LABOR MANAGEMENT PROCEDURES (LMP)  
PRIVATE INVESTMENT AND DIGITAL ENTREPRENEURSHIP PROJECT (PRIDE)  
BANGLADESH HI-TECH PARK AUTHORITY (BHTPA)

EXECUTIVE SUMMARY

The Labour Management Procedure (LMP) for BHTPA, PRIDE Project has been prepared to meet the objectives and requirements of ESS 2 and ESS 4 as well as the national Labor Law. This LMP assesses the potential risks and impacts of assignment of labor for the implementation of Component 4 of PRIDE Project by BHTPA and addresses them through mitigation measures in light of ESS and Labor policies and provisions.

Various types of workers (Direct, Contracted, and Primary Supply workers), their estimated numbers, characteristics etc. have been set out in this LMP. Key potential environmental and social risks—such as unscrupulous labor practices, OHS, community risks, waste generation, risk of GBV, exploitation of child and forced labor have been identified. Given the size of the project, the potential Environmental and Social (ES) risks and impacts, the capacity of the implementing agency to manage and mitigate the ES risks and the context under which the project is being implemented, the ES assessment has set the project risk classification as HIGH.

Provisions of ESS, Labor Act 2006 (including Amendments of 2013 and 2018), National Child Labor Elimination Policy 2010 etc have been thoroughly studied and cited to meet their requirement and obligations. Major points of consideration that include Conditions of Employment, OHS, Child/Forced Labor etc have also been referred as guidelines.

A Grievance Redress Mechanism (GRM) for labor has been worked out so that any potential dissatisfaction, concerns, notice can be raised by anyone employed by the contractor. For the Implementing Agency, a Contractor Management guideline has also been appended so that selection, retention, monitoring and guiding the contractor in its meeting of the ES requirement can be done in accordance with the ESS and national laws/acts.

This LMP will form a part of the General Specification of Contract of the bidding documents. The preparation and implementation of site specific Labor Management Plan by the Contractor will be incorporated in the Bill of Quantities (BoQ) as a component of the general items of bidding document.
INTRODUCTION
The PDO of the PRIDE Project is to promote private investment and job creation in economic zones and software technology parks in an environmentally sustainable manner. The Project’s four components finance BEZA (Component 1-3) and BHTPA (Component 4) to provide access for investment in few specific zones under Bangabandhu Sheikh Muzib Shilpa Nagar (BSMSN) in Mirsarasi (BEZA) and strengthen the digital entrepreneurship and innovation ecosystem by constructing an extension of existing Janta Tower at Karwan Bazar to provide an additional 125,000 sft working space, providing start-up and scale-up facilities and services in Software Technology Parks (STPs) and introducing entrepreneurship and innovation hubs in some of Bangladesh’s leading technological universities and business schools (BHTPA). This Labor Management Procedure (LMP) addresses the risks and impacts of labor engagement for Component 4 of the Project under BHTPA. The LMP sets out the Project’s approach to meeting national requirements as well as the World Bank’s (WB) Environmental and Social Framework (ESF), specifically Environmental and Socials Standard 2: Labor and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4).

The environmental and social assessments for PRIDE have assessed that the social risk associated with the Project to be HIGH meaning there are potentially significant risk and impacts associated with labor engagement. It also illustrates how labor engagement may give rise to Occupational and Health (OHS) concerns, concerns with engagement of forced and child labor, exploitive use of labor, discrimination against female, vulnerable and disadvantage people, non-compliance with related laws and policies, possible rise in Gender-based Violence (GBV) cases. The resultant Environmental and Social Management Plan (ESMP) provides risk and impact mitigation measures including indication of managing labor issues. This LMP is living document and will be updated as and when labor conditions are altered for project activities under Component 4.

