ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY PLAN (ESHSMP) AND CODE OF CONDUCT

DIAMOND VALLEY CONSTRUCTION LIMITED

P.O BOX 16, BEREKUM

ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY (ESHSMP) AND CODE OF CONDUCT

TABLE OF CONTENT

1) Introduction
2) construction camp management plan
3) Management of Environmental and Social Risks and Impacts
4) Occupational health and safety
5) Health and safety incidents, accidents, injuries and all fealties that require treatments
6) Inspection of workers' accommodation and workers and community grievances
7) Pollution prevention plan
8) Waste management plan
9) Fuels and hazardous substances management plan
10) Environmental and social issues encountered and how they were mitigated
11) Traffic management plan
12) Emergency preparedness plan
13) Code of conduct for the workers

ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY MANAGEMENT PLAN (ESHSMP) AND CODE OF CONDUCT

Introduction

This Environmental, Social and health and safety Management Plan (ESHSMP) and code of conduct are prepared for the **BEREKUM EAST THURSDAY MARKET ROAD**. The Project activities are, ***CONSTRUCTION OF 60 LOCKABLE STORE, HEALTH POST, FIRE POST, 10 SEATER WC TOILET FACILITY, CONSTRUCTION PLATFORM AND SUPPLY OF 2NO. CONTAINER***.

Environmental and Social Management plan focused on identifying risks/impacts and mitigation measures/strategies as they relate with Environment, gender equality, social and disabilities inclusion, with a special focus on **Gender-Based Violence(GBV)**, **Violence Against Children(VAC)** and **Sexual Harassment, Exploitation and Abuse(SHEA**), with the objective of avoiding and reducing the impacts/risks to the acceptable levels during the pre- construction, construction and operation phase.

Health and Safety Management plan focused on address workers' health and safety guarantees and prohibition of sexual harassment including the provision of safety and personnel protection equipment to workers (PPEs), with objective of minimizing risks/impacts (accidents at the work sites) by providing safety and establishing routine safety measures. Site Security Plan (Physical Security of Premises) will focus on identification security threats and determine specific measures to be implemented in response to said threats, including internal and external communication procedures.

Traffic Management Plan will focus on Access and Safety Traffic which will cause temporary negative impacts through the presence of vehicles and equipment. Inconvenience, minor disruptions to traffic on the project as well as on local access to and from the Project site during the Construction phase. Road Safety Plan comprising safe driving standards according to the type of vehicle, road behavior standards, inspection and required maintenance for the vehicle fleet, reporting and analysis of road accidents, training for drivers and maintenance personnel, among others.

Solid and Liquid Waste Management Plan will address Pollution Prevention and Resource Efficiency**,** with a specific section on handling hazardous Management materials (such as used lubricating oils, batteries, filters, contaminated rags, fluorescent tubes, toner cartridges, etc.), including the corresponding tasks, responsibilities and follow-up activities. Determine procedures to classify, store and dispose of waste as common, recyclable, hazardous, and Use of Resources Develop a management plan for the use of resources (water, energy, gas emissions, etc.) detailing quantity, source, quantity and quality controls, and applicable conservation measures. Analysis of vehicle fleet emissions quality and fuel consumption, establishing measurable improvement plans.

Emergency Response Management plan will focus on emergency prevention and response plan. Identification of potential risks and corresponding action procedures (such as: accidents, fires, earthquakes, spillages, intoxication, assaults, riots, etc.). Evacuation procedures. Fire alarm and firefighting systems. First aid procedures. Assessment of nearby available emergency medical facilities and related services (ambulances) at each location nationwide. Communications plan in case of emergencies (recipients and contents), chain of command responsible for the emergency response. Specific training plan. Emergency drills.

The code of ethics and good conduct for employees, applicable to interaction among workers as well as interaction with third parties. Identification of prohibited practices and their sanctions, such as corruption, robbery, addictions, harassment, threat, intimidation, violence or other inappropriate behavior. All workers shall comply with this Code of Conduct and in a manner consistent with high ethical standards. Failure to observe this Code of Conduct may subject you to disciplinary action by the workers, up to and including termination. Furthermore, violation of this Code may also be violation of the law and due result in civil and /or criminal penalties for you, your supervisors and/or the workers. The Contractor employees, Managers and Directors will take all responsible steps to prevent a violation of this Code, to identify and raise potential issues, and to seek additional guidance when necessary.

CONSTRUCTION CAMP MANAGEMENT

Construction camp management -The construction camp will be equipped with a health post which will include first-aid and basic medical supplies, as well as condoms and sanitary napkins. To reduce the risk of incidents at the camp, access to construction camps by other than those authorized will be prohibited. Female workers' safety needs to be specifically considered. A major threat to women workers relates to risks of work-related sexual harassment, including sexual abuse. Sexual harassment is prohibited under the Labour Law of Ghana which provides for its definition. Considering the remoteness of the project, the fact that some of the direct workers who are not locally recruited and thus need to be accommodated in a work camp and/or the expected higher number of male workers, there is the unequivocal need to ensure women safety is promoted.

Mitigation measures for reducing and avoiding impacts on worker health and safety, including women as following:

- prior to construction commences (at least a month) the contractor will demonstrate the resources and a qualified/experienced environment and safety officer (ESO), with knowledge of gender-based violence.

▪ establishment of safety measures as required by law and good engineering practice, and provision of first aid facilities at work sites and in vehicles, include the establishment of a first aid/health post at the construction camp;

▪ health post to include first aid services, access to information on family planning and condoms, as all as sanitary napkins;

▪ the contractor will conduct training for all workers on safety and environmental hygiene at no cost to the employees. the contractor will instruct workers in health and safety matters as required by law and by good engineering practice;

▪ instruction and induction in health and safety matters including road safety, of all workers, shall be carried out for all operatives before starting of work;

▪ the contractor will instruct and induct all workers in health and safety matters (health and safety induction), including construction camp rules and site agents will follow up with toolbox talks on a weekly basis which shall include information on sexual harassment prevention and reporting;

▪ workforce training for all workers started on site; it will include safety and environmental hygiene and sexual harassment and prevention of sexual exploitation of women and children. Furthermore, provision of potable water.

