REPUBLIC OF YEMEN

Yemen Improved Water Management and Irrigation for Sustainability and Efficiency Project (I-WISE, P505562)

Labor Management Procedures (LMP)

Prepared by:

United Nations Development Programme (UNDP) and
United Nations Office for Project Services (UNOPS)

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Abbreviation List

Abbreviation	Full Term
CAMA	Civil Aviation and Meteorology Authority
CFW	Cash-for-Work
CoC	Code of Conduct
CWIMS	Climate and Water Information Management System
EHS	Environmental, Health, and Safety
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIRT	Environmental and Social Incident Response Toolkit
ESRM	Environmental and Social Risk Management
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
ESS2	Environmental and Social Standard 2 (Labor and Working Conditions)
GARWSP	General Authority for Rural Water Supply Projects
GBV	Gender-Based Violence
GIS	Geographic Information System
GM	Grievance Mechanism
GRS	Grievance Redress Service (World Bank)
IDP	Internally Displaced Person
IP	Implementing Partner
IA	Implementing Agency
I-WISE	Improved Water Management and Irrigation for Sustainability and Efficiency Project
LMP	Labor Management Procedures
LWSC	Local Water and Sanitation Corporation
M&E	Monitoring and Evaluation
MAIF	Ministry of Agriculture, Irrigation and Fisheries
MWE	Ministry of Water and Environment
NWRA	National Water Resources Authority
OHS	Occupational Health and Safety
PDO	Project Development Objective
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PTW	Permit-to-Work
PWP	Public Works Project
SEA/SH	Sexual Exploitation and Abuse/ Sexual Harassment
SEP	Stakeholder Engagement Plan
SFD	Social Fund for Development
SMP	Security Management Plan
TPMA	Third-Party Monitoring Agency
UN	United Nations
UNDP	United Nations Development Programme
UNOPS	United Nations Office for Project Services
UWS-PMU	Urban Water Supply and Sanitation Project Management Unit
WASH	Water, Sanitation and Hygiene
WB	World Bank
WSS	Water Supply and Sanitation
WTPs	water treatment plants
WWTPs	wastewater treatment plants

1. INTRODUCTION

This Labor Management Procedures (LMP) document has been prepared for the Improved Water Management and Irrigation for Sustainability and Efficiency Project (I-WISE) Project, implemented jointly by the United Nations Development Programme (UNDP) and the United Nations Office for Project Services (UNOPS) with support from their Implementing Partners. The LMP sets out the principles, procedures, and institutional arrangements for managing labor and working conditions for all categories of project workers engaged under the Project, in accordance with Yemeni labor legislation and the requirements of the World Bank Environmental and Social Standard 2 (ESS2).

The LMP applies to direct workers, contracted workers, community workers, and primary supply workers engaged throughout the Project lifecycle. It aims to promote fair, safe, and inclusive working conditions; prevent child and forced labor; manage occupational health and safety risks; and provide accessible mechanisms for addressing labor-related grievances. The LMP is a living document and will be updated, as necessary, to reflect changes in Project design, implementation arrangements, or applicable legal and policy frameworks.

This Labor Management Procedures (LMP) shall be implemented in coordination with other Environmental and Social Framework (ESF) instruments prepared for the Project, including the Environmental and Social Management Plans (ESMPs), Stakeholder Engagement Plan (SEP), Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Action Plan, and the Environmental and Social Commitment Plan (ESCP). Labor-related mitigation measures, monitoring, and reporting requirements set out in this LMP will be reflected, as appropriate, in these instruments to ensure a coherent and integrated approach to environmental and social risk management.

Lessons Learned from Previous World Bank–Financed Projects.

This Labor Management Procedures (LMP) builds on lessons learned from the implementation of previous World Bank–financed projects in Yemen implemented in fragile and conflict-affected settings. These lessons underscore the importance of proactive occupational health and safety management, effective contractor supervision, timely incident reporting and investigation, implementation of corrective and preventive actions, and the consistent operation of worker grievance mechanisms. The incorporation of these lessons aims to strengthen labor risk management and enhance compliance with the requirements of Environmental and Social Standard 2 (ESS2) under the I-WISE Project.

2. OVERVIEW of LABOR USE ON THE PROJECT

2.1. Types of Project Workers

In accordance with the requirements of the World Bank Environmental and Social Standard 2 (ESS2), the I-WISE Project will engage the following categories of project workers.

1. Direct Workers

Direct workers include individuals employed or engaged directly by UNDP, UNOPS, and their Implementing Partners (IPs); namely the Yemen Social Fund for Development (SFD), the Public Works Project (PWP), and the Urban Water Supply and Sanitation Project – Project Management Unit (UWS-PMU), to carry out Project-related activities. Direct workers will include, but are not limited to:

- Project management and coordination staff;
- Technical specialists (including water resources, irrigation, water supply and sanitation, climate resilience, GIS, and monitoring and evaluation);
- Environmental and social safeguards staff, including occupational health and safety (OHS) and SEA/SH specialists;
- Consultants and advisors supporting project design, supervision, capacity building, and monitoring;

UNDP and its IPs will primarily engage direct workers for Components 1 and 2, while UNOPS and its IPs will engage direct workers for Component 3, in line with the Project's implementation arrangements and applicable World Bank operational procedures.

Indicative number of direct workers under the Project is as follows:

- **UNDP**: Approximately 27 direct workers, including project management team and qualified national and international staff covering Monitoring and Evaluation (M&E), Environmental and Social Risk Management (ESRM) team, procurement, financial management, and UNDP support functions, responsible for overall coordination and implementation of the Project.
- **UNOPS**: Approximately 23 direct workers, including project management team and qualified national and international staff covering, technical, M&E, ESRM team, procurement, financial management, and contract supervision, engaged in the implementation and oversight of the activities.
- **Social Fund for Development (SFD):** Approximately 41 direct workers, including central- and field-level staff with established ESRM team, M&E, and grievance management capacity, supporting day-to-day implementation, supervision, and compliance monitoring.
- **Public Works Project (PWP):** Approximately 20–30 direct workers, including central- and field-level staff with established ESRM team, M&E, and grievance management capacity, supporting day-to-day implementation, supervision, and compliance monitoring.
- **Urban Water Supply and Sanitation Project Management Unit – UWS-PMU**: Approximately 20 direct workers, including technical, operational, and staff with functional ESRM, M&E, and grievance management roles, supporting the activities under the Project.

The exact number of direct workers may vary over time depending on implementation needs, geographic coverage, and the scale of Project activities.

Direct workers engaged by UNDP and UNOPS will be subject to the respective UN human resources rules and procedures, while direct workers engaged by IPs will operate under contractual arrangements consistent with national labor legislation and the requirements of this LMP.

2. Contracted Workers

Contracted workers include consultants and individuals employed by contractors, subcontractors, and service providers including Third-Party Monitoring Agency (TPMA) engaged by UNDP, UNOPS, or IPs to carry out civil works and related services under the Project. Contracted workers are expected to be engaged primarily for:

- Construction and rehabilitation of water harvesting structures, irrigation canals, embankments, terraces, and flood protection works under Component 2;
- Construction, rehabilitation, and expansion of water supply, sanitation, and WASH infrastructure; including pipelines, pumping stations, water treatment plants (WTPs), wastewater treatment plants (WWTPs), and decentralized desalination systems, under Component 3;
- Ancillary activities such as transportation, equipment operation, and site supervision.

Contracted workers may include skilled workers (e.g. engineers, technicians, electricians, plumbers) and unskilled laborers. Contractors may engage subcontractors as required, subject to the labor management and contractual requirements set out in this LMP.

3. Community Workers

Community workers will be engaged primarily through Cash-for-Work (CFW), which constitute a core feature of the I-WISE Project, particularly under Component 2.

Community workers will be recruited locally from project-affected communities and are expected to participate in activities such as:

- Rehabilitation of traditional irrigation canals and terraces;
- Soil conservation, land protection, and watershed management works;
- Construction of small-scale flood protection and water harvesting structures;
- Routine maintenance of community-level infrastructure.

Priority will be given to unemployed youth, women, vulnerable households, and, where relevant, internally displaced persons (IDPs). Participation will be strictly voluntary, and conditions of work will be fair, transparent, and clearly communicated.

4. Civil Servants

Civil servants may participate in Project activities in a coordination, oversight, or technical support capacity, but are not employed by the Project. This may include staff from relevant national and local institutions such as the Ministry of Water and Environment (MWE), Ministry of Agriculture, Irrigation and Fisheries (MAIF), Local Water and Sanitation Corporations (LWSCs), NWRA, GARWSP, and basin-level institutions.

These individuals will remain subject to the terms and conditions of their existing public-sector employment and are not considered project workers under ESS2. However, occupational health and safety risks associated with their participation in Project activities will be assessed and managed in accordance with this LMP, where applicable.

5. Primary Supply Workers

Primary supply workers, where relevant, may be involved through suppliers providing materials and equipment essential to Project activities, such as cement, aggregates, pipes, fittings, electrical components, and solar systems.

While no significant risks related to primary supply workers are anticipated at this stage, the Project will monitor supply chains where there is a potential risk of child labor, forced labor, or serious occupational safety issues, in line with ESS2 requirements.

2.2. Characteristics of Project Workers

The majority of Project workers; particularly contracted workers and community workers, are expected to be recruited locally from the Aden–Tuban and Wadi Hajir basins. This approach is consistent with the Project's design, which prioritizes local participation and aims to generate short-term employment opportunities within project-affected communities.

