



## Worker Welfare Policy



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## **Leadership and Commitment:**

To improve the Standard Operating Procedures in all the project sites by following the safety guidelines from the Civil Defense, NFPA & Also according to the international safety regulatory organizations (OSHA, ISO& OHSAS). SSCL believes in developing safe working procedures and maintaining a 0 injury working environment. This scope clearly concludes that our main scope is improved performance and the effective utilization of the resources and for the benchmarking with the other departments.

## **Policy and strategic Objectives:**

The main scope of SBG O&M is to ensure the effectiveness of the safety standards and the rules and regulations of the regulatory bodies of health and safety. In all the operation and maintenance related issues in the projects, we ensure the implementation of zero accident policy. The main objective is to provide safe system of work, safe equipment of work and safe working methods to ensure the safety of employees, workplace and environment in accordance to the NFPA, OSHA, ILO and national regulatory bodies of Health and Safety

## **Smoking Policy**

SBG O&M has clear policy regarding smoking and drug addiction issue as we exhibit no tolerance policy and we clearly made this part of our recruitment portion that the employ which has to be working under SBG O&M must not be a smoker or addicted to any sort of drugs. We take strict actions if we find any employee deviating from these rules and regulations as first there is a portion of the formal warning and after that termination of the employ as in our project it is strictly prohibited to smoke

## **Organization, Resources and Competence**

The organization, resources and competence are the key factors of the success of our department in all the current projects as our organization fully exhibits all the standards implementation and the adequate hierarchy. The resources are fully utilized to achieve maximum efficiency and the competence of the staff is enhanced by arranging workshops, training sessions and various courses registration so that we can improve our performance and enhance the benchmarking factor

## **Project HSE Organization**

In all the current projects as our organization fully exhibits all the standards implementation and the adequate hierarchy. The chain of the command for the proper execution of working method is followed and we have an appropriate channel of communication from top to the last position of our department and our roles and responsibilities have adequate shared attributes.



## **Role and Responsibility**

The roles and responsibility of each and every employ is well defined and every individual is accountable for his work as safety requires adequate responsibility and so far our performance shows that actions speaks louder than words.

## **Competence Assurance**

All the staff of our department and we have also arranged a portion of the evaluation of our staff on monthly basis as we have developed the employ of the month and employ of the season award for the betterment of the performance and the motivation of the staff. We arrange certification enrolment of our competitive staff to improve the competency of our staff and the efficiency of our department.

## **AUDIT AND REVIEW**

SBG O&M undergoes yearly safety audit to measure the performance and evaluation of health and safety policy, rules regulations, SOP'S, working methods of the organization. The audit undergoes the interviewing, observation and examination process with accordance to the methodology of OHSAS 18001 Lead auditor.



## Worker Welfare Policy

### Commitment to Worker Welfare

**SBG O&M** firmly believes in supporting and protecting the health, safety, welfare, security, and dignity of each worker on its projects. Ethical recruitment and employment practices, safe work practices, as well as safe and healthy living and working conditions are critical elements to our way of delivering work. We recognize that welfare arrangements and quality facilities not only improve workers' health and well-being, but also enhance performance, efficiency, and health and safety compliance. Such conditions are also essential to achieving our Target Zero philosophy and our mission of helping clients build a better and more sustainable world.

**SBG O&M** is committed to establishing and maintaining high worker welfare standards for our employees and individuals working on Projects on our behalf. In addition, we will share this policy with our clients, and strive to influence other firms in our industry to adhere to the practices outlined in this Policy as well as local regulations. We commit to continuously improving our services to clients in this area by engaging with relevant stakeholders and drawing from international best practices.

### Scope

All the provisions and requirements of this Policy apply to **SBG O&M**, and all contractors within our supply chain working on Projects on behalf of **SBG O&M** are expected to adhere to and implement policies and practices that meet or exceed the worker welfare standards set forth in this Policy or such higher standards as required by applicable local laws and regulations. Within this Policy "Project" is defined as a **SBG O&M** facility or site-based construction project employing Workers in construction, janitorial, custodial, hospitality or maintenance activities in which the Contract requires CH2M HILL to directly project manage or supervise the Project Site-specific working conditions.

We will openly share this Policy and guidance notes with contractors in our supply chain and with our clients, and we will encourage implementation within their supply chains. Where provisions of this Policy are more stringent than the laws of a country, the Policy provisions will prevail, unless doing so will contravene local laws. Where the laws of the countries in which we operate are not in alignment with this Policy, we will strive to work directly with those governments, and will work with multi-stakeholder initiatives and civil society organizations, to influence changes in government policy and enforcement that will improve the protection of worker rights as outlined in this Policy.



## Objective

As an ethical company, we will take appropriate measures as outlined in this Policy to ensure that the Contractors in our supply chain and with whom we work on Projects hold an equal regard for the health, safety, and welfare of their Project Workers.

