



Labor Management Procedures

Date 4/27/2023

CEPF Grant:

112934

Grantee

IUCN

Sub-project Title

Catalyzing the recovery of threatened priority plant families of Jamaica.

Sub-project Location

Jamaica

Grant Summary

1. Grantee organization. IUCN
 2. Sub-project title. Catalyzing the recovery of threatened priority plant families of Jamaica.
 3. Grant number. CEPF-112934
 4. Grant amount (US dollars). \$164,457.73
 5. Proposed dates of grant. 6/1/2023 – 5/31/2025
 6. Countries where activities will be undertaken. Jamaica
 7. Date of preparation of this document. 3/24/2023
1. **Overview of labor use on the sub-project:** This section should describe the main types of workers who will be employed or engaged on the sub-project, as follows:

Number of Project Workers: The total number of workers to be employed on the sub-project, and the different types of workers: direct workers; contracted workers; and community workers. Where numbers are not yet firm, an estimate should be provided.

Thirteen people from four partners will be employed during this project. Two IUCN staff (project manager and finance officer); six RBG Kew staff (PI and training and workshop facilitation staff); four UWI local research consultants; one Conservation Planning Specialist Group staff member (training and workshop facilitation).

Characteristics of Project Workers: To the extent possible, a broad description and an indication of the likely characteristics of the project workers e.g. local workers, national or international migrants, female workers, workers between the minimum age and 18, etc.

Project workers from IUCN, CPSG, and RGB Kew are all international staff based outside of Jamaica; the UWI research consultants/trainees are local workers/staff. All workers participating in the project are over 18 years old. Gender breakdown is not finalized, but five of the known participating workers are female; five identified workers are male.

Timing of Labor Requirements: The timing and sequencing of labor requirements in terms of numbers, locations, types of jobs and skills required.

It is expected that all workers will contribute to the success of the work throughout the duration of the project. Most labor is desk-based study of research papers or participation (mainly through training and facilitation) in two project workshops (provisionally scheduled for 2024). Research study in Jamaica will take place either at UWI or at the workers home where work from home options are available. Online training and support will be largely through workers in the RGB Kew offices. In person workshops (training and assessment) will take place at the to be identified host venue – potentially UWI.

Contracted Workers: The anticipated or known contracting structure for the sub-project, with numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by each contractor/subcontractor.

IUCN will subcontract CPSG, UWI, and RGB Kew for much of the project work. UWI have indicated that should the proposal be successful they will develop standardized consultancies for four identified

botanists. No other partner will be subcontracted

2. **Assessment of key potential labor risks:** This section should identify key potential labor risks related to the sub-project, assess each risk against criteria of probability and severity, and describe in detail all risks rated as moderate, substantial or high. Risk may include, for example:

- The conduct of hazardous work, such as working at heights or in confined spaces, use of heavy machinery, or use of hazardous materials.
- Likely incidents of child labor or forced labor, with reference to the sector or locality.
- Likely presence of migrants or seasonal workers.
- Risks of labor influx or gender-based violence.
- Possible accidents or emergencies, with reference to the sector or locality.
- General understanding and implementation of occupational health and safety requirements.

All research work is anticipated to be professional and office based, with no fieldwork component – therefore risks to workers are expected to be negligible. Workshops are also expected to be largely risk-free, as the workshops will be planned and undertaken within a safe venue (e.g., UWI or NEPA offices).

Table : Potential risks associated with workshops in Jamaica :

Activity	Risk	Probability and severity
Road travel to workshop	Road accident	Low probability, severity accident dependent
Flight travel to workshop	Flight accident	Low probability, severity high
Natural disasters	Hurricane, earthquake, tropical storms	Low probability, workshops to be held within Kingston. Severity variable.
Disease	Transmission at workshop	Low as will follow national guidelines
Crime	Various criminal activities	Low, workshop participants will be within secure environment for duration of the work.

3. **Risk mitigation measures:** This section will describe the measures that will be taken to mitigate all risks rated as moderate or above. Mitigation measures will be presented following the mitigation hierarchy, which requires that risks are anticipated and avoided where possible. Where avoidance is not possible, risks should be minimized to acceptable levels. Any risks that remain following avoidance and minimization should be mitigated.

