

Council for Development and Reconstruction Lebanon Emergency Assistance Project (P509428)

LABOR MANAGEMENT PROCEDURES (LMP)

June 02, 2026

Issue and Revision History

Revision	Date	Remarks
0	21.05.2026	Draft Labor Management Plan
1	02.06.2026	Final Labor Management Plan

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Abbreviations and Acronyms

Abbreviation	Full Term
ACM	Asbestos-Containing Materials
C-ESMP	Contractor Environmental and Social Management Plan
CDR	Council for Development and Reconstruction
EHSGs	Environmental, Health and Safety Guidelines
ERW	Explosive Remnants of War
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESMP	Environmental and Social Management Plan
ESS2	Environmental and Social Standard 2
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
LAF	Lebanese Armed Forces
LEAP	Lebanon Emergency Assistance Project
LMAC	Lebanon Mine Action Center
LMP	Labor Management Procedures
MoE	Ministry of Environment
OHS	Occupational Health and Safety
PDO	Project Development Objective
PMU	Project Management Unit
POM	Project Operational Manual
PPE	Personal Protective Equipment
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
TSS	Temporary Storage Site
UXO	Unexploded Ordnance
WBG	World Bank Group

1. Project Description and Background

The Lebanon Emergency Assistance Project (LEAP) is being implemented in response to the widespread damage caused by the 2023–2024 conflict in Lebanon, which resulted in significant destruction of infrastructure, disruption of essential services, and large-scale debris accumulation across affected areas.

According to the World Bank’s Rapid Damage and Needs Assessment, the conflict resulted in approximately US\$6.8 billion in physical damages and US\$7.2 billion in economic losses, with total recovery and reconstruction needs estimated at US\$11 billion¹. The impacts have been particularly severe in the housing, infrastructure, and environment and debris management sectors, alongside a displacement crisis that affected up to 900,000 people at its peak.

The scale of debris and hazardous waste generated by the conflict presents a critical challenge. It is estimated that approximately 16.9 million tons of debris, including hazardous materials, require safe removal, management, and disposal. Lessons from previous conflicts have demonstrated that inadequate debris management can result in significant environmental and public health risks, including unsafe disposal practices and long-term ecosystem damage.

In addition to debris-related challenges, the conflict has severely affected key sectors including energy, water, transport, health, and education, leading to disruptions in essential service delivery and increased pressure on already fragile systems.

The Project Development Objective (PDO) is to enable sustainable recovery and restore lifeline services and critical infrastructure in conflict-affected areas of Lebanon.

To achieve this objective, LEAP adopts a phased approach encompassing immediate response, rapid recovery, and long-term reconstruction. Project activities include debris and rubble management, rehabilitation and repair of critical infrastructure, restoration of essential services, and preparation of reconstruction investments.

Project implementation involves multiple stakeholders, including the Council for Development and Reconstruction (CDR) as the implementing entity, with oversight from the Ministry of Public Works and Transport and coordination with relevant line ministries and agencies.

Given the nature of project activities, particularly those involving debris management, civil works, and infrastructure rehabilitation, the Project is expected to engage a diverse workforce and expose workers to a range of labor and occupational health and safety risks. These include risks associated with hazardous materials, heavy machinery, unstable environments, and work in post-conflict settings, including the potential presence of explosive remnants of war (ERW).

¹ World Bank, *Rapid Damage and Needs Assessment (RDNA) for Lebanon, 2024*.

<https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099030125012526525>

In this context, these Labor Management Procedures (LMP) establish a comprehensive framework for managing labor and working conditions throughout the project lifecycle in alignment with the World Bank Environmental and Social Standard 2 (ESS2). They aim to identify the different categories of project workers and associated labor risks, define clear procedures for effective labor management, ensure compliance with applicable national labor laws and ESS2 requirements, and promote safe, fair, and non-discriminatory working conditions.

The LMP is a living document that will be reviewed and updated annually, or following any significant change in project scope, workforce composition, or identified risks, and at least once before the mobilization of major civil works contractors.

2. Overview of Labor Use on The Project

2.1 Number of Project Workers

The exact number of project workers to be engaged under the Project is not yet fully determined and will depend on the final scope, geographic coverage, and sequencing of subprojects. Given the evolving post-conflict context in Lebanon, including the potential identification of additional damaged roads and infrastructure, workforce requirements are expected to increase and be adjusted over time.

Based on the current scope of activities described in the Project Operational Manual (POM), Environmental and Social Commitment Plan (ESCP), Stakeholder Engagement Plan (SEP), and site-specific ESMP Checklists, the Project is expected to engage the following categories of workers:

- **Direct workers:** staff of the Project Management Unit (PMU) within the Council for Development and Reconstruction (CDR), including civil servants and consultants.
- **Contracted workers:** workers employed by contractors, subcontractors, and supervision consultants carrying out core project activities (e.g., debris removal, road clearing, stabilization works and supervision).
- **Primary supply workers:** workers employed by suppliers providing essential materials such as aggregates, fuel, and equipment.
- **Community workers:** Community workers are not currently anticipated under the Project; however, their engagement could be considered as a means to enhance local recruitment and support community participation, particularly for low-skilled or labor-intensive activities where appropriate. Should community workers be involved, their participation would need to be clearly defined based on fair compensation arrangements, and fully aligned with the requirements of the World Bank ESS2. This would include ensuring safe working conditions, clear terms of engagement, non-discrimination, and access to the project's grievance mechanism. Any use of community labor would also require proper documentation, prior assessment of associated risks, and implementation of adequate supervision and occupational health and safety measures.

While precise numbers are not available at this stage, indicative estimates based on similar World Bank-financed emergency infrastructure and debris management projects suggest:

- Direct workers: 20-30
- Contracted workers: several hundred, potentially exceeding 1,000 at peak implementation
- Primary supply workers: limited and variable, depending on supply chains

These estimates will be updated as subprojects are finalized, procurement progresses, and contractors are mobilized.

2.2 Characteristics of Project Workers

2.2.1 General Characteristics

Project workers are expected to include:

- Nationality: Local Lebanese workers; Syrian workers (or others) Refugees and migrants especially in unskilled and semi-skilled roles, others (promoting workers recruitment from affected municipalities).
- Gender: predominantly male workforce particularly in construction and debris management activities and Participation of female workers mainly in administrative, supervisory, or support roles.
- Age: all workers will be above the age of 18, in compliance with Lebanese Labor Law (Decree No. 8987) and ESS2 requirements.
- Skills: skilled, semi-skilled, unskilled workforce.

2.2.2 Skills Composition

Based on the ESMP and nature of works, the workforce will include:

- **Skilled workers:** engineers, site supervisors, foremen, machine operators, E&S specialists, OHS specialists and road safety specialists.
- **Semi-skilled workers:** drivers, technicians, equipment handlers, banksmen and flagmen.
- **Unskilled workers:** laborers for debris clearing, loading, and manual support

2.2.3 Employment Types

The Project workforce will include:

- Full-time and part-time workers
- Fixed-term and temporary workers (particularly under civil works contracts)
- Casual labor (especially for debris handling and short-term activities)
- Civil servants, assigned to the PMU (without change to their employment status)

- Workers engaged through contractors and subcontractors, and potentially through intermediaries, particularly for unskilled labor

2.2.4 Civil Servants

Civil servants assigned to work on project-related activities, regardless of whether they work full time or part time, will continue to work under the terms and conditions of their existing contracts or appointments in the public sector. ESS2 provisions on occupational health and safety, and prohibition of child and forced labor shall apply to civil servants engaged in the Project.

2.3 Timing, Sequencing, and Duration of Labor Requirements

Labor requirements will vary across project phases:

- **Preparation phase:** limited number of direct workers and consultants
- **Mobilization phase:** gradual recruitment of contractors and workforce
- **Implementation phase:** peak labor demand, with multiple work fronts operating simultaneously across different locations
- **Completion phase:** gradual demobilization of contracted workers

Given the emergency nature of the Project and the evolving identification of additional works, labor deployment will be phased, flexible, and geographically dispersed.

2.4 Contracted Workers

Contracted workers are expected to constitute the largest share of the project workforce.

The Project will involve multiple contractors and subcontractors responsible for:

- Providing all necessary skilled, semi-skilled, and unskilled workers.
- Supervising their workforce and maintaining discipline and productivity.
- Complying with site safety, security, environmental, social and quality standards.
- Coordinating daily with other contractors to avoid conflicts and delays.
- Ensuring all contracted workers hold valid inductions and training on occupational health and safety (OHS), SEA/SH prevention, and workplace conduct.
- Furnishing trade-specific tools, PPE, and minor consumables.
- Reporting incidents, unsafe conditions, or non-conformances immediately.

The final contracting structure is not yet fully defined; however, based on the ESMP and POM:

- Multiple contracts are expected across different geographic areas (Cazas)
- Each contractor may deploy several teams across multiple work fronts
- Subcontracting is likely, particularly for transport, labor supply, and specialized services

There is a moderate risk of labor being recruited through intermediaries, particularly for unskilled labor. This risk will be addressed through the LMP by requiring contractors to:

- Maintain transparent labor records
- Verify worker age and identity

- Avoid exploitative recruitment practices

2.5 Migrant Workers

The Project is likely to involve migrant workers, particularly Syrian refugees (or others) residing in Lebanon, primarily in unskilled and semi-skilled roles and short-term or casual labor, as highlighted in the ESMP baseline and SEP, as well as potentially other migrant labor engaged by contractors.

Their participation reflects the local labor market structure in Lebanon, particularly in construction sectors.

Protections for migrant workers under this LMP:

- Treated in accordance with ESS2
- Access to grievance mechanisms
- Protected from discrimination, forced labor, and unsafe working conditions

Table 1 - Estimated Project Workers

Type of Workers	Description of Work Activities	Estimated Number	Worker Characteristics	Employment Relationship	Timing / Duration
Direct Workers	PMU staff (CDR), E&S specialists, OHS specialist, consultants, supervision	20-30	Mostly Lebanese; skilled; mix of civil servants and consultants	Full-time / part-time; civil servants and consultants	Throughout project implementation
Contracted Workers	Activities determined by project package. (eg. Rubble Clearance, Demolition, and Debris Management ;	Several hundred to >1,000 (depending on scope expansion)	Predominantly male; mix of local and migrant workers skilled, semi-skilled, unskilled; high exposure to hazards; including dust	Fixed-term, temporary, short-term/day labor arrangements; employed by contractors/subcontractors	Peak during implementation phase; variable across locations

	Infrastructure and Building Reconstruction and rehabilitation (Schools, Municipal Buildings, hospitals, Roads, Water, Energy, Sewage) Complying with site safety, security, environmental, social and quality standards.		and airborne particles, heavy machinery operation, demolition-related risks, manual handling injuries, vehicle and traffic movement, noise and vibration, heat stress, and potential ERW/UXO-related risks in conflict-affected areas.		
Community Workers	TBD	0	TBD	TBD	TBD
Primary Supply Workers	Supply of materials (e.g. aggregates, fuel, equipment), quarry operations	Limited / not quantified	Likely local and migrant; semi-skilled and unskilled; lower direct exposure to site hazards; including dust and airborne particles, heavy machinery operation, demolition-	Employed by suppliers; indirect relationship with project	Throughout implementation, depending on supply needs

			related risks, manual handling injuries, vehicle and traffic movement, noise and vibration, heat stress, and potential ERW/UXO-related risks in conflict-affected areas.		
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3. Assessment of Key Potential Labor Risks

3.1 Project Activities

The Project involves emergency response and recovery activities across multiple locations in Lebanon, particularly in conflict-affected areas. The following activities generate the principal labor risks for the Project:

- Debris clearing and removal from road corridors, including war-related rubble
- Excavation and stabilization of damaged road sections
- Transport and disposal of rubble to Ministry of Environment (MoE)-approved sites
- Infrastructure and Building Reconstruction and rehabilitation (Schools, Municipal Buildings, hospitals, Roads, Water, Energy, Sewage)
- Operation of heavy machinery (e.g., excavators, loaders, compactors, and trucks)
- Localized road rehabilitation and asphalt works
- Traffic management and site safety measures during works execution
- Technical assistance, supervision, and stakeholder engagement activities

These activities will be carried out simultaneously across multiple geographic locations (Cazas), often in post-conflict environments characterized by the presence of Explosive Remnants of War (ERW/UXO), damaged infrastructure, and evolving security conditions.