## Worker Welfare Issues

Worker Recruitment	Worker Management	Accommodation	Safety
<ul style="list-style-type: none"> <li>• Contract abuse</li> <li>• Recruitment fees</li> <li>• Human rights</li> <li>• Employment freedom</li> <li>• Repatriation</li> </ul>	<ul style="list-style-type: none"> <li>• Discrimination</li> <li>• Harassment and abuse</li> <li>• Restricted freedom of movement</li> <li>• Disciplinary practices</li> <li>• Working hours</li> <li>• Wages &amp; benefits</li> <li>• Freedom of association</li> </ul>	<ul style="list-style-type: none"> <li>• Facility standards</li> <li>• Food and water</li> <li>• Laundry facilities</li> <li>• Health care</li> <li>• Lifestyle and leisure</li> </ul>	<ul style="list-style-type: none"> <li>• Skills and training</li> <li>• Health &amp; safety</li> <li>• Communications</li> <li>• Welfare facilities'</li> <li>• Health care</li> </ul>

## Fundamental Principles of Worker Welfare

**SBG O&M** Workers and all Workers of Contractors (which includes by definition Sub-contractors) working on behalf of **SBG O&M** (within our supply chain) on Projects shall be treated on the basis of the following fundamental principles:

- The employment and welfare policies and standards of our Contractors shall be in line with the requirements set out in legislation in the country of work.
- Workers shall be provided with information about their human and labour rights and entitlements under the law and this Policy using appropriate methods and language to ensure they understand;
- The dignity of Workers shall be protected and preserved. Inhumane treatment, abuse and humiliating disciplinary action is not permitted;



- Forced, compulsory, bonded, or indentured labour, human trafficking practices, or any other violations of human and labour rights in accord with the work country, international standards, and this Policy, shall not be tolerated;
- Recruitment, selection, and hiring shall be conducted in a fair and ethical manner and without discrimination on the basis of nationality, gender, sexual orientation, pregnancy status, family status, ethnicity, social status, political affiliation, race, or religion;
- Employers shall ensure that Foreign Migrant Workers understand the terms and conditions of their employment and are provided with written contracts in a language that they understand. Illiterate Foreign Migrant Workers shall have the terms and conditions verbally communicated to them;
- Workers shall be provided a clean, secure, safe, and healthy working environment;
- Where Contractors are responsible for their Workers' living arrangements, Contractors shall be expected to provided clean, secure, safe, and healthy living environment;
- Workers shall have unrestricted access to water and toilet facilities at all times;
- All Workers must be treated equally and fairly, irrespective of their nationality, gender, sexual orientation, pregnancy status, family status, ethnicity, social status, political affiliation, race, or religion;
- Wage payments shall be made as agreed and on time;
- Persons under the age of 16 shall not be employed;



- Workers have the freedom to exercise their in-country legal rights, including raising a grievance, freedom of movement, resignation, freedom of association, or refusing to perform work that poses an unacceptable safety or health risks for the type of Project for which Workers have accepted employment;
- All Workers shall at all times have the freedom of movement outside normal working hours, unless there are legitimate safety or security issues that might threaten the health, safety, and well-being of the Worker;
- Appropriate assurance programs must be implemented to ensure this Policy is implemented;
- Senior management shall be engaged and provide leadership and oversight on the implementation of this Policy;
- Contractors, subcontractors and third parties falling under the coverage of this Policy will bear full responsibility for fulfilling the requirements of this Policy.

#### **Compliance with Legal Requirements**

All SBG O&M Project Contractors will be expected to adhere to the following:

- The relevant laws, including regulations, decrees, orders, guidelines, decisions, or directives issued by the relevant authorities in the country of operation;
- Any relevant amendments or additions to the aforementioned laws and any relevant new law promulgated during the implementation of the Main Contract and Sub-Contracts.
- Any contractual provisions in contracts requiring adherence to and implementation of policies and practices that meet or exceed the worker welfare standards set forth in this Policy.

Any conflicts between law and the requirements of this Policy shall be resolved by the Regional Managing Director in consultation with Health and Safety, Procurement, the Regional Legal Department, and the SBG O&M Project Manager.





## Roles and Responsibilities

### Project Manager

The **SBG O&M** Project Manager must have a thorough understanding of this Policy, and meet the requirements contained within. At all times the Project Manager must whenever practical provide appropriate support and guidance on this Policy to CH2M HILL staff, our Contractors, and the Client. The Project Manager is ultimately accountable for the assurance program and ensuring implementation of this Policy.

### Facilities Lead / Office Manager

The **SBG O&M** Facilities Lead/Office Manager must have a thorough understanding of this Policy, and meet the requirements contained within. At all times the Facilities Lead/Office Manager must whenever practical provide appropriate support and guidance on this Policy to **SBG O&M** staff and our Contractors.

**SBG O&M** Workers and all Workers of Contractors (which includes by definition Sub-contractors) working on behalf of **SBG O&M** (within our supply chain) on Projects shall be treated on the basis of the following fundamental principles:

- The employment and welfare policies and standards of our Contractors shall be in line with the requirements set out in legislation in the country of work.
- Workers shall be provided with information about their human and labour rights and entitlements under the law and this Policy using appropriate methods and language to ensure they understand;

The dignity of Workers shall be protected and preserved. Inhumane treatment, abuse and humiliating disciplinary action is not permitted

**SBG O&M Responsible Health & Safety Manager**

The **SBG O&M** Responsible Health & Safety Manager (RHSM) has oversight with regard to this Policy on specific Projects and is authorized to coordinate and assess the specific Project procedures to implement this Policy. The RHSM will assist in the implementation of the Project assurance program.