There is minimal risk associated with this project. Perhaps the only possibility of the transmission of Covid-19 during workshops, and Jamaican national guidelines for preventing transmission will be followed throughout the project.

4. **Brief overview of legislation: terms and conditions:** This section should present a brief overview of the *key aspects* of national labor and employment law relevant to terms and conditions of employment (e.g., wages, deductions, benefits, etc.).

All staff (full-time and part-time) will be paid in compliance with national laws and labor management procedures.

Jamaican labor legislation relevant to ESS2

Legislation	Relevance
Disabilities Act (2014)	Provides for employment of and non-discrimination against persons with disabilities.
Trade Unions Act (1919; amended)	Provides legal recognition for trade unions and establishes the right of collective bargaining.
Labour Relations and Industrial Disputes Act (1975; amended)	Regulates relations between employers and workers, including procedures for settlement of industrial disputes.
Minimum Wage Act (1938; amended)	Provides for the protection of workers in relation to the payment of wages.
Employment (Termination and Redundancy Payment) Act (1974)	Provides for a separation payment whenever an employee is made redundant or their employment is terminated.
Holiday with Pay Act (1974)	Establishes the right to paid annual vacation.
Jamaica (Constitution) Order in Council Act (1962; amended)	Confers protection from discrimination on the grounds of race, etc.
Employment (Equal Pay for Men and Women) Act (1975)	Prohibits discrimination on grounds of sex in respect of remuneration and other terms and conditions of employment.
Maternity Leave Act (1979)	Prevents some forms of discrimination against pregnant women and entitles pregnant women to 12 weeks of maternity leave.
Child Care and Protection Act, (2004)	Prohibits the employment of children under the age of 13, restricts employment of children under the age of 15 to light work, and prohibits the employment of young people under the age of 18 in hazardous work.
Factories Act (1943; amended)	Provides for regulation of occupational health and safety in certain settings, including building operations and engineering construction.

USA and UK labor legislation relevant to ESS2

USA	The Fair Labor Standards Act (1938)	Establishes minimum wage, overtime pay, recordkeeping, and youth employment standards affecting employees in the private sector. Among other provisions, the act requires employers to pay non-exempt employees at least the federal minimum wage, restricts the hours that children under the age of 16 can work and forbids the
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		employment of children under the age of 18 in certain dangerous jobs.
USA	The Family and Medical Leave Act (1993)	Requires employers of 50 or more employees to give up to 12 weeks of unpaid, job-protected leave to eligible employees for the birth or adoption of a child or for the serious illness of the employee or a spouse, child or parent.
USA	The Labor-Management Reporting and Disclosure Act (1959)	Deals with the relationship between a union and its members.
USA	Title VII of the Civil Rights Act (1964)	Prohibits harassment and discrimination in the workplace based on race, color, religion, sex and national origin
UK	The Employment Rights Act (1996)	Covers a variety of topics, such as employment contracts, unfair dismissal, family-friendly leave, and redundancy.
UK	The National Minimum Wage Act (1998)	Establishes a national minimum wage for employees and workers. The Employment Relations Act (1999) establishes rights at work for union recognition, derecognition, and industrial action.
UK	The Maternity and Parental Leave Regulations (1999)	Sets out the rights of employees to time off for maternity or paternity leave. The Equality Act (2010) is a comprehensive piece of legislation that protects individuals from unfair treatment inside and outside of the workplace, and promotes a fair and more equal society

5. **Brief overview of legislation: occupational health and safety:** This section should present a brief overview of the *key aspects* of national labor and employment law relevant to occupational health and safety.

Jamaican legislation relevant to occupational health and safety

Legislation	Overview
Occupational Health and Safety Bill (2017) -Draft	Provides a framework to secure the safety and health of workers.
Factories Act (1943 amended)	Provides for regulation of occupational health and safety in certain settings, including building operations and engineering construction

USA and UK legislation relevant to occupational health and safety

USA	The Occupational Safety and Health Act (1970)	Mandates that all non-government employers provide employees with an environment free from recognized hazards, such as exposure to toxic chemicals, excessive noise levels, mechanical
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		dangers, heat or cold stress, or unsanitary conditions. Section 11(c) of the Act prohibits any employer from discharging, retaliating or discriminating against any employee because the worker has exercised rights under the act. These rights include complaining to the Occupational Safety and Health Administration (OSHA), seeking an OSHA inspection, participating in an OSHA inspection, and participating or testifying in any proceeding related to an OSHA inspection.
UK	The Health and Safety at Work Act (1974)	The primary piece of legislation covering occupational health and safety. The act confers on all workers a right to work in places where risks to their health and safety are properly controlled. It sets out the general duties that: employers have towards employees and members of the public; employees have to themselves and to each other; and certain self-employed have towards themselves and others.