Component 1- Immediate Response

Activities include:

- Sorting, processing, recycling, and reuse of conflict-generated rubble and debris.

- Extraction, recovery, and handling of reusable construction materials.
- Crushing and processing of rubble for reuse as aggregates and other construction materials.
- Transportation, storage, handling, and disposal of unusable rubble and hazardous materials.
- Rehabilitation of approved disposal sites and quarry rehabilitation activities using non-recyclable rubble, where applicable.
- Securing structurally unsafe, damaged, or partially collapsed buildings.
- Temporary stabilization of cultural heritage structures and assets, where required.
- Decommissioning temporary shelters and restoration of affected public facilities to their original functions.
- Temporary restoration of access to heavily damaged areas.
- Operation of machinery, equipment, and vehicles associated with rubble management and stabilization activities.

Component 2- Rapid Recovery of Public Lifeline Services and Critical Infrastructure

Activities include:

- Repair and rehabilitation of partially damaged public infrastructure and public buildings.
- Restoration of essential public services, including education, health, water, sanitation, energy, transport, and communication infrastructure.
- Temporary provision of public lifeline services through alternative service delivery mechanisms, where required.
- Repair or replacement of damaged equipment, machinery, and service delivery assets.
- Rehabilitation of municipal and community facilities.
- Minor civil works associated with the restoration of critical infrastructure and services.
- Operation of machinery, vehicles, and equipment required for rehabilitation activities.
- Environmental and social management measures associated with recovery works.

Component 3 –Sustainable and Robust Reconstruction of Public Infrastructure and Lifeline Services

Activities include:

- Preparation of feasibility studies, technical designs, and environmental and social assessments for reconstruction investments.
- Reconstruction of severely damaged public infrastructure and public lifeline services.
- Technical, engineering, and construction supervision services.
- Activities supporting climate-resilient, disaster-resilient, and energy-efficient reconstruction.

Component 4- Project Management and Supervision

Activities include:

- Overall project coordination and management by CDR and the PMU.
- Environmental and social risk management, monitoring, and reporting.
- Procurement, financial management, and contract administration.

- Technical, engineering, and implementation support services.
 - Supervision of contractors and consultants.
 - Monitoring, evaluation, auditing, and project reporting.
 - Stakeholder engagement and grievance management activities.
- Capacity building, training, and institutional strengthening activities.

3.2 Key Labor Risks

The main labor risks identified in this Project are primarily associated with the nature of works in a post-conflict environment. These risks are further compounded by the presence of UXO/ERW, damaged infrastructure, and the use of temporary and potentially vulnerable labor.

These include:

Risk Category	Specific Risks	Affected Workers	Risk Level
UXO/ERW Exposure	Explosive remnants of war (ERW) and Unexploded Ordnance (UXO) during debris clearing, excavation, stabilization activities <i>Unstable ground may conceal unexploded ordnance; workers lack training or detection equipment.</i>	Contracted workers (all)	High
Occupational Health & Safety	Operation of heavy machinery; falling debris and unstable rubble; road traffic accidents involving construction vehicles; work in narrow and confined road environments; exposure to dust, noise, and vibration <i>Falls from unstable structures, cuts from sharp debris, crushing injuries.</i>	Contracted workers	High
Hazardous Materials	Potential exposure to hazardous materials that may be present in rubble and damaged infrastructure,	Contracted workers	High

Risk Category	Specific Risks	Affected Workers	Risk Level
	including asbestos-containing materials (ACM), silica dust, fuels, oils, lubricants, and bituminous materials.		
Working Conditions	Risk of excessive working hours, worker fatigue, inadequate rest periods, delayed wage payments, and non-compliance with labor management procedures, particularly among temporary and migrant workers.	Casual, migrant workers	Moderate
Discrimination & Exploitation	Discrimination or unequal employment opportunities against vulnerable workers; forced labor in subcontracting chains	Migrant, refugee workers	Moderate
Child Labor	Children engaged in debris handling or transport <i>Risks of child labor, particularly within subcontracting arrangements and among informal or vulnerable labor groups</i> <i>Children may be drawn to scavenge scrap metal or other materials from debris piles</i>	Vulnerable populations	Low-Moderate
Labor Influx	Social tensions with local communities; inappropriate worker behavior; pressure on local services	Local communities	Low-Moderate

Risk Category	Specific Risks	Affected Workers	Risk Level
GBV / SEA/SH	Risks of Gender-Based Violence including sexual exploitation and abuse (SEA) and sexual harassment (SH) of community members or workers	Vulnerable groups, women, children and displaced populations.	Moderate
Security Risks	Potential escalation of hostilities; work in frontline/high-risk areas	All workers	Moderate
Environmental Exposure	Heat stress, sunstroke; snakes, scorpions, wildlife	Outdoor workers	Moderate
Weak OHS Enforcement	Inconsistent PPE use; weak safety supervision and inspections; limited training	Contracted workers	Moderate-High
Grievance Access	Inadequate access to, awareness of, or trust in Grievance Mechanisms (GM) for workers. Underreporting of workplace grievances, including concerns related to working conditions, occupational health and safety, wages, and SEA/SH incidents due to fear, lack of trust, language barriers	Migrant, casual workers	Moderate

These risks are further amplified within Lebanon's post-conflict environment, where compromised infrastructure, constrained enforcement capacity, and the presence of hazardous remnants elevate the potential for incidents if not effectively controlled. Accordingly, a comprehensive Risk Assessment (RA) shall be performed for each project activity prior to initiation, with appropriate mitigation measures systematically incorporated into contractor procurement processes, site procedures, and monitoring frameworks.

Occupational Health and Safety (OHS) risks and hazardous activities shall be identified and assessed at the project level. Typical OHS risks for various project types are further detailed in the World Bank Environmental, Health and Safety (EHS) Guidelines and in Good Practice Note (GN) ESS2. This high-level assessment does not replace the requirement for a detailed, site-specific or activity/subproject risk assessment, which remains the obligation of contractors during the bidding phase and prior to the commencement of works, in accordance with ESS2 requirements.

For example, in the expected projects under LEAP, potential occupational health and safety hazards may include, but are not limited to:

- ***Stringing works;***
- ***Working at height;***
- ***Electrocution and arc flash burns;***
- ***Electrical works;***
- ***Exposure to hazardous chemicals (e.g., paints, solvents, transformer oils, lubricants, fuels, asphalt fumes, silica dust);***
- ***Use of chain saws and risks associated with tree felling;***
- ***Working on steep or unstable terrain;***
- ***Traffic-related accidents;***
- ***Excavation and trenching hazards;***
- ***Lifting and handling of heavy loads;***
- ***Injuries from exposed reinforcement bars;***
- ***Exposure to airborne construction contaminants (dust, silica, asbestos);***
- ***Ergonomic risks;***
- ***Environmental hazards (e.g., snakes, wasps, bees);***
- ***Welding hazards (fumes, burns, radiation, including thermite welding emissions);***
- ***Steel erection and tower installation risks;***
- ***Vibrations from heavy equipment and earthworks;***
- ***Dust and noise exposure;***
- ***Use of rotating and moving machinery;***
- ***Insufficient awareness or enforcement of OHS requirements, including the use of Personal Protective Equipment (PPE) and safe work practices.***

Based on experience from construction projects in Lebanon, limited worker awareness and weak enforcement of OHS requirements particularly regarding PPE usage and adherence to safe work practices represent key labor risks. Other potential risks include non-compliance by employers with obligations related to social security, health coverage, and pension contributions. These risks shall be mitigated in accordance with the policies and procedures outlined in this Labor Management Procedures (LMP) document.

For all projects, additional health, safety, and security risks affecting workers particularly vulnerable groups shall be identified and assessed. This includes, but is not limited to, risks of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). Appropriate mitigation measures, reporting mechanisms, and awareness programs shall be established and

implemented, including project-specific measures such as codes of conduct, confidential grievance mechanisms, mandatory training, and survivor-centered response procedures.

3.3 SEA/SH Risk Classification

The Project is assessed as Moderate risk on Gender-Based Violence (GBV) and Sexual Exploitation and Abuse/ Sexual Harassment (SEA/SH).

The key risk factors contributing to this rating include:

- Deployment of a predominantly male workforce
- Interaction with vulnerable communities in post-conflict settings
- Presence of migrant and refugee workers
- Weak enforcement of Codes of Conduct in the construction sector

Mitigation measures are detailed in Section 7.8 (SEA/SH Prevention and Response).

4. Brief Overview of Labor Legislation: Terms and Conditions

4.1 Applicable Legal Framework

Employment in Lebanon is governed by the Lebanese Labor Code (1946) which is the primary reference for employment regulations in Lebanon, the Social Security Law, and the individual employment contract. Table 2 presents the key legislation governing employment in Lebanon that is relevant to the Project. The overview focuses on legislation relating to terms and conditions of work, including wages, deductions, benefits, working hours, leave, non-discrimination, sexual harassment, forced labor, minimum age of employment, and grievance mechanisms.