Given the prevailing socio-economic conditions in Yemen, including high levels of poverty, unemployment, and vulnerability to climate-related shocks, Project workers may include individuals from vulnerable groups. The Project will promote inclusive participation, with particular attention to youth and women, in a manner that is consistent with local cultural norms and the nature of the work, while ensuring that recruitment and working conditions remain fair and non-discriminatory.

The use of international migrant labor is not anticipated under the Project. In limited cases, skilled national workers from outside the immediate Project areas may be engaged where specialized technical expertise is required. Such engagement will be managed in accordance with the requirements of this LMP.

2.3. Timing of Labor Requirements

Labor requirements under the I-WISE Project will vary over time and across Project components, in line with the phased implementation of activities.

For each community asset or infrastructure intervention, direct workers and consultants will be engaged during the design and planning stage. Contractors, supervision engineers, and site workers will be mobilized at the start of each sub-project and for the duration of implementation activities. Sub-projects are expected to generate employment opportunities for both skilled and unskilled workers, with skilled personnel engaged as required based on the technical nature and complexity of the works.

The number and type of workers required for each activity will be determined prior to implementation and adjusted as necessary during execution. For each category of project worker, an appropriate contract or work agreement will be issued prior to the commencement of any assignment, and all workers will be required to comply with the applicable Code of Conduct. Where existing contractual arrangements are in

place, the implementing agency will ensure that the relevant Codes of Conduct are communicated and enforced.

2.4. Contracted Workers and Contracting Structure

The Project will apply different contracting arrangements depending on the implementing agency and the nature of activities under each component. UNDP-implemented components will primarily rely on Formal contracting, community contracting, Cash-for-Work (CFW) arrangements, and service contracts for small- to medium-scale works, technical assistance, and community-based interventions.

UNOPS-implemented components will rely on formal contracting arrangements for medium- to large-scale water supply and sanitation (WSS) infrastructure works, including the engagement of qualified contractors and supervision consultants.

All contracts and contractual arrangements will include provisions requiring compliance with this Labor Management Procedures (LMP), applicable national labor legislation, the requirements of ESS2, and relevant occupational health and safety standards.

3. ASSESSMENT of KEY POTENTIAL LABOR RISKS

3.1. Project Description

The I-WISE Project is being implemented in selected priority river basins in Yemen, initially focusing on the Aden–Tuban Basin and the Wadi Hajer Basin, with the possibility of expansion to additional basins subject to implementation progress and availability of resources. The Project is designed to address critical challenges related to water scarcity, climate variability, irrigation efficiency, and access to resilient water supply and sanitation services, while strengthening community resilience to climate shocks and supporting livelihood improvement and poverty reduction.

The Project Development Objective (PDO) is to improve irrigation service delivery and enhance access to climate-resilient water supply and sanitation services in selected basins. Through integrated investments at basin, community, and institutional levels, the Project aims to strengthen water and climate information systems, improve decision-making, enhance the sustainability of water resources, and support climate-resilient agricultural and WASH outcomes.

The Project is implemented jointly by the United Nations Development Programme (UNDP) and the United Nations Office for Project Services (UNOPS), with support from national Implementing Partners (IPs), including the Social Fund for Development (SFD), the Public Works Project (PWP), and the Urban Water Supply and Sanitation Project – Project Management Unit (UWS-PMU). UNDP is responsible for the implementation of Components 1, 2, and 4, while UNOPS leads the implementation of Component 3 and 4 (Jointly with UNDP).

The Project is structured around four components:

Component 1: Strengthening Climate and Water Information Management Systems (implemented by UNDP)

This component supports the establishment and operationalization of a Climate and Water Information Management System (CWIMS) to monitor hydrological and meteorological hazards and improve data-driven decision-making. Activities include recovery and consolidation of climate and water data, development of a national CWIMS for priority basins, deployment of decision-support tools, and capacity building for national and basin-level institutions such as the Ministry of Water and Environment (MWE), the Ministry of Agriculture, Irrigation and Fisheries (MAIF), and the Civil Aviation and Meteorology Authority (CAMA). These activities are primarily analytical and institutional in nature, involving technical experts, consultants, and institutional staff.

Component 2: Improved Integrated Watershed Management and Irrigation (Integrated Management of Water and Agriculture in the Aden-Tuban Basin & Wadi Hajar Basin).

This component finances planning and implementation of watershed management and irrigation improvement activities in the Aden–Tuban and Wadi Hajer basins. It includes labor-intensive interventions such as water harvesting structures, soil conservation, erosion control, rehabilitation of irrigation canals, flood protection works, and community-based land and water management. The component combines physical investments with training and institutional strengthening and relies heavily on community labor, Cash-for-Work arrangements, and local contractors, supported by SFD, PWP, and UWS-PMU at the field level.

Component 3: Resilient Water Supply and Sanitation Systems and WASH Services (implemented by UNOPS)

This component focuses on restoring, expanding, and improving access to water supply and sanitation services in selected urban and peri-urban areas. Activities include rehabilitation and construction of medium- to large-scale WSS infrastructure, network expansion, efficiency improvements, and capacity building for urban water utilities. The component also includes targeted WASH interventions for internally displaced persons (IDPs), refugees, and marginalized communities. Implementation under this component involves formal contracting arrangements, skilled technical labor, and supervision consultants, with support from the PWP and UWS-PMU.

Component 4: Project Support, Management, Evaluation and Administration (implemented by UNDP and UNOPS)

This component will finance implementation, administration, management, monitoring and evaluation, and environmental and social aspects of the Project, including: (a) direct and indirect costs of the United Nations (UN) IAs; (c) provision of consultancy services required for Project monitoring, evaluation and coordination; (d) conducting independent audits of Project activities; (e); third-party monitoring agency; and (f) supporting the provision of technical assistance on system strengthening and service delivery improvement.

The I-WISE Project is prepared and implemented in accordance with the World Bank Environmental and Social Framework (ESF). The diversity of activities, implementation modalities, and labor engagement approaches across components gives rise to a range of labor-related risks, which are assessed in the following sections.

3.2. Project Activities Relevant to Labor

Labor-related risks under the I-WISE Project arise from a combination of technical assistance, community-based interventions, and civil works implemented by UNDP, UNOPS, and their Implementing Partners (SFD, PWP, and UWS-PMU). Key labor-relevant activities include:

- Technical and institutional activities under Component 1, implemented by UNDP, including data recovery and consolidation, development of climate and water information management systems, deployment of decision-support tools, and delivery of training and capacity-building activities for national and basin-level institutions. These activities primarily involve direct workers, consultants, and institutional staff and present limited occupational health and safety risks;
- Construction and rehabilitation of water harvesting structures, check and diversion dams, embankments, terraces, irrigation canals, and flood protection works under Component 2, implemented by UNDP with support from SFD, PWP, and UWS-PMU;
- Rehabilitation, expansion, and construction of water supply and sanitation infrastructure—including pipelines, pumping stations, water and wastewater treatment facilities, decentralized desalination units, and associated electrical and solar installations—under Component 3, implemented by UNOPS with support from PWP and UWS-PMU;
- Community-based soil conservation, watershed management, and routine maintenance works implemented through Cash-for-Work (CFW) and community contracting arrangements;
- Field-based surveys, supervision, monitoring, training, and capacity-building activities carried out by UNDP, UNOPS, IPs, consultants, and Third-Party Monitoring Agency;
- Operation and maintenance training for local institutions, water utilities, and community organizations.

These activities will be concentrated primarily in the Aden–Tuban and Wadi Hajir basins, where climate vulnerability, water scarcity, and exposure to floods and droughts are significant, and where community participation is a central feature of Project implementation.

3.3. Environmental and Social Impacts and Inherent Labor Risks

The I-WISE Project will be implemented in a fragile and conflict-affected context and involves a combination of technical assistance, community-based activities, and civil works. As such, a range of environmental, social, and labor-related risks may arise during Project implementation. These risks are closely linked to the nature of Project activities, labor engagement modalities, and the socio-economic conditions in project areas.

Social and Labor-Related Risks

Potential social and labor-related risks associated with Project implementation include:

- Risks related to targeting and transparency, including potential exclusion or unequal access to Project-supported employment opportunities if selection processes are not clearly communicated or consistently applied;
- Risks of discrimination against women, persons with disabilities, the elderly, internally displaced persons, or other vulnerable groups during the selection of workers or beneficiaries;
- Gender-related risks, including gender blindness in design and implementation, and risks of sexual exploitation and abuse and sexual harassment (SEA/SH), particularly in contexts involving community labor, interaction between workers and communities, and power imbalances;
- Child labor risks, driven by high levels of poverty and household economic stress, particularly in labor-intensive community-based activities if adequate controls are not enforced;
- Risks of social tension or conflict, including disputes related to water use, access, ownership, and allocation, or perceived inequities between upstream and downstream users, if stakeholder interests are not adequately considered.

These risks are particularly relevant for activities implemented through Cash-for-Work (CFW) and community contracting arrangements under Component 2, and for civil works carried out by contractors under Components 2 and 3.

Environmental Risks Relevant to Labor

Environmental risks with potential implications for workers and surrounding communities include:

- Soil degradation and land disturbance associated with earthworks, excavation, and construction activities if not properly managed;
- Improper handling and disposal of solid waste, including construction debris, packaging materials, and domestic waste generated at worksites, which could pose health and safety risks to workers and nearby communities.
- Climate change effects on labor such as the high temperature weather increase.

While broader environmental impacts are addressed through the Project's environmental and social management instruments, these risks are relevant to labor conditions insofar as they affect worker health and safety.