6. **Responsible staff:** This section identifies the functions and/or individuals within the sub-project responsible for (as relevant):

- Engagement and management of project workers.
- Engagement and management of contractors/subcontractors.
- Occupational health and safety.
- Training of workers.
- Addressing worker grievances.

It is expected that the lead manager for each partner organization (IUCN, UWI, CPSG, and RBG Kew) will strictly follow the appropriate national and institutional legislation concerning the above functions.

Area	Function/individual
Engagement and management of project workers	For direct workers: IUCN Project Manager For contracted UWI workers: UWI subcontract manager For contracted SSC CPSG workers: SSC CPSG Program Officer, RBG Kew, Subcontract lead
Occupational health and safety	For direct workers: IUCN Project Manager For contracted UWI workers: UWI subcontract manager For contracted SSC CPSG workers: SSC CPSG Program Officer RBG Kew, subcontract manager
Training of workers	For direct workers: IUCN Project Manager For contracted UWI workers: subcontract manager For contracted SSC CPSG workers: SSC CPSG Program Officer,

	RBG Kew, subcontract manager
Addressing worker grievances	IUCN Project Manager For contracted UWI workers: subcontract manager SSC CPSG Program Officer RBG Kew, subcontract manager

7. **Policies and procedures:** This section should describe policies and procedures for managing each category of sub-project staff, in accordance with national labor and employment law and ESS2.

No major labor-related risks are expected. However, the World Bank's provisions on Labor and Working Conditions shall apply. Any contracts will be consistent with the labor provisions outlined in the World Bank's Environmental and Social Framework. Mitigation measures will be established by incorporating standardized clauses in the contract documents so that all workers are aware of the project's Environment and Social obligations. IUCN will ensure compliance with the clauses. These clauses will include non-tolerance of gender-based violence (GBV), sexual harassment and sexual exploitation and abuse (SEA), discrimination. Project workers will be employed on the basis of equal opportunity and there will be no discrimination as it relates to compensation, working conditions and terms of employment. All project workers will be given and receive training on the Code of Conduct as well as any OHS measures required under ESS2.

IUCN Human Resources Policy guidelines for salary, benefits, working hours, etc. of direct staff are included as a separate document as part of this proposal.

A copy of the workers' Grievance Redress Mechanism and Code of Conduct will be made available to all workers included as part of the project.

8. **Contracted workers:** This section will describe how the requirements of national labor and employment law and ESS2 will be incorporated into grant agreements and/or service contracts with third parties who will employ or engage contracted workers.

UWI, RBG Kew, and SSC CPSG will adhere to the relevant national labor laws and occupational health and safety laws in Tables 2 and 3. Any contracts will be consistent with the labor provisions outlined in the World Bank's Environmental and Social Framework. Mitigation measures will be established by incorporating standardized clauses in the contract documents so that all workers are aware of the project's Environment and Social obligations. UWI, RBG Kew, and SSC CPSG will ensure compliance with the clauses. These clauses will include non-tolerance of gender-based violence (GBV), sexual harassment and sexual exploitation and abuse (SEA), discrimination. Project workers will be employed on the basis of equal opportunity and there will be no discrimination as it relates to compensation, working conditions and terms of employment. All project workers will be given and receive training on the Code of Conduct as well as any OHS measures required under ESS2.

A copy of the workers' Grievance Redress Mechanism and Code of Conduct will be made available to all workers included as part of the project.

9. **Community workers**: This section will describe how the requirements of ESS2 will be complied with in regard to community workers employed or engaged to work on the sub-project.

No community workers are expected to be employed/engaged directly by IUCN.