▪ Workers shall be equipped with appropriate Personal Protection Equipment (PPE) such as safety boots, helmets, reflector vest, gloves, protective clothes, dust mask, goggles, and ear protection at no cost to the workers. PPE should be available in sizes that also cater to possibly smaller frames of women and to needs of persons with disabilities (reasonable accommodation);

▪ The fence will be installed on all areas of excavation greater than 1-meter depth and sides of temporary works, as well on all excavation, borrow pits and sides of temporary bridges. Sufficient lighting needs to be installed to ensure minimum illumination for basic safety concerns;

▪ Reversing signals (visual and audible) shall be installed on all construction vehicles and plant. Scheduling of regular (e.g. weekly toolbox talks) to orientate the workers on health and safety issues related to their activities as well as on proper use of PPE;

▪ Protective barriers and warning signs shall be provided, when worker exposure to traffic cannot be eliminated, to shield workers from passing a vehicle. Another acceptable measure is to install channeling devices (traffic cones or moveable concrete barrier) to delineate the work zone and trained flagmen at each end of the current working zone;

▪ Construction camps shall be provided with sanitation facilities in accordance with local regulations to prevent any hazard to public health or contamination of land, surface or groundwater. These facilities shall be well maintained and cleaned regularly to encourage use and allow effective operation and emptied regularly so as never to overflow. Facilities are to be separated by gender and with reasonable accommodation for persons with disabilities.

Vegetation Removal -Site clearing, and excavation works may affect some trees, hence attention will be given during construction phase, especially on the natural environment to minimize effects on trees and crops. Suggested measures to achieve this objective are:

▪ Locate potential construction sites with minimal effect on trees;

▪ Ensure construction personnel are aware of endangered species and their habitats;

▪ In a situation where the proposed construction will pass close to these sensitive areas, shall provide safety signs to confine machines and activities.

Conduct a topographic survey and reflect trees and vegetation on maps. This will support the Design Engineers in avoiding trees and vegetation;

▪ Coordinate with the National Directorate for Environment, Forestry, and Agriculture to determine their requirements relative to tree cutting;

The initial Project activity is a land clearing of the existing market site to remove surplus materials and obstructions including trees and stumps. Some available topsoil will be stockpiled for later use. Subsequently, roots, logs, vegetation, wastes, and debris will be disposed of at designated and approved locations. Meanwhile, tree timber will be returned to the owner reuse.

The contractor will remove the whole or part of structures and obstructions, then backfilling the trenches, and pits. They will carry out satisfactory disposal at designated and approved locations of all building materials such as fences, structures, old pavements, pipelines, ditches, culverts, bridge sections and any other obstructions which are not permitted to remain at Project site.

Vegetation removal during site clearance has to be based on the schedule of trees to be cut made by the Contractor. Erosion and flood event can occur as impacts of land clearing, grubbing, cut-fill activities, and construction. Natural streams may be silted and flood due to runoff from the land clearing, borrow pits and grubbing for the side drain construction.

Meanwhile improperly soil disposal on the steep gorges, devoid compaction and blocked the existing cross-drainage system will prone to erosion during a hard rain. Invasive species shall not be introduced. During re-vegetation works, new alien plant species (i.e., species not currently established in the region of the project) shall not be used unless carried out with the existing regulatory framework for such an introduction. All replanting and compensatory tree planting will be planned in full agreement with the local forest authority.

Measures to be included in the project to ensure the protection of flora and fauna within the project area include:

- Contractor's site office, work yard, rock crushers, material storage, borrow pits, spoil disposal and quarries will all be located as approved by PMU and cleared by the Bank in consultation with local authorities and will not be permitted in any ecologically important sites or areas valuable for conservation;

- Vegetation clearance during construction activities, especially of trees along the road-side, will be avoided or minimized;

- In no circumstances, the Contractor or any of sub-contractors or employees permitted to enter nearby forests communities to remove forest wood;

- The contractor will responsible for re-vegetation in cleared areas. Vegetation from the clearance of project site, during construction activities, will be stockpiled and kept for bio- engineering and mulching in the re-vegetation works;

- The Contractor will responsible for providing adequate knowledge to construction workers in relation to existing laws and regulations regarding illegal logging;

- Contract documents and technical specifications will include clauses expressly prohibiting the felling of trees, not marked as requiring to be cleared by the project, by construction workers for the term of the project;

- The Contractor will responsible for providing adequate knowledge to construction workers in respect of fauna;

- Contract documents and technical specifications will include clauses expressly prohibiting the poaching of fauna by construction workers and making the contractor responsible for imposing sanctions on any workers who are caught trapping, killing, poaching, being in possession of or having poached fauna;

- The PMU will supervise and monitor a ban on the use of forest timber and workers shall be prohibited from cutting trees for firewood or collecting wood from forest areas. Construction workers will be informed about general environmental protection and the

need to avoid unnecessary felling of trees unless justified on engineering grounds and marked for cutting as approved by PMU.

COMMUNITY, WORKER'S HEALTH AND SAFETY MANAGEMENT

Community, worker's Health and Safety Management-Project construction could create various impacts on the health and safety of communities, specially to women and those belonging to vulnerable groups. The presence of construction workers and work camps can bring about changes to the community, by increasing economic power of a limited number of individuals (mostly men) and by inducing risk on spread of communicable diseases. Sexual harassment and sexual exploitation committed by locally engaged construction workers and technicians represent potential safety threats to women and young girls. Transmission of Sexually Transmitted Infections (STIs) and Human Immune Deficiency Virus (HIV) is a potential impact of the construction phase posed by construction workers engaging in either commercial sex or sexual relationships with local community members.

Potential of disease impacts due to sanitation condition will need to be controlled by maintaining hygienic conditions in the construction worker camps and implement the social and health awareness programs for the Project.

Public safety, particularly of pedestrian and children can be threatened by the excavation of the trenches for side drain construction. Fences will be installed within 500 m of settlements and towns prior to excavation work commencing on all sides of temporary excavations. The plans will include provisions for site security and guards, trench barriers and covers to other holes and any other safety measures as necessary. The Contractor will provide warning signs at the periphery of the site warning the public not to enter. The contractor will restrict the speed of project vehicles and also control traffic by contra-flow and provide flag men, include warning signs at either end of the works where the travel lanes must be temporarily reduced.