1. OVERVIEW OF LABOR USE ON THE PROJECT
The LMP applies in to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The LMP is applicable, as per ESS2 to the Project in the following manner:

a. **Direct Workers.** People employed or engaged directly by BHTPA (Implementing Agency, IA) or the Project Management Unit (PMU) on its behalf to work specifically in relation to the Project;

b. **Contracted Workers.** People employed or engaged by contractors to perform work related to core function i.e construction of Janata Tower 2, setting up of incubation center and startup facilities (Construction/ Civil Work, HVAC, MEP, IT and communication setup etc) of the project, regardless of location;

c. **Primary Supply Workers.** People employed or engaged by project’s primary suppliers of goods and materials for its core function (Construction material, MEP and HVAC equipment and machineries, IT equipment etc).

The project will not engage community labor or security forces. However while employing security personnel, the Borrower will (i) make reasonable inquiries to verify that the security personnel employed by the Borrower to provide security are not implicated in past abuses; (ii) train them adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities; and (iii) require them to act within the applicable law and any requirements set out in the ESCP. The employment of the security personnel will be according to the provisions of ESS 5.
Government civil servants, who may provide support to the Project, will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement.

**Project Management Unit (PMU)**

BHTPA has established a Project Management Unit (PMU) to oversee the Project. PMU will engage, throughout the Project the following personnel:

- Project Director (BHTPA Staff)
- Procurement Specialist (Direct Worker)
- Environment Specialist (Direct Worker)
- Financial Management Specialist (Direct Worker)

Besides, few other staffs (BHTPA and Direct) may be needed during Project implementation. However, BHTPA has a number of existing staffs who are expected to provide support to the Project.

**Worker for Construction of Expansion of Janata Tower (Janata 2) (Contracted Workers)**

An expansion unit of existing Janata Tower (Janata 1) will be constructed in an adjoining land to provide an additional 125,000 sft of working space for micro and small digital enterprises in the heart of Dhaka. According to prior experience it is estimated that around **500 workers** are required to construct the extension though the specific number is subject to discussion. The labor requirement will form part of the Request for Proposal (RfP). The works may include several contracts, exact procurement approach is yet to be determined. The following labor requirement is estimated at appraisal:

- **Civil Contractor (420):**
  - 8 Professionals (Engineers, Architects, Procurement, Finance etc)
  - 10 Supervisors
  - Approximately 400 manual labors

- **Mechanical, Electrical and Plumbing (MEP) including Heating, Ventilation and AC (HVAC) Contractor (80):**
  - 4 Professionals (Engineers etc)
  - 8 Supervisors
  - Approximately 60 manual labors

**Workers for Provision of Startup Facilities at STPs and Innovation Hubs at Universities.** The locations of such Project activities are yet to be known. However, these will entail minimum construction activities and it is likely that the existing floors of STPs and universities will be converted into Startup facilities and Innovation hub requiring very basic internal modification, decoration and setup. Thus the labor risks and impacts of such activities are expected to be minimal and required mitigation measures may be covered by the interventions planned under the expansion of Janata Tower mentioned above.

**Timing of Labor Requirement**

The timing and sequencing of Contracted Worker requirement in terms of numbers, locations, jobs and skills will be decided with the design and approval of construction work plan. The Direct Workers will be recruited as soon as the approval of the project, especially those forming part of PMU. Since the construction will take place at the center of the city where other constructions are taking place, local labors are abundant in the area and hence no migrant contracted workers are expected to be assigned.

**Characteristics of Labor Force**
Given that the majority of Component 4 activities will revolve around construction of the extension of Janata Tower, it can be assumed that there will be mostly unskilled and semiskilled construction labors and as far as the characteristics of labor force market in Dhaka City concerned, it is not expected that the number of female workers will be very high. It is estimated that women would represent about 20 percent of the workforce, and those would likely be technical (engineering, planning, management) and/or staff working in the operation offices and camps (maids, cooks, cleaners etc.). Based on experience, it is also assumed all workers will be over 18 and would likely be of average age of 25-30 years. There will be no child or forced labor assigned for the project.

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS
As with any other construction project, following are the key labor risks that have been identified by the environmental and social assessment:

- Employment practice that are not compliant with either labor law or ESS 2. For example, not providing written documents of assignments, wages not proportionate with tasks performed or industry standards, excess workload without provision of adequate rests and leisure, lack of hygiene facilities, discrimination towards women and labor with disability, unlawful termination and withholding of benefit etc.