10. **Grievance mechanism**: This section will describe how a mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. The mechanism must: be made easily accessible to such workers; address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution; and operate in an independent and objective manner. Please describe how you will put in place a grievance mechanism that meets these requirements.

The Grievance Mechanism for all Project staff is as follows:

The Project Managers will be the point of contact for all Grievances. Contact information (see Table 1) will be provided to workers upon signing of contract.

Upon receipt of Grievances (not channeled through the project manager,) the staff will notify the Project Manager and/or Social Specialist within 24 hours of receiving complaint. In the case of issues with project management staff, the Project Manager may be required to exclude themselves if the complaint directly involves them. Grievances involving gender-based violence, sexual exploitation and abuse and sexual harassment will be handled as set out below.

All received grievances will be recorded in a grievance register within 24 hours of receipt by the Project Managers. The Project Managers will attempt to address and resolve the grievance within the established time frame of three-weeks upon receipt. In cases of matters which require more urgent attention, a period of a minimum of twenty-four hours and a maximum of fifteen days will be allotted for addressing and resolving the grievance. Grievances can be made in person, by telephone call, or in writing. Grievances can be made anonymously. A dedicated email and telephone number will be provided for all Grievances. For grievances made via telephone or in person, grievances will be recorded a grievance register within 24 hours of receipt by the Project Managers and the complainant asked to sign same.

All workers will be made aware on employment contracts of the grievance mechanisms that are in place and what those consist of. Workers will have access to the following grievance information:

- The option of either verbal or written grievance complaint.
- Contact information for grievance submission
- Timelines for grievance response: minimum 24-hours, maximum 3-weeks.
- Grievance forms will be simple and easily available: the workers describe the actual grievance, allow the organization to track the investigation, conciliation, and remediation steps, and be available to all workers.
- The possibility to hold an open and a constructive meeting about a grievance with their immediate manager/supervisor.

- The right to appeal to another manager/supervisor against a decision made by their manager. If the workers are not satisfied and do not have confidence in those managing the grievances, they can escalate the matter. Staff can appeal to IUCN or directly to the Grievance Mechanisms of the Implementing Agency—Conservation International. IUCN staff/consultants can appeal directly to the Grievance Mechanisms of the Implementing Agency—IUCN.
- The workers' right to be accompanied by a fellow worker or support of her/his own choice when attending the meeting to discuss a grievance.
- The Ministry of Labour of the respective country or the National Courts are alternatives that the affected person (worker) can use.

The complainant will be informed in writing of the measures taken to address the grievance by the Project Manager if the complaint is against the project manager.

If unresolved, either party may seek redress in the courts of the Country. Parties involved will be advised that they can directly contact the Project Office Ministry.

All received grievances received by the project shall be logged and filed.

Contact names for grievance complaints

	Title	Phone	Email	Physical Address
	Manager IUCN-CI Biodiversity Assessment Unit	+1 (202)-984-7523	Phone number should be used	IUCN Washington D.C. Office 1630 Connecticut Ave., NW Suite 300 Washington, D.C. 20009 U.S.A.
	UWI	(876) 927-1202	Phone number should be used.	The University of the West Indies Mona, Jamaica
	RBG Kew	+44 20 8332 5655	Phone number should be used	RBG Kew, Richmond, Surrey TW9 3AE, UK
	Program Officer, SSC CPSG	+44 7376 743348	Phone number should be used	Mayes Cottage, Groombridge, East Sussex, TN3 9SG UK

11. **Addressing Gender Based Violence:** You will also need to make special provisions for grievances related to gender-based violence (GBV), due to the need for complaints to be handled by persons with specialist training and adopting a survivor-centered approach. You will be provided with the contact details of a GBV service provider in the sub-project country, and will be required to include them in your grievance mechanisms. Survivors of GBV will have the option of contacting the GBV service provider directly, who will, in-turn, inform the CEPF Secretariat, with the express consent of the survivor.

The specific nature of sexual exploitation and abuse and of sexual harassment (SEA/SH) requires tailored measures for the reporting, and safe and ethical handling of such allegations. A survivor-centered approach aims to ensure that anyone who has been the target of SEA/SH is treated with dignity, and that the person's rights, privacy, needs and wishes are respected and prioritized in any and all interactions.