Table 2: Key Employment Legislation

Year	Law / Decree / Decision	Title	Relevant Provisions
1946	Labor Law	The Lebanese Labor Code	Terms and Conditions of Employment: 48-hour max work week (Art. 31). Rest breaks during the workday and daily rest periods (Art. 34). 36 consecutive hours weekly rest (Art. 36)

Year	Law / Decree / Decision	Title	Relevant Provisions
			Annual leave of 15 days with full pay after one year of service (Art. 39). These provisions are broadly in line with ESS2.
2025	Ministry of Labor Decree No. 699	Minimum Wage	Sets the minimum daily and monthly as applicable under the Lebanese Labor Law.
2012	Decree No. 8987	Prohibition of employment of minors under the age of 18 in work that may harm their health, safety, or morals	Restricts the employment of minors under the age of 18 in hazardous activities and work that may harm their health, safety, or education. This is particularly relevant to construction and civil works activities under the Project.
2020	Law No. 205	Anti-Sexual Harassment Law	Criminalizes sexual harassment and provides protection to victims and witnesses. The law applies broadly, including in workplace-related settings, and establishes penalties for perpetrators.
1946	Labor Law	The Lebanese Labor Code	Non-Discrimination and Equal Opportunity: Article 26 prohibits discrimination between working men and women with regard to type of work, amount of wage or salary, employment, promotion, professional qualification, and apparel. Articles 28 and 29

Year	Law / Decree / Decision	Title	Relevant Provisions
			provide maternity-related protections.
2000	Law No. 220	Rights of Persons with Disabilities	Provides for quotas for persons with disabilities in public and private sector employment.
1972 / 2011 / 2003	Decree No. 3855 / Law No. 164 / Order No. 142/1	Forced Labor / Trafficking / Passport Retention	Forced labor is prohibited; trafficking in persons is criminalized; employers may not confiscate workers' passports.
1946	Labor Law, Articles 77–79	Labor Arbitration Boards	Provides for Labor Arbitration Boards in each governorate to address disputes related to wages, labor accidents, dismissal, and other labor disputes. Enterprise-level worker grievance mechanisms are not required by law.

4.2 Key Provisions

In addition, Lebanon has adopted key ILO core labor standards, including the conventions on minimum age, worst forms of child labor, forced labor, equal remuneration, discrimination in employment, and the right to organize and bargain collectively.

Information and Documentation on Terms and Conditions of Employment

Under Lebanese law (Article 12), employment contracts may be either written or oral. Written contracts must be in Arabic, although they may be translated where the employer or worker does not know Arabic. Workers are also entitled to a “work book” documenting dates of entry and exit and, upon request, wage details (Article 14). While oral contracts are legally permitted, ESS2 requires that workers receive clear and understandable information regarding their terms and conditions of employment, including wages, working hours, overtime, benefits, and grievance arrangements.

Wages and Deductions

Minimum wages is fixed by decree after consultation through the relevant national mechanisms. As noted above, the minimum monthly wage is currently **LBP 28,000,000**, and the minimum daily wage is **LBP 1,300,000**. These rates are subject to change in accordance with any future revisions

issued by the authorities. Payment must be made at least once a month for employees and twice a month for workers (Article 47). Minimum wage will apply to contracted unskilled and, where applicable, some semi-skilled workers engaged under the Project.

Terms and Conditions of Employment – Rest, Leave, and Overtime

The standard working week may not exceed 48 hours (Article 31). In exceptional circumstances, daily working hours may be increased to up to 12 hours, provided overtime is compensated at 150 percent (Article 33). Workers are entitled to a weekly rest period of at least 36 consecutive hours (Article 36), as well as breaks and daily rest periods under Article 34. Annual leave is 15 days on full pay after one year of service (Article 39).

Family and Maternity Leave

Women are entitled to maternity leave on full pay under Articles 28 and 29 of the Labor Code, as amended by Laws No. 226 and 267 of 2014. Lebanese law does not provide statutory paternity leave.

Written Notice and Payments on Termination

The employer is required to provide at least one month's written notice prior to termination (Article 50). Severance pay is generally based on length of service (Article 54). Lebanese law does not provide a fully detailed framework for final settlement of wages upon termination comparable to ESS2 good practice, and this will therefore be addressed through project procedures.

Non-Discrimination and Equal Opportunity

The Lebanese Constitution guarantees equality before the law (Article 7). The Labor Code prohibits discrimination between men and women in certain employment-related matters (Article 26). However, gaps remain regarding broader protection against discrimination on grounds such as nationality, religion, disability, or other personal characteristics unrelated to inherent job requirements. Law No. 220/2000 provides additional protections for persons with disabilities.

Gender

Lebanese Labor Code prohibits discrimination in employment based on gender to a certain extent. The Labor Code prohibits discrimination between “working men and women” with respect to type of work, amount of wage or salary, employment, promotion, professional qualification, and apparel (Art. 26). Recruitment is not expressly covered. The principle of equal pay for work of equal value is not expressly provided for in Lebanese law. It is expressly prohibited to dismiss a pregnant worker or a woman on maternity leave (Arts 29 and 52).

Night work: Women cannot work the same night hours as men. Labor Code contains a general prohibition against the employment of women in the industrial sector during the night.

Dangerous work: No restrictions for women to work in jobs deemed dangerous in the same way as men have been identified. However, women are not able to work in the same industries as

men. Women are prohibited from working in a number of industries and jobs, including mining, production and use of explosives and production of alcohol (Art. 27 and Annex 1)

Persons with disabilities

Act No. 220 (2000) provides that a certain number of jobs in the public sector are allocated to persons with disabilities (Act No. 220 of 2000, Art. 73). Quotas are also applicable to private sector employers, depending on their size (Act No. 220 of 2000, Art. 74).

Workplace Sexual Harassment

Law No. 205 of 2020 criminalizes sexual harassment and provides protection to victims and witnesses. However, project-level measures remain necessary to prevent and respond to SEA/SH risks, including Codes of Conduct, awareness raising, confidential reporting channels, and referral pathways in line with ESS2 and ESS4.

Sexual harassment in the workplace is not expressly defined or prohibited by Labor Code. However, employees are permitted to leave their jobs without notice if an employer is guilty of “molestation of the worker” (LC, Art. 75(3)). No legal consequences for the perpetrator are defined. The Penal Code includes the punishment of some indecent acts to which the description of sexual harassment may apply, including articles 385, 507, 519, and 532. The current legal framework does not provide measures to prevent or address the issue of sexual harassment. Victims of sexual harassment can file a complaint at the Ministry of Labor.

Forced Labor

Forced labor is prohibited under Decree No. 3855 of 1972. Employers are not permitted to confiscate workers’ passports under Order No. 142/1 of 2003. Trafficking in persons, including for the purpose of forced or compulsory labor, is criminalized under Law No. 164 of 2011.

Minimum Age of Employment

The minimum age of employment in Lebanon is 14 years (Article 22). However, Decree No. 8987 of 2012 prohibits persons under the age of 18 from engaging in hazardous work, including construction-related activities. Given the hazardous nature of project activities, no person under the age of 18 will be employed in project-related works.

Grievance Mechanism

There are no statutory requirements under Lebanese law for enterprise-level worker grievance mechanisms. Labor disputes may be addressed through Labor Arbitration Boards in each governorate (Articles 77–79). In line with ESS2, the Project will establish a dedicated worker grievance mechanism accessible to all categories of project workers.

Table 3: Key Provisions Summary

Topic	Legal Requirement
Work contracts	Written or oral (Art. 12); written preferred for clarity
Minimum wage	LBP 28,000,000/month; LBP 1,300,000/day
Working hours	Max 48 hours/week; 12 hours/day in emergencies (150% overtime pay)
Weekly rest	36 consecutive hours
Annual leave	15 days after one year of service
Maternity leave	10 weeks at 100% pay
Termination notice	Minimum one month written notice
Non-discrimination	Between men and women (Art. 26) – limited scope
Sexual harassment	Criminalized under Law No. 205
Forced labor	Prohibited; passport confiscation illegal
Minimum age	14 years general; 18 years for hazardous work (Dree 8987)
Grievance mechanism	Labor Arbitration Boards (Arts. 77-79); no enterprise-level GM required

4.3 Gaps Between National Law and ESS2 and Measures to Address Risks Related to the Regulatory Framework

In summary, the laws governing terms and conditions of employment in Lebanon are generally consistent with ESS2 in several areas. However, certain gaps in coverage and implementation risks remain relevant to the Project, especially given the likely engagement of contracted

workers, migrant workers, refugee workers, and casual labor in civil works and debris management activities.

Key gaps and mitigation measures include the following:

- **Verbal contracts are permitted by law**, which may create uncertainty in the communication of terms and conditions, especially for vulnerable workers.
Mitigation measure: All project workers will be provided with written contracts or equivalent written terms and conditions. Where needed, terms and conditions will also be explained orally in a language workers understand.
- **Forced labor risks may persist in practice**, despite legal prohibitions, particularly in informal recruitment chains.
Mitigation measure: All forms of forced labor will be explicitly prohibited under the Project. Contractors and subcontractors will be required to apply zero tolerance for forced labor and refrain from retaining identity documents.
- **Discrimination protections remain incomplete in practice**, especially for migrant, refugee, female, and other vulnerable workers.
Mitigation measure: Recruitment and employment under the Project will be based on transparent and non-discriminatory procedures, and discrimination unrelated to inherent job requirements will be prohibited.
- **Sexual harassment is criminalized, but project-level prevention is still required.**
Mitigation measure: The Project will adopt and enforce Codes of Conduct, provide induction and refresher training on SEA/SH, and maintain confidential, survivor-centered reporting and referral pathways.
- **National law does not require workplace-level grievance mechanisms.**
Mitigation measure: A dedicated worker grievance mechanism will be established and maintained under the Project, accessible to all workers, including migrant, refugee, and casual workers.
- **Some worker categories may face weaker effective protection under the national framework**, including day laborers, casual workers, and some non-Lebanese workers.
Mitigation measure: All project workers, regardless of contractual category, will be covered by the LMP, including provisions on terms and conditions of employment, OHS, prohibition of child and forced labor, and access to grievance mechanisms.

Table 4: Summary of Gaps and Mitigation Measures

Gap	Mitigation Measure
Verbal contracts permitted, creating uncertainty	All workers receive written contracts; oral explanation provided where needed

Gap	Mitigation Measure
Forced labor risks persist in practice	Zero tolerance for forced labor; prohibit retention of identity documents
Incomplete discrimination protections	Transparent, non-discriminatory recruitment; prohibition of discrimination on all grounds
Sexual harassment criminalized but prevention needed	Enforce Code of Conduct; provide SEA/SH training; maintain confidential reporting channels
No workplace-level grievance mechanism required by law	Dedicated worker grievance mechanism established and maintained
Day laborers and non-Lebanese workers may face weaker protection	All project workers covered by LMP regardless of contractual category

5 Brief Overview of Labor Legislation: Occupational Health and Safety

The main legislative tool governing occupational health and safety in Lebanon is Decree No. 11802/2004 on Occupational Prevention, Safety and Health in all Enterprises Subject to the Labor Code. This Decree sets out the general framework for the prevention of occupational hazards and accidents and the promotion of health and safety in workplaces covered by the Lebanese Labor Code. It applies to the categories of workers and establishments covered by the Labor Code.

The Occupational Health, Safety and Welfare framework under Decree No. 11802/2004 includes, among others, provisions related to prevention and safety, health protection, safe use of chemicals, and general obligations of employers and workers.