**SBG O&M Legal Department**

The **SBG O&M** Legal Department will provide guidance on legal matters affecting the implementation of this Policy as requested by specific Projects.

**SBG O&M Procurement Lead**

The **SBG O&M** Procurement lead is responsible for managing the Project supplier/subcontractor prequalification process under this Policy; leading the issuance of Contractor solicitations and evaluation of proposals; supporting Project facility inspections under this Policy, awarding supplier/subcontract agreements, communicating with suppliers/subcontractors and resolving issues; performing oversight functions and monitoring performance; and maintaining a register of prequalification questionnaire submissions.

**SBG O&M External Sales / Business Development Lead**

The **SBG O&M** External Sales/Business Development lead (or the appropriate client relationship manager) shall be responsible for: engaging with Clients to discuss the content and benefits of this Policy; encouraging Clients to adopt the standards set forth in this Policy; and making provisions for **SBG O&M** to support the implementation of this Policy as part of our services to Clients.

**SBG O&M Market / Regional Risk Manager**

The **SBG O&M** Market/Regional Risk Manager shall be responsible for: early identification of potential Policy violation risks (potentially in go/no-go phase); ensuring that Policy violation risks are included in the pursuit/project risk register; and verifying that appropriate mitigation actions are in place.

**SBG O&M Human Resources Manager**

The **SBG O&M** Human Resources department shall be responsible for ensuring that our Project contingent labour workforce and our direct Project Workers are treated in accordance with the requirements of this Policy.



## General Requirements

### Ethical Recruitment and Employment

The recruitment of all Project Workers shall be conducted in accordance with this Policy. **SBG O&M** reserves the right to audit and prohibit the use of certain recruitment agents, sub-contractors, or suppliers based on Policy violation risks identified during audits and the supplier selection process, including a history of non-compliance with worker welfare requirements and other risk factors.

Contractors may be terminated and prevented from working with on future projects if the requirements of this Policy are not applied on our Projects.

### Identity Documents and Passports

Foreign Migrant Workers shall be in full ownership of their passports and other personal documents. The contractors shall make available to Foreign Migrant Workers safe lockable storage facilities where they can store and access their personal documents.

### Equality

All Project Workers, irrespective of their nationality, gender, sexual orientation, pregnancy status, family status, ethnicity, social status, political affiliation, race, or religion, shall be treated fairly with regard to hiring and opportunity or treatment in employment. Contractors and Sub-contractors will be expected to develop policies as well as effective and efficient procedures to implement, monitor, and ensure company-wide adherence to this Policy.

### Freedom of movement

All Project Workers shall at all times have the freedom of movement outside normal work hours, unless there are safety or security issues that threaten the health, safety, and well-being of the Worker.

### Grievance

Contractors shall have a system for a confidential, effective grievance reporting and resolution process for all Project Workers on site and in worker accommodation.

### Accommodation standards

Project Worker accommodation standards contained in national/local regulations should be considered as a baseline. Where Project Worker accommodation requirements are not specified in national/local laws and regulations, those standards contained in Guidance Note Civil shall apply. Where there is any conflict, the higher of the standards should be applied where feasible.



If a Project Worker accommodation facility is being managed by a Contractor or Sub-contractor, the accommodation standards must be specified, and mechanisms to ensure that those standards are implemented should also be established.

### **Management of Accommodation**

Project accommodation facilities must be operated or overseen by an experienced and competent accommodation manager, with sufficient resources and the organisation to operate the facility to the required standards.

The manager should have the authority and responsibility for overseeing staff and ensuring the implementation of the standards of this Policy.

### **Communication**

Contractors shall have a process to ensure that their Project Workers are well-informed about this Policy, that an effective two-way communication processes exists, and that they encourage an open and honest dialogue on questions about this Policy.

### **Records and access**

Contractors shall keep and maintain in a safe, fireproof, and secure location all relevant information and records concerning their compliance with their own policies and practices that meet or exceed the standards set forth in this Policy. Access to Project Worker personal information shall be limited to authorized personnel.

### **Insurance**

Contractors shall have adequate general insurance coverage and comprehensive employee medical and work-related accident insurance suitable and applicable for their workforce.



## Records and Access

An individual human resources file for each Project Worker must be kept showing the Project Worker's:

- name;
- original offer of employment and employment agreement;
- job or occupation;
- age;
- nationality;
- place of residence;
- marital status;
- next of kin;
- home contact details in case of emergency;
- date of employment;
- wages paid and any adjustments made;
- leave taken (including annual leave, sick leave, and other leave);
- disciplinary record;
- period of probation;
- grievances record;
- work appraisals;
- records of pre- and post- medical examinations;
- induction and training records;
- occupational illnesses and injuries;
- date and reason for termination of employment; and

Contractors will, consistent with applicable privacy laws, at any time allow **SBG O&M PROJECTS**, or any person designated on behalf of **SBG O&M**, access to the above records and files.



## Guide Worker Communication

Effective communication between Project Workers and management is the foundation for identifying problems, finding solutions and improving productivity as a result. In other words, it's also good for the bottom line.