Occupational Health and Safety (OHS) Risks

Occupational health and safety risks under the I-WISE Project are assessed as substantial, particularly for contracted workers and community workers engaged in civil works and labor-intensive activities implemented by UNDP, UNOPS, and IPs.

Key OHS risks include:

- Excavation and earthworks hazards, including trench collapse, falling materials, and unstable ground conditions;
- Working at heights, including in the tanks plastering, elevated tanks, … etc.
- Working in confined spaces, including confined tanks, manholes, … etc.
- Working near water bodies, irrigation canals, wadis, and flood-prone areas, with heightened risks during the rainy season and flash flood events;
- Use of machinery and equipment such as excavators, pumps, generators, and construction tools, often in contexts where workers may have limited formal training;
- Manual handling and lifting of heavy materials, leading to musculoskeletal injuries;
- Use of hazardous materials for instance cement, paints, petroleum derivatives, … etc. In addition to working in hazardous environment like working in manholes with hydrogen sulfide presence.
- Exposure to extreme heat during outdoor work, increasing the risk of heat stress and dehydration;
- Electrical hazards, particularly under Component 3, related to pumping systems, treatment facilities, and solar installations;
- Traffic and transport risks associated with the movement of workers, materials, and equipment to and from worksites.

These risks are exacerbated by the fact that many community workers are unskilled, may have limited literacy, and may not be familiar with standard occupational health and safety practices, as observed in previous operations in Yemen.

Mitigation of these risks will require the consistent application of occupational health and safety measures, including appropriate training, provision and use of personal protective equipment (PPE), safe work practices, proper waste management, and effective supervision, as set out in this LMP.

3.4. Child Labor Risks

The risk of child labor under the I-WISE Project is assessed as moderate, reflecting the broader socio-economic context in Yemen, including high poverty levels, unemployment, and household reliance on multiple income sources. This risk is particularly relevant for community-based activities and Cash-for-Work (CFW) schemes, where informal labor arrangements may exist in the absence of effective controls.

Many Project activities; particularly those involving excavation, construction, work near water bodies, and the use of tools and equipment, are considered hazardous in nature. Without strict preventive measures, there is a risk that children may attempt to participate in such activities, especially in labor-intensive community works.

The Project will apply the minimum age requirements and age-verification procedures set out in Section 7 of this LMP.

3.5. Forced Labor Risks

The risk of forced labor under the I-WISE Project is assessed as low, as Project activities are implemented through UNDP, UNOPS, and national Implementing Partners operating under established fiduciary, procurement, and safeguards systems. However, given Yemen's fragile and conflict-affected context,

widespread economic hardship, and reliance on temporary employment opportunities, a residual risk remains that some workers may feel pressured to accept work under unfavorable conditions. To mitigate this risk, the Project will ensure that:

- All Project-related work is voluntary;
- Terms and conditions of employment are clearly communicated to workers prior to engagement;
- Wages are paid in full and on time, without unlawful deductions;
- Workers have access to a functional grievance mechanism and are able to raise concerns without fear of retaliation.

Detailed requirements relating to prevention of forced labor are provided in Section 6.2.

3.6. Labor Influx and Community Tension

Labor influx risks under the I-WISE Project are expected to be limited, as the Project prioritizes local recruitment and community-based implementation, particularly under Component 2. However, for specialized technical works, most notably under Component 3, contractors may need to recruit skilled workers from outside the immediate Project areas. Where labor influx occurs, potential risks may include:

- Increased pressure on local services and resources;
- Social tension between local communities and incoming workers;
- Increased traffic and safety risks;
- Heightened risk of SEA/SH due to interaction between workers and local communities.

In some cases, labor influx may also be accompanied by the arrival of individuals seeking employment or economic opportunities ("followers"), which could amplify social and environmental pressures, particularly in rural or resource-constrained areas. Overall, labor influx risk under the Project is assessed as low and localized.

To minimize labor influx risks, the Project will prioritize local recruitment where feasible, maintain regular communication with stakeholders, and provide access to grievance mechanisms.

3.7. Worker Accommodation

The Project is not expected to require dedicated worker camps as most workers will be recruited locally. However, where temporary accommodation is provided for specialized workers , contractors shall ensure that such accommodation meets the requirements of this LMP, ESS2, and applicable national legislation. Where accommodation is provided, contractors shall ensure that:

- Is safe, secure, clean, and properly maintained;
- Provides access to safe drinking water, sanitation facilities, electricity or lighting, and waste management services;
- Provides adequate sleeping space, privacy, and protection from weather conditions;
- Includes appropriate arrangements for female and male workers, where applicable;
- Has basic emergency arrangements, including first-aid supplies, fire safety equipment, emergency exits, and emergency contact information;

- Is inspected periodically to ensure acceptable living conditions.

Preference shall be given to local recruitment to minimize labor influx and the need for temporary worker accommodation. Where non-local workers are engaged, contractors shall implement appropriate measures to maintain positive relations with host communities and minimize potential social impacts.

3.8. Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)[1]

The risk of sexual exploitation and abuse and sexual harassment (SEA/SH) under the I-WISE Project is assessed as moderate, due to the Project's engagement with communities, the use of community and contracted labor, and the vulnerable context in which the Project operates. SEA/SH risks may arise from interactions between project workers and community members, power imbalances in employment or service delivery, and the limited use of non-local workers for specialized activities. These risks may affect women, internally displaced persons (IDPs), and other vulnerable groups.

SEA/SH prevention and response measures will be implemented in accordance with the Project SEA/SH Action Plan. Detailed requirements are provided in the SEA/SH Action Plan and relevant sections of this LMP. SEA/SH complaints will be managed through confidential and survivor-centred procedures in accordance with the Project's SEA/SH Action Plan, applicable UNDP and UNOPS policies, and World Bank requirements. Information related to SEA/SH incidents shall be handled confidentially and shared only on a need-to-know basis.

Detailed SEA/SH prevention, mitigation, reporting, and response measures are provided in the Project SEA/SH Action Plan.

4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Applicable National Labor Legislation in Yemen

Labor relations in Yemen are primarily governed by Labor Law No. 5 of 1995, which regulates employment conditions in the private sector, including wages, working hours, leave entitlements, occupational rights, and employer obligations. Additional relevant legislation includes the Social Insurance Law No. 26 of 1991 and the Insurance and Wages Law No. 25 of 1991, which address social security and wage-related protections.

These laws apply mainly to IPs' direct workers, contracted workers employed by contractors and service providers, and, where relevant, to community workers engaged under Project activities. Direct workers employed by UNDP and UNOPS are subject to the respective UN human resources policies and procedures, which are generally consistent with international labor standards and the principles of ESS2.

Wages, Working Hours, and Leave

Yemeni labor legislation requires that workers receive fair remuneration for work performed and that wages be paid regularly and without unlawful deductions. Working hours, rest periods, and leave

[1] Detailed prevention, mitigation, and response measures related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), are addressed in the Project's SEA/SH Action Plan, which has been prepared separately in accordance with World Bank requirements.

entitlements are regulated under national law. Under the I-WISE Project, all workers will be remunerated in accordance with applicable national labor legislation and the requirements of ESS2. Wages shall be paid on time, transparently, and without unauthorized deductions. Where task-based or piece-rate payment arrangements are used, remuneration shall be consistent with applicable legal requirements and clearly communicated to workers prior to engagement. Any deductions related to absenteeism or other disciplinary measures shall be applied only in accordance with national labor legislation

Overtime Work

In accordance with the Yemeni Labor Law, overtime work shall be undertaken only where agreed in the employment contract or work agreement. Any overtime work performed under the I-WISE Project shall be compensated in accordance with applicable national labor legislation. Working hours, including overtime, shall not exceed the limits established under national law. Project workers shall receive adequate rest periods and weekly days of rest, and overtime arrangements shall be monitored to ensure worker health, safety, and well-being.

Child and Forced Labour

Yemeni labor legislation establishes 15 years as the minimum age for employment and 18 years as the minimum age for hazardous work. Yemen has ratified ILO Convention No. 138 on Minimum Age and ILO Convention No. 182 on the Worst Forms of Child Labour. The I-WISE Project strictly prohibits child labor and forced labor and adopts 18 years as the minimum age for all project workers.

Working Hours

Official working hours shall not exceed eight hours per day or 48 hours per week, distributed over six working days followed by one paid day of rest. During Ramadan, working hours shall not exceed six hours per day or 36 hours per week.

Dismissal

Employees shall not be dismissed without just cause and due process. In accordance with Yemeni labor legislation, employment contracts shall not be terminated during a worker's approved leave, during the investigation of a labor dispute, or during detention related to their work pending a final decision by the competent authorities.

Women's employment

The Yemeni Labor Law provides for equal treatment of women and men in employment, including recruitment, promotion, wages, training, and social insurance. It also includes specific protections for pregnant women, including restrictions on overtime work from the sixth month of pregnancy until six months after returning from maternity leave. The I-WISE Project shall adhere to the principles of non-discrimination, equal opportunity, and equal pay for equal work, in accordance with national legislation and ESS2.

Non-Discrimination and Equal Opportunity

Yemeni labor legislation includes provisions that prohibit discrimination in employment. In line with ESS2, the I-WISE Project will apply principles of non-discrimination and equal opportunity to all project workers.

