntarily and is extracted from an individual under the threat of force or penalty. These may include bonded labor (work in satisfaction of a debt of an amount that would be difficult or impossible to pay off), excessive limitations on freedom of movement, excessive notice periods, retaining the worker's identity and other government-issued documents (such as passports) or personal belongings, imposition of recruitment or employment fees payable by the worker at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work on a non-voluntary basis.

These practices are prohibited and will not be used in connection with the project. This prohibition covers any kind of involuntary or compulsory labor.

### **5.4 Labor Influx**

The influx of workers might lead to adverse social and environmental impacts on host communities, especially if these communities are rural, remote or small, or existing resources are limited. These impacts are in terms of:

- Influx of additional population puts increased pressure on accommodation and rents.
- Increased risk of communicable diseases and burden on local health services.
- Increased risk of illicit behavior and crime.

The project can lead to an increased risk of Gender Based Violence, as women are particularly vulnerable within the context of construction projects. Gender based violence can be manifested through multiple behaviors including Sexual harassment of women and girls or Exploitative sexual relations and unpaid work, or low wages.

### **5.5 Gender Based Violence/sexual exploitation and abuse (SEA)**

The project workers include both men and women, especially for the Direct workers. There is potential risk of GBV/sexual exploitation and abuse and sexual harassment (SH).

### **5.6 Unfair and/or unclear contract terms and conditions and irregular payment of salaries**

Including wages, overtime, compensation, benefits and working hours. In some cases, there might be no contracts issued as many workers will be assigned on a daily compensation basis.

The significance of this risk can also increase with the lack of implementation the grievance mechanism (GM).

### **5.7 Unfair treatment or discrimination of project workers**

Project workers could be subjected to unfair treatment or discrimination on the basis of personal characteristics unrelated to job requirements, such as race, gender, religion and sexual orientation. These risks apply to workers on sub-projects, as well as staff employed and engaged by the PCU.

### **5.8 Risk of labor unresolved complaints**

This risk could be a result of the lack of the absence of a GM, or the presence of inefficient and not properly designed GM.

## **5.9 Restrictions related to freedom of association and collective bargaining**

### **6. Policies and Procedures**

The GCCC Project will apply the following policies and procedures to address the key labor risks identified under Chapter 5.

#### **6.1 Occupational health & safety**

The Project obliges all contractors, primary suppliers and private sector operators involved with the Project (especially Components 2 and 3) to prepare, adopt, and implement an OHS plan complying with national legal requirements, General World Bank Environmental, Health and Safety Guidelines (EHSs) and, as appropriate the industry-specific EHSs as well as other [Good International Industry Practice \(GIIP\)](#).

This should be reflected in the design requirements, contracts as well as in all ToRs for the different Project components throughout the implementation period.

The OHS plan shall be approved by the PCU and the TIU prior to the start of the relevant activities. The plan shall cover the following:

- Identification of all potential hazards affecting the physical, mental, and social well-being of project workers in all occupations, with focus on life threatening hazards.
- Provision of appropriate measures to prevent and protect against the potential hazards, including modifying, substituting, or eliminating the hazard sources. These measures include adequate Personal Protective Equipment (PPE) at no cost to project workers; adequate first aid facilities; hazard labelling in both Arabic and English languages.
- Developing and implementing an Emergency Prevention and Preparedness and Response arrangements to emergency situations.
- Provision of remedies for adverse impacts such as occupational injuries, deaths, disability and disease.
- Putting in places processes which enable project workers to report work situations that they believe are not safe or healthy.

All contractors and private operators shall hire a full-time accredited OHS professionals at each of the construction sites. Records shall be kept and shared with the PCU on OHS performance at all sites, and all work-related accidents, illnesses, and all other incidents will be formally reported and documented.

#### **6.2 Child labor**

The minimum age for employment on the project is 18 due to the hazardous nature of the work, particularly under components 2 and 3. **The process of age verification presents in section 7**

#### **6.3 Forced Labor**

If forced labor is discovered in the project's workforce, prompt action should be taken to address the practice that has coerced the worker and not recreate conditions of coercion. Any cases of

forced labor discovered in the project's workforce should be referred to relevant government authorities and support services, as appropriate, to be addressed in accordance with national law.

### **6.4 Labor Influx**

To mitigate the risk of labor influx, the following should be thoroughly implemented:

- Apply the full requirements related to operating the project grievance mechanism including anonymous channels.
- Raising awareness of the local community about the project commitment towards community members and the measures taken for that through public consultation and focus group discussions.
- Conduct random drug and alcohol tests.
- Codes of conduct to be signed by all workers, and a penalty system to be put in place for all not adherence including cases where workers will be staying in rented apartments by the contractor or sub-contractor. Each contractor should use the code of conduct in their contract, as needed it can be updated in coordination with the PCU.
- In case no codes of conduct are available in the contracts of service providers, a code of conduct to be developed in coordination with PCU.

### **6.5 Unfair treatment or discrimination of project workers**

As previously mentioned, the project implements GIIP relating to labor standards and working conditions (in line with ILO Core Conventions) and national law. This particularly applies to equal opportunities and non-discrimination. The employment of Project workers should be based on the principle of equal opportunity and fair treatment, and there should be no discrimination with respect to any aspects of the employment relationship including but not limited to: recruitment requirements; training opportunities; termination of employment; inappropriate treatment or harassment including sexual harassment. Where disabled persons are hired (higher probability will be among Direct Workers), accessibility will be ensured in terms of provision of wheelchair ramps or elevators, or alternative formats of communication, etc.).

Men and women should be given equal opportunities relating to all recruitment opportunities under the project. This should be applied to hiring of all project workers. The workforce grievance mechanism (GM) should be communicated to all workers as detailed in section 10 and should be used for non-compliance monitoring.

The project should also provide all measures necessary for protecting vulnerable groups of workers such as the disabled, women and migrant workers. As mentioned above, a code of conduct should be developed. It should include provisions on Sexual and gender-based violence (GBV) and safety. Induction trainings and refresher trainings should be provided for all workers as detailed below.