For Project Workers, communication creates a better understanding of business issues faced by the Project, builds a stronger partnership with management and helps to solve every-day problems. For management, communication supports better and safer work, better worker retention and better feedback—all of these things are essential to continuous business improvement.

Successful companies recognize the importance of having an effective feedback mechanism that is trusted and used by Project Workers. Project Worker feedback provides an early warning of any issues. By collecting feedback, the Project management team can avoid a problem or minimize the severity and duration of problems. And, managers can make necessary changes to systems or procedural weaknesses before they become serious operational risks.

## Pre-Departure Training

Prior to commencing work at a Project, the Project team or the Contractor should provide the Project Workers with pre-departure training to inform them about the applicable Worker Welfare Policy (including the “no recruitment fee” requirement), employment terms and conditions, receiving country living arrangements, workplace conditions, grievance process, and rights and responsibilities.

## Arrival Orientation and Training

Upon arrival, the Project team or Contractor should ensure that all Project Workers receive post-arrival orientation in the language they understand to reaffirm the information given pre-departure and to cover topics not addressed during pre-departure orientation. Repeating the information post-arrival will help Project Workers remember it.

The following topics should be addressed during the arrival orientation:

- Project policies & procedures:
- working hours, overtime policy, holidays, vacation, sick leave
- recruitment policy
- safeguarding passports and identity documents
- workplace rules
- dormitory regulations
- disciplinary procedures
- termination and repatriation
- Legal rights & other protections provided by the applicable company or client codes of conduct
- Legal requirements and responsibilities
- Project Worker feedback and communication
- Mechanisms for workers to report violations of the applicable company policies
- Project Worker accommodation health and safety



- Receiving country culture and common practices
- Awareness and prevention skills related to most relevant diseases
- Social and cultural awareness of local community.

Training should be delivered in a language or languages all Project Workers understand. Furthermore, signs, symbols, and other indicators related to health and safety hazards should be marked so that Project Workers can understand them.

Contractors are encouraged to appoint an on-site Project Worker coordinator conversant in the languages of the different Project Workers. Additionally, training supervisors on the sending country language and culture would improve workplace communication.

The training and communication program should include the following elements:

- Clear procedures for Project Workers' on-the-job training.
- Objective evaluation of Project Workers' understanding of and training effectiveness.
- Standard, measurable, and objective indicators and tools for skills training evaluation.
- All trainers speak the Project Workers' native language
- All verbal and written communication is done in the Project Workers' native language

#### **Notice boards**

Health and Safety and other general notice boards must and be established in prominent locations and cater for multiple languages. Notice boards must include welfare information, including grievance procedure, contact details for the accommodation manager and other key staff, work hours and other information as deemed necessary.

#### **Safety and Welfare Committee**

A safety and welfare committee must be established at the accommodation facility and be representative of the workforce and the facility management. The committee must include Project Worker representatives from all nationalities and be selected by the Project Workers. The Contractor's management representatives must include as a minimum the Health & Safety Representative and HR Manager. The committee shall meet on at least a monthly basis, minutes should be taken of the discussions and a signed attendance register be taken. Welfare arrangements will be included as an agenda item of the project HSE meetings with the Contractor and Project management.

#### **On-going Project Worker welfare awareness and promotion**

Topics associated with welfare, (health, hygiene, diet, drugs, alcohol, etc.) will be communicated to the Project Workforce via regular toolbox talks and ad-hoc training programs in a language they understand.

Good health and hygiene initiatives will be encouraged throughout all phases of a Project. Healthy lifestyle bulletins and alerts and reminders should be circulated as often as possible.



## Grievance process

The Project team and the Contractor must make available to all Project Workers a confidential process in which they can raise grievances, report concerns or non-compliance with legal or policy requirements, anonymously and without fear of retaliation. The Project Workers shall be informed of this process during both their pre-departure training and arrival induction.

The primary purposes of a grievance procedure are to:

- Manage conflict, using a structured process for peaceful resolution; and

Enable Project Workers to complain with confidence in the process, knowing there is a system of appeals leading to an impartial decision-maker. To build the foundation for a proper grievance procedure, the Contractor must have a written policy to receive and address Project Workers grievances, which must include:

- Established procedures that are easy to understand;
- A way to protect Project Workers' confidentiality;
- A procedure for management response that is communicated to Project Workers;
- A way for Project Workers to report a grievance against a supervisor to someone other than that supervisor
- A procedure for Project Workers to monitor the status of complaints;
- An appeal system for unfavourably resolved complaints or disciplinary actions;
- A guarantee that Project Workers can report a grievance without fear of penalty, dismissal, or reprisal of any kind.
- A provision that gives Project Workers access to additional support or advocacy, for example, interpreters and/or counselling.





## General Facility Requirements

Ensuring acceptable standards of living facilities for site-based Project Workers is important in order to minimize safety hazards and to protect Project Workers from disease or illness. The location of the accommodation is important to prevent unreasonable exposure to wind, fire, flood and other natural hazards. It is also important that Project Workers' accommodation is reasonably unaffected by the environmental or operational impacts of the worksite (for example noise, emissions or dust) but is sufficiently close that Project Workers do not have to spend undue amounts of time travelling from their accommodation to the Project worksite. Living facilities should be built of adequate materials and should be kept in good repair, clean and free from rubbish and other refuse.