Recruitment, remuneration, and working conditions shall not discriminate on the basis of gender, age (above the minimum employment age), ethnicity, disability, , displacement status or any other status protected under applicable legislation and ESS2. The project shall apply equal remuneration for work of equal value. Women and men undertaking the same or equivalent work, including under Cash-for-Work and community contracting arrangements, shall receive the same wage or task-based rate. Any difference in remuneration shall be based only on objective job-related factors such as qualifications, experience, level of responsibility or working conditions and shall be documented

Consistent with Project design, efforts will be made to promote the participation of women and youth in Project-supported employment opportunities, particularly under community-based activities, in culturally appropriate manner and with suitable, safe and non-discriminatory working conditions

Measures to Promote Equal Opportunity (Non-discrimination) and Vulnerable Workers

UNDP, UNOPS, their Implementing Partners (IPs), and contractors, shall implement practical measures to promote equal opportunity and ensure that all project workers are treated fairly and with respect throughout the employment cycle.

These measures shall include, as applicable:

- Recruitment, selection, promotion, remuneration, and termination decisions based solely on qualifications, experience, performance, and job requirements;
- Recruitment procedures that are transparent, accessible, and free from discrimination based on sex, age, disability, ethnicity, religion, social status, political affiliation, or other characteristics protected under applicable national legislation and ESS2;
- Reasonable accommodation for workers with disabilities, where feasible and appropriate, including adjustments to workplaces, equipment, duties, or work arrangements that enable them to perform their work safely and effectively;
- Provision of safe, accessible, and gender-sensitive workplace facilities, including separate sanitation facilities for women and men, where appropriate, and access to drinking water and rest areas;
- Implementation of measures to prevent workplace harassment, intimidation, bullying, discrimination, and retaliation against workers who raise concerns or participate in grievance processes;
- Equal access for all workers to training, occupational health and safety measures, grievance mechanisms, and career development opportunities; and
- Periodic awareness-raising activities for supervisors and workers on equal opportunity, respectful workplace behavior, prevention of discrimination, and inclusion.

Any allegations of discrimination, harassment, retaliation, or unequal treatment shall be addressed promptly through the Worker Grievance Mechanism or other appropriate procedures, while ensuring confidentiality and protection against retaliation.

Gaps Between National Legislation and ESS2

While Yemeni labor legislation provides a general framework for labor management, certain areas; such as protections for temporary and community workers, grievance mechanisms, and enforcement capacity, may be limited or inconsistently applied.

In cases where national legislation is silent, insufficient, or inconsistent with the requirements of ESS2, the ESS2 provisions will apply. This approach will be implemented across all Project components and by all implementing entities, including UNDP, UNOPS, and Implementing Partners.

4.1. Occupational Health and Safety

National Legal Framework on Occupational Health and Safety

Occupational health and safety in Yemen is primarily regulated under Labor Law No. 5 of 1995, which establishes the general obligations of employers to provide safe and healthy working conditions.

Under Article 113, employers are required to ensure that workplaces meet occupational safety and health requirements, subject to oversight by the relevant authorities. Article 114 further outlines employer responsibilities to protect workers from occupational hazards, including risks associated with machinery, physical working conditions, harmful substances, excessive noise, vibration, and potential explosion hazards.

The Labor Law also provides that costs associated with occupational injuries or work-related illnesses shall not be deducted from workers' wages, and requires employers to record occupational accidents and diseases in accordance with applicable procedures.

These provisions apply primarily to contracted workers employed by private-sector contractors and service providers. Community workers engaged under Project activities are also covered in practice through contractual arrangements and Project-specific labor management measures. Direct workers employed by UNDP and UNOPS are subject to the respective UN internal occupational health and safety policies, which are generally consistent with the principles of ESS2.

Application to Project Workers and ESS2 Alignment

While Yemeni labor legislation provides a general framework for occupational health and safety, its application and enforcement may be constrained by institutional capacity and the operating context.

In line with ESS2, where national legislation is silent, limited, or inconsistently applied, the Project will apply the more stringent requirements set out in ESS2 and relevant international good practice. This approach applies to all categories of project workers engaged by UNDP, UNOPS, and their respective Implementing Partners.

Detailed occupational health and safety measures to be applied under the Project; including risk mitigation, training, supervision, and incident reporting, are addressed in Section 6 (Policies and Procedures) and relevant environmental and social management instruments.

4.2. Minimum Contents of Worker Contracts and Work Agreements

Table 1: Minimum Contents of Worker Contracts and Work Agreements

Minimum Content	Requirement
Worker and employer/engaging entity	• Name of the worker • Name employer, contractor, Implementing Partner, or other responsible entity
Position and nature of work	• Job title • Description of duties • Work location • Applicable work arrangements
Duration of engagement	• Start date and, • End date, where applicable • Duration of assignment
Wages and payment	• Wage/rate • Payment frequency • Payment method • Applicable allowances or benefits
Working hours	• Normal working hours • Rest periods • Weekly rest days • Applicable arrangements for adjusted working hours
Overtime	• Conditions under which overtime may be required • Applicable compensation
Leave and entitlements	• Applicable leave, including sick leave, maternity-related entitlements, and other statutory or contractual leave
Deductions	• Permitted deductions and conditions under which deductions may be made
Occupational health and safety	• Worker OHS rights and responsibilities • PPE requirements • Training • Applicable safe-work procedures
Code of Conduct	• Requirement to comply with the Project Code of Conduct, including provisions on SEA/SH and respectful workplace behavior
Worker Grievance Mechanism	• Available channels for raising labor-related concerns and protection against retaliation
Termination	• Conditions and procedures for termination of the agreement, including applicable notice and due process
Applicable requirements	• Reference to this LMP • Applicable national labor legislation • ESS2 requirements

These minimum requirements shall apply to all categories of Project workers, as applicable. For community workers engaged through Cash-for-Work or other simplified arrangements, the requirements shall be reflected in an appropriately simplified work agreement or engagement record while maintaining the essential protections set out above.

5. RESPONSIBLE STAFF

5.1. UNDP Responsibilities

UNDP is responsible for the overall management and oversight of labor-related requirements for Components 1, 2, and 4 of the Project, including activities implemented through its Implementing Partners (SFD, PWP and UWS-PMU).

UNDP's responsibilities include:

- Ensuring compliance with this Labor Management Procedures (LMP) and the requirements of ESS2 for activities under its implementation;
- Managing and supervising direct workers engaged by UNDP, including project staff and consultants, in accordance with UNDP human resources policies;
- Overseeing the engagement and management of community workers under Cash-for-Work (CFW) and community contracting arrangements, including ensuring voluntary participation, fair working conditions, and access to grievance mechanisms;
- Ensuring that labor-related provisions; covering occupational health and safety, child labor prevention, forced labor prohibition, and Codes of Conduct, are incorporated into relevant contracts and agreements implemented by UNDP and its IPs;
- Ensuring that workers engaged under UNDP-managed activities have access to an effective worker grievance mechanism in accordance with this LMP;
- Monitoring labor and OHS compliance through routine supervision and coordination with Implementing Partners and Third-Party Monitoring Agency, where applicable.

5.2. UNOPS Responsibilities

UNOPS is responsible for the management and implementation of labor-related requirements for Component 3 of the Project, which involves medium- to large-scale water supply and sanitation (WSS) infrastructure works, implemented with support from PWP and UWS-PMU.

UNOPS' responsibilities include:

- Ensuring compliance with this LMP and ESS2 requirements for all activities implemented under Component 3;
- Managing direct workers engaged by UNOPS, including technical staff and consultants, in line with UNOPS internal policies and procedures;
- Procuring, supervising, and managing contractors and subcontractors engaged in WSS infrastructure works;
- Ensuring that contractor contracts include clear labor management, occupational health and safety, Codes of Conduct, and worker grievance requirements consistent with this LMP;

- Supervising contractor performance with respect to labor conditions and OHS, and addressing non-compliance through corrective actions;
- Ensuring that workers engaged under UNOPS-managed activities have access to an effective worker grievance mechanism.

5.3. Implementing Partners (IPs)

Implementing Partners are responsible for supporting UNDP and UNOPS in the implementation, supervision, and monitoring of Project activities at the field level.

IPs' responsibilities include:

- Managing direct workers engaged under their respective mandates in compliance with national labor legislation, ESS2, and this LMP;
- Supporting the supervision of contractors and community workers, as applicable, and ensuring adherence to labor management and OHS requirements;
- Informing workers about available grievance channels and supporting grievance resolution; Reporting labor-related issues, incidents, and non-compliance to UNDP or UNOPS, as appropriate.

5.4. Contractors and Subcontractors

Contractors and subcontractors engaged under the Project, whether through UNDP or UNOPS, are responsible for managing their workforce in compliance with:

- Applicable Yemeni labor legislation;
- The requirements of ESS2;
- The provisions of this LMP; and
- Labor and OHS clauses included in their contracts.

At a minimum, contractors are responsible for:

- Providing safe and healthy working conditions at worksites;
- Ensuring that no child labor or forced labor is used;
- Clearly communicating terms and conditions of employment to workers;
- Paying wages in a timely and transparent manner;
- Enforcing Codes of Conduct, including provisions related to SEA/SH;
- Establishing and operating a worker grievance mechanism and cooperating with UNDP, UNOPS, and IPs in grievance resolution.

5.5. Third-Party Monitoring and Oversight

Third-Party Monitoring Agency (TPMA), where engaged, will support UNDP and UNOPS by providing independent verification of Project implementation, including compliance with labor management and occupational health and safety requirements.

Their role may include conducting field visits and spot checks, verifying compliance with labor standards and Codes of Conduct, identifying non-compliance, and supporting adaptive management, particularly in areas with access or security constraints.

