ZAMBIA - MALAWI INTERCONNECTOR PROJECT
(RETRADE - P175190)

LABOUR MANAGEMENT PROCEDURE

October 2026

ABBREVIATIONS

EAPP	Eastern African Power Pool
ESMP	Environment and Social Management Plan
ESF	Environment and Social Framework
E&S	Environmental and Social
ESIA	Environmental Social Impact Assessment
ESS	Environment and Social Standard
LMP	Labor Management Procedure
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
MPA	Multi-Phase Programmatic Approach
NGO(s)	Non-Government Organization(s)
PAP	Project Affected Person
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RETRADE	Regional Energy Transmission, Trade and Decarbonization Project
RTIFF	Regional Transmission Infrastructure Financing Facility
SAPPCC	Southern African Power Pool Coordination Centre
SEP	Stakeholder Engagement Plan
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
ZEMA	Zambia Environmental Management Agency
ZAMA	Zambia Malawi Interconnector Project

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1. Introduction/Project Description

The Regional Energy Transmission, Trade, and Decarbonization (RETRADE) Platform is the World Bank response to support countries in the Eastern and Southern African Region in enhancing energy security, resilience, and a transition toward a low-carbon energy sector. In the Southern Africa region, the RETRADE platform is being implemented through a horizontal Multi-Phase Programmatic Approach (MPA), consisting of four phases namely: Phase 1 comprising two components including investments in the Zambia-Tanzania Interconnection Project (ZTIP); Phase 2, which will finance the Angola-Namibia Interconnection Project (ANNA) in the Western corridor, Phase 3, which will support the development of one additional high-benefit interconnection in the Central or Western corridor, and Phase 4 which will finance the Zambia-Malawi (ZAMA) Interconnector Project in the Eastern corridor.

The ZAMA scope comprises: (i) a 46.6 km segment of a 400kV double-circuit overhead transmission line from the existing Chipata West 330/132/33/11kV substation to the Zambia/Malawi border, using triple-bundle ACSR "Tern" conductor on self-supporting lattice steel towers in vertical configuration, within a 50 m right-of-way; (ii) the extension of Chipata West Substation to include a new 400kV switchyard with 2 line bays, 2 line-connected shunt reactors, 2 × 600 MVA 400/330kV autotransformers, a 400kV busbar system, and a new control building; and (iii) Project Management and Technical Assistance.

The development objective of the ZAMA is to increase cross-border transmission capacity in the Eastern Province of Zambia and strengthen ZESCO's operational and commercial capacity to engage in regional power trade with Malawi. The Project is thus aligned with the strategic objectives of SAPP and the broader development goals of both countries. Additionally, the Interconnector will provide power to the Lobito Corridor. The Corridor is a strategic transport, industrial, and trade route centered on the railway line from the Port of Lobito in Angola to the Copperbelt regions of the Democratic Republic of Congo and Zambia.

The objectives of the ZAMA are:

i. To promote and enhance electricity trade between the Southern African Power Pool (SAPP) and Eastern Africa Power Pool (EAPP).
ii. To increase the reliability and stability of the ZESCO Transmission network.
iii. To promote regional integration.

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iv. To increase the power transfer capacity to the increasing mining loads on the Copperbelt and North-Western Provinces.

The main labour demand will likely arise during detailed design, mobilisation, vegetation clearance, survey and pegging, access preparation, tower foundation excavation, tower erection, stringing, substation civil and electrical works, testing and commissioning, demobilisation, and restoration of disturbed areas. Labour demand will include skilled, semi-skilled and unskilled workers. The Project shall prioritise fair and transparent local recruitment for appropriate roles, while ensuring that all recruitment is based on objective criteria and does not discriminate on the basis of sex, ethnicity, disability, religion, political affiliation, age, marital status or other protected status.

2. Overview of Labour Use on the Project

The Labour Management Procedure (LMP) will apply to all project workers, skilled or unskilled, who include full-time, part-time, temporary, seasonal, or even migrant workers. Thus, the LMP applies to direct workers, contracted workers, workers engaged by the Supervising Consultant/Owner's Engineer and other consultants, and primary supply workers to the extent required under ESS2. The LMP requirements shall be reflected in procurement documents, contracts, subcontract agreements, induction materials and site-specific labour management arrangements.[1]

2.1 Number of Project Workers

An estimate of 500 direct Project workers will be employed or engaged during the construction period. A further 1000 workers over the project implementation period will be engaged for Right of Way/Wayleave management prior to Project construction, transmission line maintenance prior to commissioning, and for two months annually for transmission line maintenance after commissioning. The LMP is applicable, as per ESS2 to the following categories of Project workers:[2]

i. **Direct Workers:** These are workers to be directly employed or engaged in the ZAMA Project Implementation Unit (PIU) to work specifically in relation to the Project. There will be the PIU staff (see Table 1 composition details). The composition of the PIU will comprise 24 employees. Qualifications, experience, and terms of reference requirements for each position will be provided in the Project Implementation Manual (PIM).
ii. **Contracted Workers:** These are workers that will be employed or engaged by the Project Contractor to perform work related to core activities of the Project on site, along the stretch of the transmission line. Contracted workers will also consist of consultants hired to conduct technical studies and workers employed under hired subcontracted companies.
iii. **Primary Supply Workers:** These will be workers employed or engaged by the ZAMA as primary suppliers of goods and materials for the core functions of the Project (construction materials, fuel, lubricants etc.). Workers from primary suppliers will be required to adhere with ESS2 and ESS4 and national labor law through formal labor engagements with the supplying entity regarding involvement with the implementation of activities on ZAMA.

[1] This LMP should be read together with the ESIA/ESMP, ESCP, SEP, RAP, SEA/SH Action Plan, contractor C-ESMPs and site-specific OHS plans. Where national requirements and ESS2 differ, the more protective requirement for workers shall apply, unless otherwise agreed with the World Bank.

[2] For ESS2 purposes, the estimated construction workforce should be treated primarily as contracted workers unless they are directly employed or engaged by ZESCO. Contractors shall confirm the final workforce estimate, labour sourcing strategy, worker accommodation arrangements, labour influx management measures, and staffing profile in their site-specific Labour Management Plan before mobilisation.

iv. **Community Workers:** These workers may be employed or engaged by the project to facilitate community development initiatives and collective solutions within the community. If community workers are not used under the Project, this category shall be recorded as not applicable. If community workers are engaged, ZESCO and the contractor shall document the terms of engagement, voluntary nature of participation, working hours, OHS measures, remuneration or benefit arrangements, grievance access and protections against child labour, forced labour, discrimination and SEA/SH.