5.1 LB Decree No. 11802/2004 – Content Summary

General Scope and Objective

- Applies to all enterprises subject to the Lebanese Labor Code
- Establishes minimum occupational safety, health, and hygiene requirements
- Aims to:
 - Prevent occupational accidents and diseases
 - Protect workers' health
 - Ensure safe working conditions in all workplaces

Chapter 1 – Prevention and Safety Measures

This chapter defines technical safety requirements, including:

- Protection of machinery (guards, safety devices)
- Fire prevention measures and emergency preparedness
- Safety requirements for pressure equipment
- Control of:
 - Noise exposure
 - Vibrations
 - Radiation
- Safe handling and transport of loads
- Workplace signage and safety warnings
- General accident prevention obligations

Chapter 2 – Occupational Hygiene

Focuses on workplace health and environmental conditions:

- Ventilation, lighting, and air quality requirements
- Provision of clean drinking water
- Sanitary facilities (toilets, washing facilities)
- Waste management and cleaning systems
- First aid equipment and emergency medical provisions
- Medical surveillance and periodic health checks
- Protection from biological and chemical contamination

Chapter 3 – Chemical Safety

Covers handling and control of hazardous substances:

- Safe storage and labeling of chemicals
- Protection against exposure to toxic substances
- Ventilation and containment systems
- Worker training for chemical risks
- Use of protective equipment (PPE)

Chapter 4 – Specific Hazardous Substances (Benzene-related risks)

- Special protective measures for exposure to benzene
- Monitoring of exposure limits
- Preventive health surveillance for exposed workers

Chapter 5 – General Provisions

- Employer obligation to inform workers of risks
- Requirement for safety training and instructions
- General enforcement responsibilities
- Employer duty to implement preventive measures continuously

Technical Annexes

The decree includes technical limits and reference tables such as:

- Maximum allowable **noise exposure levels**
- Maximum permissible **radiation doses**
- Weight limits for manual handling (by gender/age categories)

Employer Responsibilities (Key Principle Across the Decree)

Employers must:

- Ensure a safe working environment at all times
- Provide protective equipment (PPE)
- Conduct regular risk prevention measures
- Maintain equipment safety and workplace hygiene
- Train employees on occupational risks
- Ensure compliance with legal safety standards

Enforcement Context

- Implemented under the Lebanese Ministry of Labour
- Linked to labour inspections and compliance monitoring
- Forms the core reference for OSH legal compliance in Lebanon

5.2 General OHS Measures

Under Decree No. 11802/2004, the employer is required to take all necessary measures to protect workers' health and safety in the workplace. This includes, in particular, measures relating to safety, lighting, ventilation, aeration, drinking water, lavatories, dust and smoke evacuation, and hygiene measures to protect workers from pollution by pathological or biological factors.

The employer is also required to:

- conduct regular checks of machinery, tools, and substances used by workers to ensure that they do not pose risks to workers' health and safety;

- provide workers with appropriate personal protective equipment (PPE), uniforms, and protective gear at the employer's expense;
- provide sufficient first-aid kits and emergency response arrangements;
- provide workers with information on workplace hazards, including those related to machinery, equipment, chemical agents, biological factors, and physical hazards;
- continuously train workers on the procedures and methods for the safe use of chemicals and equipment.

In addition, Article 61 of the Lebanese Labor Code requires establishments falling under the law to remain clean and to meet the necessary health, safety, and rest conditions for workers. Equipment, machinery, and tools must be installed and maintained in a manner that ensures the highest possible level of safety.

For LEAP, these obligations are particularly relevant because project activities involve civil works and debris management in post-conflict areas, including the operation of heavy machinery, work around unstable structures and rubble, possible exposure to hazardous materials, and outdoor work in difficult environmental and security conditions. Site-specific ESMPs, ESMP Checklists, Contractor ESMPs (C-ESMPs), and OHS Management Plans will therefore be required to supplement and operationalize national OHS requirements for project activities.

5.3 Record Keeping and Accident Reporting

Decree No. 11802/2004 requires employers to report occupational accidents to the Ministry of Labor within 24 hours of their occurrence, as well as cases of occupational disease. The Decree also requires employers to maintain appropriate records, including records of workplace medical examinations and checks of certain equipment and vessels where relevant.

Workers may leave a work location where circumstances give them reasonable grounds to believe that their safety or health is in danger. The worker is protected from the consequences of such withdrawal in accordance with applicable laws and regulations.

For LEAP, contractors and supervising firms will be required to establish and implement procedures for documenting and reporting occupational injuries, illnesses, lost-time incidents, near misses, and fatalities. These records shall form part of the regular review of OHS performance and working conditions. In line with the ESCP, incidents and accidents with significant adverse effect must also be notified to the World Bank within the required timeframe.

5.4 Worker Facilities and Accommodation

Employers are not generally required under Lebanese law to provide accommodation to workers. However, where dormitories or accommodation are provided, Decree No. 11802/2004 requires employers to take the necessary health protection measures to prevent contamination and disease. The Labor Code also prohibits the accommodation of minors employed by the employer in lodgings belonging to the employer.

If worker accommodation is provided under LEAP, contractors will be required to ensure that accommodation complies with applicable national requirements and good international practice, including adequate hygiene, ventilation, sanitation, fire safety, safe drinking water, separate

facilities where needed, and appropriate living conditions consistent with the IFC/EBRD guidance on workers' accommodation.

5.5 Summary and Measures to Address Risks Related to the Regulatory Framework

Regulatory requirements for occupational health and safety in Lebanon are generally consistent with ESS2. However, certain gaps remain in the national framework and in implementation practice, especially in relation to construction and emergency works in post-conflict settings.

The main gaps and mitigation measures relevant to the Project are summarized below:

- National law does not comprehensively require project-specific OHS risk assessments and risk registers for all work activities.
- Mitigation measure: The Project will require contractors to prepare site-specific OHS Management Plans, including hazard identification, risk assessment, risk registers, and mitigation measures for all relevant work activities.
- National law does not provide sufficiently detailed requirements on emergency preparedness and response for the specific hazards associated with post-conflict civil works.
Mitigation measure: Contractors will be required to establish emergency prevention, preparedness, and response procedures covering, inter alia, UXO/ERW, unstable structures, machinery accidents, fires, hazardous materials, traffic incidents, and medical emergencies.
- National law does not expressly establish detailed worker procedures for reporting unsafe or unhealthy work situations, nor does it comprehensively protect workers against retaliation in such cases in practical implementation.
Mitigation measure: The LMP and contractors' OHS procedures will require the establishment of clear reporting channels for unsafe situations, explicit protection against retaliation, and a requirement that corrective action be taken before workers are required to resume work.
- National law does not fully address all sector-specific risks relevant to LEAP, including work in post-conflict areas, debris management, possible exposure to ACM, road traffic risks, and work in locations affected by UXO/ERW.
Mitigation measure: The Project will require site-specific ESMPs/ESMP Checklists, C-ESMPs, OHS Plans, traffic management measures, and mandatory coordination with LAF/LMAC before and during works where applicable.
- Practical implementation of OHS requirements may be weak, particularly for contracted, subcontracted, casual, migrant, and vulnerable workers.
Mitigation measure: Contractors and subcontractors will be required to provide induction and regular refresher training on OHS, PPE, SEA/SH prevention, incident reporting, grievance mechanisms, and emergency response in a language understandable to workers.

Table 5: Key OHS Requirements Under Decree No. 11802/2004

Requirement	Description
General OHS measures	Employer must take all necessary measures for health protection (lighting, ventilation, drinking water, sanitation, dust/smoke evacuation)
Machinery safety	Regular checks of machinery, tools, substances to ensure no risks to workers
PPE provision	Provide appropriate PPE, uniforms, protective gear at employer's expense
First aid	Provide sufficient first-aid kits and emergency response arrangements
Information & training	Provide information on hazards; continuously train workers on safe practices
Accident reporting	Report occupational accidents to Ministry of Labor within 24 hours
Worker withdrawal	Workers may leave unsafe location and are protected from retaliation

Given the nature of LEAP, special attention will be paid to sector-specific labor and OHS risks associated with debris clearing, road rehabilitation, operation of heavy machinery, transport activities, outdoor work in extreme heat, hazardous materials, and work in post-conflict environments. These risks and the required mitigation measures are further elaborated in the sections below on 7. Policies and Procedures and 11. Contractor Management.

6. Responsible Staff

The Project shall be implemented by the Council for Development and Reconstruction (CDR) through a Project Management Unit (PMU). The PMU shall be responsible for overall implementation, coordination, and monitoring of environmental and social aspects of the Project, including labor management.

In accordance with the ESCP, the PMU shall maintain qualified staff, including:

- Environmental Specialist
- Social Specialist
- Occupational Health and Safety (OHS) Specialist

6.1 Responsibilities for Direct Workers

The PMU shall be responsible for:

- Implementing and monitoring the Labor Management Procedures (LMP) for direct workers;
- Maintaining records of recruitment and employment processes;
- Ensuring that all direct workers are provided with clear and documented terms and conditions of employment;
- Establishing and maintaining a grievance mechanism for project workers;
- Monitoring implementation of the Code of Conduct;
- Ensuring that workers receive appropriate training on Occupational Health and Safety (OHS), prevention of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), and workplace conduct standards;
- Establishing and implementing an age verification mechanism to ensure that no child labor is engaged and that all workers meet the minimum age requirements in line with applicable labor laws and ESS2;
- Establishing procedures for documenting and reporting occupational injuries, illnesses, and incidents;
- Ensuring that a confidential SEA/SH grievance mechanism is in place and accessible;
- Applying disciplinary measures in cases of misconduct, including SEA/SH related violations;
- Reporting serious incidents to relevant authorities and the World Bank in accordance with the Environmental and Social Commitment Plan (ESCP).

6.2 Responsibilities for Contracted Workers

The PMU shall:

- Ensure that the requirements of the LMP and ESS2 are incorporated into bidding documents and contracts;
- Ensure that contractors prepare and implement site-specific OHS Plans and C-ESMPs prior to mobilization;
- Ensure that contractors establish grievance mechanisms for their workers;
- Monitor contractors' compliance with labor and OHS requirements;
- Monitor recruitment processes and working conditions of contracted workers;
- Ensure that contractors comply with national labor law and ESS2;
- Monitor implementation of training programs, including OHS and SEA/SH;
- Ensure that Codes of Conduct are implemented and enforced.

6.3 Responsibilities of the Supervision Consultant

The Supervision Consultant shall:

- Monitor contractor performance on a day-to-day basis;
- Oversee implementation of ESMPs, OHS Plans, and LMP requirements;
- Verify compliance with Codes of Conduct and SEA/SH measures;
- Report on environmental, social, labor, and OHS performance to the PMU.

6.4 Responsibilities of Contractors

Contractors shall:

- Prepare and implement site-specific OHS Plans and C-ESMPs consistent with this LMP and ESS2;
- Appoint qualified OHS and social personnel;
- Ensure compliance of subcontractors with LMP and OHS requirements;
- Maintain records of recruitment and employment;
- Provide written contracts and clearly communicate employment conditions;
- Establish and operate a grievance mechanism for workers;
- Deliver induction and ongoing training on OHS, SEA/SH, and Codes of Conduct;
- Ensure that all workers sign and comply with the Code of Conduct;
- Maintain records of occupational incidents and report them to the PMU;
- Report serious incidents to relevant authorities in accordance with national legislation and the ESCP.

6.5 Updating of Responsibilities

This LMP shall be updated, as necessary, following contractor mobilization to reflect finalized contractual arrangements and staffing structures.