5.6. Coordination and Reporting

UNDP and UNOPS will coordinate closely to ensure consistent application of labor management procedures across all Project components. Labor-related issues, incidents, and grievances will be documented and managed through the procedures established under this LMP.

Roles and Responsibilities for Labor Management

The table below summarizes the key roles and responsibilities of UNDP, UNOPS, Implementing Partners, and Contractors in implementing and monitoring labor management requirements under this LMP, in accordance with ESS2.

Table 2: Roles and Responsibilities for Labor Management under the I-WISE Project

Entity	Key Responsibilities under LMP
UNDP	Overall oversight of labor management for Components 1, 2, and 4; management of direct workers; contracted workers; supervision of community labor and Cash-for-Work arrangements; oversight of implementation of worker grievance mechanisms; monitoring and reporting to the World Bank.
UNOPS	Oversight of labor management for Component 3 and 4; management of direct workers; procurement and supervision of contractors; ensuring inclusion of labor, OHS, and SEA/SH provisions in contracts; monitoring contractor compliance and incident reporting.
Implementing Partners (SFD, PWP, UWS-PMU)	Field-level supervision of labor and OHS practices; support to worker recruitment and monitoring; facilitation to grievance mechanisms, grievance awareness and resolution; reporting labor issues and incidents to UNDP or UNOPS.
Contractors and Subcontractors	Day-to-day management of contracted workers; implementation of OHS measures; prohibition of child and forced labor; enforcement of Codes of Conduct; establishment and operation of worker grievance mechanisms; reporting incidents and accidents.
Third-Party Monitoring Agency (if applicable)	Independent verification of labor and OHS compliance; site inspections; identification of non-compliance and recommendations for corrective actions; reporting to UNDP and UNOPS.

6. POLICIES AND PROCEDURES

6.1. Occupational Health and Safety

Occupational health and safety (OHS) measures will be applied to ensure that all project workers are provided with a safe and healthy working environment appropriate to the nature, scale, duration, and risk level of Project activities. OHS measures will be implemented by UNDP, UNOPS, and their respective Implementing Partners as follows:

- UNDP, together with its IPs (SFD, PWP, and UWS-PMU), for activities under Components 1, 2, and 4; and

- UNOPS, together with its IPs (PWP and UWS-PMU), for activities under Components 3 and 4.

Key OHS measures include:

- Identification and mitigation of occupational risks associated with construction, rehabilitation, technical assistance, and community-based works;
- Provision of appropriate personal protective equipment (PPE) to workers at no cost;
- Safety induction and on-the-job awareness for workers, with particular attention to community workers and Cash-for-Work participants;
- Application of the World Bank Group Environmental, Health, and Safety (EHS) Guidelines, as appropriate, to complement national legislation;
- Supervision and monitoring of OHS practices by UNDP, UNOPS, IPs, and contractors, with support from Third-Party Monitoring Agency where applicable.

Occupational Health and Safety Management Procedures

To ensure the effective implementation of occupational health and safety requirements, UNDP, UNOPS, their Implementing Partners (IPs), contractors, and subcontractors shall establish and implement practical OHS management procedures that are proportionate to the nature, scale, and risks of Project activities.

These procedures shall include, as applicable:

- Preparation of site-specific Occupational Health and Safety (OHS) Plans prior to mobilization, identifying site hazards, mitigation measures, emergency arrangements, and responsibilities;
- Completion of Job Hazard Analyses or equivalent risk assessments before commencing activities with significant occupational risks, including excavation, work at height, electrical works, lifting operations, confined space entry, and work near water bodies;
- Implementation of permit-to-work procedures for high-risk activities, including confined space entry, hot works, electrical isolation, excavation, lifting operations, and other hazardous tasks, where applicable;
- Provision and mandatory use of appropriate personal protective equipment (PPE) suitable for the specific tasks being undertaken;
- Routine workplace inspections conducted by supervisors to verify compliance with OHS requirements and identify unsafe conditions or unsafe acts;
- Regular toolbox talks and safety briefings to reinforce safe working practices and communicate site-specific hazards;
- Monitoring and tracking of corrective actions until they are fully implemented and verified; and
- Maintenance of OHS records, including training attendance, inspection reports, incident investigations, corrective actions, and emergency drills.

Implementing partners and Contractors shall ensure that all workers receive appropriate safety induction before commencing work and that additional task-specific training is provided whenever work activities or site conditions change significantly.

Emergency Preparedness and Response

UNDP, UNOPS, their Implementing Partners (IPs), contractors, and subcontractors shall establish and implement emergency preparedness and response measures proportionate to the nature, scale, and risks of Project activities. Emergency procedures shall be communicated to all project workers during induction and reinforced through regular toolbox talks and emergency drills, where appropriate.

Emergency preparedness measures shall include, as applicable:

- Preparation of site-specific Emergency Response Procedures before commencement of works;
- Identification of potential emergency situations, including workplace injuries, fires, electrical incidents, excavation failures, flooding, extreme weather events, heat stress, hazardous material spills (where applicable), and security-related incidents;
- Provision of adequately stocked first-aid kits at all worksites and designation of trained first-aid personnel;
- Establishment of emergency communication procedures, including emergency contact numbers displayed prominently at worksites;
- Preparation of evacuation procedures, assembly points, and safe evacuation routes appropriate to each worksite;
- Arrangements for the safe transportation of injured workers to the nearest appropriate health facility;
- Coordination, where appropriate, with local health facilities, emergency responders, and relevant local authorities;
- Implementation of preventive measures to reduce heat-related illnesses, including adequate drinking water, shaded rest areas, adjustment of working hours during extreme heat, and worker awareness on recognizing symptoms of heat exhaustion and heat stroke;
- Suspension of outdoor work where severe weather conditions, flash floods, armed conflict, or other emergencies create an unacceptable risk to workers; and
- Periodic review and updating of emergency procedures based on lessons learned from incidents, drills, or changes in site conditions.

All occupational emergencies, serious injuries, fatalities, dangerous occurrences, and significant near misses shall be reported immediately to the responsible implementing entity. Such incidents shall be investigated promptly to identify root causes, implement corrective and preventive actions, and strengthen future emergency preparedness measures. Serious incidents shall be reported to the World Bank in accordance with the Environmental and Social Incident Response Toolkit and the Project's Environmental and Social Commitment Plan (ESCP).

Working at Nighttime in Ramadan:

Under the Yemen Labor Code, official working hours during the month of Ramadan shall not exceed six hours per day. Where necessary, the Implementing Partners may schedule certain activities during the evening or nighttime, provided that the total daily working hours do not exceed the legal limit, all applicable occupational health and safety (OHS) requirements are met.

Night work during Ramadan may be considered appropriate where it:

- Protects workers from excessive heat, dehydration, and heat-related illnesses associated with fasting, particularly in hot and coastal areas;
- Improves worker health, safety, and productivity after the breaking of the fast;
- Helps maintain implementation schedules and reduces delays during Ramadan;
- Enables completion of critical activities before seasonal weather conditions (e.g., heavy rainfall and flooding) restrict site access; and
- Enhances safety for road works and other activities in densely populated or high-traffic areas by reducing interaction with pedestrians and vehicles.

Before any nighttime work is undertaken, a site-specific risk assessment should be conducted to identify potential risks associated with working at night and implement appropriate mitigation measures. These should include, as applicable, adequate lighting, traffic management, worker supervision, emergency preparedness, communication arrangements, security measures, and compliance with the project's Occupational Health and Safety (OHS) requirements. Specific contractual provisions governing nighttime work shall also be incorporated into the contractor's management plans.

Heat Stress and Extreme Weather Conditions

Contractors and Implementing Partners shall implement measures to prevent heat-related illness, including provision of drinking water, rest breaks, shaded rest areas, worker awareness, and adjustment of working hours where necessary.

Right to Refuse Unsafe Work

Project workers will have the right to remove themselves from work situations that present an imminent danger to life, health, or safety and to report such conditions without fear of retaliation. Work shall resume only after appropriate corrective actions have been implemented. Contractors will be required to implement OHS measures proportionate to the scale and risk of the works, as specified in their contracts and consistent with this LMP.

Stop-Work Authority

All project workers shall have the right and responsibility to immediately stop work or remove themselves from any work situation that they reasonably believe presents an imminent danger to life, health, or safety. Supervisors and contractors shall promptly assess the situation and ensure that work resumes only after appropriate corrective measures have been implemented. No worker shall be subject to retaliation, disciplinary action, or loss of pay for exercising this right in good faith.

Security Risk Management[2]

Given Yemen's fragile and conflict-affected operating environment, project workers may be exposed to security risks during field missions, site visits, supervision activities, and construction works. UNDP,

[2] For further details on security risk assessment, mitigation measures, roles and responsibilities, and implementation arrangements, please refer to the I-WISE Security Management Plan (SMP).

UNOPS, Implementing Partners, contractors, and subcontractors shall implement appropriate security measures to protect workers while carrying out project activities.

Security management measures shall include:

- Conducting security risk assessments prior to field activities, taking into account local security conditions and potential threats;
- Obtaining required security clearances and approvals before travel to project locations, in accordance with applicable UNDP, UNOPS, and national security procedures;
- Ensuring that workers receive security briefings before deployment to areas with elevated security risks;
- Maintaining effective communication arrangements between field teams and designated focal points during field activities;
- Establishing procedures for reporting security incidents, threats, or near misses, and ensuring that such incidents are documented, investigated, and addressed promptly;
- Coordinating, where appropriate, with relevant local authorities and security actors to facilitate safe implementation of project activities, while maintaining the humanitarian and development principles applicable to the project;
- Ensuring that emergency contact information and evacuation procedures are available to all field personnel.