- Assignment of child and forced labor and use of unscrupulous labor practice

- The conduct of hazardous work, such as working at heights or in confined spaces, use of heavy machinery, or use of hazardous materials

- Lack of Occupational Health and Safety (OHS) practice and procedures

- Community health and safety issues, especially alteration of power dynamics, shifting the economic power balance, rise of communicable diseases

- Generation of solid, liquid and fecal wastes, especially around labor camps and toilet area

- Rise of incidence of Gender-Based Violence (GBV) emanating from the labors

3. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS
Terms and Conditions of employment is guided by The Bangladesh Labor Act, 2006 and Amendment 2013 that illustrate the basic conditions of employment which are materially consistent with ESS 2. The Act makes it mandatory for employers to furnish employees with written particulars of employment stating, hours of work, wages, leave entitlements, job description, grievance procedure, benefits if any etc. This Act also contains:

- Contracts of employment
- Leave entitlements, i.e. annual leave, sick leave, maternity leave and compassionate leave
- The protection of wages (prohibition against unlawful deductions)
- Retrenchment procedures
- Fair and unfair reasons for termination of employment
- Grievance mechanism
4. **BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY**

Chapter 6 of The Bangladesh Labor Act 2006 (*Safety*) specifically details the safety and working condition of the assigned workers. The salient aspects that this chapter illustrates are:

- **Safety of building and machinery.** It details the inspection requirement of these installations and actions to be taken if these are found unsafe for workers.
- **Precautions as to fire.** Illustrates fire safety requirement, equipment needed as well as actions to be taken in case of fire.
- **Fencing of machinery, machinery in motion, automatic machines.** Details the fencing and safety requirement to be set around dangerous machinery.
- **Floors, Stairs and Passages.** Sets out the construction and setup requirement for safe access and ease of use.
- **Excessive weights.** Illustrates that no excessive weights to be lifted by any worker.
- **Dangerous fumes and explosive and flammable gas.** Details courses of action in case dangerous and explosive gases and fumes are in work area.
- **Personal protective equipment (PPE).** Makes it mandatory to supply workers with PPE.

Chapter 7 of the same Act (*Special Provision Relating to Health, Hygiene and Safety*) details:

- **Dangerous operations.** All potential dangerous operations to be declared and women and children to be barred from such operations.
- **Notice on accident.** Makes it mandatory to report any accident in workplace.
- **Notice on diseases.** If any worker is infected with any disease listed in the Second Schedule of the Act, it is mandatory to notify and the employer is obligated to treat the worker.
- **Restriction to Employ Women Worker.** Lists specific assignments where women may not be employed.

5. **RESPONSIBLE STAFF AND PROCEDURE**

Various aspects of the responsibility with respect to worker management have been described in details in the ESMP. The summary of responsibility is appended below:

**Overall Management.** The PMU has the overall responsibility to oversee all aspects of the implementation of the LMP, in particular to ensure contractor compliance. PMU will address all LMP aspects as part of procurement for works as well as during contractor induction. The contractor is subsequently responsible for management in accordance with contract specific *Labor Management Plans*, implementation of which will be supervised by the PMU. The Contractor will be required to write, adopt and implement a written Labour Management Plan as part of the bidding document and contract before employing any labor in the work.

**Occupational Health and Safety (OHS).** Contractors must engage a minimum of one safety representative/ officer. He/she will ensure the day-to-day compliance with specified safety measures and records of any incidents. Minor incidents are reported to PMU on a monthly basis, serious incidents are reported immediately. Minor incidents are reflected in the quarterly reports to the WB, major issues are flagged to the WB immediately.

**Labor and Working Conditions.** Contractors will keep records in accordance with specifications set out
in this LMP. PMU may at any time require records to ensure that labor conditions are met. PMU will review records against actuals at a minimum on a monthly basis and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the WB.