The Grantee will specify an individual who will be responsible for dealing with any SEA/SH issues, should they arise. A list of SEA/SH service providers will be kept available by the project. The Grantee should assist SEA/SH survivors by referring them to Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

To address SEA/SH, the project will follow the guidance provided on the World Bank Technical Note "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Civil Works". This Grantee will follow the official WB definitions described on the Technical Note as shown below:

Sexual Abuse (SEA) is an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions

Sexual Exploitation (SE) refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual harassment (SH)

Sexual Harassment (SH) is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) service provider

An organization offering specific services for SEA/SH survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

Survivor-centered approach

The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in

which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

SEA/SH grievances can be received through any of the available channels and will be considered as "High-profile grievances - that if not resolved promptly may represent significant risks to the environment or community". A list of SEA/SH service providers will be kept available by the Project. Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centered approach.¹ Any cases of SEA/SH brought through the Grantee will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The CEPF will be notified as soon as the designated persons from the Grantee organization learn about the complaint.

If a SEA/SH related incident occurs, it will be reported through the Grantee, as appropriate and keeping the survivor information confidential. Specifically, following steps will be taken once an incident occurs:

ACTION 1: COMPLAINT INTAKE AND REFERRAL

If the survivor gives consent, the designated person responsible from the Grantee fills in a complaints form, excluding any information that can identify the survivor:

- The nature of the allegation (what the complainant says in her/his own words without direct questioning)
- If the alleged perpetrator was/is, to the survivor's best knowledge, associated with the project (yes/no)
- The survivor's age and/or sex (if disclosed); and,
- If the survivor was referred to services

If the survivor does not want to provide written consent, her consent can be verbally received. If needed or desired by the survivor, the designated person responsible from the Grantee refers her/him to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and according to preestablished and confidential referral procedures. The survivor's consent must be documented even if it is received verbally. The service providers will be able to direct survivors to other service providers in case the survivor wishes to access other services. The designated person responsible from the Grantee will keep the survivor informed about any actions taken by the perpetrator employer. If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the designated person responsible from the Grantee can close the case.

ACTION 2: INCIDENT REPORTING

The designated person responsible from the Grantee needs to report the anonymized SEA/SH incident as soon as it becomes known, to the Executive Director who will in turn inform the CEPF.

¹ The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

Complaint Forms and other detailed information should be filed in a safe location by the designated person responsible from the Grantee. Neither the designated person responsible from the Grantee nor the Executive Director should seek additional information from the survivor.

SEA/SH incident reporting is not subject to survivors' consent but the designated person responsible from the Grantee needs to provide ongoing feedback to the survivor at several points in time: (1) when the grievance is received; (2) when the case is reported to designated person responsible from the Grantee and CEPF; (3) when the verification commences or when a determination is made that there is an insufficient basis to proceed; and (4) when the verification concludes or when any outcomes are achieved or disciplinary action taken.

As long as the SEA/SH remains open the designated person responsible from the Grantee and/or Executive Director should update the CEPF on the measures taken to close the incident.

ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION

Each SEA/SH incident should be verified to determine if it was related to the CEPF funded project. The designated person responsible from the Grantee should form a SEA/SH verification committee comprised by her/him, one member of the Grantee organisation, one member of a local service provider and a representative of the contractor (if relevant). The designated person responsible from the Grantee should notify the SEA/SH Committee of the incident within 24 hours of its creation. The SEA/SH verification committee will consider the SEA/SH allegation to determine the likelihood that the grievance is related to the project.

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to a project², the verification committee discusses appropriate actions to be recommended to the appropriate party—i.e., the employer of the perpetrator, which could be the designated person responsible from the Grantee or a contractor. The designated person responsible from the Grantee will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labor legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

For SEA/SH incidents where the survivor did not consent to an investigation, the appropriate steps should be taken to ensure the survivor is referred to/made aware of available services and that the project mitigation measures are reviewed to determine if they remain adequate and appropriate or if they require strengthening.