The ZAMA project workers will be a mix of skilled and unskilled employees based on the Project activity. These shall be a combination of male and female workers, with a balance of local and international experts, all of whom will be over the age of 18 years, and in line with labour laws in Zambia are able to sign employment consents without need for parental or legal guardian consent. Migrant workforce is expected to predominantly consist of personnel recruited from various regions within the country and internationally. Furthermore, the Project contractors may have some international personnel among them for respective jobs. The ZAMA project will ensure, through the engineering consultant, that international workers will be employed or engaged by contractors of their own free will with valid work permits or documentation supporting their work status in the Country.

2.2 Timing of Labour Requirements

The timing of labour requirements will correspond to the schedule of work on the Project and activities to be implemented by the Contractor. This will further be informed by the structure of work that the Contractor will put in place.

Table 1 Description on PIU of Project Direct Workers

S/N	Position	Number	Responsibilities of Worker
1.	Project Manager	1	To provide oversight and coordination of activities under the PIU.
2.	M&E Specialist	1	To conduct Monitoring and Evaluation of Project activities covering key project phases namely preparation, construction and operation.
3.	Gender Coordinator	1	To coordinate the gender mainstreaming aspects on the Project and ZESCO

S/N	Position	Number	Responsibilities of Worker
4.	Technical Manager	1	Responsible for implementation of the entire Project, in collaboration with the Supervision consultant.
5.	Chief Civil Engineer	1	To oversee all civil and structural engineering works and ensure that these works are done according to design specifications and quality assurance.
6.	Procurement Specialist	1	Facilitates the procurement of goods, works, non-consultancy and consultancy services for effective delivery of project goals in line with World Bank Procurement Guidelines.
7.	Financial Manager	1	Oversee the carrying out of financial assessments covering project budgeting, internal controls, accounting, funds flow, financial reporting, auditing arrangements.
8.	Chief Environmental & Social Analyst	1	Responsible for the overall oversight of Environmental and Social aspects on the project
9.	Environmental Scientist	1	Responsible for environmental sustainability, environmental risk management and to provide clear input in environmental aspects of the Project through full and documented implementation of the World Bank (WB) Environmental and Social Framework (ESF) and related Environmental and Social Safeguards (ESS) throughout the project cycle.
10.	Social Scientist	1	Responsible for social sustainability and social risk management to provide technical support for social sustainable and inclusive development, particularly relating to involuntary resettlement and livelihoods, labour issues (forced labor), and to provide clear input in the social aspects of the Project through full and documented implementation of the World Bank (WB) Environmental and Social Framework (ESF) and related

S/N	Position	Number	Responsibilities of Worker
			Environmental and Social Safeguards (ESS) throughout the project cycle.
11.	Gender Based Violence Specialist	1	Responsible for GBV/SEA/SH prevention and risk management and to provide clear input in the gender equality and social inclusion aspects of the Project through full and documented implementation of the World Bank (WB) Environmental and Social Framework (ESF) and related Environmental and Social Safeguards (ESS) throughout the project cycle.
12.	Wayleave Officer	1	To provide clear input in the management of wayleaves aspects of the Project through full and documented implementation of the World Bank (WB) Environmental and Social Framework (ESF) and related Environmental and Social Safeguards (ESS) throughout the project cycle.
13.	SHEQ Officer	1	To provide clear input in the Occupational Health and Safety aspects of the Project through full and documented implementation of the World Bank (WB) Environmental and Social Framework (ESF) and related Environmental and Social Safeguards (ESS) throughout the project cycle.
14.	Project Accountant	1	Carry out financial assessments covering project budgeting, internal controls, accounting, funds flow, financial reporting, auditing arrangements.
15.	Procurement Officer	1	Facilitates the procurement of goods, works, non-consultancy and consultancy services for effective delivery of project goals in line with World Bank Procurement guidelines.
16.	Civil Engineer - Transmission Line - Substation	2	To ensure that all civil and structural engineering works are done according to design specifications and quality assurance.

S/N	Position	Number	Responsibilities of Worker
17.	Electrical Engineer - Transmission Line - Substation	2	To ensure that all electrical engineering works are done according to design specifications for the transmission line and substation.
18.	Support Specialists (Protection, Telecoms, SCADA, Metering etc.)	5	Responsible for providing technical support for specialized equipment to be installed on the project covering protection, substation automation, metering, telecommunication systems etc.
	Total	**24**	

Table 2: Showing the Number of Categorized Workers

S/N	Number of Categorized Workers.	Number of Workers
1.	Direct workers	24
2.	Primary Supply	Hired when required
3.	Contracted Workers	Hired when required

3. Assessment of Key Potential Labour Risks

3.1 Project Activities

The following are the key labour-intensive activities to be conducted:

i. Clearing of the Right of Way (ROW) / line wayleave;
ii. Construction of access roads (where required);
iii. Land clearing and construction of tower foundations;
iv. Erection of towers/pylons;
v. Cutting trees and high vegetation; and
vi. Stringing of conductors.

3.2 Key Labour Risks

Labour risks are assessed as material because the project involves high-voltage transmission infrastructure, civil works, electrical works, dispersed construction sites, temporary labour influx, worker accommodation and multiple contractors and subcontractors. Labour risks shall be assessed and updated throughout implementation, including during final design, procurement, contractor mobilisation, construction and commissioning. Key labour risks anticipated during Project implementation include, but are not limited to, the following:

i. Potential discrimination; deprivation of equal opportunity based on gender, religion, political affiliation, physical ability/disability, inappropriate treatment; or harassment of Project workers based on background or status. This may include workers being subjected to poor working conditions, workers having unclear terms of employment, delays in payment of workers' salaries, limited equal opportunities for promotion and training, and other practices that do not align with ESS2 and national labour laws. Further, discrimination could arise during the recruitment processes and project workers may also be deprived of the right to establish worker organizations for collective bargaining;
ii. Working at heights, operating/using heavy machinery; handling hazardous materials (used oil), unsafe working environment or poor working conditions (stress from long working periods), including lack of Personal Protective Equipment;
iii. Likely incidents of child labour or forced labour may occur on the project. The risk of forced labour may arise among contracted workers who may be coerced to work against their will;
iv. Possible accidents or emergencies may occur due to the nature of construction. Some sections of the worksite may remain open to traffic during construction, and disobedience of traffic signs by motorist can put project workers at risk;