The Contractors shall provide information boards near the work sites to inform and instruct the public on how to conduct themselves and to be aware of their surroundings if they must approach the works. The information contained in these boards shall be widely accessible, including through the use of local language and drawing/pictures as well as in braille. Information boards will be refreshed as necessary and also show the name and telephone contacts in contractors' offices for complaints about the workers. The Company will implement the following public safety measures:

- The Contractor will appoint one Environmental and Safety Officers (male or female) to address health and safety concerns, including issues relevant for gender-based violence within the Project area;

- Any barriers and signs shall be installed at construction areas to deter pedestrian access to the roadway except at designated crossing points. Warning signs will be provided at the periphery of the site warning the public not to enter, and shall be widely accessible to the community, including by being written in the local language, in addition to official language, make use of pictures for those with low literacy level ;
- The Contractor shall ensure the construction workforce attends training on gender based violence, including sexual harassment and sexual exploitation and abuse, as well as health training on STI and HIV/AIDS prevention, provided through an approved service provider. The workshops will be conducted to the Contractor's workforce prior to commencement of any civil works, and shall be mandatory to every employee, whether foreign, national or locally engaged;
- Provision of social-based community awareness efforts about gender-based violence, reproductive health and transmission of STIs and HIV, in partnership with specialized local based organization. The program will be implemented after mobilization to site and when training staff are in post and prior to construction works commencing;
- Adequate safe signs and security will be provided at the site office and works yard and prevention of unauthorized people (including children) entering work areas and camp;
- The community/residents shall not be allowed in high-risk areas e.g., excavation sites and where there is mobilization or operation of heavy equipment; these sites will have a watchman at the entrance to keep the community safety;
- Upon completion of construction works, borrow areas will be backfilled or temporarily fenced, awaiting backfilling. Contractors will ensure that no wastewater is discharged to local rivers, streams, lakes and irrigation channels and any other water bodies;
- Provision of site security, safety barriers, and signs will be erected outside trenches deeper than 1 meter and covers will be placed over other holes. Other safety measures will be installed as necessary;
- Provision of appropriate road safety signs along of the work site including flagman, especially at the locations of cutting slope and excavation work; to prevent any accident for worker and community who pass through the construction area;
- The Contractor and its subcontractor will be aware of the community health and safety issues due to construction activities such as noise and dust or any hazardous material;
- Drivers will be educated on safety drive practices to minimize accidents and to prevent the spill of spoil, hazardous substances (fuel and oil) and other construction materials during transport. Speed restrictions shall be imposed on project vehicles and equipment traveling within 50 meters and sensitive receptors (residential, schools, station, places of worship);
- Measures to prevent mosquitoes' bleedings shall be implemented (e.g., provision of insecticide-treated and mosquito nets to workers), include installation of proper drainage to avoid the formation of stagnant water. Stagnant water will not be allowed to accumulate in the temporary drainage facilities or along the roadside; and
- The Contractor will ensure the construction workforce attends STI and HIV/AIDS prevention workshops provided through an approved service provider. The workshops will be conducted to the workforce prior to the commencement of any civil works;

- Recruitment and mobilization of manpower needed for construction activity will include the provision of site engineers, technicians, and surveyors, heavy equipment operators and assistants, mechanics, general laborers, and security. Given the manpower from local should be considered, hence as far as possible some of the manpower will be sourced from local people or villager, especially for semi-skilled and unskilled work according to the Contractor requirements. As part of the Company commitment, a minimum 30% of women shall be engaged as workers, which shall not fall below 20% for technical and management positions. Design of internal procedures to ensure effective incorporation of women need to be developed due to entrenched **social gender norms** that expect women are main cares of children.
- To establish rights and responsibilities for employer and workers, including third-party workers, if any. Procedures for selection, hiring and training human resources, methods of determining remunerations and benefits, grievance mechanisms, and others including a code of ethics and conduct.
- Relocation of utilities will likely be necessary for certain sections. The utilities will be mainly power lines and community water supply lines and water tanks. Relocation of power lines will generally be the responsibility of the contractor while relocation of community water lines and rebuild of water tank shall be done by the assistance of the Contractor. The contractor will remove the whole or part of structures and obstructions, then backfilling the trenches, and pits. They will carry out satisfactory disposal at designated and approved locations of all building materials such as fences, structures, old pavements, pipelines, ditches, culverts, bridge sections and any other obstructions which are not permitted to remain at Project site**.**

Table 1. **Identification of risks/impacts and mitigation measures**

ESHS Risks/Impacts/ Activity	**Description of the Risk/Impact**	**Mitigation Measures**
Occupational risks at work sites	Lack of awareness among workers on the ESHS risks and requirements of the Project	Company's supervisor will provide ESHS awareness session to staff, before they start working on site, on primary ESHS risks associated with the proposed construction works; and the workers' responsibility. The Contractor will ensure all its workers have attended the ESHS awareness session provided by the supervisor.
Personal Protective Equipment (PPEs) and First Aid Kits	Lack of relevant PPEs will increase the risk of worker's exposure to construction hazards	Contractor shall provide personal protection equipment (PPEs) for workers, such as safety boots, helmets, masks, gloves, protective clothing, goggles, body harness, and ear protection based on the work requirements, as well as First Aid Kits to address immediate/minor healing needs

	Lack of First Aid Kits may aggraviate possible minor wounds	
Building demolition works	Hazards from falling debris and objects	• - Remove or secure objects (glass, structural members) that may fall while workers work under them • - Use debris netting, sidewalk sheds, canopies, or catch platforms to reduce hazards from falling objects • - Verify the location of all other utility lines; ensure lines have been shut-off, capped, or otherwise controlled outside the building before beginning work • - Notify utility companies before controlling their utility lines

ESHS Risks/Impact/ Activity	**Description of the Risk/Impact**	**Mitigation Measures**
Working at heights	Risk of fall from improper ladder and scaffold use	• - Inspect ladders for cracked, broken, or defective parts before use • - Do not exceed the load rating of ladders or scaffolds-remember that load ratings include people, tools, and equipment • - Set up ladders and scaffolds on stable surfaces • - Use non-conductive ladders (e.g., fiberglass) and exercise extreme caution when working near power lines • - Secure ladders that can be displaced by work activities;

		consider barricades at the base to keep traffic away • - Ensure that the scaffold is built on firm foundations. Footings should be able to support the scaffold without settling or moving. Do not use unstable objects to support scaffolds • - Fully plank each scaffold on all working levels. For wood planking, use wood graded for the intended load • - Provide guardrails or fall protection systems on platforms 2m or higher
Working with the electrical lines and live electrical equipment	Risk of electrical shocks while working with the electrical lines, transformers and other electrical equipment	• - Assume that electrical lines are energized until proven otherwise; lines may become energized because of back feed from portable generator use, circuit ties/switch point, lightning, or other downstream events; ensure that grounding procedures are accomplished and that all sources of electricity are isolated • - Inspect the work area for downed conductors and do not go near, drive over, or otherwise come in contact with them • - Downed electrical conductors can energize other objects, including fences, water pipes, bushes, trees, and telephone/ fiber optic cables • - Ensure that all workers assessing and repairing electrical installations are experienced • - Use electrical-specific PPE (gloves, face shields) needed based on the type and approximate voltage of service • - Unless de-energized and visibly grounded, maintain proper distance from overhead electrical power lines (at least 3 m) and/or provide insulating barriers