7. Policies and Procedures

The Project's identified labor risks and impacts will be mitigated through a set of policies and procedures addressing occupational health and safety (OHS), labor and working conditions, worker relationships, non-discrimination and equal opportunity, terms and conditions of employment, labor influx, SEA/SH, forced labor, and worker grievance arrangements.

The principles and procedures presented below represent the minimum requirements to be applied under the Project and are not exhaustive. These measures shall be developed and implemented by contractors and monitored by the PMU and the Supervision Consultant to ensure fair treatment of all project workers in accordance with ESS2, national legislation, and Good International Industry Practice (GIIP).

7.1 Recruitment and Employment

Recruitment procedures under the Project shall be transparent, public, and non-discriminatory with respect to ethnicity, religion, disability, gender, nationality, sexual orientation, and other grounds protected under applicable national law and ESS2. Contractors shall ensure that:

- employment opportunities are communicated through appropriate local channels, using clear and inclusive language;
- applications for employment are considered in accordance with transparent and documented procedures;
- clear job descriptions are provided in advance of recruitment and explain the skills required for each post;
- all workers receive written contracts describing terms and conditions of work, and the contents are clearly explained in a language that workers understand;
- where workers may have difficulty understanding written documentation, oral explanations of employment conditions are provided;
- terms and conditions of employment are available at work sites;
- recruitment is merit-based, while contractors may prioritize local labor, women, and other disadvantaged groups where feasible;
- no worker is charged recruitment or hiring fees;
- foreign workers engaged under the Project possess the required permits and documentation to work legally in Lebanon;
- all contractor and subcontractor personnel engaged in hazardous project activities are 18 years of age or older.

7.2 Non-Discrimination and Equal Opportunity

There shall be no discrimination in employment on the basis of personal characteristics unrelated to inherent job requirements, particularly with respect to recruitment, compensation, working conditions, training, promotion, termination, retirement, or disciplinary measures.

Under the Project:

- equal pay for equal work shall apply;
- women and men shall be treated equally in employment and working conditions;
- workers shall be protected from harassment, intimidation, discrimination, and retaliation;
- reasonable efforts shall be made to promote equal access to employment opportunities, including for women and persons with disabilities, where feasible and consistent with the nature of the work.

7.3 Occupational Health and Safety

All contractors and implementing entities under the Project, particularly for Components 1 and 2, shall prepare, adopt, and implement site-specific Occupational Health and Safety (OHS) Plans consistent with:

- Lebanese legal requirements;
- the applicable site-specific ESMP / ESMP Checklist;
- the World Bank Group Environmental, Health and Safety Guidelines (EHSGs);
- relevant Good International Industry Practice (GIIP);
- and this LMP.

These OHS Plans shall be reviewed and approved by the PMU prior to commencement of the relevant activities.

The OHS Plans shall include, at a minimum:

- identification of all potential hazards affecting the physical and mental well-being of project workers;
- hazard identification and risk assessment for all work activities;
- risk elimination or reduction through management and engineering controls, where possible;
- provision of appropriate preventive and protective measures, including PPE at no cost to workers;
- adequate first-aid facilities and emergency response arrangements;
- hazard communication and labeling in Arabic and, where necessary, other languages understood by workers;
- procedures enabling workers to report unsafe or unhealthy situations;
- explicit protection of workers from retaliation for refusing unsafe work;
- a requirement that corrective measures be taken before workers are required to resume work in unsafe areas;
- maintenance of records on OHS performance, accidents, incidents, and corrective actions.

Given the nature of LEAP activities, OHS Plans shall specifically address the following Project-related risks:

- debris removal and handling;
- excavation and road rehabilitation works;
- work near unstable rubble and damaged structures;
- operation of heavy machinery and transport vehicles;
- road traffic and access risks;
- possible exposure to hazardous materials, including fuel, oils, lubricants, and potentially asbestos-containing materials (ACM);
- work in post-conflict environments, including exposure to UXO/ERW;
- outdoor work in high temperatures and exposure to environmental hazards.

Contractors shall ensure that all workers are provided with:

- adequate drinking water;
- rest areas;
- sanitation facilities for both male and female workers;
- PPE suited to the risks of the tasks performed;
- immediate access to first aid and emergency medical support.

The Project shall establish and maintain procedures to document and report all accidents, diseases, dangerous occurrences, and near miss events. Contractors shall report all significant incidents to the PMU immediately. The Borrower shall notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the

environment, affected communities, the public, or workers, within the timeframe specified in the ESCP.

The Project shall also ensure that all workers have access to remedies in cases of occupational injury, illness, disability, or death. Contractors and subcontractors shall maintain adequate insurance and medical coverage for all workers not automatically covered under national social security provisions, including daily and casual workers, and shall provide documentary proof of such coverage.

7.4 OHS Staff, Training, and Site Oversight

Each contractor shall appoint qualified OHS personnel responsible for implementation and supervision of the OHS program at each site. Contractors shall define an OHS accountability matrix covering project managers, site managers, foremen, OHS staff, and workers, with clear OHS roles and responsibilities.

Before commencing work, and regularly thereafter, contractors shall provide OHS training in a language understandable to workers. Training shall include, at a minimum:

- general principles of health and safety;
- safe work procedures;
- use of machinery, equipment, and tools;
- emergency response and evacuation procedures;
- hazard identification and risk control measures;
- use and maintenance of PPE;
- traffic and vehicle safety;
- UXO/ERW awareness where relevant;
- reporting of unsafe conditions and incidents.

All workers shall complete a site induction prior to being allowed access to the site. Access shall be restricted to authorized personnel only.

Daily toolbox talks shall be conducted prior to commencement of works, and regular OHS briefings and meetings shall be organized to review risks, preventive measures, incidents, non-compliances, and corrective actions.

Table 6 - OHS Training:

Training Type	Timing / Frequency	Minimum Content
Site induction	Before first site access	General safety, emergency procedures, PPE use, UXO/ERW awareness, SEA/SH, Code of Conduct

Training Type	Timing / Frequency	Minimum Content
Job-specific training	Before assignment to hazardous tasks	Safe work procedures, machinery operation, chemical handling
Toolbox talks	Daily before work	Hazards of the day, preventive measures, PPE checks
Refresher training	TBD	Updates on risks, procedures, incident lessons learned

All training shall be delivered in a language understandable to workers (Arabic, with translation as needed). Training records shall be maintained by the contractor and made available for inspection.

The Supervision Consultant shall carry out periodic supervision of contractors' OHS performance, including site inspections and review of records, and shall report findings to the PMU.

Table 7 - Site Oversight:

Activity	Frequency	Responsible
Contractor OHS inspections	Daily	Contractor OHS staff
Supervision Consultant inspections	Weekly	Supervision Consultant
PMU oversight visits	Weekly / Monthly	PMU E&S and OHS Specialists
Joint World Bank/PMU review	Quarterly (or as requested)	PMU + World Bank

7.5 Emergency Preparedness and Response

Contractors shall prepare and implement Emergency Preparedness and Response Procedures appropriate to the risks of the site and activities. These procedures shall cover, as relevant:

Emergency Type	Required Response Elements
Serious injuries/fatalities	First aid, ambulance transport, designated medical facility, notification procedures
Machinery accidents	Shutdown procedures, rescue, investigation
Fires/explosions	Fire extinguishers, evacuation routes, assembly points, training
Traffic accidents	Traffic management plan, first aid, coordination with local authorities
Hazardous material release	Spill containment, PPE, evacuation, notification
Unstable structure collapse	Exclusion zones, search and rescue coordination
UXO/ERW discovery	Stop work, immediate exclusion zone, notify LAF/LMAC, do not touch
Security deterioration	Communication plan, evacuation procedures, coordination with authorities
Medical emergencies	First aid, transport plan, designated hospital, communication

Display requirements: Emergency contact numbers, first-aid arrangements, evacuation routes, and designated assembly points shall be prominently displayed at all work sites (as minimum in local language - in Arabic). Contractors shall ensure that first-aid resources and transport to designated medical facilities are available at all times.

7.6 Worker Accommodation

Worker accommodation is not anticipated as a standard feature of the Project. However, if contractors provide accommodation for workers, they shall ensure that such accommodation meets acceptable health, hygiene, and safety standards and complies with applicable national law, ESS2, and relevant IFC/EBRD guidance on workers' accommodation.

Contingency requirement: If any contractor proposes to provide accommodation for workers, the following minimum standards shall apply:

Requirement	Description
Drinking water	Safe, potable water freely available
Sleeping areas	Clean beds; no "hot-bedding"; minimum 4-5.5 m ² per resident
Sanitation	Separate toilet and shower facilities for men and women; hot and cold running water; soap; privacy (floor-to-ceiling partitions, lockable doors)
Lighting/ventilation	Adequate natural and artificial lighting; ventilation/cooling in summer; heating in winter
Cooking/eating	Separate, clean cooking and eating areas
Electrical safety	Safe electrical installation; fire protection (alarms, extinguishers, smoke detectors)
Waste management	Adequate sewage and waste disposal systems
Security	Lockers for personal belongings
Medical	First aid kit; access to medical care

Compliance: Any worker accommodation shall comply with IFC/EBRD guidance on workers' accommodation and be subject to inspection by the Supervision Consultant.

7.7 Labor Influx and Community Relations

Although large-scale labor influx is not expected, the Project recognizes that movement of workers into conflict-affected communities may create risks related to social tensions, inappropriate worker behavior, pressure on local services, and SEA/SH.

To address these risks, the Project shall require contractors to:

- prioritize local recruitment where feasible;
- implement and enforce Codes of Conduct for all workers, including subcontracted workers;
- conduct induction and regular refresher training on community conduct, respectful behavior, and SEA/SH prevention;
- establish and maintain worker grievance mechanisms, including confidential channels;
- communicate project commitments and grievance arrangements to affected communities through appropriate channels;

- coordinate with local authorities and municipalities on community access, disruptions, and safety arrangements.

7.8 SEA/SH Prevention and Response

The Project adopts a zero-tolerance policy for Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH).

All project workers shall be entitled to fair treatment and protection from harassment, sexual harassment, and abuse at work. Contractors shall establish mechanisms to protect workers and community members from SEA/SH risks.

To this end:

- all project workers shall sign a Code of Conduct as a condition of employment;
- the Code of Conduct shall be explained during induction and refresher training;
- the Code of Conduct shall include explicit prohibitions against SEA/SH, exploitation, abuse, intimidation, and inappropriate conduct toward workers and community members;
- violations of the Code of Conduct shall result in disciplinary measures, up to and including dismissal and referral to legal authorities where appropriate;
- copies of signed Codes of Conduct shall be retained by employers and displayed at worksites and, where applicable, accommodation facilities;
- contractors shall establish confidential and survivor-centered channels for reporting SEA/SH grievances;
- the PMU shall ensure that dedicated SEA/SH grievance arrangements and referral pathways are operational and accessible.

The PMU Social Specialist, or another designated trained focal point, shall oversee SEA/SH awareness, grievance referral, and monitoring of compliance with SEA/SH-related measures.