v. Risks of labour influx as the project may attract migrant or seasonal workers due to the nature of the construction jobs. Contractors may also bring in skilled labour such as machine operators. There is also a risk of increase in commercial sex transactions around project sites and surrounding areas, which may pose additional challenges; and
vi. Gender-based violence (GBV), Sexual exploitation and abuse and Sexual Harassment (SEA/SH). Women workers might be exposed and experience GBV and SEA/SH from the project male workers for instance during hiring and employment process, at work sites or outside worksites during field work in Project areas and surrounding areas. This risk may be experienced by workers across all labour categories. Further, inappropriate interactions between workers and surrounding communities may also result in increased incidences of GBV/SEA/SH.
vii. There are extensive Community Health and Safety (CHS) risks associated with the project. These risks include,
    - Traffic and road safety risks due to increased construction and vehicular traffic.
    - Spread of diseases caused by virus and infections to and from local communities due to the influx of workers into project areas.
    - Inappropriate disposal of wastewater, solid waste, and hazardous waste, leading to the spread of infectious diseases and pollution of local water resources and air.
    - Storage of bulk fuel, which can result in fuel leakage or fire incidents that could impact nearby communities and water resources.
    - Lack of emergency response coordination at project sites, leading to uncontrolled spread of contaminants and fire incidents.
    - Inappropriate storage of hazardous materials, resulting in community exposure through water and air pollution.
    - Operational hazards at specific subprojects, where careless usage of harmful materials can lead to serious accidents.
    - Inadequate provision of drinking water and potential irreversible damage to the local ecosystem.
    - infrastructure may create a dangerous environment to the community members especially vulnerable groups of Project sites and surrounding areas for example the dust from the construction site may be a health hazard and construction equipment may cause harm to the community.
viii. Increased risk of worker injuries due to inadequate OHS practices and procedures during project implementation leading to worker injury. Workers may be exposed to physical, chemical, biological, and other hazards, including working at heights, in confined spaces, night work, improper ventilation, poor lighting, faulty electrical systems, trenches, tools, machinery, equipment, stress, electricity, road travel, noise, vibration, trips, slips, falls, heat, paints, cement, hazardous materials, viruses, infections, excavations, moving objects,

and more. High-risk transmission line tasks, including tower erection, conductor stringing, work at height, lifting operations, excavation and foundation works, energised or near-energised electrical work, and work in extreme heat or remote sites, shall be subject to job hazard analysis, method statements, permit-to-work procedures, rescue arrangements, competent supervision and appropriate PPE.

Additional ESS2-relevant risks include inadequate written contracts, delayed payment of wages, excessive overtime, inadequate rest periods, lack of induction or task-specific training, weak subcontractor oversight, inadequate worker accommodation, poor sanitation at camps, insufficient emergency preparedness, and inadequate reporting of near misses, incidents and accidents. Contractors shall assess these risks in their C-ESMP, site-specific OHS Plan and Labour Management Plan(s) before site mobilisation.

4. Brief Overview of Labour Legislation: Terms and Conditions

The Government of Zambia has enacted labour laws which regulate principles/concepts of employment in Zambia and govern the employer and employee relationship. The LMP for ZAMA is informed by articles contained in relevant national labor laws that include the Constitution of the Republic of Zambia, the Industrial and Labour Relations Act No. 269 of 1993, Minimum Wages and Conditions of Employment Act No. 25 as amended by Act 13 of 1994, the Anti-Gender Based Violence Act No.1 of 2011, Occupational Health and Safety Act No. 36 of 2010, the Factories Act Cap 441 of 1967, National Council for Construction Act No. 10 of 2020, and Public Health Act Cap 295 of 1930. The laws' basic requirement of employment is materially consistent with ESS2 and ESS4 of the World Bank ESF. The national labor directives cover hours of work, benefits (if any), job description, leave entitlements, protection of wages, termination of employment, grievance procedure and code of conduct, and prohibited labour of children or young persons, and forced labour. In addition, occupational health and safety, stipulation of categories of workers (including protected, non-protected and casual workers) and prescription on national health cover are also specified in the legislation.

The Project shall apply national labour requirements and ESS2 in a complementary manner. This includes written employment contracts or engagement letters, clear information on wages and benefits, working hours, overtime, leave, termination, freedom of association, non-discrimination and equal opportunity, prohibition of child labour and forced labour, and access to a functioning worker grievance mechanism without retaliation.

Table 3 presents a brief overview of national Labour Legislation that will be applicable to project workers

Table 3: Brief Overview of Labour Legislation: Terms and Conditions

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
1.	The Constitution of the Republic of Zambia	Part III of the Constitution covers the Protection of fundamental rights and freedoms of an individual. It recognises the equality of individuals, prohibits forced and or child labour, protects individuals from discrimination or inhuman treatment, and protects young children from exploitation.	The Project will employ workers from different backgrounds and ensure that all persons employed do so of their own free will, who will be treated fairly and without discrimination, and will be of the legal employment age.
2.	The Employment Code Act No. 3 of 2019	The Employment Code Act governs the employer and employee relationship in Zambia. It prohibits forced child labour, refers to the protection of wages regards salaries and deductions, stipulates aspects relating to various types of legal leave from work, prescribes the working hours, and prescribes the management of labour conflicts.	The workers employed on the Project will be subject to the provisions of the Act, with respect child labour, requisite wages, leave entitlement, hours of working and resolution of labour conflicts.
3.	The Industrial and Labour Relations Act, No. 269 of 1993	Provides for the formation of trade unions and employers' representative organisations, including matters related to dispute resolution in employment cases.	The project workers may belong to various employer representative organisations and may in their line of work encounter disputes that require resolution by employers representatives.
4.	Minimum Wages and Conditions of Employment Act No. 25 as amended by Act 13 of 1994	Provides for the regulation of minimum wage levels and minimum conditions of employment.	Project workers will be subject to wage levels as guided by the Act, in their respective roles of employment on the Project as per contract entered into.
5.	Anti-Gender Based Violence Act No.1 of 2011	Provides for the protection of victims of gender-based violence; constitutes the Anti-Gender-Based Violence Committee; and establishes the Anti-Gender-Based Violence Fund.	The project will employ women, youth, and men, and will be located in proximity to local communities where these categories of people, including children, will be present and may susceptible to the vices of GBV.