**Worker Grievances.** A Grievance Redress Mechanism (GRM) has been detailed with this LMP including the setup of a Grievance Redress Committee (GRC). Contractors will be required to abide by the provisions of the GRM. The Social Specialist/Consultant will review records on a monthly basis. PMU will keep abreast of resolutions and reflect in quarterly reports to the World Bank. Given the anticipated number of the project workers the labor GRM will be a separate document apart from the Project level GRM, though personnel in the committees (GRC) on both the GRMs may have overlapping functions. Reporting Channels for the GRMs may also be same.

**GBV, waste management, communicable diseases.** Contractor will be fully responsible to ensure that their workers know and are trained on their obligations with respect to avoidance of any form of GBV, safe disposal of wastes and reporting of communicable diseases if they contract any. Continuous motivation, monitoring and reporting on the same is the responsibility of the Contractor. The PMU will have a monitoring team to ensure the same.

**Additional Training.** Contractors are required to ensure that the assigned workers are adequately trained and briefed with overall safety arrangement, use of equipment, GRM procedure, working conditions of the project. Training on GBV and preparation and obtaining signed code of conduct are also Contractor’s responsibility.

### 6. POLICIES AND PROCEDURES

This section outlines main policies and procedures to be followed during the implementation of the project and will be updated and amended as needed, after contracts have been awarded. Bangladesh has in place the **Bangladesh Labor Act 2006 and Amendment 2013, National Occupational Health and Safety Policy 2013** that illustrates rights and responsibilities of employers and workers, conditions of employment, child and force labor issues, OHS requirements etc. In line with this LMP and National Labors Acts, the Contractor will prepare **Labor Management Plan.** The principles and procedures presented below represent minimum requirements, but are not an exhaustive list of requirements.

As specified in the Labor Act and ESS 2 of WB ESF, the employment of project workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination with respect to any aspects of the employment relationship, such as recruitment, compensation, working conditions and terms of employment, access to training, promotion or termination of employment. The following measures will be developed by the contractors and monitored by PMU to ensure fair treatment of all employees:

- As per Labor Code requirements, recruitment procedures will be transparent, public and non-discriminatory with respect to ethnicity, religion, sexual orientation, disability, gender, and other grounds included in the Labor Code
- Applications for employment will be considered in accordance with the application procedures established by the Contractor.
- Clear job descriptions will be provided in advance of recruitment and will explain the skills
LABOR MANAGEMENT PROCEDURES (LMP): PRIDE, BHTPA

required for each post

• All workers will have written contracts describing terms and conditions of work and will have the contents explained to them. Workers will sign the employment contract. Terms and conditions of employment will be available at work sites

• Unskilled labor will be preferentially recruited from the affected communities and local areas

• Employees will be informed at least two months before their expected release date of the coming termination. If more than 50 workers will be terminated within any three month period, the Contractor will prepare a retrenchment plan for review and approval by the PMU

• The contracted workers will not pay any hiring fees. If any hiring fees are to be incurred, these will be paid by the Contractor

• The labor contracts will be developed in Bangla so as to be understandable by all workers

• In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulties with understanding the documentation

• While communicating with women workers, it is to be ensured that they understand their rights and process of raising issues and grievances related to their employment

• PMU will include in contracts that all labors must be of the age of 18 years or more and that no forced or child labor would be allowed

The health and safety procedure illustrated in the Labor Acts, WB Environmental and Health Safety Guidelines (EHSG) (General and Infrastructure) and ESS 2 will be referenced all activities under PRIDE Project (Component 4) implementation. PMU is expected to carry out field visits and inspections of the construction from time to time.