### **6.6 GBV/sexual exploitation and abuse (SEA)**

A code of conduct should be developed. It should include provisions on Sexual and gender-based violence (GBV) and safety. Induction trainings and refresher trainings should be provided for all workers as detailed below.

## **6.7 Unfair and/or unclear contract terms and conditions and irregular payment of salaries**

### **- Direct Workers**

All Direct Workers should be provided with clear and understandable terms and conditions of employment.

### **- Contracted and Primary Supply workers**

For the Contracted and Primary Supply workers, clauses should be included in the all-project procurement documents to ensure that terms and conditions of employment are being provided according to the requirements of ESS2 and/or national law.

This includes providing them with signed contracts stating clearly the duration of the contract, leave entitlements, conditions of contract termination including receiving written notices of termination, disciplinary procedures that are applicable, housing and accommodation provisions and allowance where applicable, food and payment, their rights related to hours of work, fair wages, overtime, compensation, benefits as stated in the national law as well as those arising from the requirements of ESS2.

Monitoring systems should be put in place to ensure that all types of Project workers are properly paid on a regular basis and compensated for longer working hours and certain shifts which may need to be paid at a higher hourly rate as per applicable legislation (e.g., night shifts). Workers should be presented with details of grievance procedures, including the person to whom grievances should be addressed (refer to section 10 for more details about the workers' grievance mechanism).

The Project is expected to deal with contracted and supplied workers who may not be capable of reading and/or may have difficulties understanding the employment documentation. The project should therefore ensure that working conditions and terms of employment are orally communicated and explained.

For the migrant domestic workers, who are also expected as part of the Contracted and Primary Supply workers, the project should ensure that the working conditions and terms of employment are the same or substantially equivalent to those of non-migrant workers (when performing the same type of work).

## **6.8 Restrictions related to freedom of association and collective bargaining**

The rights of workers and the role of unions should be respected and the right to enter free and voluntary collective bargaining agreements with management should be also respected.

## **6.9 Risk of labor unresolved complaints**

The workforce grievance mechanism (GM) should be communicated to all workers as detailed in section 10 and should be used for non-compliance monitoring.

## **6.10 Training and Capacity Building**

Trainings should be provided to all workers on general (and specific) OHS during induction and on a regular basis to ensure all workers are well capacitated with the project's OHS requirements. The PCU Health and Safety Officers should provide training to Direct Workers, while trainings to Contracted and Primary Supply Workers should be provided through Third Parties.

Trainings should include but will not be limited to work at heights; electrical and vehicular safety; handling of hazardous materials, use of PPE, hazard avoidance and reduction measures, use of first aid and rescue techniques, emergency prevention and preparedness and response arrangements to emergency situations, and firefighting

Additional training sessions for different targeted workers might include the following:

- Awareness of the requirements of this LMP and associated plans/procedures;
- Code of conduct, Gender-based violence and SEA;
- Grievance mechanism, including roles, responsibilities, and accountabilities, and contact persons/communication channels.
- E&S instruments as relevant including the implementation of the different ESMPs and e-wastemanagement plans.

Trainings should be delivered by experienced trainers (i.e. the E&S implementation support consultant), based on the competency requirements. Records of the training will be kept including training evaluation.

### **7. Age of Employment**

The minimum age for employment on the project is 18 due to the hazardous nature of the work, particularly under components 2 and 3.

#### **Process of age verification**

In order to prevent engagement of under-aged labor, all contracts with work contractors shall have contractual provisions to comply with the minimum age requirements including penalties for not adherence, and it will be well communicated to all potential stakeholders including the local community where the unskilled workforce will be sourced.

The contractor is required to maintain labor registry of all contracted workers with age information. Verification of the age shall be undertaken prior to the engagement of labor and be documented. Below is indicative age verification means that could be used in the context where official ID system is unavailable:

- Check the birthday on official documents such as birth certificate, national ID or other credible records, where available;
- Obtain written confirmation from the medical practitioner;
- Obtain written and signed declaration from the worker and his/her parents or guardian; or
- Inquire with the local community leader, community action group or with other credible community sources.

### **8. Terms and Conditions**

The project has Direct, Contracted and Primary Supply Workers. The terms and conditions of employment for each of them are described below according to the national laws and the WB ESS2.

#### **8.1 Terms and Conditions for Direct Workers and Contracted Workers**

- **Maximum number of hours that can be worked on the project**



According to the Labor Law, the maximum working hours per day are 8 hours, or 48 hours per week in case of a six-day work week. Worker shall receive a weekly rest of not less than 24 hours every six working days. However, an employee, occasionally may be required to work additional hours upon need. The minimum premiums are set at 35% of the normal pay for overtime work during daylight and 70% for work at night-time; 100% for work performed on days off and holidays.

The working hours shall include a rest period of minimum one hour in total and one continuous working period shall not exceed five consecutive hours whilst the total work duration should not exceed 10 hours in total. In all cases, weekly rest shall be paid.

### **– Provisions on termination**

Project workers should receive written notice of termination of employment and details of severance payments in a timely manner. All wages that have been earned, social security benefits, pension contributions and any other should be paid on or before termination of the working relationship, either directly to the project workers or where appropriate, for the benefit of the project workers. Where payments are made for the benefit of project workers, project workers should be provided with evidence of such payments.

### **– Annual leave**

Article 47 of the Labor Law stipulates that the duration of the employees' annual leave is 21 days per year provided they have worked one year for the employer. For employees who have worked for more than 10 years, serving one or more employers, annual leave is 30 days. Employees aged more than 50 years are also entitled to an annual leave of 30 days. For employees employed less than a year and not less than 6 months, annual leave is pro-rated to the period of service.

### **– Maternity leave**

According to the Child Law No 12 of 1996, amended by law No 126 of 2008, female employees covered by social insurance are entitled to three months of paid maternity leave for each up to three times, provided that they have contributed to the social insurance for the past 10 months. Maternity benefits are paid at 75% of the last wage. Moreover, women employed in establishments with more than 50 employees will be entitled to up to two years of unpaid childbearing leave per child.