ESHS Risks/Impact/ Activity	Description of the Risk/Impact	Mitigation Measures
Trenches and excavations	Risk of community individuals' fall in the trenches; and occupational risks	• - Ensure that trenches in the public areas shall be adequately barricaded and provided with signs to prevent risk of public falling in to the trenches • - Store all materials, including those removed from the trench or excavation, at least 2 feet away from the sides of the trench or behind a suitable restraining system • - Ensure that all adjacent buildings/structures or surface obstructions (e.g., trees, large rocks) near the trench are supported or removed • - Support and protect all utilities spanning a trench or excavation
Workers facilities at the works/construction sites	Lack of safe drinking water and sanitation facilities create unhygienic conditions at worksites	The company will: • - Arrange safe drinking water to workers • - Provide adequate sanitation facilities agreed with the Engineer • - Clean all worksites daily • - Ensure workers do not eat, drink or smoke in the work areas affected by mold
Child and youth labor	Children under the age of 15 years are prohibited from working. Youth workers of age 15 to 18 have some work restrictions. Children under the age of 16 should undergo compulsory education	• - The Contractor will not hire any labor less than 16 years of age. • - The Contractor will not engage youth workers in nighttime shifts (between 7.00 p.m. and 7.00 a.m.) and perform dangerous works, such as operate cranes, platform hoists, fork- lift; and carry or lift loads frequently.

Grievance Mechanism	Workers shall have access to GRM to raise workplace concerns.	If contractor does not address concerns, workers will be directed to the GRM team.

ESHS Risks/Impact/ Activity	**Description of the Risk/Impact**	**Mitigation Measures**
Workplace injuries and accidents and other incidents	If incidents are not investigated and root causes are not identified, there is a risk that they may repeat	• - The Environmental and Social Safeguards Officers and their Supervision Consultant will investigate all incidents related to workplace injuries and accidents; and, on the environment (e.g. oil spills, pollution events), and social (e.g. gender-based violence, the non-function of GRM, etc.) incidents. • - The Contractor will be implement the recommendations of the Supervision Consultant to avoid recurrence of these incidents.
Waste from works/ construction sites	Pollution from the improper management of solid wastes and excess materials from the construction sites.	• - The Contractor will collect all waste from the worksites and transport these wastes to the disposal sites approved by the NRPB. • - When discarding the damaged material affected by the mold, the Contractor shall wrap and seal them in the plastic bags.
Mold remediation in small isolated areas	Mold remediation may pose health risks to the infants and persons recovering from surgery, immune suppressed people, or people with chronic inflammatory lung diseases (e.g., asthma, hypersensitivity	• - The Contractor will ensure the work area should be unoccupied, and the nearby areas are free of infants and people with respiratory problems. • - The contractor shall cover surfaces in the work area that could become contaminated with secured plastic

	pneumonitis, and severe allergies)	sheets to contain dust and debris and prevent further contamination; and use approved biocides and detergents for the cleaning of mold. • - After the mold cleaning, the area shall be clean, dry, and free of visible debris.
Drainage and Wastewater from the construction sites	Drainage from the construction sites and material storage sites (sand and aggregates) may contain sediment load	The Contractor shall • - Cover all stockpiles containing loose materials such as sand and aggregates with the plastic covers to protect them from rain • - Not allow ponding of water near the construction sites. • - Direct all wastewater from the construction activities to the municipal sewerage system
Noise pollution	Noise and vibrations from the construction activities and equipment may cause a nuisance to the nearby communities.	The Contractor will be: - Avoid undertaking the noisiest activities, where possible, when working at night near the residential areas. - Maintain all equipment and vehicles to keep them in good working order.

ESHS Risks/Impact/ Activity	**Description of the Risk/Impact**	**Mitigation Measures**
Air pollution	Dust from construction activities and emissions from construction equipment and vehicles may cause air pollution	The Contractor will: • - Use water spray or mist to suppress dust generation, especially during operations that may create a lot of dust, such as cutting or sawing silica-containing materials, jack hammering, impact drilling, using heavy equipment, and demolishing structures

		• - Maintain all machinery and vehicles in acceptable working conditions.
Traffic and road safety	The temporary storage of materials on the streets and parking of equipment and vehicles, and excavations along the roads may block the local streets	The Contractor will: - Not block the local streets/roads for the traffic - Where relevant, place traffic signs and flagmen at required places to control the traffic as directed by the consultant
Community complaints	Negative impact on the local community	The contractor will acknowledge, record the complaint and act on it and report the complaint to the GRM team and consultant. Should contractor fail to resolve complaint it will be taken up by social specialist who will in turn investigate and follow up with the complainant.
Damage to private or public property	Negative impact on community and stakeholders	The contractor will record, report the incident to the supervisor and NRPB Environment and Social Safeguard Officers who will work together to resolve the incident.
Use of preservatives and paint substances	Hazardous substances in preservatives and paint substances	- All paints and preservatives shall be used only with the approval of the contracting officer. Information shall be provided to the consultant that describes the essential components of the materials to be used so that an informed determination can be made as to the potential for environmental effects and suitability can be made. - The contractor shall provide the contracting officer with a list of materials and estimated quantities to be used, storage, spill control and waste disposal plans to be observed by the supervisor of works during the execution of the contract. This plan is subject to the approval of the contracting officer.

ESHS Risks/Impact/ Activity	Description of the Risk/Impact	Mitigation Measures
Site stabilization and erosion control	Risks of soil erosion	- Contractor will implement measures at the site of operations to manage soil erosion through minimization of excavated area, preservation of existing ground cover to the extent possible, provision of approved ground cover. Where excavations are made, contractor shall implement appropriate stabilizing techniques to prevent cave-in or landslide. Erosion control measures shall be approved by the contracting officer.

Component/Activities with Potential Environmental and Social Impacts	Scope of works	Potential Environmental and Social Impacts and Risks
	Mobilization of Materials, Workers, and Equipment. Stack yards, site offices and labor sheds will need to be built. The land and premises required will be rented. No land acquisition will be required.	remediation works may pose health risks to the infants and persons recovering from surgery, immune suppressed people, or people with chronic inflammatory lung diseases (e.g., asthma, hypersensitivity pneumonitis, and severe allergies). **Nuisance from the Construction Activities**. Noise and vibration, dust and vehicular movement from the construction activities may cause a nuisance to the nearby communities,

		staff working in the offices and construction workers. **Traffic and Road Safety**. Construction related to vehicular movement and temporary storage of construction materials on the streets may affect the local traffic.

TRAFFIC MANAGEMENT PLAN

Access and Safety Traffic -The Project will cause temporary negative impacts through the presence of vehicles and equipment. Inconvenience, minor disruptions to traffic on the project as well as on local access to and from the Project site during the Construction phase.