7.9 Forced Labor

Under no circumstances shall the PMU, contractors, subcontractors, or suppliers engage in forced labor.

Forced labor includes, but is not limited to:

- bonded labor;
- retention of wages to prevent workers from leaving employment;
- confiscation of identity papers or passports;
- excessive restrictions on workers' freedom of movement;
- recruitment fees charged to workers;
- coercion, intimidation, or threats;
- physical punishment or abuse;
- any practice that compels a worker to work on a non-voluntary basis.

The Project shall require all contractors and subcontractors to explicitly prohibit forced labor and to ensure that recruitment and employment practices are voluntary and lawful.

7.10 Monitoring and Reporting

The PMU and the Supervision Consultant shall monitor the implementation of these policies and procedures throughout project implementation.

Monitoring shall include, as relevant:

- site inspections;
- review of labor, OHS, and SEA/SH records;
- review of grievance logs;
- review of recruitment and employment documentation;
- verification of worker training;
- review of contractor monthly reports.

Contractor reporting obligations:

Contractors shall provide monthly reports including:

- Workforce statistics (total, gender, nationality, skills)
- OHS performance (fatalities, lost-time injuries, serious injuries, near misses)
- Training completion (numbers, topics)
- Grievance summary (number received, resolved, pending)
- Primary supplier list and compliance status
- Any inspections or findings by labor authorities

The Supervision Consultant shall review this information and report to the PMU.

Authority notification: Any inspections, audits, or findings by the Labor Inspectorate or other authorities shall be reported to the PMU. Where requested, such findings shall be made available to the World Bank.

8 Age of Employment

8.1 Minimum Age Requirement

The minimum age for employment under the Project shall be **18 years**, given the hazardous nature of civil works activities, including:

- Debris removal and handling
- Excavation
- Road rehabilitation
- Operation of heavy machinery
- Work near unstable structures
- Work in UXO/ERW-contaminated areas

No person under the age of 18 shall be employed or engaged in any Project-related activities.

8.2 Legal Basis

This requirement is consistent with:

- Lebanese Decree No. 8987 (2012), which prohibits persons under 18 from engaging in hazardous work
- World Bank ESS2, which requires special protection for workers under 18
- ILO Convention 182 on the Worst Forms of Child Labor

To prevent engagement of underage labor, all contracts with contractors and subcontractors shall include provisions requiring compliance with minimum age requirements, including penalties for non-compliance. These requirements shall be communicated to all relevant stakeholders, including local communities from which labor may be sourced.

8.3 Age Verification Procedures

Contractors shall be required to verify the age of all workers prior to their engagement. Age verification shall be based on official documentation such as:

- national identification card;
- passport;
- birth certificate;
- other official government-issued official records.

Where official documentation is unavailable, alternative verification methods may be used, including:

- written and signed declarations by the worker; and/or
- confirmation from local authorities or community representatives.

Record keeping: Contractors shall maintain a labor registry of all workers, including age verification documentation.

8.4 Contractual Requirements

All contracts with contractors and subcontractors shall include:

- Explicit prohibition of employment of persons under 18
- Requirement for age verification
- Penalties for non-compliance (financial penalties, suspension of works, termination)

If a worker under the age of 18 is identified as being engaged in Project activities, the contractor shall take immediate steps to terminate the employment or engagement of the individual in a responsible manner, taking into account the best interest of the child, and in accordance with national legislation and ESS2 requirements.

8.5 Procedure if an Underage Worker is Identified

Step	Action
1. Immediate removal	Remove the worker from hazardous activities immediately
2. Investigation	Investigate whether due to negligence or deliberate action by contractor/subcontractor
3. Responsible termination	Terminate employment in a responsible manner, taking into account the best interest of the child
4. Contractor penalty	Apply contractual penalties (financial penalty, suspension, or termination)
5. Reporting	Report the finding to the PMU and World Bank within 48 hours

9. Terms and Conditions of Employment

9.1 Governing Principle

This section outlines the key terms and conditions applicable to all Project workers, including wages, working hours, employment arrangements, and applicable labor standards, in accordance with the Lebanese Labor Code and the World Bank Environmental and Social Standard 2 (ESS2). Where discrepancies exist, the more stringent requirement will apply.

9.2 Terms and Conditions of Employment

Project workers will be engaged only upon signing a written employment contract or engagement agreement in accordance with the Lebanese Labor Code. Each worker will receive a copy of their contract, which will clearly define their employment status, rights, and obligations. All work performed under the Project will be remunerated, and any form of disguised employment will not be permitted.

Contracts will be provided in a language understandable to the worker and will include, at a minimum, information on working hours, wages, rest periods, leave entitlements, disciplinary procedures, and termination conditions. Workers will also be informed, during onboarding, of the grievance mechanism and procedures for raising complaints.

Minimum contract content:

Element	Description
Worker identification	Name, ID number (if available), contact details
Employer identification	Contractor name, address, contact
Employment nature	Duration (fixed-term, temporary, casual), full-time/part-time
Job description	Role, responsibilities, location of work
Working hours	Daily/weekly hours, overtime arrangements
Wages	Base wage, overtime rate, payment frequency, method
Leave entitlements	Annual, sick, maternity, other leave
Termination	Notice period, severance, final settlement
Disciplinary procedures	Applicable rules and consequences
Grievance mechanism	How to raise concerns
OHS obligations	Worker and employer responsibilities
Code of Conduct	Reference to CoC and requirement to comply

Language: Contracts shall be provided in Arabic. For non-Arabic speaking workers, a translation shall be provided, and key terms explained orally.

9.3 Direct Workers

The terms and conditions for direct workers within the Project Management Unit (PMU) will be governed by applicable CDR consultancy frameworks. All direct workers will receive clear and transparent contractual arrangements.

9.4 Contracted Workers

Contracted workers will be governed by the Lebanese Labor Code, as outlined in Section 3 of this LMP. All procurement documents will include provisions requiring contractors to comply with ESS2 and national labor legislation.

Each contracted worker will be provided with a written contract specifying:

- Worker identification details
- Employer information
- Nature and duration of employment
- Working hours and location
- Remuneration and benefits
- Leave entitlements
- Procedures for suspension and termination
- Applicable disciplinary measures

Where workers may have difficulty understanding written documentation, terms and conditions will be explained orally. For migrant workers, conditions of employment will be equivalent to those of non-migrant workers performing similar tasks.

9.5 General Provisions

Employment conditions will comply with national legislation and include provisions on leave (annual, sick, and maternity), rest days, and social security. The standard weekly rest days are Saturday and Sunday, subject to operational requirements.

Wages and Working Hours

Working hours will not exceed 48 hours per week, in line with the Lebanese Labor Code. Any overtime will be compensated in accordance with applicable legislation.

Workers are entitled to:

- Daily rest periods, including breaks during working hours
- A minimum weekly rest period of 36 consecutive hours
- Additional protections during Ramadan, where working hours will not exceed seven (7) hours per day

While the national minimum wage is set by the State, the Project will ensure that wages reflect fair market rates for each job category.

Monitoring systems will be established to ensure timely payment of wages and proper compensation for overtime, night shifts, and other applicable allowances.

Working Hours:

Requirement	Standard
Maximum weekly hours	48 hours per week (Labor Code Art. 31)

Requirement	Standard
Maximum daily hours	8 hours per day
Overtime	Permitted only in emergencies (Art. 33); compensated at 150% of regular wage
Daily rest	9 consecutive hours per 24-hour period (Art. 34)
Breaks	30-60 minute break after 5-6 consecutive hours of work (Art. 34)
Weekly rest	36 consecutive hours (Art. 36); typically Saturday and Sunday
Ramadan	Maximum 7 hours per day

Wages and Payment:

Requirement	Standard
Minimum wage	LBP 28,000,000 per month (Decree 699/2025); LBP 1,300,000 per day. These rates are subject to change in accordance with any future revisions issued by the competent authorities.
Payment frequency	At least once per month for employees; twice per month for workers (Art. 47)
Payment method	Bank transfer or cash with signed pay slip

Requirement	Standard
Payment timing	Wages due on agreed date; delay beyond 15 days triggers grievance
Deductions	Only as permitted by law (social security, taxes, court-ordered)
Pay slip	Itemized pay slip provided with each payment

Leave Entitlements:

Leave Type	Entitlement	Legal Basis
Annual leave	15 days on full pay after one year of service	Art. 39
Sick leave	Based on employment duration: minimum half month full pay + half month half pay	Art. 40
Maternity leave	10 weeks at 100% pay	Arts. 28-29 (as amended by Laws 226, 267/2014)
Paternity leave	None required by law (not provided)	N/A

9.6 Occupational Health and Safety (OHS)

Employers and contractors will be responsible for identifying job-related risks and implementing preventive and protective measures to ensure a safe and healthy working environment.

Workers will be informed of occupational risks and trained on relevant health and safety measures. They are required to comply with all safety instructions and avoid actions that may endanger themselves or others.

9.7 Freedom of Association and Collective Bargaining

Project workers will have the right to form and join organizations of their choosing and to engage in collective bargaining, in accordance with national law. Employers will not interfere with these rights or discriminate against workers exercising them.

9.8 Equal Opportunity and Non-Discrimination

Employment under the Project will be based on equal opportunity and fair treatment. No discrimination will be permitted in any aspect of employment, including recruitment, training, promotion, or termination.

The Project will ensure the protection of vulnerable groups, including women, persons with disabilities, and migrant workers. Measures will be taken to ensure accessibility and inclusion where required.

Sexual harassment, exploitation, and abuse (SEA/SH) are strictly prohibited. A Code of Conduct will be implemented and enforced.

9.9 Prohibition of Forced Labor

Forced labor in any form is strictly prohibited. This includes bonded labor, restriction of movement, withholding of identity documents, delayed wages, or any form of coercion.

Any identified cases will be immediately addressed and reported to the relevant authorities in accordance with national law.

9.10 Training and Capacity Building

All Project workers will receive induction and ongoing training on occupational health and safety, labor rights, and Project procedures.

Training will cover, at a minimum:

- OHS requirements and use of personal protective equipment (PPE)
- Emergency preparedness and response
- Code of Conduct and SEA/SH
- Grievance mechanism procedures
- Relevant environmental and social instruments (e.g., ESMPs)

Training for contracted workers will be delivered by qualified personnel, and records will be maintained.

10. Grievance Mechanism

10.1 Purpose and Scope

A well-communicated and accessible grievance mechanism (GM) shall be established for all direct and contracted project workers to raise workplace concerns related as minimum to:

- Recruitment and hiring practices
- Terms and conditions of employment
- Wages and benefits

- Working hours and rest periods
- Occupational health and safety
- Harassment, discrimination, or SEA/SH
- Any other labor-related matter

The worker grievance mechanism shall be established prior to the engagement of project workers and maintained throughout Project implementation, in accordance with the requirements of the World Bank Environmental and Social Standard 2 (ESS2) and the Environmental and Social Commitment Plan (ESCP).

The Project Management Unit (PMU) shall be responsible for establishing and maintaining the grievance mechanism for direct workers. Contractors shall be required to develop and implement a grievance mechanism for their workforce, including subcontracted workers, prior to the commencement of works.