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5. Brief Overview of Labour Legislation: Occupational Health and Safety (OHS)

In accordance with the Occupational Health and Safety Act No. 36 of 2010 (which applies to all places of work), the Public Health Act Cap 295 of the Laws of Zambia and annex 2, it is the duty of the employer to ensure and provide for:

- The establishment of health and safety committees where there are ten or more workers at workplaces
- Worker welfare provisions such as safe drinking water, shelter, and rest areas etc.
- The protection of persons, other than persons at work, against risks to human health or safety arising from, or in connection with, the activities of persons at work; including adequate first-aid arrangements to deal with emergencies and accidents
- Placing and maintaining an employee in an occupational environment adapted to the employee's physical, physiological, and psychological ability.
- Maintaining adequate supply of drinking water and separating eating & resting areas free from poisonous or injurious substances.
- Preparing a health and safety policy concerning the protection of the health and safety of the employees, including a description of the organization and arrangements for carrying out reviews to that policy.

Table 4 presents a brief overview of national Occupational Health and Safety Legislation that will be applicable to project workers.

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Table 4: Brief Overview of Labour Legislation: Occupational Health and Safety

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
1.	Occupational Health and Safety Act, No. 36 of 2010	The Occupational Health and Safety 2010 Act: - Provides for the establishment of health and safety committees at workplaces and for the health, safety and welfare of persons at work; and - Provides for the protection of persons, other than persons at work, against risks to health or safety arising from, or in connection with, the activities of persons at work.	- Project workers will constitute the health and safety committees formed in the project sites. - The Project sites will be close to communities who may be affected by activities on the project.
2.	The Factories Act, Cap 441 of 1967	The Factories Act: - Makes further and better provision for the regulation of the conditions of employment in factories and other places as regards the safety, health and welfare of persons employed therein; and - Provides for the safety, examination and inspection of certain plant and machinery.	- The Project sites will be subject to the Factories Act requirements with regards to the health and welfare of the Project workers. - Equipment and other machinery that will be used by Project workers for various tasks, may be subject to the safety examination and inspection.
3.	National Council for Construction Act No. 10 of 2020	The National Council for Construction Act No. 10 of 2020: - Enhances contractor capacity development and technical compliance in the construction industry; and - Provides for a complaints and appeals procedure.	The construction of the transmission line, and complaints and appeals with regards to the construction activities on the Project may arise and will adhere to the requirements of the Act.
4.	Public Health Act Cap 295 of 1930	The Public Health Act Cap 295 provides for the prevention and suppression of diseases and generally to regulate all matters connected with public health in Zambia.	The Project will employ several workers at different sites and within proximity to communities throughout the Project construction phase. The risk of spread of communicable diseases would therefore be high, of which their prevention would be subject to the provisions of the Act.

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A worker is also expected to take reasonable care for his/her own health and safety and that of other persons who may be affected by his/her actions or omissions at the workplace. Annex 2 outlines the responsibilities of the employer/s and workers. The OHS is applicable to all categories of workers on the project. Therefore, before the implementation of the ZAMA activities, the PIU or leading entity should conduct project screening, prepare an ESMP that includes or accompanies a standalone OHS plan, and includes OHS terms and conditions in the bids and contracts including OHS requirements and the preparation of a C-ESMP and an appropriately scaled OHS plan. The leading entity or contractor will be required to (i) conduct a hazard analysis of the work tasks and activities to identify potential OHS risks (ii) prepare preventive and mitigation measures following the mitigation hierarchy (elimination, substitution, engineering controls, administration controls, PPE).

Other requirements of the contractor will include (i) training of, and communication, to workers (ii) developing and communication of OHS objectives and targets (iii) utilization of work permit systems where required (iv) ensuring adequate policies and actions are implemented for management of subcontractors (v) ensuring health and safety at project sites, and (vi) provision for emergency responses in the OHS plan with a focal contact officer should an accident occur.

The contractor will be required to keep the site free of drugs and alcohol. The contractor`s site safety plan will include provision for a safe work environment and provide safety measures and personal protective equipment to all workers, including hand, head, eye and ear protection and safety footwear. The site safety plan will include training at regular intervals to workers to enhance their OHS skills, provision of first aid facilities on-site and employ a trained first aid person, in accordance with the provisions of the Occupational Health and Safety Act No. 36 of 2010 and the Public Health Act Chapter 295 of the Laws of Zambia. The PIU and Contractor will document, report and investigate all occupational accidents and incidents no later than 48 hours after learning of the incident (i.e. accident or near miss) and in accordance with World Bank incidence classification and national laws.

Fatalities and SEA/SH allegations shall be notified immediately through the agreed Project incident reporting channels, and serious incidents, lost time injuries, major near misses and significant OHS events shall be reported within the timeframes set out in the ESCP and World Bank incident reporting requirements. Root cause analysis and corrective actions shall be documented, tracked to closure, and reflected in monthly contractor and quarterly PIU E&S reports.

Before commencement of works, each contractor shall prepare a site-specific OHS Management Plan acceptable to ZESCO and the Supervising Consultant. The plan shall include hazard identification and risk assessment, mitigation hierarchy, task-specific method statements, toolbox talks, work-at-height controls, lifting and rigging controls,

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electrical safety/lock-out-tag-out procedures, excavation safety, traffic interface controls, heat stress management, emergency preparedness and response, first aid, incident reporting, and arrangements for subcontractor OHS supervision.