### Benchmarks

- Facilities are located to avoid flooding and other natural hazards.
- Project Workers' accommodation is located within a reasonable distance from the Project worksite.
- Transport from Project Worker accommodation to worksite is safe and provided free of charge.
- The living facilities are built with adequate materials kept in good repair and maintained clean and free from rubbish and other refuse.
- The site of building is adequately drained to avoid the accumulation of stagnant water.

## Heating, air conditioning, ventilation and light

Heating, air-conditioning and ventilation should be appropriate for the local climate and to provide Project Workers with a comfortable and healthy environment to rest and spend their spare time.

### Benchmarks

- When living facilities are located in cold weather zones, the temperature should be kept at a reasonably comfortable temperature setting notwithstanding the need for adequate ventilation.
- When they are located in hot weather zones, living facilities are provided with adequate ventilation and/or air conditioning systems.
- Both natural and artificial lighting are provided in living facilities, with window area representing not less than 5 to 10% of the floor area.



## Water

To prevent dehydration and diseases resulting from lack of hygiene, Project Workers should always have an easy access to a source of clean water. An adequate supply of potable water must be available in the same buildings where bedrooms or dormitories are provided. Drinking water must meet local or WHO drinking water standards. It could either be produced by dedicated catchment and treatment facilities or be tapped from existing municipal facilities if their capacity and quality are adequate. It is also best practice to provide Project Workers with cool drinking water.

### Benchmarks

- Project Workers have access to an adequate and convenient supply of free potable water is always available. Depending on climate, 80 to 180 litres per person per day are available.
- Drinking water meets national / local or WHO drinking water standards, whichever is most protective.
- All tanks used for the storage of drinking water are constructed and covered as to prevent water stored therein from becoming polluted or contaminated.



## Waste water and solid waste

Waste water treatment and effluent discharge as well as solid waste treatment and disposal must comply with local or World Bank effluent discharge standards and be adequately designed to prevent contamination of any water body, to ensure hygiene, and to avoid the spread of infection and disease, the proliferation of mosquitoes, flies, rodents, and other pest vectors. Treatment and disposal services can be either provided by dedicated or existing municipal facilities.

### Benchmarks

- Waste water, sewage, food and any other waste material are adequately discharged, in compliance with local or World Bank standards, whichever are most protective.
- An adequate number of leaks proof, covered containers for rubbish collection are provided and emptied on a regular basis.
- Pest extermination, vector control and disinfection are carried out throughout the living facilities on a regular basis.

### Dormitory facilities

The standards of dormitory facilities are important to allow workers to rest properly and to maintain good hygiene. Overcrowding should be avoided particularly. This also has an impact on Project Workers' productivity and reduces work-related accidents. Dormitories should be kept clean and in a good condition. Exposure to noise and odour should be minimised. In addition, dormitory design should strive to offer Project Workers a maximum of privacy. Dormitories must be separate by gender.

### Benchmarks

- Dormitories are kept clean and in good condition.
- Dormitory flooring material is easily cleanable.
- Sanitary and sleeping facilities are located within the same buildings.
- Density standards per resident range from 10 to 12.5 cubic m (volume) per person or 4 to 5.5 square meters (surface) per person.
- A minimum ceiling height of 2.10 meters is provided.
- In collective rooms, in order to provide workers with some privacy, only a reasonable number of Project Workers are allowed to share the same room. Standards range from 2 to 8 Project Workers.



- All doors and windows should be lockable, and provided with mosquito nets where conditions warrant.
- There should be mobile partitions or curtains to ensure privacy
- Every resident is provided with adequate furnishings such as a table, a chair, a mirror and a bedside light.
- Separate sleeping areas are provided for men and women, except in family accommodation.

### **Bed arrangements and storage facilities**

The provision of an adequate numbers of beds of an appropriate size is essential to provide Project Workers with decent, safe and hygienic conditions to rest and sleep. Here again, particular attention should be paid to privacy. Consideration should be given to local customs so beds could be replaced by hammocks or sleeping mats for instance.

### **Benchmarks**

- A separate bed for each Project Worker is provided. The practice of “hot-bedding” is prohibited.
- Where bunk beds are used, there must be enough clear space between the lower and upper bunk of the bed. Standards range from to 0.7 to 1.10 meters.
- Triple deck bunks are prohibited.
- Each Project Worker must be provided with a comfortable mattress, pillow, cover and clean bedding.
- Bed linen is washed frequently and applied with repellents and disinfectants where conditions warrant (malaria).
- Secure, lockable facilities for the storage of personal documents and other belongings are provided.
- Separate storage for work boots and other PPE, as well as drying/airing areas may need to be provided depending on conditions.



## Sanitary and toilet facilities

Sanitary and toilet facilities will always include all of the following: toilets, urinals, washbasins, showers and feminine care facilities. Sanitary and toilet facilities should be kept in a clean and fully working condition. Facilities should also be constructed of materials that are easily cleanable and ensure privacy. Sanitary and toilet facilities are never shared between male and female residents, except in family accommodation, if applicable.