10.2 Principles of the Grievance Mechanism

The worker grievance mechanism shall be based on the following principles:

- accessibility and transparency for all project workers;
- confidentiality and protection from retaliation;
- non-discrimination in the handling of grievances;
- acceptance of anonymous complaints;
- timely and fair resolution of grievances;
- documentation and tracking of all grievances;
- the right of workers to seek alternative judicial or administrative remedies under national law.

All workers shall be informed of the grievance mechanism at the time of recruitment and during induction, in a language and format that is understandable, including through oral communication where necessary.

10.3 Grievance Procedure

Workers shall be encouraged to raise concerns informally with their direct supervisors where appropriate. However, all formal grievances shall be documented and processed through the worker grievance mechanism.

Where the direct supervisor is the subject of the complaint, the worker may submit the grievance directly through the formal mechanism.

The grievance procedure shall include the following steps:

Step 1: Receipt, Acknowledgment and Registration

- Grievances may be submitted through designated channels established by the PMU and contractors.
- Workers will be encouraged to use a standard grievance form, where available.
- Oral grievances (in person or by phone) shall be recorded by the designated GM focal point.

- Anonymous grievances may be submitted and shall be processed.
- All grievances shall be recorded in a grievance log.
- Receipt of the grievance shall be acknowledged within a reasonable timeframe, and the complainant shall be informed of next steps.

Step 2: Grievance Assessment and Investigation

- The grievance shall be reviewed by the designated GM focal point.
- Where necessary, this may include discussions with the complainant, interviews, and field verification.
- The grievance shall be assessed for eligibility and appropriate course of action.

Step 3: Response and Feedback

- The complainant shall be informed of the outcome of the assessment and proposed resolution within an established timeframe.
- For straightforward cases, responses may be provided promptly.
- For more complex cases, additional information may be gathered before proposing a resolution.
- The response shall include a clear explanation of the proposed actions and available options, including the right to appeal.

Step 4: Appeal, Agreement and Closure

- If the complainant is satisfied, the agreed resolution shall be implemented and recorded.
- If the complainant is not satisfied, they may appeal the decision.
- Appeals shall be reviewed at a higher level within the PMU and, where necessary, with support from relevant personnel. s
- Final actions, timelines, and outcomes shall be documented.
- Confidentiality shall be maintained throughout the process.

10.4 Sensitive Grievances and SEA/SH

The worker grievance mechanism shall include specific procedures for handling sensitive grievances, including those related to workplace harassment and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).

Such grievances shall be handled:

- in a confidential and survivor-centered manner;
- through restricted access to information;
- by trained personnel designated by the PMU;
- in accordance with the Project's SEA/SH prevention and response measures.

Where appropriate and with the consent of the complainant, referrals shall be made to relevant support services.

Any SEA/SH-related incident shall be managed in accordance with confidential, survivor-centered procedures and reported in line with the ESCP, while preserving confidentiality and safety. Sensitive grievances shall be recorded separately to ensure confidentiality and data protection.

10.5 Monitoring and Reporting

The PMU and the Supervision Consultant shall monitor the implementation of the worker grievance mechanism, including:

- the number and types of grievances received;
- the timeliness of responses and resolutions;
- the effectiveness of corrective actions;
- the number of unresolved or escalated cases.

Contractors shall report regularly on worker grievances as part of their reporting obligations. The Supervision Consultant shall review and consolidate this information and report to the PMU.

Monitoring and Reporting Frequency:

Responsible	Frequency	Report Content
Contractor	Monthly	Number of grievances received, resolved, pending; categories; average resolution time
Supervision Consultant	Monthly	Verification of contractor GM records; review of sample grievances
PMU	Monthly (direct notification on each GM)	Aggregate analysis; trends; recommendations for improvement
PMU to World Bank	Per ESCP	Summary of GM performance

Grievance Log and Tracking

Standard Grievance Log (Annex 3) shall include:

Field	Description
Grievance ID	Unique sequential number
Date received	Day/month/year
Worker information (optional)	Name, contact (confidential)
Grievance category	Wages, OHS, harassment, discrimination, other
Description	Summary of complaint
Acknowledgment date	Date sent to complainant
Resolution proposed	Description of proposed action
Resolution date	Date complainant informed
Status	Open, resolved, appealed, escalated
Closure date	Date final actions completed

10.6 Communication and Awareness

Workers shall be informed of the grievance mechanism:

- At recruitment: During onboarding and induction
- In writing: Through the Code of Conduct and employment contract
- Visually: Notice boards at worksites (in Arabic)

- Verbally: During toolbox talks and refresher training

Information to be displayed:

- How to submit a grievance (all channels)
- Who to contact (names, photos, contact details)
- Timeframes for resolution
- Non-retaliation policy
- SEA/SH confidential channel information

10.7 Future Updates

The detailed operational arrangements of the worker grievance mechanism, including communication channels, designated focal points, response timelines, and escalation procedures, shall be finalized at the start of Project implementation and, where necessary, reflected in an updated version of this LMP.

11 Contractor Management

11.1 Contractor Selection

The Project will ensure that all contractors, implementers, and subcontractors comply with the requirements of the World Bank Environmental and Social Standard 2 (ESS2), the Lebanese Labor Code, and the provisions set out in this Labor Management Procedures (LMP).

Contractors will be selected based on technical qualifications and financial capacity. The CDR/PMU will undertake due diligence to verify that contractors are legitimate and capable of managing labor in accordance with applicable standards.

11.2 Contractual Provisions

All contracts will include provisions requiring compliance with ESS2 and national labor legislation. These will incorporate enforceable measures, including sanctions, in cases of non-compliance with environmental and social (E&S) requirements, including obligations related to occupational health and safety (OHS) and Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH).

Each contract shall explicitly require the contractor to:

- Comply with this LMP and prepare, submit for approval, and implement a site-specific LMP and Occupational Health and Safety Plan prior to mobilization.
- Flow down all ESS2 requirements, including those contained in this LMP, to all subcontractors at any tier.
- Appoint qualified environmental, social, and occupational health and safety personnel to manage and monitor compliance.
- Submit monthly labor and occupational health and safety performance reports to the Supervision Consultant and the PMU.
- Maintain all required labor records (contracts, payroll, training, grievances, incidents) for a minimum of three years following contract completion and make them available for inspection upon request.

- Allow unannounced spot checks and inspections by the PMU, the Supervision Consultant, and the World Bank.
- Implement and enforce a Code of Conduct for all workers, including specific provisions prohibiting sexual exploitation, abuse, and harassment.
- Establish, communicate, and operate a worker grievance mechanism, including confidential channels for sensitive grievances.
- Provide remedies for occupational injuries, illnesses, disabilities, and deaths, including adequate insurance coverage for all workers not covered by national social security.
- Accept that non-compliance with labor and occupational health and safety requirements may result in penalties, suspension of works, or termination of the contract.

11.3 Monitoring Contractor Performance

The Project will establish procedures to monitor contractor performance. This will include periodic site inspections, review of documentation, and follow-up on corrective actions. Contractors will be required to maintain and submit labor management records, including:

- Employment contracts and signed Codes of Conduct
- Grievance logs and resolution records
- Age verification documentation
- Records of occupational accidents and incidents, including corrective actions
- Training records for workers

Contractors will be responsible for ensuring safe working conditions, including the provision of appropriate personal protective equipment (PPE) and the implementation of occupational health and safety measures in line with applicable standards.

The Supervision Consultant shall have the day-to-day responsibility to manage and monitor the performance of contractors in relation to contracted workers. The Supervision Consultant shall focus on compliance by contractors with their contractual obligations related to labor management, occupational health and safety, and the Code of Conduct.

Monitoring activities shall include:

- Daily and weekly site inspections to observe working conditions, worker behavior, and compliance with safety requirements.
- Monthly review of contractor records, including timesheets, payroll documentation, training attendance logs, and grievance logs.
- Verification that all workers have received and signed employment contracts and the Code of Conduct.
- Verification that all workers have received required induction and refresher training on occupational health and safety, the Code of Conduct, and the grievance mechanism.
- Spot checks of subcontractor labor records to ensure flow-down of requirements.
- Review of contractor monthly reports on labor, occupational health and safety, grievances, and incidents.
- Documentation of any non-compliances and follow-up on corrective actions.

Contractors' monthly progress reports to the Supervision Consultant shall include as minimum:

- Workforce statistics, including total number of direct and subcontracted workers, disaggregated by gender, nationality, and skill level.

- Occupational health and safety performance, including number of fatalities, lost-time injuries, serious injuries requiring hospitalization, and significant near misses, together with a summary of corrective actions taken.
- Training completion data, including the number of workers who completed induction and refresher training on occupational health and safety, the Code of Conduct, and the grievance mechanism.
- A summary of grievances received, resolved, and pending, disaggregated by category (wages, working hours, occupational health and safety, harassment, discrimination, or other), together with average resolution times.

Responsibility for monitoring:

Entity	Role
Supervision Consultant	Day-to-day monitoring; site inspections; record review; monthly reporting to PMU
PMU	Oversight; periodic audits
World Bank	Quarterly reviews; spot checks

11.4 Non-Compliance Response

The PMU and the Supervision Consultant shall apply a graduated response to contractor non-compliance with labor and occupational health and safety requirements.

For minor non-compliance such as incomplete record keeping, minor personal protective equipment violations, or isolated training gaps the Supervision Consultant shall issue a Corrective Action Plan (CAP) with clear deadlines for remediation. The contractor shall submit evidence of corrective actions to the Supervision Consultant for verification. The Supervision Consultant shall increase the frequency of monitoring until compliance is confirmed.

For major non-compliance including the use of child labor, any form of forced labor, a confirmed incident of sexual exploitation, abuse, or harassment, a worker fatality, systematic wage theft affecting multiple workers, or deliberate falsification of records the Supervision Consultant shall take immediate action. The Supervision Consultant shall inform the PMU of the corrective measures to be implemented and the agreed remediation timeline. This action may include issuing a stop-work order for the affected activities, imposing contractual penalties such as liquidated damages, and requiring the contractor to submit a detailed corrective action plan within a specified timeframe. The PMU shall notify the World Bank within 48 hours of any major non-compliance incident.

Where the contractor fails to remedy major non-compliance within a timeframe specified by the PMU depending on the severity of the non-compliance, and not exceeding fifteen (15) working

days or where the non-compliance is egregious, The PMU may suspend one or more on-site activities. Suspension measures shall remain in place until the contractor demonstrates compliance and the corrective measures are verified by the Supervision Consultant and approved by the PMU.

12. Documentation, Record Keeping, Information Sharing and Reporting

12.1 Documentation and Record Keeping Requirements

The PMU shall establish a centralized, secure employment documentation system. Contractors shall maintain their own records and make them available for inspection by the PMU, the Supervision Consultant, and the World Bank.

Worker Registry: Contractors and the PMU shall maintain a worker registry containing each worker's name, age (with a copy of the verification document used), gender, nationality, job title, work location, and start and end dates of employment.