PMU will include into the bidding documents specific OHS standard requirements that all contractors will meet under this project. The standards will be consistent with local regulations, WBG EHS guidelines and Good International and Industry Practices (GIIP). The following OHS standard requirements should as a minimum be included in the OHS Plan to be prepared by the contractors:

• Risk Assessment Procedure;

• Work permitting for hazardous work (working at heights, hot work, work on energized lines, work within confined spaces);

• Rules for life threatening works;

• Emergency response procedure;

• Fall prevention and working at heights;

• Excavations safety, Ladders and scaffolding safety; welding and cutting safety; Cranes, Derricks, and forklifts safety; power and hand tools safety;

• Respiratory prevention to chemical and airborne hazards (including dust, silica and asbestos); Electrical safety (hazardous energies control, safe distance work, wiring and design protection, grounding, circuit protection, arc fault protection, Electrical safety, PPE and dielectric tools); hazards communication; Noise and vibration safety; Steel erection safety; fire safety; material handling safety; concrete and masonry safety;

• Construction PPE;

• OHS training;

In addition, OHS plans also include OHS accountability matrix for all staffs including its Project manager, contract manager, OHS staff, foremen, and all employees with clear roles and OHS responsibilities. All Contractors must have its own OHS staff that will be responsible for the implementation and supervision of the OHS program. Contractors will provide a safe workplace, therefore a risk assessment will be completed before the commencement of any construction activities, and safety measures will be
implemented in accordance with applicable safety standards. PPEs and other preventive measures will be provided at no cost for employees. All employees will strictly follow rules for life threatening works (OHS rules that cannot be broken in any circumstances), which will be enforced under contractual matrix of consequences. Monthly OHS meetings will be conducted to discuss preventive measures, deviations and non-compliances, accidents and corrective actions. Contractors will conduct internal OHS surveys and audits to verify compliance of OHS practices. Non-compliances will be documented and reported internally. A time frame for a corrective action will be set and followed up. Daily OHS briefings will be conducted before the commencement of the works highlighting the hazards and preventive measures from each job. Contractors will document and report to PMU all accidents and illness with a day lost or more, fatalities or serious injuries that may happen at work site. There must be on site resources for first aid and for more serious injuries there must be a pre-approved health facility for medical treatment, as well as appropriate transportation of injured workers. Contractors will control the access to the construction site only to authorized people and verify if workers are meeting training and capacity requirements to carry out their jobs. All workers must complete at minimum an OHS induction to have access to the construction site.

If accommodations are provided for workers, the Contractor will ensure that they are provided in good hygiene standards, with fresh drinking water, clean beds, restrooms and showers, clean bedrooms, good illumination, lockers, proper ventilation, safe electrical installation, fire and lightening protection, separate cooking and eating areas. There will be separate facilities provided for men and women.

PMU will conduct periodic supervision of Contractor’s OHS performance, including site visits, at least monthly. These supervisions will cover compliance with above mentioned standards, accidents, violations of rules, recommendations, and progress of ongoing corrective actions. PMU will include in the contract(s) as requirement for Contractor’s to report on issues such as number of accidents rates, severity rates, number of recurring non-compliances, violations of rules, fatalities and serious injuries; and penalties for non-completion.

PMU will review and approve contractors’ safety plans and procedures.

PMU will inform WB promptly about 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 (labor, health and safety, or security incident, accident or circumstance) as soon as reasonably practicable. Such events can include strikes or other labor protests, serious worker injuries or fatalities, project-caused injuries to community members or property damage. PMU will prepare a report on the event and the corrective action and submit to WB within 30 calendar days of the event.

The Contractor will develop and implement Code of Conduct (CoC). The CoC will reflect the Contractors’ core values and overall working culture. This will include provisions relating to GBV, waste management and disease prevention and work ethics. CoC will have to be understood and signed by all workers. The content of the CoC will be included in the Standard Bidding Documents (SBD).

The Contractor will be required to provide the periodic information on the performance in terms of labor, OHS issues. The information will be included in the Contractor’s monthly report and will be reviewed by PMU.