Women will be also entitled to two half-hour nursing breaks per day, or alternatively one combined an hour-long break, for 24 months after the date of birth of each child. Women will preserve their rights and benefits upon return to workplace from maternity leave.

### **– Rest per week**

Workers shall receive a weekly rest of not less than 24 hours every six working days. The working hours shall include a rest period of minimum one hour in total and one continuous working period shall not exceed five consecutive hours whilst the total work duration should not exceed 10 hours in total. In all cases, weekly and daily rests are paid.

### **– Sick leave, injuries, and death**

As stipulated in Article 54 of the Labor Law, in case of employee's sickness he/she is entitled to sick leave based on the report from concerned medical authority. According to Social Insurance

Law, during the sick leave an employee is entitled to his/her salary. An employee with proven record of sickness is entitled to a paid sick leave at the rate of 75% of his/her salary upon which social insurance payments are calculated; for a period of 90 days, to be increased to 85% for the following 90 days. Sick leaves are payable up to 180 days. The right is reserved for the employee to benefit from his/her accumulated annual leaves as well as convert these into sick leaves if such a balance exists. Pregnant women will be re-assigned and allowed to work in non-hazardous, non-arduous work as per medical advice without pay severance or penalty.

It is the contractor's responsibility that all workers, including temporary and daily laborers, shall be appropriately insured against injuries and death.

– **Compensation related to workplace injury and accidents**

The Project should at least comply with all the requirements of the Egyptian Labor Law in the cases of work-related injuries and accidents. All employees should be covered by social insurance to ensure their eligibility for a workplace injury benefit as stipulated in the Law. Definition in the Law in terms of temporary disabilities, permanent disabilities partial disabilities should be complied to.

– **Work Permit Requirements for Foreign Employees**

Foreign employees are not permitted to work in Egypt unless Residency and Work Permits are obtained.

## **8.2 Terms and Conditions for Primary Supply Workers**

The requirements under ESS2 for primary suppliers are related to risks of **child labor, forced labor and serious safety risks**. When sourcing [construction materials] from primary suppliers, the contractor will require such suppliers to identify the risk of child labor/forced labor and serious safety risks in producing the [construction materials].

The PCU and the engineering and supervision consultants will review and approve the purchase of primary supplies from the suppliers following such risk identification/assessment and any other relevant due diligence (such as the review of license for quarries). Where appropriate, the contractor will be required to include specific requirements on child labor/forced labor and work safety issues in all purchase orders and contracts with primary suppliers.

If child labor/forced labor and/or serious safety incidents are identified in relation to primary supply workers under the project, the PCU and the engineering and supervision consultant will require the primary supplier to take appropriate steps to remedy them. Such mitigation measures will be monitored periodically to ascertain their effectiveness. Where the mitigation measures are found to be ineffective, the PCU and the engineering and supervision consultant will, within reasonable period, shift the project's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements.

## **9. Responsible Staff**

The responsibility of implementing this LMP and the other related project documents is divided between the PCU, the TIUs, the Contractors/ private sector operator, Primary Suppliers, and Engineering and Supervising Consultants.

The Project employs Direct Workers for the PCU, who oversee the project's overall coordination

between the national actors. The PCU in coordination with the TIUs ensures that the project is implemented in accordance with the project documents.

The PCU and the TIUs are also taking required measures and actions to ensure that the LMP is consistent with the World Bank's Environment and Social Framework particularly Environment and Social Standard 2 "Labor and Working Conditions" and the labor national laws.

For Contractor/private sector operator, they have to comply with the national laws and the requirements of ESS2. The Contractor has to pass the requirements to all his sub-contractors.

The roles and responsibilities of the PCU, contractors, supervising consultants, primary suppliers include but not limited to the following:

### **9.1 Project Coordination Unit**

The GCCC Project employed Direct Workers for the PCU at the MoE. The PCU responsibilities are as following:

- Apply this labor management procedures to the PCU workers.
- Update these procedures, when necessary, during preparation, development, and implementation of the Project.
- Engage and manage consultants and contractors in accordance with this LMP and applicable procurement documents.
- Provide trainings to all members of the PCU, to raise awareness about adherence to national labor laws, including on terms and conditions of employment, occupational health and safety, child labor and forced/trafficked labor.
- Sign a Code of Conduct with all the PCU workers. In addition to, ensuring that contractors' workers signed the CoC.
- Verify that requirements regarding child labor, forced labor, and workplace safety are included in all purchase orders and contracts between the PCU and primary suppliers.
- Prepare and review contract clauses for contractors to ensure that E&S requirements are addressed.
- Oversee and ensure the effective implementation of this LMP by contractors.
- Notifying the Bank of any incident or accident related to the project workers within a maximum of 48 hours.
- Report to the World Bank on a quarterly basis on E&S performance including LMP implementation, SEP implementation, labor and occupational health and safety performance, etc.

### **9.2 Technical Implementation units**

The TIU responsibilities in implementing the LMP with the PCU are as follows:

- Engage and manage consultants and contractors in accordance with this LMP and applicable procurement documents.
- Prepare and review contract clauses for contractors to ensure that E&S requirements are addressed.

- Approve contractors OHS and E&S plans prior to the start of the relevant activities.
- Oversee and ensure the effective implementation of the LMP by contractors.