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in SVG legal system, the designated person responsible from the Grantee should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the courts, not the SEA/SH verification committee. Unlike other types of issues, the designated person

² Project actors are: (a) people employed or engaged directly by the Grantee to work specifically in relation to the project (direct workers); (b) people employed or engaged through third parties (Project staff, subcontractors, brokers, agents or intermediaries) to perform work related to core functions of the project, regardless of location (contracted workers); (c) people employed or engaged by the Grantee's primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labor such as voluntary services or participation in project activities and processes (community workers).

responsible from the Grantee does not conduct investigations, make any announcements, or judge the veracity of an allegation.

Any cases of SEA/SH brought through the Grantee will be documented but remain closed/sealed to maintain the confidentiality of the survivor. Here, the GM will primarily serve to:

- Refer complainants to the SEA/SH Services Provider; and
- Record the resolution of the complaint

The Grantee will also immediately notify both the CEPF and the World Bank of any SEA/SH complaints **WITH THE CONSENT OF THE SURVIVOR.**

Disclosure: CEPF requires that all direct and contracted workers be informed of the existence of the grievance mechanism and the measures put in place to protect them against any reprisal for its use, either at the time of recruitment or at the start of the sub-project, whichever is later.

CEPF also requires that all direct, contracted and community workers be provided with Conservation International's (CI's) Code of Ethics, and be informed that any violations of the Code of Ethics should be reported to CI via its Ethics Hotline at www.ci.ethicspoint.com

The code of ethics will be consistent with the code of conduct of the WB:

Neil Cox will signed a contract with the Grantee for code of ethics. This assignment will be carried out at project initiation. This contract requires you to implement measures to address environmental and social risks related to the sub-project, including the risks of sexual exploitation, sexual abuse, and sexual harassment.

Herewith, all persons are referred to as "**Grantee's Personnel**" and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that is required from all Grantee Personnel.

The workplace is an environment where unsafe, offensive, abusive, or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

Grantee's Personnel shall:

1. carry out his/her duties competently and diligently;
2. acknowledge that adherence to this Code of Conduct is a condition of employment;
3. comply with this Code of Conduct and all applicable laws, regulations, and other requirements, including requirements to protect the health, safety and well-being of other Grantee's Personnel and any other person;

4. maintain a safe working environment including by:
 - a. ensuring that workplace equipment, and processes under each person's control are safe and without risk to health;
 - b. wearing required personal protective equipment when visiting construction sites and follow sub-project COVID-19 related protection guidelines, as described in the Stakeholder Engagement Plan (SEP), Labor Management Procedure (LMP), Environmental and Social Management Framework (ESMF) and plans (ESMPs), or other relevant instruments.;
 - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d. following applicable emergency operating procedures.
5. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
6. avoid any conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection);
7. respect reasonable work instructions (including regarding environmental and social norms);
8. protect and properly use property (for example, to prohibit theft, carelessness, or waste);
9. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
10. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with Grantee's or other Personnel;
11. not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
12. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
13. protect children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behavior towards children, limiting interactions with children, and ensuring their safety in project areas).
14. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
15. shall have access to a referral system for victims of Gender Based Violence/Sexual Exploitation and Abuse of employees and any individual that may be associated with sub-project. Where such incident would have occurred, it should immediately be reported to the Employer or his/her designate who would ensure that the victim is referred to a service provider trained to handle GBV cases;
16. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
17. shall have access to a Grievance Redress Mechanism, which will afford effective remedies.
18. report violations of this Code of Conduct to the Employer under this project;
19. not retaliate against any person who reports violations of this Code of Conduct, whether to the Employer or the Project's Grievance Redress Mechanism; and,

20. the Grantee staff will follow the relevant requirements set out in LMP.

RAISING CONCERNS

If you observe any behavior that is believed may represent a violation of this Code of Conduct, or that otherwise concerns you, you should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the Employer's Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Employer to handle these matters*] in writing at this address [] or by telephone at [] or in person at []; or
2. Call [] to reach the Employer's hotline (*if any*) and leave a message

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

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

Disclosure: CEPF requires that all direct and contracted workers be informed of the existence of the grievance mechanism and the measures put in place to protect them against any reprisal for its use, either at the time of recruitment or at the start of the sub-project, whichever is later. CEPF also requires that all direct, contracted and community workers be provided with Conservation International's (CI's) Code of Ethics, and be informed that any violations of the Code of Ethics should be reported to CI via its Ethics Hotline at www.ci.ethicspoint.com