Mitigation measures of impacts on access and safety traffic will include:

- The Contractor will have provided diversions and management measures. Traffic signs and other appropriate safety features will be used to indicate construction works has undertaken;

- A clause in the contract document stipulates that care must be taken during the construction period to ensure that disruptions to access and traffic are minimized, and all access to the Project site always maintained. Provincial Works and village officials will be consulted if access to a site must be disrupted time and temporary access arrangements made;

- Construction vehicles will use local access roads or negotiate access with landowners to obtain access to material extraction sites, rather than drive across vegetation or agricultural land. When local roads are used, they will be reinstated to their original condition after the completion of work;

- The site will always be kept free of debris, spoil, and any other materials. Disposal sites and haul routes will be identified and coordinated with local officials;

- Provision of adequate protection to the general public in the vicinity of the work site, including advance notice prior to the commencement of works, installing safety barriers if required by villagers, and signage or marking of the work areas; and

- Provision of safe access across the work site to people whose villages and its access are temporarily affected during road sheeting activities**.**

SOLID AND LIQUID WASTE MANAGEMENT PLAN

Solid and Liquid Waste Management Plan-Waste disposal operations can cause significant impacts when uncontrolled, therefore mitigation measures will seek to reduce, recycle and reuse waste as far as practicable. the waste management of the ESMP and all mitigation measures. The waste management section of the ESMP will be included all matters related to solid and liquid waste disposal including the following:

- expected types of waste and quantities of waste arising;
- (ii) waste reduction, reuse and recycling methods to be employed;
- (iii) agreed reuse and recycling options and locations for disposing receive endorsement from local groups;
- (iv) methods for treatment and disposal of all solid and liquid wastes;
- (v) methods of transportation to minimize interference with normal traffic; and (vi) establishment of regular disposal schedule.

The mitigation measures in the ESMP will be included but not necessarily be limited to the measures listed below. The Company will ensure the implementation of these measures.

▪ Disposal areas to be agreed with local authorities ; checked, recorded and monitored;

▪ Prohibited to burn of waste associated with the Project or the supporting activities. The burning of waste will not be allowed anywhere on the Project;

▪ Waste segregations shall be observed and cleared foliage, shrubs, and grasses may be given to local farmers for fodder and fuel. Organics (biodegradables) shall be collected and disposed-off on-site by composting (burning waste not be allowed anywhere within the Project site footprint or in the camps);

▪ Recyclable wastes shall be recovered and sold to a recycler. Construction camps, contractor will provide with garbage bins. Residual general wastes shall be disposed of in disposal sites approved by local authorities;

▪ Strictly prohibited of soil waste disposal into flood/waterways, wetland, rivers, other watercourses, farmland, forest, places of worship or other culturally sensitive areas or areas where livelihood is derived such as canals, agricultural fields, and public areas;

▪ There will be no site-specific landfills established by the Contractor. All solid waste will be collected and removed from the construction camps and disposed in local authority designated waste disposal sites; and

▪ Waste disposal areas approved by local authorities shall be rehabilitated, monitored, cataloged, and marked.

Waste Management: the volume reduction of waste generation is the highest priority for the Project. All waste generated from construction and maintenance activities shall be sorted and amounts estimated and recorded. Where available, waste which suitable to reuse or recycle shall be reused or recycled. Materials and products with recycled content shall be proposed for the works wherever these are cost and performance competitive and they are environmentally preferable to the non- recycled alternative. The oil waste shall be sent to approved recyclers where appropriate or delivered to the disposal facility. Waste and containers not able to be recycled shall be disposed of at a Municipality or municipal waste disposal site nominated.

Non-construction materials waste shall be left on site once the construction and maintenance activity has been completed. The site shall be left in a clean and tidy state upon completion of the works. **The following waste management methods need to be considered in the formulation of waste management strategies**:

- **Landfill** – as the disposal method for exceeding 85% of waste around Asia. Waste is deposited in holes in the ground or pre-dug trenched with soil capping. The landfill site at near uses this landfill method;

- **Recycling** – recycling and reusing waste is an environmentally acceptable disposal option. There are facilities in the Dili area for aluminum cans and plastic bottles to be recycled. Cement bags can also be reused to hold soil for growing grasses for bioengineering purposes. Given no local commercial or industrial recycling opportunities exist, demolition waste and excavation waste during construction shall be reused in a new development under the approval of the Engineer;

- **Composting** – this process breaks down organic waste to form a material that can be used for horticultural or agricultural purposes. The contractor could process the vegetable waste in the composting method.

- **Anaerobic Digestion** – this process is similar to the composting method that breaks down organic waste to produce a substance similar to compost and gas which can be used in cooking. However, such an amount is quite small in road construction.

The mitigation measures in the ESMP will be implemented by Contractor:

- Areas for waste disposal to be agreed with local authorities; checked, recorded and monitored;

- The burning of waste associated with the Project or the supporting activities is NOT ALLOWED anywhere;

- Segregation of wastes shall be observed; cleared foliage, shrubs, and grasses may be given to local farmers for fodder and fuel. Organic (biodegradables) shall be collected and

disposed of on-site by composting (burning waste not be allowed anywhere within the Project site footprint or in the camps);

▪ Recycle-able shall be recovered and sold to recyclers;

▪ Residual general wastes shall be disposed of in disposal sites approved by local authorities

▪ Construction camps shall be provided with garbage bins.

Solid waste disposal into floodways, wetland, rivers, and other watercourses, farmland, forest, places of worship or other culturally sensitive areas; or areas where livelihood is derived canals, agricultural fields and public areas shall be strictly prohibited.

There shall be no site-specific landfills established by the Contractor. All solid waste shall be collected and removed from the work camps and disposed of in local authority designated waste disposal sites. Waste disposal areas approved by local authorities shall be rehabilitated, monitored, cataloged, and marked.

Hazardous Materials and Waste Disposal

Hazardous substances such as oils and lubricants can cause significant impacts if uncontrolled or if the waste is not disposed of properly, to avoid or minimize impacts from oils and lubricants usage. The mitigation measures identified in the ESMP include the following:

▪ Ensure that fuel and hazardous substances storages are safe and agreed by Assembly, as well have necessary approval from consultant and local authorities;

▪ Toxic materials and explosives (if required) will be stored in adequate protected sites consistent with national and local regulations to prevent soil and water contamination;

▪ Maintenance of the construction's equipment/vehicle and refueling areas will be confined to areas in construction sites designed to the containment of spilled lubricants and fuels. Refuel areas shall be provided with drainage leading to an oil-water separator that will be regularly skimmed oil off and maintained to ensure efficiency;

▪ Fuel and other hazardous substances shall be stored in areas provided with a roof, impervious flooring and secondary containment or bund wall to protect these and to readily contain spilled fuel/lubricant;

▪ Fuel, oil, and other chemicals as required for the works will be stored in secure containers or tanks located away from the surface waters or streams. Surplus used oil and waste chemical will be disposed of at the approved area, and oil collection

site accompanied by waste manifest/record, and in no circumstances should oil be discharged to soil;