### **9.3 Engineering and Supervising Consultant**

The supervising consulting firms will take primary responsibility for ensuring the implementation of the LMP by contractors, while the PCU will oversee and ensure that the process is carried out effectively. The roles of Engineering and Supervising Consultant are as follows:

- Prepare and review contract clauses for contractors in collaboration with the PCU to ensure that E&S requirements are addressed.
- Ensure that contractors prepare their Labor Management Plan (Contractor's LMP) in compliance with this LMP and obtain the PCU and the supervising consultant approval before mobilizing to the field.
- Supervise and monitor the implementation of the LMP requirements.
- Review and approve the contractor's site-specific Construction ESMPs (CESMP), Health and Safety Plans, and Labor Management Plans in coordination with the PCU.
- Monitor contractor compliance with obligations toward workers as outlined in the General Conditions of Contract, the World Bank Standard Bidding Documents, ESS2, and the national labor code.
- Ensure the establishment and implementation of a grievance mechanism for contractors and subcontractors' workers, and confirm that workers are adequately informed and trained on accessing it.
- Verify that requirements regarding child labor, forced labor, and workplace safety are included in all purchase orders and contracts between contractors and primary suppliers.
- Monitor occupational health and safety issues and performance across all project sites and activities.
- Ensure that contractors' and subcontractors' workers sign the CoC.
- Ensure that workers are trained on their rights and responsibilities, OHS, GRM, GBV related issues etc.;
- Identify any not adherence to E&S provisions.
- Conduct periodic audits and inspections.
- Prepare summary monthly report for the PCU covering key issues and findings from supervision activities.
- In case of any accidents or incidents, immediately notify the PCU and support the process of documenting and reporting the case to the WB.

### **9.4 Contractor/private sector operator**

The Contractor/private sector operator have to comply with the requirements of ESS2 which will be incorporated into contractual agreements. The Contractor has to pass the requirements to all his sub- contractors. The following represent a non-exhaustive list of their responsibilities under these LMP:

- Prepare contractor-LMP (or adopt this one), OHS plans and Labor GRM (or adopt this one) for contractor and subcontractor workers. These plans should be submitted to the PCU for review and approval before the contractor is allowed to mobilize to the field.
- Employ or appoint qualified environmental, social, occupational health and safety expert(s) to manage OHS issues for each project site.
- Ensure that this labor management procedure is also applied to their workers and extended to their subcontractors.
- Maintain employment process with terms of employment, job description, etc.
- Maintain records of recruitment and employment of contracted workers with age verification to avoid child labor.
- Have contractor and sub-contractor workers understand and sign the Code of Conduct prior to the commencement of works.
- Require the primary supplier to identify and address risks of child labor, forced labor and severe safety issues, and risks of equity and discrimination for primary supply workers.
- Develop and implement the grievance mechanism for contracted workers, including ensuring that grievances received from their contracted workers, resolved promptly, and reporting the status of grievances and resolutions.
- Provide induction and regular training to contracted workers on environmental, social and occupational health and safety issues.
- Report to the PCU on labor and occupational health and safety performance.

## **10. key achievements in implementing the LMP**

This section highlights the key achievements by the PCU in operationalizing the Labor Management Procedures. The following procedures were undertaken:

### **1. Development of a Workers Grievance Mechanism:**

The PCU prepared a detailed standalone Workers Grievance Mechanism outlining the steps to resolve project workers' grievances effectively.

### **2. Stakeholder Engagement for GM Development:**

Several meetings were held with project workers and partners to gather their feedback and comments, ensuring the establishment of a clear and effective GM.

### **3. LMP Dissemination in English and Arabic:**

A summary of the LMP was prepared in both English and Arabic and shared with project workers to enhance their awareness of their rights and responsibilities.

### **4. Awareness Sessions for Project Staff:**

The PCU Social Specialist explained the LMP and Labor Grievance Mechanism to drivers and office support staff to ensure their understanding of these processes.

### **5. Workshops on E&S Instruments:**

The PCU E&S Specialists conducted workshops for project partners to explain the environmental and social instruments, including the LMP.

**6. Grievance Channel Dissemination:**

Grievance mechanism channels were widely shared with the project workers and workers at the 10th of Ramadan site, complementing the contractor's grievance channels.

**7. Collaboration with the NCW on SEA/SH Grievances:**

The PCU coordinated with the National Council for Women to address Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) grievances from project stakeholders or workers.

**8. Updates to the LMP:**

The LMP was updated to further refine and clarify the roles and responsibilities of project workers, particularly within the PCU, ensuring effective implementation and oversight.

**9. Preparation of Tools for Implementation:**

Detailed checklists were developed, and a Code of Conduct was established to promote adherence to the principles and guidelines of the LMP.

## 11. Grievance Mechanism

A Workers Grievance Mechanism (WGM) was developed to be used by all the project workers (direct workers, contracted workers, and primary suppliers). The GM was prepared in alignment with the National Labor Requirements, the World Bank Environmental and Social Standards (ESS), in particular ESS2: “Labor and Working Conditions”, and the project Labor Management Procedures. It was also prepared to fulfill the requirements of the Project Environmental and Social Commitment Plan (ESCP).

### Workers Grievance Mechanism Process

The following steps outline the process that may be followed to resolve the project workers grievances.

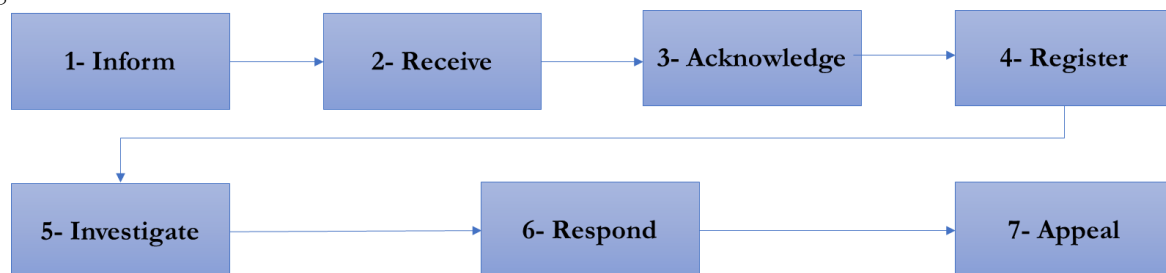


Figure 2: WGM Process

#### Step 1: Inform

The Grievance Mechanism begins with informing all the Project workers of this mechanism. Project workers should be fully aware of the existing grievance mechanism and how they can submit their complaints or inquiries, to whom, the timeframe, and the ways in which grievances and complaints can be registered. The contact details of the members of the complaints structure should appear on:

- The Project website: <https://www.gccceg.com/>
- ECAA website: <https://www.ecaa.gov.eg/>
- Printed brochures of the mechanism in the PCU premises.

- Printed brochures of the mechanism at the Project construction sites.