Project workers shall not be required to work or travel in situations that present an imminent and serious threat to their life or personal security. Workers may decline or suspend work in such circumstances without fear of retaliation or disciplinary action and shall immediately report the situation to their supervisor for further assessment and appropriate action.

UNDP, UNOPS, Implementing Partners, and contractors shall regularly review security conditions and adjust work arrangements, travel plans, and implementation schedules as necessary to ensure the safety and security of project workers.

6.2. Prohibition of Child Labor and Forced Labor

The I-WISE Project strictly prohibits the use of child labor and forced labor in any Project-related activities implemented by UNDP, UNOPS, or their IPs. In particular:

- No person under the age of 18 will be employed or engaged in Project activities;
- All work under the Project will be voluntary, and workers will be free to leave employment in accordance with applicable contractual terms;
- Contractors and community implementing partners engaged by UNDP (through SFD, PWP, and UWS-PMU) and by UNOPS (through PWP and UWS-PMU) will be required to apply age-verification procedures and ensure that recruitment practices do not involve coercion or exploitative conditions;
- Retention of identity documents, withholding of wages, tied payments, or any form of debt-based or coercive labor practices are strictly prohibited.

Any identified instances of child labor or forced labor shall be treated as serious non-compliance, addressed immediately, and reported to the World Bank in accordance with agreed incident reporting procedures.

6.3. Codes of Conduct and SEA/SH Prevention

All direct workers, contracted workers, and community workers engaged under the Project will be required to adhere to a Code of Conduct that sets out expected standards of behavior, including provisions related to respectful conduct, non-discrimination, and the prevention of sexual exploitation and abuse and sexual harassment (SEA/SH). The Code of Conduct will:

- Be communicated clearly to workers in a language and format they understand;
- Apply equally to all categories of project workers engaged by UNDP, UNOPS, and their IPs;
- Include clear consequences and sanctions for non-compliance.

SEA/SH prevention and response measures will be implemented in line with UNDP and UNOPS policies, with support from their respective IPs. Detailed SEA/SH prevention, mitigation, and response measures are addressed in the Project's SEA/SH Action Plan.

6.4. Training and Awareness

Appropriate training and awareness activities will be provided to ensure that project workers understand their rights and obligations under this LMP. This may include:

- Induction briefings for workers on labor conditions, occupational health and safety, and grievance mechanisms;
- Targeted training for contractors and supervisors on labor management and OHS requirements;
- Simplified awareness sessions for community workers engaged under Cash-for-Work and community contracting arrangements.

Training activities will be delivered by UNDP and its IPs (SFD, PWP, UWS-PMU) and by UNOPS and its IPs (PWP and UWS-PMU), as applicable, and will be adapted to local literacy levels, cultural context, and the specific risks associated with Project activities.

Training Matrix

Training shall be provided to all categories of project workers in a manner proportionate to their roles, responsibilities, and exposure to labor and occupational risks. Training records shall be maintained by the responsible implementing entity or contractor and made available during supervision and monitoring activities.

Table 3: Indicative Training Matrix

Target Group	Training Topic	Frequency	Responsibility
Direct Workers	Labor Management Procedures, Code of Conduct, Worker Grievance Mechanism, OHS	Upon induction and refresher annually	UNDP / UNOPS /IPs
Contractors and Supervisors	ESS2 requirements, labor management, OHS, emergency preparedness, incident reporting, SEA/SH prevention	Before mobilization and annually	UNDP / UNOPS /IPs
Contracted Workers	Site induction, PPE use, safe work practices, emergency procedures, Worker GM, Code of Conduct	Before starting work and toolbox talks throughout implementation	Contractors / IPs
Community Workers	Safe work practices, PPE, community health and safety, grievance mechanism, Code of Conduct	Before engagement and periodically during implementation	IPs
Primary Supply Workers (where applicable)	Supplier labor requirements, child labor and forced labor prohibition, OHS obligations	As required	Contractors / Suppliers /IPs

6.5. Monitoring and Reporting of Labor Issues

UNDP and UNOPS will monitor the implementation of labor management measures within their respective components, with support from their IPs and Third-Party Monitoring Agency where applicable.

Labor-related incidents, accidents, and cases of non-compliance shall be documented and addressed in accordance with this LMP. To ensure effective implementation of the Labor Management Procedures and early identification of labor-related risks, the Project will apply a structured and proportionate monitoring approach. Labor monitoring will be integrated into routine project supervision and reporting processes implemented by UNDP, UNOPS, and their respective Implementing Partners.

Table 4: Labor Monitoring Framework

Area	Key Indicators	Monitoring Frequency	Responsible Entity
Workforce Management	Number of workers by category and gender; percentage of workers with signed employment contracts/work agreements	Quarterly	UNDP / UNOPS / IPs
Gender and social inclusion	Number and percentage of workers disaggregated by gender and worker category and, where voluntarily disclosed, disability and displacement status; number of women in skilled or supervisory positions; comparison of wage or task-based rates for women and men undertaking equivalent work;	Quarterly	UNDP / UNOPS / IPs

Area	Key Indicators	Monitoring Frequency	Responsible Entity
Code of Conduct	Percentage of workers who have signed the Code of Conduct; number of Code of Conduct violations	Quarterly	UNDP / UNOPS / IPs
Occupational Health and Safety	Number of workers receiving OHS induction and refresher training; PPE distributed and observed in use; number of toolbox talks; number of OHS inspections conducted; number of incidents and near misses	Monthly	UNDP / UNOPS /IPs / Contractors
Child and Forced Labor	Number of workers whose age has been verified; number of child or forced labor incidents identified	Continuous	UNDP / UNOPS /IPs / Contractors
Worker Grievances	Number of grievances received, resolved, pending, and unresolved beyond the prescribed timeframe; average grievance resolution time	Monthly	UNDP / UNOPS /IPs / Contractors
Wages and Working Conditions	Number of payment delays reported; number of complaints related to wages, working hours, or working conditions	Monthly	UNDP / UNOPS /IPs / Contractors
Corrective Actions	Number of non-compliance findings; percentage of corrective actions completed within agreed timeframes	Quarterly	UNDP / UNOPS / IPs
Contractor Performance	Contractor compliance with approved Labor Management and OHS Plans; timely submission of monthly labor reports	Monthly	UNDP / UNOPS / IPs
Primary Supply Workers (where applicable)	Number of supplier screenings completed; number of suppliers requiring corrective actions; number of suppliers replaced due to labor-related non-compliance	As required	UNDP / UNOPS /IPs
SEA/SH	Number of SEA/SH awareness sessions conducted; percentage of workers trained on Code of Conduct and SEA/SH prevention	Quarterly	UNDP / UNOPS / IPs

The results of labor monitoring shall be reviewed regularly by UNDP, UNOPS, and Implementing Partners to identify trends, recurring issues, and areas requiring corrective action. Where monitoring identifies significant non-compliance with this LMP or ESS2 requirements, appropriate corrective measures shall be implemented, tracked to completion, and verified through subsequent supervision and monitoring activities.

In addition to routine monitoring, specific procedures are in place for the reporting and management of occupational incidents and accidents. The Project will document and report all occupational incidents and accidents involving project workers. Serious incidents, including fatalities, serious injuries, major occupational accidents, or credible allegations of sexual exploitation and abuse or sexual harassment (SEA/SH) related to project workers, will be notified to the World Bank within 24–48 hours of becoming known, in accordance with Environmental and Social Framework (ESF) requirements. Incident reporting will be followed by a written investigation, including root-cause analysis, and the implementation and tracking of corrective and preventive actions. Lessons learned will be communicated to contractors, implementing partners, and relevant project staff.

7. AGE OF EMPLOYMENT

Minimum Age for Employment

The minimum age for employment under the I-WISE Project is 18 years. Age verification requirements and procedures are described below.

Age Verification Procedures

Appropriate measures will be applied to verify the age of all project workers prior to engagement. Given documentation constraints in Yemen, age verification will follow a clear hierarchy of methods to ensure compliance with ESS2 while remaining context-appropriate:

- Primary method: Review of official identification documents (e.g., national ID, passport, or birth certificate), where available;
- Secondary method: Verification through community-based confirmation by recognized community leaders or committees, validated by Implementing Partner field staff (SFD, PWP, or UWS-PMU, as applicable);
- Tertiary method: Signed self-declaration by the worker, countersigned by the contractor or Implementing Partner, confirming that the individual is at least 18 years old.

Implementing Partner field staff will be responsible for validating non-documentary age verification and maintaining records for monitoring and audit purposes. Age verification requirements will be included in contractor agreements and community work arrangements. These procedures will be applied in a culturally appropriate manner while ensuring compliance with ESS2 requirements.

Procedure for Managing Underage Workers

If a person under the age of 18 is identified as being engaged in Project-related activities, the following actions will be taken immediately:

- The individual will be removed from Project-related work without penalty;
- The case will be documented and reported to UNDP or UNOPS, as appropriate;
- Corrective actions will be agreed with the responsible contractor or Implementing Partner to prevent recurrence;
- Any use of child labor will be treated as serious non-compliance with this LMP.

Young Workers

As the Project does not permit the engagement of workers under the age of 18, no young workers will be employed under the I-WISE Project. Consequently, no specific risk assessments or mitigation measures for young workers are required.