▪ Fuel and oil spills will be contained and immediately cleaned up as per the requirement of the emergency response plan

▪ Segregate hazardous wastes (oily wastes, used batteries, fuel drums) and ensure t hat storage, transport, and disposal shall not cause pollution and shall be undertaken consistent with national and local regulations;

▪ Ensure all storage containers are in good condition with proper labeling both in English and Tetum. Prepare a regular schedule of checking containers for leakage and undertake necessary repair or replacement;

▪ Store hazardous materials above flood level. Discharge of oil-contaminated water shall be prohibited, and separated oil shall be disposed of at approved disposal site accompanied by waste manifest/record;

▪ Used oil, other residual toxic, and hazardous materials shall not be poured on the ground, these shall be disposed of in an authorized facility off-site;

▪ Adequate precautions will be taken to prevent oil/lubricant/hydrocarbon contamination from mobile equipment of river channel beds. Washing of project vehicles in rivers and streams is strictly prohibited;

▪ Ensure availability of spill clean-up materials (e.g., absorbent pads, etc.) specifically designed for petroleum products and other hazardous substances where such materials are being stored;

▪ Fuel and oil spillage will be immediately cleared with utmost caution using absorptive cleanup materials to leave no traces. Spillage waste will be disposed at disposal sites approved by consultant;

▪ All areas intended for storage of hazardous materials will be quarantined and provided with adequate facilities to combat emergency situations complying with all the applicable statutory requirements;

▪ The company will identify named personnel in their ESMP in-charge of storage sites for hazardous materials and ensure they are properly trained to control access to these areas and entry will be allowed only under authorization.

Soil Storage, Handle and Disposition

The use of immediately available material can be considered, as it will reduce the need for additional extraction of rock-based materials. Should there any suitable materials can reuse as far as possible on other roads or other local infrastructure projects, this will reduce the need to extract other rock and gravel resources from vulnerable hillsides and river beds. The surplus can then be stockpiled at locations agreed with local authorities for other local Municipality projects or other nationally planned infrastructure. The surplus shall not be stockpiled at the side of the road or dumped over the barriers or side of slopes. Furthermore, areas for disposal shall be designated and agreed with the local authorities.

The surplus rock and soil-based materials for disposing must be controlled to avoid potential impacts due to improperly disposal. The appointed Contractor shall initially review the PMU's options regarding stockpile and disposal locations of the cut surface materials; and reconfirm or propose alternative disposal locations for agreement with the local authorities. The ESMP covers all aspects of construction waste disposal and preferred that Government land is utilized for stockpiling and dumping of material. If private land to be used for the purpose of dumping, it shall commence only after written permission from the landowner is checked and recorded by the consultant.

Mitigation measures shall seek to prevent slope collapse impacts and control the impacts at source in the first place. The mitigation measures of the soil disposal in the ESMP include:

- Spoil shall be reused as far as possible for bulk filling; and under no circumstances, spoil shall not be disposed or dumped into any other watercourses (rivers, streams, drainage, irrigation canals) and another natural drainage;

- Spoil disposal shall not cause sedimentation and obstruction of the flow of watercourses, damage to agricultural land and densely vegetated areas; The surplus shall not be stockpiled at the side of the road or dumped over the crash barriers. However, surplus spoil shall be used where practicable for local repair works to fill eroded gullies and depression areas, or degraded land in consultation with the local community;

- Spoil shall not be disposed of on fragile slopes, floodways, wetland, farmland, forest, beaches, religious or other culturally sensitive areas or areas where livelihood is derived; Spoils shall only be disposed to areas approved by local authority. Spoil shall be disposed- off to dis-used quarries and abandoned borrow pits where practicable;

- Disposed spoil shall be spread in 15 cm layers and compacted to optimum moisture content, covered with topsoil, landscaped and provided with drainage and vegetation to prevent erosion in line with best practice. The spoil disposal site shall be located at least 50 m from surface watercourses and shall be protected from erosion by avoiding the formation of steep slopes and grassing.

Pest Control -Create a pest management handbook by our company in order to verify the use of authorized products, proper application methods including handling and storage of pesticides, avoiding potential harm to workers and the community, as well as to stored merchandise, and adapted to the type of pest seeking to control without affecting other non-problematic species. Final disposal sites for each type of waste. In the case of hazardous waste, verifying its traceability until its final disposal according to current regulations.

Table 1 : Potential Impacts

Project Activity	Potential Impacts	
Installation of new streetlight and electrical and equipment,	Environmental	• Risk of site, soil and water contamination from spillage of used oil when extracted from de-commissioned ; and when transferred to storage facilities. • Risk of spills of used oils while in storage • Improved and safer storage of waste oils and lubricants in new storage tank • Reduced amount of hazardous solid waste with the removal of old/decommissioned • Reduction in overall noise emissions from new gen sets compared to old gen sets • Reduction in overall emissions from new gen sets compared to old gen sets
	Social	• Health and safety risk to workers exposed to hazardous conditions during installation and operational phases • Nuisance of noise, dust and vibration to neighbouring families. • Possible land issues arising from network line extension outside road reserve.

New waste oil storage tank	Environmental	• Reduced risk of site, soil and water contamination from accidental spills and potential leaks from old storage tanks. • Safe disposal of stored used oils and lubricants and old/decommissioned • Reduced cumulative impacts - accumulation of used oil

		• Safe storage of waste oil.
road	Environment	• Possible loss of productive trees, mature indigenous trees, crops and other non-land assets;
	Social	• Encroachment into private land for streetlight poles located outside the road reserve/easement • Health and safety of workers and bystanders during construction / installation activities; • Impact on the daily movement and safety of motorists and pedestrians on public road
Building construction	Environment	• Increase in solid and liquid wastes; • Problems associated with waste accumulation during construction - collection, storage and disposal; • Soil compaction from heavy machinery and equipment; • Damage to coastline and lagoon environments from the movement/transfer to land site of heavy machinery and containerized capital equipment in the pre-construction and construction phase. • Health hazard from exhaust fumes emitted by generator sets which contain poisonous gases like carbon monoxide that can be life threatening and result in death.

		• Increased in noise, dust, vibration during construction and operations.
	Social	• Loss of productive trees and crops especially on distribution cable network route; • Health and safety of workers and bystanders during construction • Increased potential for Gender-Based Violence (GBV) and Violence Against Children (VAC) and culturally inappropriate behaviour from foreign workers during construction phase. • Health risks to locals from degraded air quality and noise during construction and operation phases. • Safety of local population at night with street lights. • Less back-breaking work for women and children with • Increase school access to internet for educational purposes; • Potential for employment opportunities for locals during and after construction.