### Benchmarks

- Sanitary and toilet facilities are constructed of materials that are easily cleanable.
- Sanitary and toilet facilities are cleaned frequently and kept in working condition.
- Sanitary and toilet facilities are designed to provide workers with adequate privacy, including partitions and lockable doors.
- Sanitary and toilet facilities are not shared between men and women, except in family accommodation, if applicable.
- An adequate number of toilets are provided to Project Workers; usual standards range from 1 unit per 6 to 15 Project Workers depending on local customs and gender mixes. For urinals, usual standards are 1 unit per 15 Project Workers.
- Toilet facilities are conveniently located and easily accessible from sleeping rooms. Toilet rooms shall be located to be accessible without passing through any sleeping room. In addition, all toilet rooms should be well lighted, have good ventilation or external windows, have sufficient hand wash basins and be conveniently located. Toilets and other sanitary facilities should be (especially in cold climates) in the same building as rooms and dormitories.

## Showers/washrooms and other sanitary facilities

Hand washbasins and showers should be provided in conjunction with rooms/dormitories. These facilities must be kept in good working condition and cleaned frequently. Flooring in shower facilities should be of hard washable materials, impervious to damp and properly drained. Adequate space must be provided for hanging, drying and airing clothes. Suitable light, ventilation and soap should be provided. Finally hand washing, shower and other sanitary facilities should be located within a reasonable distance from other facilities and from sleeping facilities in particular.

### Benchmarks

- Showers/washroom flooring is made of slip resistant, hard washable materials.
- An adequate number of hand wash facilities are provided to workers, ranging from 1 unit per 6 to 15 Project Workers. Hand wash facilities should consist of a tap and a basin, soap and hygienic means of drying hands.



- An adequate number of shower/washroom facilities are provided to Project Workers. Standards range from 1 unit per 6 to 15 Project Workers.
- Showers/washrooms are conveniently located.
- Shower/washroom facilities are provided with an adequate supply of cold and hot running water.

### **Canteen, cooking and laundry facilities**

Adequate canteen, cooking and laundry facilities and equipment should be provided. When caterers are contracted to manage kitchen and canteens, special attention should be paid to ensure that the following requirements are taking into account and implemented. To this end, adequate reporting/monitoring mechanisms should be implemented. Canteen and cooking facilities should provide sufficient space for preparing food and eating, as well as conforming to safety requirements. When Project Workers can individually cook their meals, they should be provided with dedicated space outside of the sleeping compounds. Facilities must be kept in a clean and sanitary condition. In addition, canteen, kitchen, cooking and laundry floor, ceiling and wall should be made of easily cleanable material.

Providing facilities for workers to wash work and non-work related clothes is essential for personal hygiene. The alternative is to provide a free laundry service.

### **Benchmarks**

- Canteen, cooking and laundry facilities are built in adequate and easy to clean materials.
- Canteen, cooking and laundry facilities are kept in clean and sanitary condition.
- Places for food storage and preparation are clean and sanitary.
- All kitchens floor, ceiling and wall surfaces are made of non-absorbent, easily cleanable materials.
- Food preparation tables are also equipped with a smooth impervious washable surface.
- The WHO 5 keys to safer food or an equivalent process is implemented
- Different choices of food are served taking into consideration cultural and religious background.



## Medical facilities

Access to adequate medical facilities is important to maintain Project Workers' health and to provide adequate responses in case of health emergency situations. The availability or level of medical facilities provided in Project Worker accommodation is likely to depend of the number of Project Workers living onsite and of the medical facilities already existing in the neighbouring communities. However, first aid must always be available on site. Providing adequate first aid can save lives and prevent minor injuries becoming major ones.

### Benchmarks

- An adequate number of first aid kits are available and adequately stocked.
- An adequate number of staff/Project Workers are trained to provide first aid on all shifts.
- Depending on the community's medical infrastructure, other necessary medical facilities are provided (nurse rooms, dental care, and small surgery).

### Leisure, social and telecommunication facilities

Basic leisure and social facilities are important for Project Workers to rest and also to socialise during their free time. It is also important to provide Project Workers with adequate means to communicate with the outside world. This is particularly true where Project Workers' accommodation is located in remote areas far from any communities. Consideration of cultural attitudes is important. Provision of space for religious observance needs to be considered taking cognisance of the local context and potential conflicts in certain situations.

### Benchmarks

- Basic collective social/rest spaces and recreational facilities are provided to Project Workers.
- Project Workers are provided with dedicated places for religious observance if the context warrants.
- Project Workers are given access to public phones at affordable/public prices (i.e. not inflated).
- Internet facilities should also be provided, particularly where large numbers of Foreign Migrant Workers are accommodated.



## **Managing Workers' accommodation**

Effective on-going management of living facilities is essential to ensure accommodation is safe and sanitary. This encompasses issues such as the physical maintenance of buildings, security and consultation with residents and neighbouring communities in order to ensure the implementation of the housing standards on the long term.

Housing facilities should have a written management plan, including management policies or plans on health and safety, security, living conditions, and relationships with the communities.

The quality of the staff managing and working at the Project Worker accommodation facilities will have a decisive impact on the level of standards which are implemented and the well-being of Project Workers (for instance on the food safety or overall hygiene standards). It is therefore important to ensure that managers are competent and other workers are adequately skilled. The manager will be responsible for overseeing staff, for ensuring the implementation of the accommodation standards and for the implementation of the management plans. It is important the accommodation manager has the corresponding authority to do so.