8. WORKER GRIEVANCE MECHANISM

The grievance mechanism (GM) will be available to all project workers engaged under the I-WISE Project. The worker grievance mechanism is designed to provide a transparent, accessible, confidential, and non-retaliatory process through which workers can raise concerns related to their employment and working conditions.

Objectives of the Worker Grievance Mechanism

The objectives of the worker grievance mechanism are to:

- Provide project workers with a clear and accessible channel to raise workplace concerns and complaints;
- Address grievances in a timely, fair, and transparent manner;
- Promote respectful labor relations and prevent escalation of labor disputes;
- Protect workers from retaliation for raising grievances in good faith;
- Enable UNDP and UNOPS to identify and address systemic labor issues during Project implementation.

Scope of the Grievance Mechanism

The worker grievance mechanism will be available to all categories of project workers, including:

- Direct workers engaged by UNDP, UNOPS, and their Implementing Partners;
- Contracted workers employed by contractors and subcontractors;
- Community workers engaged under Cash-for-Work (CFW) and community contracting arrangements.

Grievances that may be raised through the mechanism include, but are not limited to:

- Wages, working hours, and payment delays;
- Occupational health and safety concerns;
- Harassment, discrimination, or unfair treatment;
- Breaches of Codes of Conduct;
- Use of child labor or forced labor;

SEA/SH-related complaints shall be managed through confidential procedures described in Section 8.1.

Grievance Submission Channels

Workers may submit grievances through multiple entry points to ensure accessibility, confidentiality, and inclusiveness, taking into account literacy levels, connectivity constraints, and local conditions.

At least one grievance channel independent of the worker's immediate supervisor or contractor shall be available to all workers. Grievance information and submission channels shall be accessible to women, persons with disabilities, internally displaced persons, workers with low literacy, and workers without reliable access to telephone or internet services.

Available channels include:

- Direct reporting to a supervisor, site engineer, or designated grievance focal point at the worksite;
- Submission through UNDP, UNOPS, or Implementing Partner offices, as applicable;
- Complaints submitted to contractor-designated grievance focal points;
- Telephone numbers established under the Project grievance system;
- SMS-based reporting where available;
- WhatsApp or similar messaging platforms managed by the implementing entities;
- Physical complaint boxes placed at worksites or community locations accessible to workers.

Information on available grievance channels, including how and where to submit complaints, will be communicated to workers at the time of recruitment and during induction, and displayed at worksites in a manner appropriate to local conditions.

Workers may submit grievances anonymously, if they choose, and all grievances will be handled without retaliation.

Grievance Handling and Resolution Process

Worker grievances will be handled through a structured process that includes:

- Receipt and registration of the grievance;
- Acknowledgement of receipt, where contact details are provided;
- Assessment and investigation by the responsible party (UNDP, UNOPS, Implementing Partner, or contractor, as appropriate);
- Proposal and communication of a resolution to the complainant;
- Closure of the grievance once resolved.

Grievance Resolution Timeframes

To ensure timely and transparent handling of worker grievances, the following indicative timeframes shall apply to all grievances, unless exceptional circumstances require additional time. Workers shall be informed of any justified delays.

Table 5: Grievance Resolution Timeframes

Step	Description	Timeline	Responsible Party
Sorting, processing	Any complaint received is forwarded to the designated grievance focal point; logged in the central GM database; categorized according to the complaint types[3].	Upon receipt of complaint	Local GM focal points
Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by SMS, phone, email, or written note. A grievance ID number is provided.	Within 2 – 3 days of receipt	Local GM focal points
Verification, investigation, action	Grievances shall be reviewed and resolved by the designated grievance focal point, with support from relevant management, technical, or environmental and social personnel, as required by the nature of the complaint.	Within 10 – 14 working days The duration also depends on each case individually, based on its type, circumstances, and sensitivity.	GM Focal Point. Where required, the designated grievance focal point may seek support from relevant management, technical, Human Resources, or environmental and social personnel during grievance review and resolution.
Monitoring and evaluation	Data on complaints is collected in the GM Information System and reported bi-annually to the World Bank.	Monthly tracking; quarterly/bi-annually reporting	GM Focal Points
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected through follow-up calls, SMS, short surveys, or in-person meetings, and documented in the GM Information System.	Upon resolution of grievance	GM Focal Point
Training	Personnel responsible for grievance management shall receive training on grievance handling, confidentiality, worker rights, SEA/SH survivor-centred principles, and applicable World Bank requirements.	At start of project and quarterly with refresher sessions held annually	Personnel responsible for grievance management shall receive appropriate training on grievance handling, confidentiality, worker rights, and SEA/SH survivor-centred principles.

[3] Low = inquiries, requests for assistance, or false calls.
Moderate = operational delays, under-distribution, unclear selection criteria, quality issues, overlapping activities, dissatisfaction, labor disputes, technical shortcomings, environmental concerns, or non-critical OHS incidents. Critical = staff misconduct, corruption, fraud, Sexual Exploitation and Abuse (SEA), Gender-Based Violence (GBV), child protection violations, abuse of authority, forced displacement, land-related issues, or fatal/serious workplace accidents.

Step	Description	Timeline	Responsible Party
Appeals process	If a complainant is not satisfied with the proposed resolution, the grievance may be reviewed by a higher management level within the responsible organization. If the complainant remains dissatisfied, other available administrative, judicial, or World Bank grievance mechanisms may be used.	Case by Case basis	Project team at UNDP, UNOPS, and Implementing Partners (SFD, PWP, and UWS - PMU), and World Bank

Where a grievance cannot be resolved within the indicative timeframe due to its complexity or the need for additional investigation, the complainant shall be informed of the reasons for the delay and the expected timeframe for resolution.

Grievances that involve imminent risks to worker health and safety, serious occupational incidents, allegations of child labor or forced labor shall receive priority attention and be handled in accordance with the relevant procedures set out in this LMP and other Project environmental and social instruments such as ESCP.

Records of all grievances, actions taken, resolution status, and closure dates shall be maintained by the responsible implementing entity and summarized in regular labor monitoring reports.

8.1. SEA/SH-Sensitive Grievance Handling

Grievances related to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) shall be managed through confidential, survivor-centered procedures that prioritize the safety, dignity, privacy, and wishes of the survivor. SEA/SH complaints shall not be handled through the standard worker grievance resolution process and shall instead follow the procedures established in the Project's SEA/SH Action Plan and applicable UNDP, UNOPS, and World Bank protocols.

Key principles for managing SEA/SH grievances include:

- **Confidentiality:** Information related to SEA/SH complaints shall be strictly confidential and shared only with personnel directly responsible for facilitating referrals and providing appropriate support, and only with the survivor's informed consent.
- **Survivor-Centered Approach:** The survivor's rights, needs, dignity, safety, and preferences shall guide all actions taken. Survivors shall not be pressured to pursue any particular course of action, including reporting to law enforcement or participating in investigations.
- **Informed Consent:** No information identifying the survivor shall be shared without the survivor's explicit informed consent, except where disclosure is required by applicable law or where there is an imminent risk to life or safety.
- **Safe and Accessible Reporting Channels:** Survivors may report concerns through designated GBV focal points, confidential telephone lines, secure email addresses, trusted referral partners, or other confidential reporting channels established by UNDP, UNOPS, and their Implementing

Partners. Multiple reporting options shall be available to maximize accessibility and survivor choice.

- **Referral to Appropriate Services:** Upon receiving a SEA/SH complaint, the designated GBV focal point shall, with the survivor's consent, facilitate timely referral to available medical, psychosocial, legal, security, or other specialized support services, in accordance with the Project's SEA/SH Referral Pathway.
- **Safe Documentation:** Only the minimum information necessary to facilitate referrals and meet reporting obligations shall be documented. Personally identifiable information shall not be included in routine project reports, and all records shall be stored securely with restricted access.
- **Protection Against Retaliation:** Survivors, complainants, witnesses, and individuals supporting the grievance process shall be protected from intimidation, discrimination, retaliation, or any adverse employment consequences resulting from reporting a SEA/SH concern.
- **Separate Case Management:** SEA/SH grievances shall not be investigated or resolved by contractors, supervisors, or standard grievance committees. Case management shall be undertaken only by designated personnel trained in survivor-centered approaches and in accordance with the Project's SEA/SH Action Plan.

The Project shall maintain anonymized records of SEA/SH complaints for monitoring purposes only. Any reporting to the World Bank shall protect survivor confidentiality and follow the World Bank's Environmental and Social Incident Response Toolkit (ESIRT) requirements, as well as applicable UNDP and UNOPS reporting procedures.

Detailed procedures for survivor support, referral pathways, service mapping, incident reporting, and case management are provided in the Project's SEA/SH Action Plan, which shall take precedence for all SEA/SH-related cases.

8.2. Monitoring and Reporting

Information on worker grievances, including the number received, resolved, pending, and recurring issues, shall be reviewed periodically to identify trends, recurring issues, and opportunities for improvement.

9. CONTRACTOR MANAGEMENT

9.1. Contractor Selection and Due Diligence

Contractors engaged under the Project, whether through UNDP, UNOPS, or their respective Implementing Partners (IPs), will be selected through transparent and competitive procurement processes in accordance with applicable procurement procedures.

As part of the selection process, contractors will be required to demonstrate adequate capacity to manage labor and working conditions, including:

- Relevant experience in implementing similar works under comparable technical and contextual conditions;
- Availability of qualified personnel to manage labor, occupational health and safety, and site supervision;
- Ability to comply with Yemeni labor legislation, the requirements of ESS2, and the provisions of this Labor Management Procedures (LMP).