In addition, the PCU should explain the GM to their project workers. Dedicated meetings or a workshop should be held to make sure that all the project workers are aware of the GM and that the grievance contact details are well disseminated.

For the government civil servant and the companies that the project contracted with, they should add the project GM to their own mechanism.

Regarding the contractors and sub-contractors (if any), the PCU should request them to place the project grievance channels beside their own GM at the construction sites. In addition, the Social Specialists of Contractors should explain the project GM to all workers before starting the construction activities.

## **Step 2: Receive**

All the project workers can submit their grievances (complaints, inquiries, and suggestions) in writing using the Grievance template, in person or by telephone or e-mail to one of the following entities:

### **- The Project Coordination Unit through the following channels:**

- **Mobile number:** 01126669002
- **WhatsApp:** 01126669002
- **Email :** [Complaints@gccceg.com](mailto:Complaints@gccceg.com)
- **Project website:** <https://www.gccceg.com/>

### **- The Egyptian Environmental Affairs Agency (EEAA) Complaints Office, through the following reporting channels:**

- **WhatsApp:** 01222693333
- **E-mail :** [Shakwa-ecaa@moenv.eg](mailto:Shakwa-ecaa@moenv.eg)
- **Facebook Page:** <https://www.facebook.com/egy.environment/?fref=ts>
- **Face to face:** in Citizens Service Department, EEAA, New Capital

\* The PCU should ask the consulting firms, contractors, service providers to add the project grievance channels to their own GM and to report to the PCU if they receive grievances related to the Project.

\* Regarding the government civil servants, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. Yet, this GM is open for the civil servants working on the project to use. They can use their own GM in their entities or use the project GM to submit any grievance related to the project.

\*All the project workers can submit their grievances or complaints anonymously and they will be considered and addressed.

\* In case the consulting firms, contractors, service providers receive grievances related to the project through their own Grievance Mechanism, they should report to the PCU/ GCCC about these grievances in their periodic report.

### **Step 3: Acknowledge**

The Grievance Receptor should acknowledge receipt of any grievance as soon as possible, but up to two days from the date it was submitted and shall inform the complainant about the timeframe in which a response can be expected.

### **Step 4: Classify and Register**

In this stage the Grievance Receptor will classify and register the grievance in a database “Excel sheet”. The grievances will be classified also according to the categories mentioned in Section 5. The categorizations<sup>5</sup> are:

- Discrimination and unequal opportunities.
- Late payment of consultants' dues.
- Salaries and working hours.
- Forced labor.
- Social and medical insurance.
- Child Labor.
- Gender Based Violence.
- Occupational Health and Safety.
- Freedom of association and collective bargaining.
- Others.

The grievance will also be classified based upon severity. The level of severity is understood as the level of impact the grievance may have on the operations and reputation of the Project if it is not appropriately addressed. The severity of grievance will be divided into three levels: Low, Moderate, High. It will therefore determine, who needs to be informed and who manages the case:

- Grievances classified as low will be handled directly by the Grievance Receptor at the entity received the grievance, who will assess the grievance and propose a resolution within 5 days.
- Grievances classified as moderate or high severity will be handled by a technical committee (see the Appeal stage).

The WGM Manual includes details on the severity rating criteria.

\*All grievances should be classified and registered within the same day of reception or the next day at the latest.

\* All anonymous complaints will be registered and considered.

### **Step 5: Investigate and Referral**

This stage involves gathering information about the grievance to determine its validity, causes and develop corrective actions to minimize or avoid potential recurrence of the causes of the complaint.

In case the EEAA was the entity that received the grievance, they will initiate the investigation process and refer the grievance to the competent entity (if needed) and follow up on with them until the issue is resolved. The EEAA will then report to the PCU about the complaint and the

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<sup>5</sup> These categories might be modified during the life of the project.



corrective actions in their periodic report. The PCU should agree with EEAA to send a periodic report to the PCU about the status of the complaints received.

Regarding the complaints received on the level of the PCU, they will be received and registered by the Social Specialist who will refer the grievance to the concerned department (if needed) and follow up on them until the grievance is closed. The PCU will send quarterly report to the WB regarding the grievances' status.

For contractors and consulting firms, they should be able to resolve complaints at their level. Yet, as needed, if complaints received are beyond their capacity, they should be escalated to the EEAA or PCU (it depends on the nature of the complaint). After that they will be requested to send a monthly report to the PCU on the number and status of grievances related to the project even if no grievances have been received. All complaints should be registered, even if resolved on the spot.

The referral stage should not take more than 10 days from the receipt of the grievance.

Regarding SEA/SH grievances, there are special measures to handle this type of grievances.

### Step 6: Respond

The entity through which the grievance was raised will inform the complainant of the action taken to resolve his grievance, and the complainant should receive periodic updates on the progress of his complaints.

The time frame for resolving a complaint should not exceed 20 days from the date it was first received. If the case is still pending by the end of the 20 days, the complainant will be provided with the latest information on the status of the grievance and the time required to reach a decision. All grievances will be settled within 30 days of receipt.

### Step 7: Appeal

If the complainant is not satisfied with the solution or the corrective action that was taken, or if the complaint is of high severity, the Head of the Citizens Service Department, EEAA will escalate the complaint to a committee formed of:

- National Project Director, Dr. Ali Abo Sena.
- Head of the TIU (it will depend on to which component and the nature of the grievance the grievance related to).
- Head of Citizens Service Department, EEAA.

The responsibilities of the Head of the Citizens Service Department at the EEAA regarding escalated complaints are as follows:

1. **Register the Complaint:** Record the details of the escalated complaint in the appropriate registry system.
2. **Verify Supporting Documents:** Investigate the supporting documents provided to ensure their validity and relevance to the complaint.
3. **Coordinate Committee Meetings:** Liaise with the committee members to schedule and convene a meeting to address the escalated complaint.