To manage Community Health and Safety risks the following should be considered (i) appropriate road safety policies, plans, construction standards and mitigation measures detailed in the ESMPs (ii) appropriate use of international recognized building and infrastructure construction codes with an emphasis on climate resilience (iii) sub project site security measures to prevent accidental and intentional encroachment on project sites, theft of equipment, attacks and robbery of project site workers, (iv) appropriate waste management plans including the use of the standards and management procedures set out in the WB ESHGs (v) comprehensive and well-rehearsed emergency response measures to address potential subproject unanticipated incidents, arising from both natural and man-made hazards in protected and unprotected areas that includes but is not limited to a catastrophic fuel leak into a waterway or ground water from fuel installation, or an explosion of a fuel installation, (vi) the appropriate level of Covid-19, Malaria and other current communicable diseases mitigation measures (vii) all C-ESMPs should include a thorough assessment of operational safety hazards and will provide an appropriate level of mitigation measures e.g. the potential for pollution events that will contaminate local community water resources etc. and (vii) the appropriate management of hazardous materials to prevent discharge to the environment, fire or accidental or intentional access by local community members. Similarly, risks and impacts associated with project TA activities are likely to be moderate and mitigated by adopting ESS 4 requirements into Terms of Reference of TA activities.

6. Responsible Staff

The PIU (see Table 5 below) under ZESCO will be responsible for the overall project management and coordination, including compliance with national labour laws along with ESS2 and ESS4 requirements. The responsibilities of the PIU will be as follows;

The Project Manager will be responsible for overall management and coordination of the ZAMA activities and will be assisted by a team of specialists comprising financial management, engineers, environmental and social specialists, and procurement. The day-to-day fiduciary requirements and technical engagements will further be achieved with the support of office administration, accountants, and transport officers. With respect to accountability, the PIU will report to the Project Steering Committee comprising of ZESCO and Ministry of Energy (MoE).

The PIU organisation structure is presented in Figure 1.

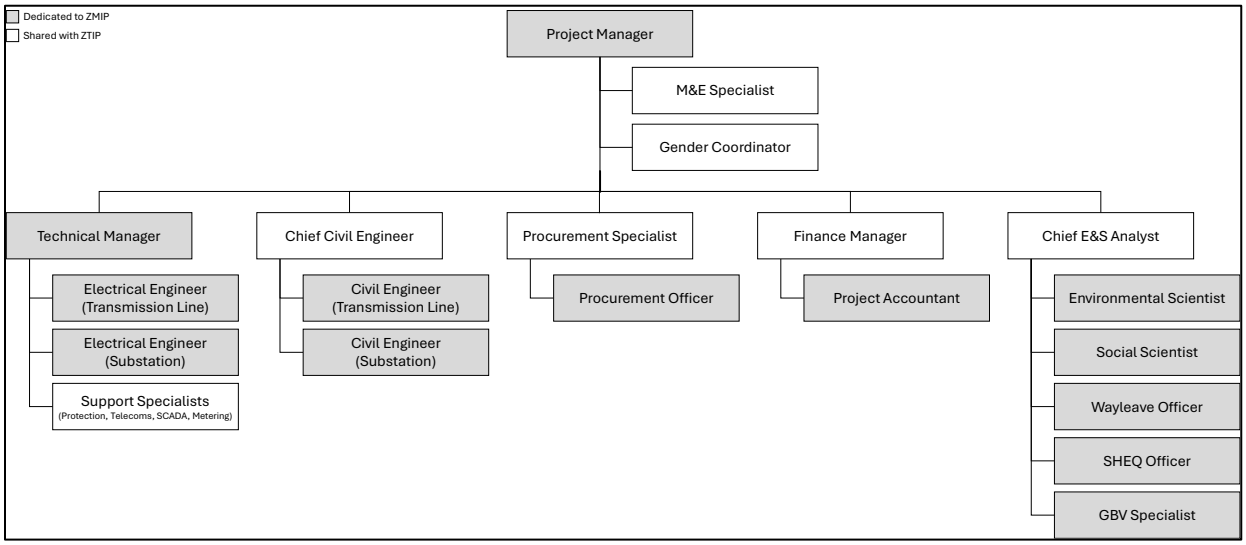


Figure 1: Structure for the Project Implementation Unit

The PIU, through the Project Manager and the Chief Environmental and Social Analyst, will oversee all aspects of the implementation of the LMP, to ensure contractor and/or Supervising Consultant comply with the ESMP, ESIA, C-ESMP, OHS plans, and other E&S safeguards, related procedure and policies. The PIU will be responsible for notifying the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injuries. The PIU will provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. The PIU will handle all LMP aspects as part of hiring for works and during procured contractor induction to the Project. The contractor will be responsible for management of their workers' contracts in accordance with national labor laws, World Bank ESS2, ESS4 and LMP requirements, which will be supervised by the PIU monthly. The Contractor will be required to adhere to the requirements of the LMP as part of the contract in the works of the Project.

The Supervising Consultant shall verify contractor compliance with this LMP, review and approve contractor LMPs and OHS Plans, undertake routine site inspections, issue non-compliance notices, verify corrective action close-out, and recommend suspension of unsafe works where there is imminent danger to workers or communities.

The PIU shall maintain adequate E&S capacity throughout implementation, including environmental, social, SHEQ/OHS, GBV/SEA/SH, wayleave/resettlement and stakeholder engagement functions. The Supervising Consultant and each contractor shall also

appoint qualified ESHS staff proportionate to the works, including OHS and social/SEA/SH focal points, before site mobilisation.

Table 5: Responsible Staff

No.	Oversight Area	Responsible Staff	Key Roles
1.	Engagement and management of Project workers	PIU / Supervising Consultant Project Coordinator with Social Specialist, Procurement specialist	Ensure the project will use the national labour law and World Bank ESF standards to engage and manage Project workers
2.	Engagement and management of contractors/subcontractors	Project Supervising Consultant / Contractor	Ensure the project will use the national labour laws and World Bank ESF standards to engage and manage the contractors
3.	Occupational Health and safety (OHS)	Project Coordinator with E & S and OHS Personnel	- Oversee the adherence and implementation of OHS aspects during all project activities in accordance with the provisions of the OHS Act and the World Bank ESS2
4.	Training of workers / Capacity Building	PIU / Supervising Consultant	- Engage the contractors and oversee adherence to manage training under OHS which will include, how they conduct regular Toolbox Talks/ Safety Circle Meetings (Use of PPE), GBV (how they can prevent), HIV/AIDS (provide information) OHS Plan etc.
5.	Addressing worker grievances	PIU / Supervising Consultant / Contractor	- PIU will implement a functional Grievance Redress Mechanism and sensitize workers on the GRM - Engage the contractor and ensure adherence to provision of functional worker grievance management mechanism and sensitize their workers.
6.	ESS2 compliance, worker protection and SEA/SH-sensitive labour risk management	PIU Chief E&S Analyst, Social Scientist, SHEQ Officer, GBV Specialist, Supervising Consultant and Contractor ESHS/HR personnel	Ensure implementation of ESS2 requirements, worker Codes of Conduct, age verification, worker GM, SEA/SH-sensitive reporting, worker accommodation standards, OHS reporting and subcontractor labour supervision.