Where relevant, contractors' past performance related to labor management, OHS compliance, and adherence to Codes of Conduct may be considered during evaluation.

9.2. Labor Provisions in Contracts

All contracts with contractors and subcontractors will include labor-related provisions consistent with this LMP. These provisions will require contractors to:

- Comply with applicable Yemeni labor legislation and ESS2 requirements;
- Prohibit the use of child labor and forced labor;
- Provide workers with clear and documented terms and conditions of employment;
- Implement occupational health and safety measures proportionate to the scale and risk of the works;
- Enforce Codes of Conduct, including provisions related to sexual exploitation and abuse and sexual harassment (SEA/SH);
- Establish and operate a worker grievance mechanism accessible to all workers.

Contracts will also specify consequences for non-compliance, including corrective actions and contractual remedies where necessary.

9.2.1. Contractor Labor Management and Occupational Health and Safety Plans

Prior to the commencement of any site activities, Implementing Partners, contractors and, where applicable, subcontractors shall prepare and submit site-specific Labor Management and Occupational Health and Safety (OHS) Plans for review and approval by UNDP, UNOPS, or the relevant Implementing Partner, as appropriate. No contractor shall mobilize to the worksite until the required plans have been reviewed and accepted.

The site-specific plans shall be proportionate to the nature, scale, and risks of the works and shall include, as a minimum:

- Workforce management arrangements, including recruitment procedures, employment terms and conditions, and labor records;
- Occupational health and safety risk assessments and corresponding mitigation measures;
- Site-specific emergency preparedness and response procedures;
- Procedures for the provision, maintenance, and mandatory use of personal protective equipment (PPE);
- Gender- and disability-responsive occupational health and safety measures, including PPE appropriate to the worker's size and assigned task, separate and lockable sanitation facilities for women and men where applicable, adequate lighting and rest areas, reasonable accommodation for workers with disabilities, and appropriate assignment of duties for pregnant and nursing workers based on site-specific risk assessments;
- Traffic and pedestrian safety measures, where applicable;
- Code of conduct implementation and worker awareness measures, including prevention of sexual exploitation and abuse and sexual harassment (SEA/SH);
- Worker grievance mechanism procedures and designated grievance focal points;
- Incident and accident notification, investigation, and reporting procedures;
- Training and toolbox talk schedules; and
- Monitoring, inspection, and corrective action procedures.

Contractors shall review and update these plans whenever there are significant changes to the scope of work, work methods, site conditions, or identified risks. Updated plans shall be submitted to the responsible implementing entity for review prior to implementation of the revised activities. Once approved, these plans shall form part of the contractual obligations and shall be attached to the signed contract.

9.2.2. Monitoring and Supervision of Contractors

UNDP and UNOPS, with support from their respective IPs and Third-Party Monitoring Agency (where applicable), will monitor contractor performance with respect to labor management and OHS through:

- Routine supervision and site visits;
- Review of contractor reports and labor-related documentation;
- Follow-up on grievances and incidents reported through the worker grievance mechanism;
- Independent verification by Third-Party Monitoring Agency in areas with access or security constraints.
- Monitoring and supervision activities will be proportionate to the scale and risk of the works and adapted to the operating context.

9.2.3. Contractor Labor Reporting Requirements

Implementing Partners or Contractors shall submit monthly labor management reports to UNDP or UNOPS, as appropriate, throughout the duration of their contracts. The reports shall provide information on labor management performance, occupational health and safety, and compliance with the requirements of this LMP.

As a minimum, monthly reports shall include:

- Total number of workers, disaggregated by worker category, sex, and nationality, where applicable;
- Number of new workers recruited and workers who have left employment during the reporting period;
- Confirmation that all workers have signed employment contracts or work agreements;
- Confirmation that all workers have signed the project code of conduct;
- Age verification records confirming compliance with the minimum age requirement;
- Summary of wages paid, payment status, and any payment delays or disputes;
- Summary of working hours, overtime worked, and rest periods, where applicable;
- Personal protective equipment (PPE) issued, replaced, and used during the reporting period;
- Occupational health and safety training, toolbox talks, and emergency drills conducted;
- Results of workplace inspections and identified hazards;
- Occupational accidents, incidents, near misses, lost-time injuries, and corrective actions implemented;
- Worker grievances received, resolved, pending, and referred;
- Allegations of child labor, forced labor, discrimination, or SEA/SH (reported in accordance with confidentiality requirements);
- Status of corrective actions arising from inspections, audits, incident investigations, or supervision missions; and
- Any significant labor management challenges, non-compliance issues, and proposed corrective measures.

UNDP and UNOPS shall review Implementing Partners and contractor reports as part of routine supervision activities and may require additional information or corrective actions where deficiencies or non-compliance are identified.

9.2.4. Corrective Measures and Sanctions

Where non-compliance with labor management or OHS requirements is identified, UNDP, UNOPS, or the relevant IP will require contractors to implement corrective measures within a specified timeframe. Corrective actions may include:

- Immediate measures to address serious health and safety risks;
- Additional training, supervision, or technical support;
- Revision of work practices or procedures;

- Application of sanctions in accordance with contractual provisions in cases of persistent or serious non-compliance.

In cases of major or repeated non-compliance, termination of the contract may be considered in accordance with the contractual terms and applicable regulations.

10. COMMUNITY WORKERS

10.1. Use of Community Labor under the Project

Community workers will be engaged primarily through Cash-for-Work (CFW) and community contracting arrangements to support labor-intensive activities, including:

- Rehabilitation of traditional irrigation systems and canals;
- Construction and rehabilitation of small-scale water harvesting and flood protection structures;
- Soil conservation, terracing, and watershed management works;
- Routine maintenance of community-level infrastructure.

These activities are designed to provide short-term income support while contributing to climate resilience and sustainable water management in Project areas.

10.2. Voluntary Participation and Recruitment

Participation of community workers in Project activities will be strictly voluntary. No individual will be forced, coerced, or required to participate in community labor activities.

Recruitment of community workers will be conducted transparently at the local level, in coordination with community leaders and relevant local structures. Community leaders and local structures may support community outreach and verification but shall not have sole authority over the selection of workers. Eligibility and selection criteria shall be publicly communicated in accessible formats; selection records shall be maintained, and the selection process shall be subject to verification by the responsible Implementing Partner. Complaints or appeals related to worker selection may be submitted through the Worker Grievance Mechanism.

Selection criteria may prioritize vulnerable households, unemployed youth, women and, where relevant, internally displaced persons (IDPs), in line with the Project objectives and local context. Selection shall not be conditioned on land ownership, tribal or political affiliation, personal relationships, or membership in community committees or water-user organizations.

10.3. Terms and Conditions of Work

Community workers will be engaged under simplified work agreements that clearly outline:

- The nature and scope of the work;
- Duration of engagement;
- Daily or task-based wage rates;

- Working hours and rest periods;
- Occupational health and safety requirements;
- Access to the worker grievance mechanism.

10.4. Occupational Health and Safety for Community Workers

Given the labor-intensive nature of community works, specific attention will be given to occupational health and safety for community workers. Key measures include:

- Basic safety orientation prior to commencement of work;
- Provision of appropriate personal protective equipment (PPE) at no cost;
- Simple, task-specific safety instructions adapted to local literacy levels;
- Supervision by trained site supervisors or community facilitators.

10.5. Grievance Mechanism for Community Workers

Community workers shall have access to the Worker Grievance Mechanism described in Section 8. Information on grievance procedures and contact points shall be communicated prior to commencement of activities.

10.6. Monitoring of Community Labor

UNDP, with support from its Implementing Partners (SFD, PWP, and UWS-PMU) and Third-Party Monitoring Agency where applicable, will monitor the engagement of community workers to ensure compliance with this LMP. Monitoring will focus on:

- Voluntary participation;
- Fair and timely payment of wages;
- Adherence to occupational health and safety measures;
- Functionality of grievance mechanisms.

11. Primary Supply Workers

Where primary suppliers provide goods, materials, or equipment that are essential to the core functions of the Project, UNDP, UNOPS, their Implementing Partners (IPs), and contractors, as applicable, shall apply a risk-based approach to identify and manage labor and occupational health and safety (OHS) risks associated with primary supply workers, in accordance with the requirements of ESS2.

Prior to procurement, primary suppliers shall be screened, to the extent reasonably practicable, to identify potential risks related to:

- The use of child labor;
- The use of forced or compulsory labor;
- Significant occupational health and safety risks;
- Serious or repeated violations of applicable national labor legislation; and
- Previous records of labor-related non-compliance, where such information is available.

Procurement and supply contracts shall require primary suppliers to comply with applicable national labor legislation, the requirements of ESS2, and relevant occupational health and safety standards. Where appropriate, suppliers shall also be required to confirm that they do not employ child labor or forced labor and that appropriate occupational health and safety measures are implemented for their workforce.

During Project implementation, UNDP, UNOPS, their Implementing Partners, and contractors shall monitor significant labor risks associated with primary suppliers through contract management, supplier declarations, documentation review, field verification where feasible, and follow-up of any labor-related complaints or incidents.

Where credible evidence identifies child labor, forced labor, or serious occupational health and safety violations within a primary supplier's operations, the Project shall require the supplier to implement appropriate corrective actions within an agreed timeframe. If the supplier fails to implement satisfactory corrective measures, the Project shall, where feasible and consistent with procurement requirements, seek an alternative supplier that demonstrates compliance with the labor requirements of this LMP and ESS2. The Project will maintain records of supplier screening, identified risks, corrective actions undertaken, and follow-up measures as part of its environmental and social monitoring system.