Pre-Construction Phase Mitigation Plan

Environmental or social impact	**Pre-Construction Mitigation Actions**
General / all impacts	The ESMP will be included in the Contractors / Suppliers specification and contract. Specific mitigation measures for the contractor / supplier shall be highlighted in the general conditions.
	Apply for and secure permits to install and battery storage, under the Air Pollution Control Standards and Regulations of State and similar regulations in Yap and K
Soil and water contamination as a result of leaks and spills entering the environment.	Ensure, through design of spill containment at the Berekum and / or within the building, that 100 percent of fuel and oil held within the generators can be contained and collected for removal within the footprint of the building. Ensure generator exhaust systems are properly installed with adequate ventilation provided to ensure unobstructed flow of cooling and ventilating air, and emissions is directed away from in habited areas. Ensure through design of spill containment at the Berekum and/or within the building, that 100 percent of fuel and oil held within the generators can be contained and collected for removal within the footprint of the building. All Project staff will be trained on this plan and attendance will be recorded.

Environmental or social impact	
Waste oil and other hazardous wastes	
Old gensets and other equipment	
Environmental or social impact	Construction Mitigation Actions
Oil spill or leaks during construction / installation	Oil sorbents and spill kits will be kept on-site to contain any spills, and staff shall be trained in spill procedures. A berm will be placed under the engine generator skid during the replacement reducing the risk of soil contamination during a spill while the engine work is being done outside. Ensure effective containment of spilled or leaked oil from generators within the footprint of the building, prior to collection and removal to an authorized site otherwise as per EPA approved Solid Waste Management Plan.

Soil and water contamination	Any contaminated soils and water as a result of construction activities will be removed by contractor and disposed to landfill sites approved by the relevant State Authority. Records to be kept of the amount of material, contaminants, and destination of the waste material.
	All construction workers will have site inductions by the State Utility on health and safety.

Construction worker health and safety	All workers will be provided with hard hats, hearing protection, high visibility jackets and covered boots. All work shall be in accordance with the World Bank / IFC Environment, Health and Safety Guidelines for Occupational Health and Safety. Refer to Annex 8.
Air Discharges	Apply for and obtain a permit to operate gensets in accordance with the Air Quality Regulations and the relevant regulation of Ghana.

Operation Phase Mitigation

Environmental or social impact	Operation Mitigation Actions
Soil and water contamination from oil and diesel	Oil collectors and separators (such as bunds), and any storm water treatment devices, will be regularly checked and maintained. Equipment will be regularly checked and maintained to prevent leaks.
Waste oil	All waste oil will be stored in leak proof containers under cover / inside a building, and be collected for reuse or recycling by permitted operators. Explore and where feasible, utilize all opportunities for reuse of waste oil by licensed operators.
Hazardous wastes (not including oil)	All hazardous wastes will be stored in leak proof containers under cover / inside a building and be transported for reuse, recycling, treatment and / or disposal at special disposal places permitted by State EPA. For PUC projects, comply with the Pohnpei EPA Solid Waste Regulations, by implementing the hazardous waste management plan. For KUA projects, comply with KIRMA's Waste Management Plan 2011 – 2016 or subsequent updates. For YSPSC projects, comply with appropriate EPA regulation.
Complaints from the neighbors and local community	Complaints shall be recorded and followed up through the ESMF approved Grievance Redress Mechanism (Refer to Annex 10).
Air discharges	Operate and maintain level of air emissions consistent with IFC / World Bank Environment, health and Safety Guidelines for Air

	Emissions and Ambient Air Quality and state permit requirements as appropriate.

Construction Phase Mitigation Plan

Environmental or social impact	Construction Mitigation Actions
Noise	Ensure noise levels do not exceed CEPA approved standards. Restrict work to regular working hours and days (Monday to Saturday). No work on Sundays without prior approval, with surrounding population to be informed at least two days in advance. Fence off project areas to inhibit unauthorized access using fences and locked gates.
Aggregate supply	Source all sand and aggregate from Chuuk EPA approved sites and quarries. No lagoon dredging is permitted without appropriate permit from Chuuk EPA.
Non-toxic solid wastes (metal, packing, etc.)	Metal, cardboard and plastic will be recycled, where local facilities exist. Waste that cannot be recycled will be transported by licensed contractor to places specially allocated for landfills, approved by appropriate local authority.

Environmental and Social Management Plan (ESMP)

Environmental or social impact	**Construction Mitigation Actions**

Hazardous wastes, oil spills or leaks during installation	Collect and store all hazardous wastes such as damaged solar panels and batteries that contain heavy metals, prior to disposal.
	Provide a leak-proof container and a roofed structure over the container in a location approved by EPA for the on-site storage of hazardous wastes.
	Ensure no leaks of oil from new site during installation. Where old de-commissioned site are replaced, ensure 100% of oils and lubricants in old site can be contained and collected for removal within the footprint of the building.
	Have available on site, oil sorbents and spill kits to contain any spill, and staff should be trained in spill procedures.
	No hazardous waste is disposed locally. Removal from on-site storage, transport and disposal of hazardous wastes will be by a licensed operator in an offshore licensed facility approved by appropriate authority in receiving country.
Erosion Control	Plan all earthmoving activities in such a manner to minimize the area of disturbed land, coastline and or lagoon.
	Accelerated sedimentation caused by coastal disturbance resulting from the transfer of bulk project machinery and supplies from barges / pontoons to landing areas shall be contained, confined, and restricted by the best available means in such a manner that turbidities will be kept to a minimum.

Environmental or social impact	Construction Mitigation Actions
Erosion Control	All permanent facilities for the conveyance of water around, through, or from the project site shall be designed to reduce the velocity of flow in the facilities to a speed that will not cause significant erosion.
	Within a section or area of the project, all slopes, channels, ditches, or any disturbed area shall be stabilized as soon as possible after the final grade or final earthmoving has been completed, and restored to the original vegetation cover or improved as agreed with the land owners.
	Where it is not possible to permanently stabilize a disturbed area immediately after the final earthmoving has been completed, or where the activity stops for more than fourteen days, interim stabilization measures shall be promptly implemented.
Erosion Control	All run-off from the project area shall be collected and diverted to facilities for removal of sediments.

	Run-off from the project area shall not be discharged into the waters of FSM without effective means to prevent sedimentation.
	All channels of conveyance of run-off shall be designed and or grassed or lined with erosion resistant materials so as to reduce the speed of low of surface run- off so as not to cause accelerated erosion.
ESHS	All work shall be in accordance with the World Bank / IFC Environment, Health and Safety Guidelines for Occupational Health and Safety. Refer to Annex 8. All workers will be provided with hard hats, hearing protection, high visibility jackets and covered boots.