If the facility is being managed by a contractor, the housing and management standards should be specified in the relevant contract, and mechanisms to ensure that those standards are implemented should be established. As part of this process, the accommodation manager (or contractor) should have a duty to monitor the application of the accommodation standards and to report frequently on their implementation to the client.

## **Benchmarks**

There are management plans and policies especially in the field of health and safety (with emergency response), security, and relationships with the communities.

An appointed person with the adequate background and experience is in charge of managing the Project Workers' accommodation.

If contractors are being used, there are clear contractual management responsibilities and reporting requirements.

Depending on the size of the accommodation, there is a sufficient number of staff in charge of cleaning, cooking and of general maintenance.

Such staffs are recruited from the local communities to the extent possible.

Staffs have received basic health and safety training.

Persons in charge of the kitchen are trained in nutrition and food-handling and adequately supervised.



**Charging fees for accommodation and services**

Project Workers should not be charged fees for the accommodation or the services provided to them such as food or transport where Project workers do not have the choice to live or eat anywhere else. If unavoidable any charges should be transparent, discussed during recruitment and specified in writing to Project Workers. Any such charges should still leave Project Workers with sufficient income and should never lead to a Project Worker becoming indebted.

**Health and safety on site**

The company or body in charge of managing the Project Workers' accommodation has the prime responsibility for ensuring Project Workers' physical well-being. This involves making sure that the facilities are kept in good condition (ensuring that sanitary standards or fire regulations are respected for instance), and that adequate health and safety plans and standards are designed and implemented.

**Benchmarks**

- Health and safety management plans including, electrical, mechanical, structural and food safety have been carefully designed and implemented.
- The person in charge of managing the accommodation has a specific duty to report to the health authorities the eruption of any contagious diseases, food poisoning and other important casualties.
- An adequate number of staff/Project Workers is trained to provide first aid.
- A specific fire safety plan is prepared, including training of fire wardens, periodic inspection, testing and maintenance of fire safety equipment, fire safety inspections and periodic drills.
- Guidance on the detrimental effects of the abuse of alcohol and drugs and other potentially harmful substances, and the risk and concerns relating to HIV/AIDS and of other health risk related activities is provided to Project Workers.
- Project Workers have an easy access to medical facilities.
- Emergency plans on health and fire safety are prepared. Depending on the local context, additional emergency plans are prepared as needed to handle specific occurrences (earthquakes, floods, tornadoes).

**Security on Project Workers' accommodation**

In order to ensure the security of Project Workers and their property on the accommodation site a security plan must be designed and implemented, including policies regarding the use of force (force can only be used for preventive and defensive purposes in proportion to the nature and the extent of the threat). To implement this plan, it may be necessary to contract security services or to recruit one or several staff whose main responsibility is to provide security, to safeguard Project Workers and property. Before making any security arrangements, it is necessary to assess the risks of such arrangements to those within and outside the Project Workers' accommodation and to respect best international practices and applicable law). Particular attention should be paid to the safety and security of women Project Workers.

**Benchmarks**

A security plan including clear policies on the use of force has been carefully designed and is implemented.

Security staff has been checked to ensure that they have not been implicated in any previous crimes or abuses.

Security staff has received clear instruction about their duty and responsibility.

Security staff has received an adequate training on appropriate security procedures

Security staff has a good understanding about the importance of respecting Project Workers and the communities, and adopt an appropriate conduct.

Security staff adopts an appropriate conducts towards Project Workers and communities.

Project Workers and members of the surrounding communities have specific means to raise concern about security arrangement and staff.

**Workers' rights and responsibilities in Worker accommodation**

House rules and regulations should be reasonable and non-discriminatory and should not prevent Project Workers from exercising their basic rights. In particular, Project workers' freedom of movement needs to be preserved if they are not to become effectively "trapped". Whenever possible, Project workers should be provided with 24/7 access to the accommodation and free transport services to and from the surrounding communities. Any restriction to this freedom of movement should be limited and duly justified.

Penalties for breaking the rules should be proportional and implemented through a proper procedure allowing Project Workers to defend themselves and to contest the disciplinary actions taken. The relationship between continuing employment and compliance with the rules of the Project Worker accommodation should be clear and particular attention should be paid to ensure that housing rules do not create indirect limitation of the right to freedom of association. Best practice might include a written code of conduct relating to the accommodation to be signed by each Project Worker housed in an accommodation facility.

**Benchmarks**

Restriction to Project Workers' freedom of movement to and from the site is limited to the extent feasible and duly justified. Any restrictions based on security reasons should be balanced by the necessity to respect Project Workers' freedom of movement.

Where possible, an adequate transport system to surrounding communities is provided. It is good practice to provide Project Workers with free transportation to and from local communities.

Withholding Project Workers ID papers is prohibited.

Freedom of association is expressly respected. Provisions restricting Project Workers' rights on site should take into account the direct and indirect effect on Project Workers' freedom of association.

Project Workers' religious, cultural and social background is respected. In particular, Project Workers should be provided with the possibility to celebrate religious holidays and observances.