7. Policies and Procedures

The Contractors are expected to perform their duties under the contract in a professional manner and using best practices. The contractors who shall be liable for implementation of their works are expected to interpret the information presented in the contract documents. Should the finished output(s) be found to be at variance with the requirements of the contract, the contractors will be expected to repair or replace at their own costs. The contractors are liable for the conformity of their work during the defects liability period of 12 months. The contractors are obliged at their own cost to repair defects during the defects liability period. Therefore, ZESCO, through the ZAMA PIU is committed to oversee compliance to the requirements of the policies and procedures outlined in this Section to avoid, mitigate, and respond to the potential labour and OHS related risks on the Project. These are detailed in Table 6:

Table 6: Policies and Procedures

No.	Aspect / Risk	Actions
1.	Discrimination, inappropriate treatment or harassment of project workers based on background or status	Equitable terms and conditions shall be upheld in accordance with the Zambian Employment Code for both employees and consultants engaged on the Project. The hiring of Project workers will be the responsibility of the Contractor, conducted in alignment with the specific job requirements
2.	- Hazardous work such as working at heights, use of heavy machinery, or use of hazardous materials. - Accidents or emergencies	The use of appropriate tools, personal protective equipment, and health and safety policies such as emergency preparedness plans shall always be implemented on the Project.
3.	Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH).	A Sexual Exploitation and Abuse and Sexual Harassment procedure shall be developed and implemented throughout to safeguard against this risk.
4.	Monitoring and Reporting	The PIU and Supervising Consultant shall conduct periodic monitoring and reporting as prescribed in the Environmental and Social Commitment Plan.
5.	Health and Safety	The ZESCO SHEQ Policy, and the following ZESCO Health and Safety Procedures shall be adhered to, in addition to the WB ESS2: - Management of Personal Protective Equipment; Management of Incidents; SHEQ Circle Meetings; Management of Contractors; Management of Operational Risks; Occupational Hygiene; Management of Alcohol and Drugs in the Workplace; Management of Chemicals; Management of Emergency Preparedness Plans; Rigging, Slinging, and Lifting; and other H&S related procedures.
6.	Child labour and forced labour, including risks in subcontracting and primary supply chains	The contractor and subcontractors shall verify worker age before employment, maintain age verification records, prohibit hazardous work by persons under 18, prohibit forced labour, retain recruitment and payment records, and screen primary suppliers for child labour, forced labour and serious OHS risks.

		Any under-age worker identified shall be removed from Project work and referred for age-appropriate support in accordance with national law and ESS2.
7.	Worker accommodation, labour influx and worker-community interaction risks	Where worker accommodation or camps are used, contractors shall prepare and implement a Worker Accommodation and Labour Influx Management Plan consistent with GIIP, including standards on water, sanitation, hygiene, sleeping space, food safety, security, health services, communicable disease prevention, worker conduct, community interaction rules, and prohibition of alcohol and drugs at work sites.
8.	SEA/SH risks affecting workers and communities	All workers shall sign Codes of Conduct with SEA/SH provisions before deployment and receive induction and refresher training. SEA/SH complaints shall be handled through confidential, survivor-centred channels and referrals to qualified service providers; the general grievance log shall not record personally identifiable information. Contractors shall enforce sanctions for non-compliance.
9.	Contractor and subcontractor labour management	Each contractor shall prepare a site-specific Labour Management Plan and OHS Plan before mobilization, maintain labour records, wage records, training records, incident logs, worker GM records and subcontractor registers, and submit monthly ESHS/labour reports to the Supervising Consultant and PIU.
10.	Incident reporting, corrective action and stop-work authority	Contractors shall immediately notify the Supervising Consultant and PIU of serious incidents, fatalities, SEA/SH allegations, lost time injuries and major near misses. Corrective Action Plans shall be prepared, tracked and closed. ZESCO, the Supervising Consultant and contractors shall have authority to stop unsafe works where there is imminent risk to life, health, safety or the environment.

8. Age of Employment

Regarding the age of employment, the following shall apply:

i. The minimum age of employment shall be 18 years;
ii. The prospective Project workers ages shall be verified through the presentation of their National Registration Card (NRC); and
iii. Any under-age worker found working on the Project shall be relieved of their work to comply with the national law in the Employment Act of Zambia.

The contractor and subcontractors shall maintain copies of age verification documents or age verification records for all workers. If a child is identified in Project work, the contractor shall immediately remove the child from hazardous or Project-related work, notify the PIU, assess the circumstances, and implement a remediation plan that protects the child's welfare and avoids punitive action against the child.

9. Terms and Conditions

The following terms and conditions shall apply:

i. All employed workers shall be remunerated in accordance with the task or activity that they have been assigned. Salaries shall be established by collective agreement or by professional category. The minimum wage shall be determined on an hourly or monthly basis;
ii. No remuneration deductions shall be made other than those prescribed in labour laws, except for the repayment of advances received from the employer and evidenced in writing;
iii. The maximum number of working hours shall be eight hours a day (08hrs to 17hrs), whilst contracted workers will have varied hours depending on the arrangement of shift works and Project activities;
iv. Workers shall be entitled to rest on National public holidays, and be entitled to other rest that may be prescribed in their conditions of appointment;
v. All contractors or subcontractors shall be entitled to leave (maternity, paternity, annual, compassionate etc.) as required and as prescribed in the Employment Act;
vi. At a minimum, contractors/sub-contractors must ensure that their workers have access to medical care / medical facilities.

All Project workers shall receive written contracts or engagement letters in a language they understand before commencing work. Contractors shall maintain records of contracts, attendance, working hours, overtime, wage payments, deductions, leave, insurance or medical arrangements, training and disciplinary actions. Overtime shall be voluntary, compensated in accordance with applicable law, and managed to prevent fatigue and OHS risks.