### Key Stages of Workers Grievance Mechanism

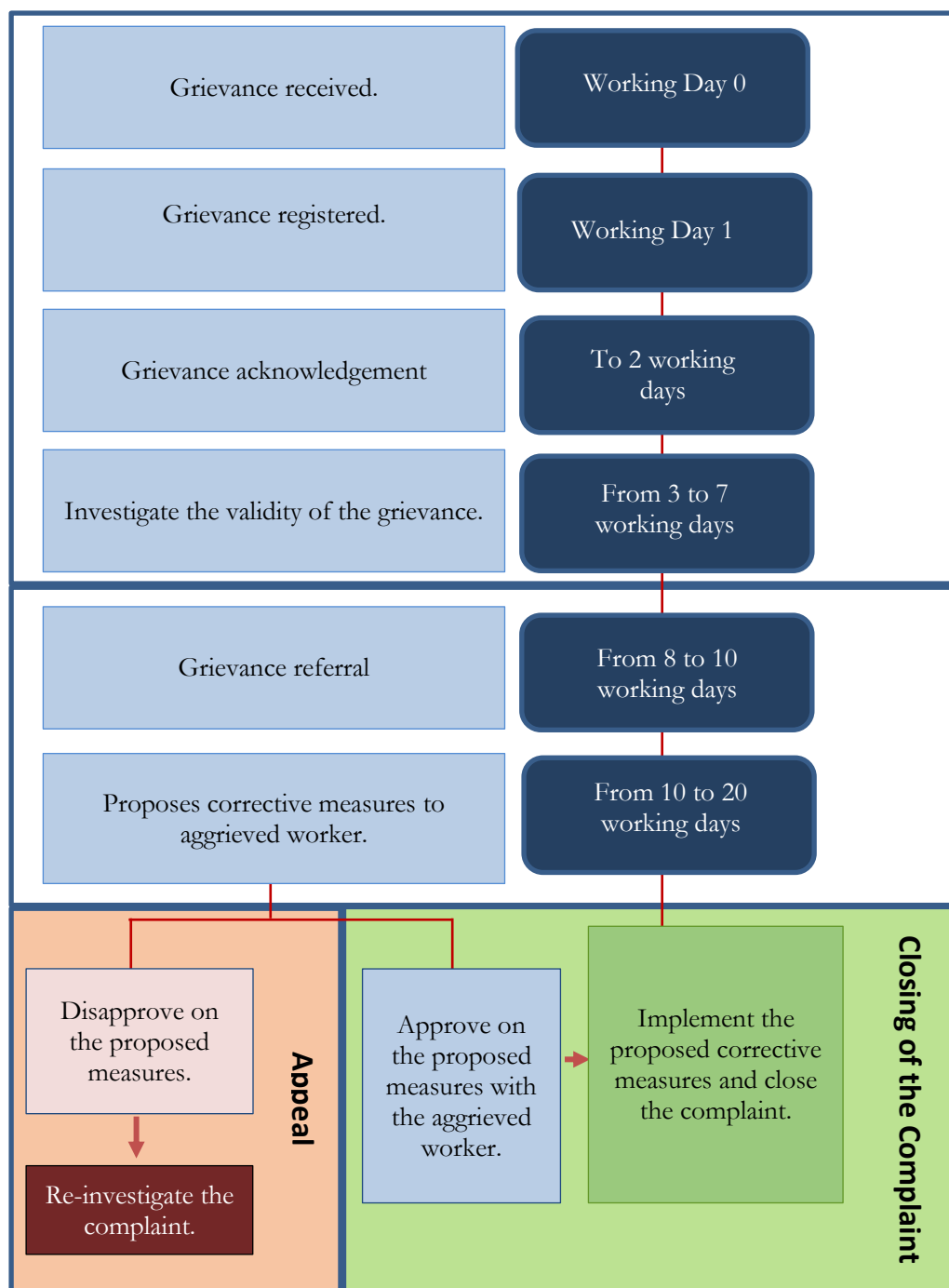


Figure 3: WGM Flowchart

### Handling Grievances related to Sexual Exploitation and Abuse and Sexual Harassment (SEA-SH)

Handling grievances related to SEA-SH is one of requirements of the World Bank. Accordingly, the PCU prepared SEA/SH Prevention and Response Action Plan in 2022 as a standalone document. It details the operational measures to mitigate the risks of Gender-Based Violence (GBV), most notably sexual exploitation, and abuse and sexual harassment, and how they will be integrated over the life of the project.

#### The procedures to handle SEA-SH grievances

Given that the NCW is taking a leading role in Egypt in addressing Gender Based Violence (GBV) SEA-SH grievances through the legislation and action plans at the national level, the PCU coordinated with the NCW to handle SEA/SB grievances that might be raised either from the project stakeholders or workers. Following are the NCW channels:

- **Branches of the Women's Complaints Office in the governorates:**
  - Direct communication
- **Hotline:** (15115) 12 hours a day from 9 am to 9 pm
- **Fax:** Headquarter 02-23490066 - 68
- **Email:** [complain.office.2001@gmail.com](mailto:complain.office.2001@gmail.com)
- **NCW Facebook page:** <https://www.facebook.com/ncwegyptpage>

According to the coordination made with the NCW, SEA/SB allegations will be dealt with as follows:

- If any of the project employees (Direct, contracted, and primary suppliers' workers) has SEA/SB grievance, s/he may submit the grievance to either the NCW directly or to the PCU Social Specialist. Given that the PCU Social Specialist does not have the capacity to handle this kind of grievances, the PCU social specialist will submit the grievance to the NCW after obtaining a consent from the survivor/ victim (see Appendix A5 consent form to refer the grievance to the NCW).
- The NCW will provide the survivor/ victim all the required support. Furthermore, the survivor will be asked for his/her consent for an internal investigation of alleged perpetrator (see Appendix A6 Consent form to conduct investigation).
- If survivor does not give consent, the grievance will be closed and preventive measures such as additional trainings and refreshment trainings on Code of Conduct (CoC) will be carried out. If s/he gives consent, a consent form will be filled out by the survivor.

\* According to the ESCP, the WB should be informed of SEA-SB grievance by the PCU within maximum 48 hours **noting the confidentiality of the case.**

- If survivor gave consent, an internal investigation will be conducted by an independent Party or Specialist and prevention measures such as additional trainings and review the code of conduct will be carried out in parallel.