7. AGE OF EMPLOYMENT

Chapter III of Bangladesh Labor Act 2006 describes provisions related to Employment of Adolescent Worker. It details the restrictions of using child labor, where adolescent labors (age between 14 and 18,
under **Definition number 8**, Chapter I, Labor Act 2006) can be used, fitness requirements, verification of age, reference to list of hazardous work not to be performed by adolescent workers, daily and weekly working hour restrictions, time of work, need for medical certificate etc. **National Child Labor Elimination Policy 2010** also details the age of child (**under 14 years**) and adolescent (**age 14-18**), adolescent employment principles, their health and safety issues etc. Contractors and the monitoring PMU officials is obliged to abide by the requirements of Chapter III of the Labor Act 2006. As per the Labor Act 2018 and ESF 5, no one below the age of 14 (minimum age) will be employed as a labor. A child over the minimum age (14) and under the age of 18 may be employed or engaged in connection with the project only if the work is not likely to be hazardous or interfere with the child’s education or be harmful to the child’s health or physical, mental, spiritual, moral or social development; an appropriate risk assessment is conducted prior to the work commencing; and the Borrower conducts regular monitoring of health, working conditions, hours of work and the other requirement of ESS5.

If a child under the minimum age is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child.

**8. TERMS AND CONDITIONS**

The terms and conditions of employment in Bangladesh are governed by the provisions of Bangladesh Labor Act 2006, Labor Law (Amendment) 2013, Bangladesh Child Labor Elimination Policy 2010.

**Chapter II** of the Labor Act 2006 (Conditions of Employment and Service) makes it mandatory to provide workers with Appointment Letter, Identity Card and a Service Book (**Act 5 and 6**). A registers of workers including details of all workers engaged also is mandatory to be maintained by the employer (**Act 9**). Leave Procedures are illustrated in **Act 10**. Termination of employment is described in **Act 26** for both permanent and temporary workers.

**Chapter IX** details the working hours (**maximum 8 hours a day ordinarily, except exceptional cases and 48 hours a week**), rest hour (**1 hour for more than 6 hours of work**), overtime work (**more than 8 hours a day with twice the rate of normal working hour**), working hour for women (**no work between 10 PM to 6 AM without her consent**) and leave entitlement.

**Chapter X** of the Labor Act details wages and its calculation. **Act 123** describes the time for wage payment (the wages of a worker shall be paid before the expiry of the seventh working day following the last day of the wage period in respect of which the wages is payable). **Act 125** defines the cases where deductions may be made from wages.

**Chapter XI** of the Act (**Act 148**) makes it binding on the contractors (employers) to abide by the minimum wages rate. Contractors will also be required to comply with the most current decision of Wages Board assigned by the government. The Wage Board Order and the Labor Act specify the minimum wages, hours of work, overtime pay, leave entitilements, travelling and subsistence allowances and the issue of protective clothing.
Chapter XIII of the Act (Trade Unions and Industrial Relations) stipulates the right workers shall, without distinction whatsoever, have the right to form trade union primarily for the purpose of regulating the relations between workers and employers, or between workers and workers and, subject to the constitution of the union concerned, to join trade union of their own choice.

Upon receiving a public contract, the Contractor shall certify in writing that the wages, hour and conditions of work or persons to be employed by him on the contract are not less favorable than those contained in the most current wages regulation issued by the government recommended by the Wages Board Chairman. The employer shall maintain worker’s register which will be available for inspection during working hours for the Inspector appointed by PMU.

In ensuring full compliance with the law in this regard, the Contractor will be required to furnish PMU with copies of the Service Book or copies of contract of all its workforce. Contractors will not be allowed to deploy any employee to work in the project if such copy of employment of that employee has not been handed to PMU. The Contractor also is obliged by the law to allow workers to form trade unions subject to the provision of Labor Act 2006.

As a monitoring mechanism, a contractor shall not be entitled to any payment unless he has filed, together with his claim for payment, a certificate: - a) stating whether any wages due to employees are in arrears; b) stating that all employment conditions of the contract are being complied with. It will be a material term of the contract to allow PMU to withhold payment from contractor should the contractor not fulfill their payment obligation to their workers.

9. GRIEVANCE REDRESS MECHANISM (GRM)

The Labor Act 2006 Section 33 provides for the Formal Grievance Procedure in case a worker who has been laid-off, retrenched, discharged, dismissed, removed, or otherwise terminated from employment. Section 202 (Subsection 24) describes the responsibilities of a Collective Bargaining Agent (CBA) especially bargain with the employer in matters of the conditions of work or environment of work of the workers and conduct cases on behalf of any individual worker or a group of workers under this Act.