10. Grievance Mechanism

To avoid labor disputes, fair terms and conditions will be applied for project workers (guided by relevant national laws). Management of grievances on the Project shall be managed in accordance with the Project Grievance Redress Mechanism (GRM) and worker GRM for project workers. The following will also apply:

i. Contracted workers shall also have a mechanism to raise grievances through their direct supervisors in line with the channel identified within the work area;
ii. The Contractors E&S personnel shall avail all registered grievances to the Supervising Consultant monthly; and
iii. The Supervising Consultant E&S personnel shall provide a report to the PIU E&S personnel on all grievances, monthly.

Typical workplace grievances may include demand for employment opportunities; labour wage rates; delays of payment; disagreement over working conditions; and health and safety concerns in work environment, including GBV/SEA/SH. Although incidences of GBV/SEA/SH occur in most workplaces, it usually goes unreported. Building on the principles of the project GRM, a separate worker GRM will be established for all workers, and they will be informed of the GRM and complaint form (see Annex 1) at the time of recruitment. Handling grievances will be objective, prompt and responsive to the needs and concerns of the aggrieved workers. The mechanism will also allow for anonymous complaints to be raised and addressed. Individuals who submit their complaints or grievances may request that their name be kept confidential, and this will be respected. Further, the mechanism will involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution.

Point to note: The worker grievance mechanism shall be separate from the community GRM and shall include multiple intake channels, including supervisor/HR channels, ESHS focal points, suggestion boxes, phone or email channels, and anonymous reporting. The mechanism shall be explained during induction and displayed at worksites and camps in language and formats understandable to workers.

10.1 Direct workers.

Direct workers engaged for the project will be informed of the existing grievance management system in place for all project workers as part of their orientation process, and this will be included in their contracts. The Project Manager will exercise oversight in the PIU to address grievances raised by individual workers or those raised in a group set up. The grievances raised by workers will be recorded with the actions taken by each unit. The summary of grievance cases

will be reported to the World Bank as part of the regular report. Where the aggrieved direct workers wish to escalate their issues or raise their concerns anonymously and/or to a person other than their immediate supervisor/hiring unit, the workers may raise the issues with ZESCO Management and Ministry of Labour and Social Security.

10.2 Contracted workers

Contractors will be required to establish procedures for workers to report complaints through the human resource officer or their immediate supervisors. In addition, contracted workers will also be encouraged to utilize existing complaint channels that establish collective bargaining groups. Beyond the established worker grievance channels, workers will also be at liberty to register concerns on non-compliance by their employers through the respective labour offices under Ministry of Labour. The mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

10.3 Primary Suppliers

It is anticipated that complaints from this group will mostly comprise of unfair contract award for provision of goods and services to the project. Primary suppliers will be made aware of the grievance handling process for procurement related complaints, consistent with WB procurement guidelines and national procurement regulations.

The following actions will be used for managing complaints on this project:

Complaints should be sent by email, text, phone, letter, through complaint boxes or in person to the GRM focal point that will be appointed at the workplace. The complaints will be collated and logged into the register. The email address and phone number of the GRM focal points will be made available at signing of contracts/ recruitment.

Complaints will be reviewed by GRM focal persons that will comprise the Project Manager, the Social Specialist, Human Resource Officers for contractors, and worker/supplier representatives. The team will review the complaints and provide guidance on the course of action and ensure follow-up on previous complaints.

Complaints regarding GBV/SEA/SH will be kept confidential. The name of the complainant will not be recorded, with only their age and gender, and whether a project worker was involved, being registered. If the complaint cannot be adequately addressed

at this level, the case will be referred to GBV Service Providers to be identified by the project. All GBV/SEA/SH cases will be reported to the World Bank within 48 hours through the PIU GBV Specialist and recorded in the grievance database.

SEA/SH-related worker complaints shall not be investigated by ordinary grievance committees or discussed in open meetings. The worker GM shall record only minimum non-identifiable information, seek survivor consent before any referral, prioritize survivor safety, and promptly refer survivors to available GBV/SEA/SH service providers. Employer disciplinary or contractual processes shall be handled separately and confidentially, without requiring survivors to repeatedly recount the incident.

No disciplinary or legal action will be taken against anyone raising a complaint in good faith. Retaliation against workers who raise grievances, report unsafe conditions, refuse unsafe work in good faith, or report SEA/SH, discrimination, harassment, child labour, forced labour or OHS concerns is prohibited. Contractors shall inform workers of this protection and shall discipline supervisors or staff who retaliate against complainants or witnesses.

The labour laws provide for legal appeals process that can be utilized by any aggrieved staff if they consider the process established by the project to be ineffective and/or unfair.

11. Contractor Management

Contractors shall be selected according to the criteria set in the bidding documents. The World Bank Procurement Guidelines shall include Occupational Health and Safety requirements based on the Environmental and Social Commitment Plan (ESCP) and Environmental and Social Commitment Framework (ESMF) requirements.

The Supervising Consultant shall supervise contractor works to determine adherence to standards, specifications and compliance with rules and regulations. Remuneration for workers shall be guided by the local labour laws and terms and conditions will be made known to workers before commencement of work. Performance of contractors shall be evaluated during project inspections by the PIU. The contractor will be required to also include records of workers, number of workers, code of conduct, as well trainings held and training dates. Sub-contractors will have to adhere to all the labour guidelines under the Project.

The selection process for contractors shall be guided by the tender evaluation criteria that shall include contractor's eligibility and value of works, and these shall be selected via the evaluation of bids. The following shall apply:

i. The Contractor shall develop and implement site specific Labour Management Plans;

ii. The Contractor shall adhere to all codes of conduct (employment, labour, SEAH/SH, etc.);
iii. The Contractor shall ensure that all workers brought on site are recruited fairly, accorded equal opportunity, and not discriminated against;
iv. The Contractor shall ensure that all personnel i.e. workers and suppliers that will be on site follow all laid down occupational health and safety, and site security requirements;
v. The Contractor shall ensure that all workers shall have signed contracts for their period of work on the Project;
vi. The Contractor shall conduct regular toolbox / safety circle talks, training and capacity building with their workers;
vii. The Contractor shall develop and implement a Grievance Redress process for workers;
viii. The Contractor shall allow the workers to have freedom to join worker association groups for collective bargaining;
ix. The Supervising Consultant shall ensure that contractors are inducted adhering to ZESCO standards and this Labour Management Procedure. The PIU will provide oversight in this regard;
x. Daily monitoring of the Contractor shall be done by the Supervising Consultant, who will avail monthly reports to the PIU; and
xi. The PIU shall conduct monthly site visits, with subsequent reporting.