In this Grievance Mechanism, inappropriate behaviors which require disciplinary actions and corresponding sanctions are mentioned. Sanctions are classified according to the number of repetitions of the violations. Inappropriate behaviors regarding SEA/SB are specified as follows:

- Assaulting or abusing an employee on the job site (including sexual abuse and assault)
- Harassment at work (including sexual harassment)
- Sexual abuse, assault, or harassment to the local community

In case of any of these behaviors, the incident will be transmitted to the Independent Party or Specialist, who will investigate the incident by hearing the witnesses, seeing evidence, if those are easily available without harming the victim and listening to the defense of the alleged perpetrator and conclude a relevant disciplinary sanction to the perpetrators.

Sanctions will be determined as proportional to the nature of the incident as reported and determined by the Independent Party or Independent Consultant inquiry and may include:

- Verbal warning.
- Written warning.
- Salary deduction.
- Suspension of employment (with or without payment of salary).
- Termination of employment.
- Report to the police or other authorities as warranted.
- Among other actions as deemed necessary.

If no ground is established for the grievance according to the result of the internal investigation, the grievance will be closed. After the completion of internal investigation, the Independent Party will inform the survivor about the result of internal investigation, the complaint will be closed, and the case will be reported to the World Bank. The grievance will be responded and finalized within 30 business days after taking the grievance.

The following figure illustrates the responding mechanism for SEA/SH incidents:

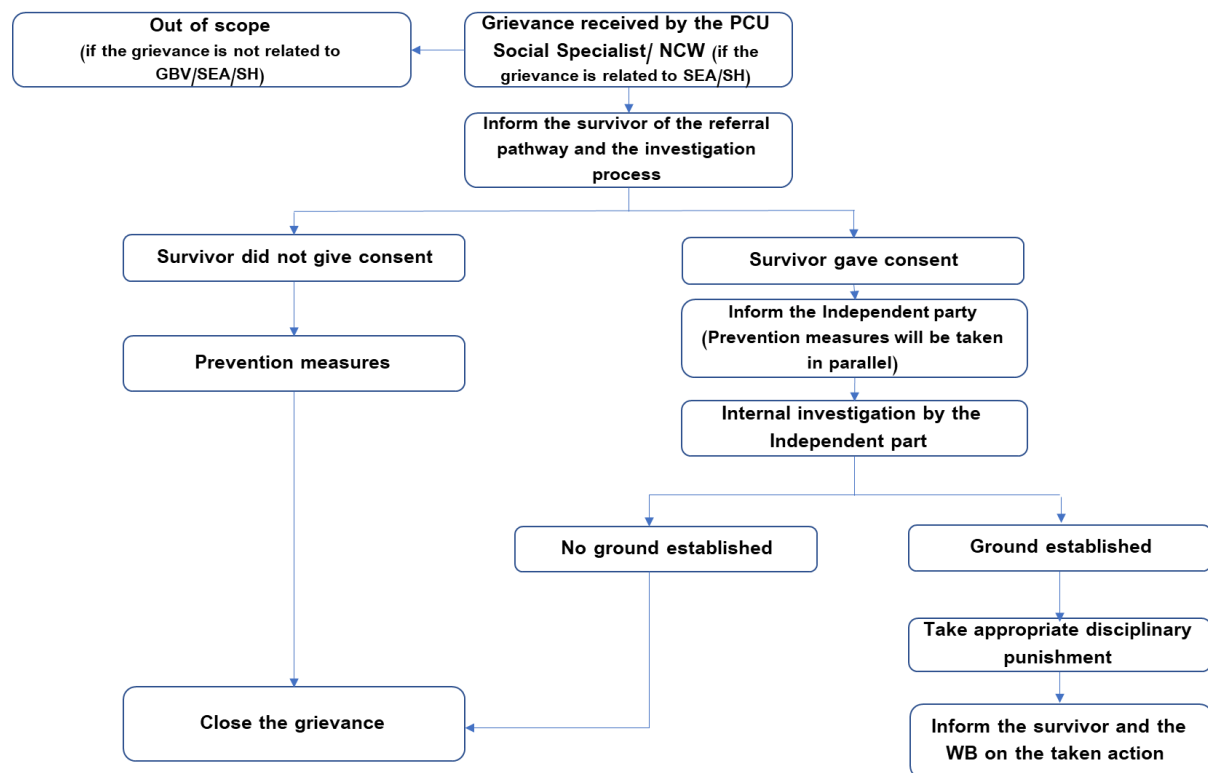


Figure 4: Responding mechanism for SEA/SH incidents

## 12. Annexes

### 11.1 Annex 1: Code of Conduct

# Code of Conduct

## Message from the Top Management

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

## Preamble

The Greater Cairo Air Pollution Management and Climate Change Project (GCCC) Code of Conduct defines labor standards that aim to achieve decent and humane working conditions. The Code's standards are based on national law and accepted good labor practices.

This Code of Conduct applies to the direct workers, contracted workers, service providers, and any employee contracted to work under GCCC project. For clarity, the following terms are defined as:

- **Direct worker:** is a worker with whom the GCCC Project has a directly contracted employment relationship and specific control over the work, working conditions.
- **Contracted worker:** is a worker employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third-party exercises control over the work, working conditions, and treatment of the project worker.
- **Service provider:** is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person.

All employees MUST commit to the following principles:

1. Adherence to all applicable laws, rules, and regulations of Egypt.
2. Adherence to health and safety requirements to protect the local community (including vulnerable and disadvantaged groups), Project direct workers, contractor's personnel, including sub-contractors, day workers, and primary suppliers.
3. Avoid and prohibit the use of illegal substances (e.g. drugs or alcoholic beverages) on all project sites.
4. Act non-discriminately when dealing with the local community (including vulnerable and disadvantaged groups), Project direct workers, contractor's personnel, including sub-contractors, day workers, and primary suppliers (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, gender identity, political conviction or social, civic, or health status).
5. Respectfully interact with the local communities, and any affected person(s).
6. Zero tolerance towards sexual harassment, which refers to any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature.
7. Zero tolerance for sexual exploitation which refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

8. Zero tolerance for sexual abuse, which refers to actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
9. Avoid conflicts of interest in the execution of all project activities (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection).
10. All staff and personnel will respect reasonable work instructions (including regarding environmental and social norms).
11. Confidential information cannot be shared with third parties while leaving the Project.
12. Protecting and ensuring proper use of property (for example, to prohibit theft, carelessness, or waste).
13. All have a duty to report violations of the Code.
14. There will be non-retaliation against workers who report violations of the Code, if that report is made in good faith.