However, the PMU will require the Contractor to develop and implement a Grievance Redress Mechanism (GRM) for their own workforce prior to the start of design stage. The Contractor will prepare their Labor Management Plan before the start of civil works, which will also include detailed description of the workers GRM. The GRM must be well circulated and written in a language understood by all.

The workers GRM will include:
- A channel to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline that might also be anonymous;
- Stipulated timeframes to respond to grievances;
- A register to record and track the timely resolution of grievances;
- A responsible section/wing/committee to receive, record and track resolution of grievances.

The GRM will be described in workers induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:
- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially.
Anonymous grievances will be treated equally as other grievances, whose origin is known.

Management will treat grievances seriously and take timely and appropriate action in response. Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of “suggestion/complaint boxes”, and other means as needed.

The Project workers’ grievance mechanism will not prevent workers to use conciliation procedure provided in the Labor Act 2006.

A PMU representative will monitor the Contractors’ recording and resolution of grievances, and report these to PMU in their monthly progress reports. The process will be monitored by the GRM Focal Point of PMU (preferably the Social Consultant).

10. CONTRACTOR MANAGEMENT
As part of the process to select construction Contractor who will employ contracted workers, the PMU will review the following information:

- Information in public records, for example, corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies;
- Business licenses, registrations, permits, and approvals;
- Documents relating to a labor management system, including OHS issues, for example, labor management procedures;
- Identification of labor management, safety, and health personnel, their qualifications, and certifications;
- Workers’ certifications/permits/training to perform required work;
- Records of safety and health violations, and responses; recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth);
- Accident and fatality records and notifications to authorities;
- Records of legally required worker benefits and proof of workers’ enrollment in the related programs;
- Worker payroll records, including hours worked and pay received;
- Identification of safety committee members and records of meetings; and
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting materially consistent with ESS2.

The contracts with selected Contractor will include provisions related to labor and occupational health and safety, as provided in the World Bank Standard Procurement Document (SPD) and Bangladesh Labor Act 2006. The bid document will make it mandatory for the contractors to annex a Contractor’s ESMP (C-ESMP) which will include work program, Code of Conduct, Traffic Management Plan, Labor Influx Management Plans, among others.
The PMU will manage and monitor the performance of the Contractor in relation to contracted workers, focusing on compliance by contractors with their contractual agreements (obligations, representations, and warranties). This may include periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by contractors. Contractors’ labor management records and reports may include: (a) a representative sample of employment contracts or arrangements between third parties and contracted workers; (b) records relating to grievances received and their resolution; (c) reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions; (d) records relating to incidents of non-compliance with national law; and (e) records of training provided for contracted workers to explain labor and working conditions and OHS for the project.

11. COMMUNITY WORKERS
The project is unlikely to engage any Community Workers.

12. PRIMARY SUPPLY WORKERS
The primary suppliers for the project will mainly be construction material (brick, cement, rods etc) suppliers, Electrical and Sanitary Equipment suppliers, HVAC equipment (AC, Ventilation etc), IT and communication Equipment suppliers etc.

Manufacturers of Electrical, Mechanical and Plumbing (MEP), HVAC and IT / Communication equipment industries are not known to involve significant risks of child labor and forced labor. It is expected, that these primary suppliers will be large scale international companies.

In case of construction material suppliers, Contractors shall be required to carry out due diligence procedure to identify if there are significant risks that the suppliers are exploiting child or forced labor or exposing worker to serious safety issues. In instances where foreign suppliers are likely to be contracted, the Contractor will be required to inquire during his/her procurement process whether the supplier has been accused or sanctioned for any of these issues and also their corporate requirements related to child labor, forced labor, and safety. If there are any risks related to child and forced labor, and safety identified, the Contractor will notify PMU and will address these risks and may avoid such suppliers, where possible.