The Conditions of Contract for each Contractor shall include the right to terminate the contract if the Contractor fails, within the reasonable time given, to comply with any notice to correct related non-compliance with the national labour laws, OHS laws and regulations, and provisions of this LMP. Contractor performance shall be monitored through daily supervision by the Supervising Consultant, monthly contractor ESHS reports, PIU site visits, worker interviews, review of wage and contract records, incident logs and grievance records. Persistent non-compliance may result in corrective action requirements, withholding of payments, suspension of works, removal of personnel, or termination in accordance with the contract.

Bidding documents and contracts shall include ESS2, ESS4 and LMP requirements, including contractor ESHS staffing, OHS Plans, site-specific Labour Management Plans, worker GM, Codes of Conduct, SEA/SH provisions, age verification, subcontractor management, primary supplier screening, monthly reporting and incident notification. No contractor shall mobilize workers to site until the relevant C-ESMP, OHS Plan, Labour Management Plan, worker GM arrangements and Codes of Conduct have been reviewed and approved by ZESCO and the Supervising Consultant.

12. Primary Supply Workers

The implementation of the ZAMA will engage primary supply workers in activities involving construction and reinforcement of transmission lines and substations within Zambia including professional expertise, IT, communication equipment to mention a few. The Project will ensure adherence to ESS2 and ESS4 requirements and national labor laws through formal labor contracts.

All the requirements of this LMP shall apply to all primary supply workers on site, including the following, as indicated in this procedure related to:

i. Code of conduct related to labour conditions;
ii. Site security and occupational health and safety;
iii. Prevention of child labour or forced labour;
iv. Sexual Exploitation and Abuse, Sexual Harassment and Gender Based Violence; and
v. Discrimination, inappropriate treatment, or harassment.

ZESCO through the PIU will identify potential risks of child labour, forced labour and serious safety issues which may arise in relation to primary suppliers. Additionally, where there is a significant risk of serious safety issues related to primary supply workers, the PIU will require the relevant primary supplier to introduce procedures and mitigation measures to address such safety issues. Such procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness. The ability of ZESCO through the PIU to address these risks will depend upon the level of control or influence over its primary suppliers. Where remedy is not possible, the PIU will, within a reasonable period, shift the project's primary suppliers to those that can demonstrate ability to meet relevant requirements of this LMP.

Where significant risks are identified among primary suppliers, the contractor shall require corrective actions within an agreed timeframe and shall report progress to the PIU. If the supplier fails to implement corrective actions or if remedy is not feasible, the contractor shall replace the supplier with one that can demonstrate compliance with ESS2, ESS4 and national labour and OHS requirements.

Primary suppliers of key materials and services, including steel, cement, aggregates, fuel, lubricants, electrical equipment, transport and other inputs required for transmission line and substation works, shall be screened for legal compliance, child labour, forced labour, serious safety risks and material E&S non-compliance. Supplier contracts shall include labour, OHS and SEA/SH requirements proportionate to the risks and shall allow ZESCO or the contractor to request evidence of compliance.

Annex 1: Sample Complaint Form

Note: This form shall not be used to record detailed SEA/SH allegations unless the survivor explicitly chooses to use it. SEA/SH complaints shall be received through confidential channels, recorded without personally identifiable information in the general grievance log, and handled in accordance with survivor-centred referral procedures.

	ZAMBIA - MALAWI INTERCONNECTOR PROJECT **WORKER GRIEVANCE/COMPLAINT FORM**	
Section 1: Complaint		
1. Which Project site/area do you work from? (Please include Site/Province/District name)		
2. Where do you live? (within the project area / away from the project area / state location)		
3. What grievance / complaint do you have over the ZAMA project? Please describe in as much detail as possible. (When did this occur? Who was involved? What occurred and where?		
4. Is this a repeated grievance / complaint? (If yes, please provide details of how often this has occurred)		
5. What would be your desired remedy or solution to this grievance / complaint?		
6. Have you previously reported your grievance / complaint to ZAMA PIU / Supervisor / Supervising Engineer? (If yes, please provide the details about those communications and explain why you may have not been satisfied with the action in response)		

7. If known, please list the operational procedures you believe have been violated by the ZAMA as you as a worker
8. Do you expect any form of retaliation or threats for filing this complaint?
Section 2: Contact Information
9. Are you filing an individual submission or representing a worker?
Individual: ☐ Representing a worker ☐
10. Submitter's Name & contact information
Name: Address: Email: Phone:
11. Would you like your name and contact details to be kept confidential? (ZAMA will not disclose your identities to anyone without your prior consent)
Yes ☐ No ☐
12. I, the undersigned, request the ZAMA to investigate the issues described above
Name: Date: Signature/Thumbprint NOTES: Please attach supporting documents, if available.
Section 3: Official Use Only Grievance ID Number: Recorded by: Date: Place/method grievance/complaint was received:

Annex 2: Workers and employer's responsibilities

RESPONSIBLE ENTITY	RESPONSIBILITIES	KEY ACTIVITIES	MEASURES OF ACCOUNTABILITY
Project Director or equivalent	Setting of business level OHS objectives and targets	Develop and monitor implementation of business level OHS objectives and targets	Business level performance reports
Site Manager or equivalent	Coordinate all activities including those of contractors to ensure compliance to HSMP	Implementing business level OHS objectives and targets	Site level HSMP performance reports
Human Resource/Admin Manager or equivalent	Ensure human resource has the competences to enhance OHS	Identify required OHS competences by conducting training needs assessment	HR reports reflecting improved OHS competences among staff
Procurement Manager or equivalent	Ensure goods and services procured meet HSMP provisions	Liaise with H&S Manager and end users to determine OHS specs of required goods and services	Procurement plans bearing OHS specs relating to goods and services
Health and Safety Manager or equivalent	• Ensure compliance with regulations and HSMP provisions • Monitor HSMP performance	• Carry out OHS inspections, trainings. • Communicate OHS information	Risk assessment, inspection, training and induction reports
Workers	• Comply with all OHS measures on site • Report any near misses or incidents and accidents • Report any unsafe working practices	• Worker OHS compliance	Employee working practices