Project Workers are made aware of their rights and obligations and are provided with a copy of the internal Project Worker accommodation rules, procedures and sanction mechanisms in a language or through a media they understand.

Non-discriminatory house regulations are in writing and signed by Project Workers housed in an accommodation facility.



Decisions should be made on whether to prohibit alcohol, tobacco and third parties access or not on the camp and the rules relating to these should be clearly communicated to all Project Workers at the time of hire.

A fair and non-discriminatory procedure exists to implement disciplinary procedures including the right for Project Workers to defend themselves.

### **Grievance mechanisms**

All Project Workers must be made aware of any rules governing the accommodation and the consequences of breaking such rules. Processes that allow for consultation between site management and the resident Project Workers will assist in the smooth running of an accommodation site. These must include formal confidential processes that allow Project Workers to lodge grievances about their accommodation.

### **Benchmarks**

- Mechanisms for Project Workers' consultation have been designed and implemented.
- Confidential processes and mechanisms for Project Workers to articulate their grievances
- In case conflicts among Project Workers or between Project Workers and staff break out



## Compensation to Workers

Wages shall be paid in full at regular intervals not exceeding one month and within five days of the end of the pay period. Wages shall include basic salary plus allowances, benefits and all other dues payable to Project Workers in accordance with their employment agreements.

Where possible contractors should pay money directly into Project Worker bank accounts. If necessary, employers should establish bank accounts for their Project Workers, which will help facilitate payment and create an auditable transaction system to verify that all Project Workers are being paid in full and on time. The employer must not be able to access Project Worker bank accounts other than to deposit wages. Where this is not possible, there must be a system for logging payment amount and receipt of wages signed by Project Workers.

- Project Workers must be provided with a payslip in a language they understand, itemising hours worked, payment, and any authorized deductions in accordance with the employment contract and relevant laws, as well as accrued leave.
- Any wage deduction program must be in accordance with the requirements of the law and be formally communicated to Project Workers at the time of hire. Deductions must be itemised on their payslip.

Workers' wages shall not be deducted for:

- relocation, repatriation and annual leave air fare, except as authorized elsewhere in this Guidance Note;
- visa/residency permit costs;
- in-country legal requirements such as identification cards;
- training (normal wages shall be paid for all time spent in training);
- safety related equipment and PPE;
- uniforms (when required);
- laundry;
- job-related medical fees; or
- At the end of employment on the Project all wages and end of service gratuity shall be paid promptly to the Project Worker, before repatriation to their country of origin.
- If the event of a death of a Project Worker all due wages and end of service gratuity must be paid in full to the deceased next of kin within 30 days. In addition any insurance or any other compensatory entitlement shall be paid in full as soon as practical.



## Worker Welfare Management Plan

Contractors in our direct supply chain are required to submit a Worker Welfare Management Plan (“WWMP”) prior to commencing work with **SBG O&M**. The purpose of the plan is to describe the physical and procedural processes and controls that our Contractors will use to ensure compliance with their worker welfare policies.

The WWMP, which will form part of an integrated HSE Management Plan, will be assessed to ensure compliance with local legal requirements, the **SBG O&M** Worker Welfare Policy and the requirements of the Contractor’s worker welfare policy. The WWMP will be reviewed by the Responsible Health & Safety Manager (RHSM) and be subject to the approval of the **SBG O&M** Project Manager.

**SBG O&M** will periodically review the Contractor’s performance in implementing the WWMP as part of our process to ensure that the minimum requirements of the Company’s Worker Welfare Policy, Guidance Notes, and applicable law are implemented.

The WWMP includes, but is not be limited to:

- A written policy statement signed by senior management of the Contractor describing their commitment to worker welfare;
- Organizational chart identifying the key personnel and their duties and responsibilities for welfare of Project Workers;
- Project Worker communication, consultation, and training program, describing how all Project Workers will be informed about the Contractor’s Worker Welfare Policy and the protections afforded to Project Workers and applicable client and legal requirements. A written description of how the Contractor will provide and manage a confidential process by which any Project Worker can raise grievances and report concerns or non-compliance with legal or policy requirements, anonymously and without fear of retaliation.
- A written description of the Contractor’s Project Worker accommodation and supporting infrastructure plan and procedures. That includes, at a minimum:
  - Potable water, sanitary and washing facilities, including a potable water testing regime;
  - Laundry facilities;
  - Recreational and social well-being programs;
  - Religious facilities – mosques and multi-denominational prayer facilities;
  - Transportation arrangements to and from Project Worker accommodation;



- Medical treatment management;
- Fire prevention, detection, and response;
- Emergency response, including evacuation planning, training, and drills;
- Security management, including training of security personnel on proper security practice and treatment of Project Workers;
- Traffic management;
- Waste management;
- Kitchen management to include all ISO2200 and HACCP required processes and records;
- Arrangements for supplying food and drink addressing cultural/religious food needs, balanced nutrition;
- Facilities for eating meals;
- Project Worker accommodation HSE Plan including Safety Procedures and Safe Systems of Work which should include Risk Assessments and Method Statements for all maintenance and routine tasks
- Proactive and reactive maintenance;
- Routine, daily, weekly and as required periodic cleaning;
- Deep cleaning programme