Employment Contracts: Contractors shall retain a signed written contract for every worker, including direct, contracted, and any community workers engaged.

Payroll Records: Contractors shall retain monthly payroll sheets, wage payment receipts (signed by the worker or with digital confirmation), and proof of enrollment in social security or equivalent insurance.

Occupational Health and Safety Records: Contractors and the PMU shall retain risk assessments, inspection records, training attendance logs, personal protective equipment issue records, and accident and incident reports, including near misses.

Grievance Logs: Contractors shall retain a standard grievance log (see Annex 3) recording all non-sensitive worker grievances. The PMU shall retain a separate, confidential SEA/SH grievance log with restricted access.

Code of Conduct: Contractors shall retain a signed copy of the Code of Conduct (Annex 2) for every worker.

Age Verification: Contractors shall retain a copy of the official documentation used to verify each worker's age, such as a national identification card, passport, birth certificate, or other valid official record. Where official documentation is unavailable, the alternative verification method used shall be documented.

Training Records: Contractors shall retain records of all training provided, including dates, topics, attendance sheets, and trainer details for induction and refresher training.

Primary Supplier Records: Contractors shall retain a list of all primary suppliers, signed Primary Supplier Statements of Compliance (Annex 2), and any due diligence site visit reports.

12.2 Confidentiality and Data Protection

Personal information regarding individual workers including pay, benefits, health status, medical records, grievance details, and religious or political affiliations shall be treated as strictly confidential.

Disclosure of personal information shall only occur with the informed written consent of the individual worker concerned, or where disclosure is required by Lebanese law, such as to a labor inspector or by court order.

SEA/SH records shall be stored in a separate, password-protected, access-restricted system or physical file. Access shall be limited to the PMU's designated SEA/SH Focal Point and the PMU Social Specialist. Names and identifying details shall be removed from any aggregate reporting.

Digital security. Contractors shall ensure that digital records are stored on secure, access-controlled systems with appropriate backup and data protection measures.

Physical security. Physical records shall be kept in lockable filing cabinets with access restricted to authorized personnel.

12.3 Information Sharing with Workers

All workers shall be provided with a copy of their employment contract in Arabic. For workers who may have difficulty understanding written documentation, an oral explanation of the key terms and conditions shall be provided in a language they understand.

A worker-friendly summary of rights including working hours, wage rates, overtime pay, leave entitlements, occupational health and safety rules, and how to access the grievance mechanism shall be provided to each worker orally and, where appropriate, in written or pictorial form.

Summaries of the LMP, the Code of Conduct, and the grievance mechanism procedures shall be posted on notice boards at all worksites and, where applicable, at worker accommodation facilities. These notices shall be in Arabic and, where a significant number of non-Arabic speaking workers are present, in a language they understand.

Emergency contact numbers, first-aid arrangements, evacuation routes, and designated assembly points shall be prominently displayed at all work sites in Arabic.

12.4 Reporting to the World Bank

The Borrower (CDR) shall provide regular progress reports to the World Bank at the frequency specified in the Environmental and Social Commitment Plan (ESCP). These reports shall include the following aggregated and anonymized information on LMP implementation.

Workforce statistics: The report shall include the total number of direct and contracted workers, disaggregated by gender, nationality, and skill level (skilled, semi-skilled, or unskilled), together with any significant changes in workforce composition during the reporting period.

Occupational health and safety performance: The report shall include the number of worker fatalities, lost-time injuries, serious injuries requiring hospitalization, and significant near misses. A summary of corrective actions taken in response to incidents shall also be provided.

Training completion: The report shall include the number of workers who completed induction training on occupational health and safety, SEA/SH prevention, and the Code of Conduct during the reporting period.

Grievance mechanism: The report shall include the number of grievances received, disaggregated by category (wages, working hours, occupational health and safety, harassment, discrimination, or other), the number resolved, and the average resolution time. SEA/SH grievances shall be reported only as an aggregate number (for example, "two SEA/SH grievances received") without any identifying details.

Contractor compliance: The report shall include a summary of any significant contractor non-compliances with labor and occupational health and safety requirements, together with any penalties imposed or stop-work orders issued.

Primary supplier issues: The report shall include any findings of child labor, forced labor, or serious occupational health and safety issues among primary suppliers, together with the actions taken to address them.

Incident notification: The Borrower shall notify the World Bank of any serious incident or accident related to the Project that has or is likely to have a significant adverse effect on workers, including a fatality, major injury, strike, SEA allegation, or child labor finding. Such notification shall be made within 48 hours of the Borrower becoming aware of the incident. A full investigation report and corrective action plan shall be submitted to the World Bank within 30 calendar days of the incident.

12.5 Public Disclosure

An anonymized, aggregate summary of the Project's labor management performance shall be included in the Project's semi-annual environmental and social monitoring reports. These reports shall be disclosed on the CDR and World Bank websites in accordance with the Bank's Access to Information Policy. The summary shall not contain any personally identifiable information about individual workers.

Annex 1 Example Format for Report on Compliance with Conditions of Work with ESS2 for Third Parties Engaging Contracted Workers²

Assignment name:
Contract ref. No:
Contract period: Start date (M/D/Y): End date (M/D/Y):
Contractor/Service Supplier:
Reported period:
Date of report:
Signature of authorized person:

LABOR AND WORKING CONDITIONS COMPLIANCE REPORT

Company Employees³ Statistics

Total number of employee's gender disaggregated⁴: M _____ F _____

Number of employees with an employment contract out of total number of employees:

Number of employees without an employment contract out of total number of employees:

Number of employees with access to social security, pension and health insurance out of total number of employees:

Number of employees who receives wages/salaries at least once a month out of total number of employees:

Number of employees who left the company in the reported period out of total number of employees:

Number of employees hired in the reported period:

Number of hours worked per employee (monthly average):

Total overtime (monthly average per employee):

Health and Safety

Number of injuries at work (in reporting period and cumulative since contract start) out of total nr. of employees:

Number of fatalities at work (in reporting period and cumulative) out of total nr. of employees:

² This is an example of the way in which information could be presented in a monthly report.

³ The employee is any natural person employed or engaged to work or perform service for the employer

⁴ The number of employees refers to the actual number/headcount on the date of the report.

Number of reported violence out of total nr. of employees:

Number of reported harassment/ abuses out of total nr. of employees:

Grievance Mechanism

Availability of an accessible and functioning employee grievance mechanism (GM) (Y/N):

Number of grievances raised with the GM (in reporting period and cumulative since contract start):

Number of grievances resolved by GM (in reporting period and cumulative since contract start):

Number of open grievances past 30 days:

Legal Cases

Number of suits filed with regard to labor, employment and OHS issues:

Number of disputes brought to peaceful settlement/ voluntary arbitration procedure:

Monitoring

Number of visits by labor/ OHS inspection:

Working and Labor Conditions Screening Check List

	Terms and conditions	Yes / No	Notes
1	All Project workers have an employment contract or engagement agreement in writing	Yes ☐ No ☐	If "No" please specify and explain
2	All Project workers are paid at least once a month	Yes ☐ No ☐	If "No" please specify and explain
3	All non-shift Project workers worked 8 hours a day, 40 hours a week All shift Project workers worked 12 hours a day for 15 consecutive days, followed by 15 days off	Yes ☐ No ☐	If "No" please explain and specify the hours worked
4	All Project workers had a regular daily and weekly rest	Yes ☐ No ☐	If "No" please specify and explain

	Terms and conditions	Yes / No	Notes
5	Number of Project workers who were terminated from employment in line with national labor law and ESS2	Yes ☐ No ☐	If "Yes" please specify number and explain conditions of termination
6	Number of Project workers that attended OHS related training program	Yes ☐ No ☐	If "Yes" please specify number and explain
7	Project workers were granted leave they are entitled to (e.g. annual leave, maternity leave etc.)	Yes ☐ No ☐	If "Yes" please specify the type and number of leaves
8	Project workers were involved in accidents at work resulting in injuries or fatalities	Yes ☐ No ☐	If "Yes" please specify and explain
9	Project workers reported on cases of discrimination, harassment, sexual harassment or non-compliance with law	Yes ☐ No ☐	If "Yes" please specify and explain
10	Project workers raised grievances or started voluntary arbitration / legal proceedings to settle a dispute	Yes ☐ No ☐	If "Yes" please specify and explain
11	In the reported period there were some incidents of non-compliance with the LMP	Yes ☐ No ☐	If "Yes" please specify and explain

Annex 2 Code of Conduct

CODE OF CONDUCT

The Code of Conduct is designed to foster the highest standards of integrity, ethical conduct and labor standards to ensure a safe and decent working environment. The Code's standards are based on national law and accepted good labor practices. The main aim is to mitigate social risks within the context of the Lebanese Emergency Assistant Project, if any, including the risks of sexual exploitation, sexual abuse and sexual harassment.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation. [Include Implementing Agency] is committed to establishing best practices for respectful and ethical treatment of workers, and promoting sustainable conditions through which workers earn fair wages in safe and healthy workplaces.

This Code of Conduct identifies the behavior that is required from every individual working on the Project, including all direct, contracted and subcontracted workers.

REQUIRED CONDUCT

Employees shall:

1. Carry out his/her duties competently and diligently;
2. Comply with this Code of Conduct and all applicable laws, regulations and other requirements, including labor laws in relation to child labor;
3. Treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children (persons under the age of 18);
4. Not use language or behavior towards men, women or children/learners that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
5. Not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other workers or members of the surrounding communities;
6. Not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
7. Not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
8. Not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
9. Not employ anyone under the age of 18 for construction activities or hire children for domestic or other labor, which is inappropriate given their age, or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury;

10. Complete training/sensitization related to the social aspects of the Contract, including on Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), occupational health and safety, HIV/AIDS, Code of Conduct etc. as requested by my employer;
11. Refrain from any form of theft for assets and facilities including from surrounding communities;
12. Remain in designated working area during working hours;
13. Not be in possession of alcohol and illegal drugs and other controlled substances in the workplace and being under influence of these substances on the job and during working hours;
14. Wear mandatory PPE at all times during work;
15. Follow prescribed environmental occupation health and safety standards;
16. Raise grievances through the established grievance redress mechanism;
17. Report violations of this Code of Conduct and acts of misconduct by a fellow worker, whether in my company or not; and
18. Not retaliate against any person who reports violations of this Code of Conduct.

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact XXXX in writing at this address XXXX or by telephone at +XXXX (Option 2); or
2. Call +XXXX to reach the Company's hotline (XXXXXX) and leave a message.
- 3.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct may result in serious consequences, up to and including termination and possible referral to legal authorities.

DECLARATION:

I do hereby acknowledge that I have read and received a copy of this Code of Conduct in a language that I comprehend. I do agree to comply with the standards contained therein and understand my roles and responsibilities. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in termination of the contract.

Signed by: [insert name] _____

Signature: _____

Date: (day month year): _____

Countersignature of authorized representative of the individual:

Signature: _____

Date: (day month year): _____

Annex 3 Sample Grievance Log

Grievance ID	Date received	Worker information (optional)	Grievance category	Description	Acknowledgment date	Resolution proposed	Resolution date	Status	Closure Date