The Code of Conduct shall be signed by each worker to indicate that they have:

- a) received a copy of the code;
- b) had the code explained to them;
- c) acknowledged that adherence to this Code of Conduct is a condition of employment; and
- d) understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.

**Sanctions**

I understand that if I breach this Code of Conduct, my employer will take disciplinary action, which could include:

- Informal warning or formal warning
- Additional training
- Loss of salary
- Suspension of employment (with or without payment of salary)
- Termination of employment
- Report to the police or other authorities as warranted.

**Signature:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Date:** \_\_\_\_\_

## **12.1 LMP Performance Monitoring**

The PCU will use the following checklists to validate contractors, consulting firms, primary suppliers' adherence to the LMP.

### **9.1.1 Consulting Firms**

This checklist will be used to verify that consulting firms (e.g. EcoConServ, Chemonics, Integral, etc.) are following the project LMP.

<b>No.</b>	<b>Item</b>	<b>Yes/No</b>	<b>Comment</b>
1.	All employees working on GCCC Project have signed contracts set out their rights according to the national labor and employment laws and this LMP.		If "No" please specify and explain
2.	Measures relating to occupational health and safety under ESS2, national requirements and this LMP are applied to all employees working on the Project.		If "No" please specify and explain
3.	A grievance mechanism is provided for all employees working on GCCC Project to raise concerns related to the Project.		If "No" please specify and explain
4.	Oversees, and supervision the implementation of the LMP at all levels.		If "No" please specify and explain
5.	Reporting on the implementation of the LMP.		If "No" please specify and explain

### **9.1.2 Contractors**

This list will pertain to contractors at construction sites.

<b>No.</b>	<b>Item</b>	<b>Yes/No</b>	<b>Comment</b>
1.	Contractor-LMP, OHS plans and Labor GRM for contractor and subcontractor workers were prepared and approved by the PCU.		If "No" please specify and explain
2.	Qualified environmental, social, occupational health and safety expert(s) were employed to manage OHS issues for each project site.		If "No" please specify and explain
3.	All contractors' workers and subcontractors' workers have an employment contract or engagement agreement in writing according to the related national laws.		If "No" please specify and explain
4.	All contractors' workers and subcontractors' workers are informed about the terms and conditions of employment prior to their appointment.		If "No" please specify and explain
5.	A policy on the minimum age of workers is available.		If "No" please specify and explain
6.	Awareness on recognizing, preventing and dealing with forced labor were provided to all workers		If "No" please specify and explain
7.	All contractors' workers and subcontractors' workers are paid regularly according to their contract or engagement agreement.		If "No" please specify and explain
8.	All contractors' workers and subcontractors' workers have a regular weekly rest.		If "No" please specify and explain

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No.	Item	Yes/No	Comment
9.	Workers who work at night receive night allowance.		If “No” please specify and explain
10.	The workers records reflect overtime hours worked.		If “No” please specify and explain
11.	Number of contractors’ workers and subcontractors’ workers were terminated from employment with termination in line with national labor law and ESS2.		If “Yes” please specify number and explain conditions of termination
12.	The presence of medical and social insurance coverage.		If “No” please specify and explain
13.	Contractors’ workers and subcontractors’ workers were granted leaves they are entitled to.		If “Yes” Please specify the type and number of leaves
14.	Number of contractors’ workers and subcontractors’ workers attended induction trainings, toolbox talks, OHS trainings.		If “Yes” please specify number and explain
15.	Contractors’ workers and subcontractors’ workers were involved in accidents at work resulting in injuries or fatalities		If “Yes” please specify and explain
16.	Contractors’ workers and subcontractors’ workers reported on cases of discrimination, harassment, sexual harassment or not adherence to law.		If “Yes” please specify and explain
17.	Presence of sanitary facilities (separate for men and women)		If “No” please specify and explain
18.	PPE is available and worn when required		If “No” please specify and explain
19.	Contractors’ workers and subcontractors’ workers raised grievances or started voluntary arbitration / legal proceedings to settle a dispute.		If “Yes” please specify number and explain
20.	Have contractor and sub-contractor workers understand and sign the Code of Conduct prior to the commencement of works.		If “No” please specify and explain
21.	The primary suppliers identified and addressed risks of child labor, forced labor and severe safety issues, and risks of equity and discrimination for primary supply workers.		If “No” please specify and explain
22.	A grievance mechanism for workers of contractors and subcontractors has been developed and implemented.		If “No” please specify and explain
23.	Report to the PCU on labor and occupational health and safety performance.		If “No” please specify and explain
24.	Disseminate information related to CoC GM, etc.		If “No” please specify and explain

**9.1.3 Primary Suppliers**

This list will pertain to service providers that the Project works with on a regular basis or has ongoing contracts with them.

No.	Item	Yes/No	Comment
1.	Have the service provider submitted an Occupational Health and Safety Plan?		If “No” please specify and explain
2.	Does the labor service provider have a		If “No” please specify and explain



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	policy on the minimum age of workers?		
3.	Can the labor service provider provide evidence of age for all workers?		If “No” please specify and explain
4.	Forced labor, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty, is not used in connection with the project.		If “No” please specify and explain
5.	A grievance mechanism is provided for all workers working on GCCC Project to raise concerns related to the Project.		If “No” please specify and explain
6.	Service provider ensure that the measures mentioned above applied to the staff involved in the project (e.g. contract, insurance, GRM, etc.).		If “No” please specify and explain