Operation Phase Mitigation Plan

Environmental or social impact	Construction Mitigation Actions
	Ensure 100% personnel compliance with Code of Conducts Agreements for GBV and VAC. In the event of non-compliance, notify Project Manager immediately.
Environmental or social impact	Operation Mitigation Actions
Noise	Ensure regular monitoring of noise levels and the immediate implementation of mitigation / remedial measures should there be non-compliance.
	In the case of machinery/equipment exceeding noise limits, either install silencers or mufflers, fixed or replaced if faulty. Avoid the simultaneous operation of noisy plant wherever practicable. Noise generated from any Power Generator must not exceed an average of 75dB in the Day period, and 60 dB in both the Evening and Night periods. Ensure all vehicles and equipment are serviced regularly, as per manufacturers' instructions and maintained in proper working order and turned off when not in use. Carry out maintenance work on construction plant and vehicles away from identified sensitive receivers and confined to standard daytime construction hours, wherever practicable. Register all complaints related to noise in the GRM Register and attend to their resolution via the GRM immediately.

ENVIRONMENTAL, SOCIAL AND HEALTH AND SAFETY (ESHS) – CODES OF CONDUCT

CODES OF CONDUCT AND ACTION PLAN FOR IMPLEMENTING ENVIRONMENTAL, SOCIAL AND HEALTH AND SAFETY MANAGEMENT PLAN ((ESHS) ,PREVENTING GENDER BASED VIOLENCE (GBV) AND VIOLENCE AGAINST CHILDREN (VAC)

1**. Background**

The purpose of these Codes of Conduct for Implementing ESHS and OHS Standards, and Preventing Gender Based Violence (GBV) and Violence Against Children (VAC), and guidelines that:

i. clearly define obligations on all project staff (including sub-contractors and day workers) with regard to implementing the project's environmental, social, health and safety (ESHS) and occupational health and safety (OHS) requirements, and;
ii. prevent, report and address GBV and VAC within the work site and in its immediate surrounding communities.

The application of these Codes of Conduct will help ensure the project meets its ESHS and OHS objectives, as well as preventing and/or mitigating the risks of GBV and VAC on the project.

Mutual respect and fair treatment between those working on the project and local communities is critical to a safe, respectful, and productive workplace and operating environment. GBV and VAC can be one of the most serious violations of respect and fair treatment which can harm the local community, and significantly damage trust and cooperation between parties.

These Codes of Conduct are to be adopted by those working on the project and are meant to:

i. create awareness of the ESHS and OHS expectations on the project;
ii. create common awareness about GBV and VAC and:

a. ensure a shared understanding that they have no place in the project; and,
b. create a clear system for identifying, responding to, and sanctioning GBV and VAC incidents.

1. Ensuring that all project staff understand the values of the project, understand expectations for all employees, and acknowledge the consequences for violations of these values, will help to create a smoother, more respectful and productive project implementation thereby helping e The company commits to full implementing its 'Contractors Environmental and Social Management Plan' (CESMP**).**
2. The company commits to treating women, children (persons under the age of 18), and

   men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Acts of GBV and VAC are in violation of this commitment.

3. The company shall ensure that interactions with local community members are done with respect and non-discrimination.
4. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all company employees, associates, and its representatives.
5. Respect reasonable work instructions (including regarding environmental and social norms)
6. Protect and ensure proper use of property (for example, to prohibit theft, carelessness or waste)

Health and Safety

8. The company will ensure that the project's occupational health and safety (OHS) management plan is effectively implemented, including wearing prescribed personal protective equipment[PPEs], preventing avoidable accidents and reporting conditions or practices that pose a safety hazard or threaten the environment.
9. The company will:
    1. prohibit the use of alcohol during work activities.
    2. The company will prohibit the use of illegal substances at all times.
10. The company will ensure that adequate sanitation facilities are available on site and at any worker accommodations provided by the contractor.

Gender Based Violence and Violence Against Children

11.Acts of GBV or VAC constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment. All forms of GBV and VAC, including grooming are unacceptable, regardless of whether they take place on the work site, the work site surroundings, at worker's camps or at worker's homes.

12. In addition to company sanctions, legal prosecution of those who commit acts of GBV or VAC will be pursued if appropriate.
13. Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
14. Sexual Harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior, is prohibited. Ex. Looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc. is prohibited.
15. Sexual favors —for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior are prohibited.
16. Unless there is full consent by all parties involved in the sexual act, sexual interactions between the company's employees (at any level) and members of the communities surrounding the work place are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered "non-consensual" within the scope of this Code.
17. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV and/or VAC by a fellow worker, whether in the same company or not. Reports must be made in accordance with GBV and VAC Allegation Procedures.
18. Managers are required to report suspected or actual acts of GBV and/or VAC as they have a responsibility to uphold company commitments and hold their direct reports responsible.

Implementation

To ensure that the above principles are implemented effectively the company commits to ensuring that:

19. All managers sign the 'Manager's Code of Conduct' detailing their responsibilities for implementing the company's commitments and enforcing the responsibilities in the 'Individual Code of Conduct'.
20. All employees sign the project's 'Individual Code of Conduct' confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in GBV or VAC.
21. Displaying the Company and Individual Codes of Conduct prominently and in clear view at workers' camps, offices, and in in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas, health clinics.
22. Ensure that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.

23. An appropriate person is nominated as the company's 'Focal Point' for addressing GBV and VAC issues, including representing the company on the GBV and VAC Compliance Team (GCCT) which is comprised of representatives from the client, contractor(s), the supervision consultant, and local service provider(s).
24. Ensuring that an effective GBV and VAC Action Plan is developed in consultation with the GCCT which includes as a minimum:

- GBV and VAC Allegation Procedure to report GBV and VAC issues through the project Grievance Redress Mechanism (GRM);
- Accountability Measures to protect confidentiality of all involved; and,

- Response Protocol applicable to GBV and VAC survivors and perpetrators.

25. That the company effectively implements the GBV and VAC Action Plan, providing feedback to the GCCT for improvements and updates as appropriate.
26. All employees attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to ESHS and OHS standards, and the project's GBV and VAC Codes of Conduct.
27. All employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's ESHS and OHS standards and the GBV and VAC Code of Conduct.

CODE OF CONDUCT

This Code of conduct identifies risks associated with: environmental and social management, resettlement, labor influx, spread of communicable diseases, sexual harassment, gender based violence, criminal behavior, crime, child labour, and safety.

The Code of Conduct contains obligations to all project staff (including sub-Contractors and day workers) in minimum specific requirements as follows:

1. The Contractor and its subsidiaries shall comply with applicable Laws, Rules and Regulations of the jurisdiction;
2. The Contractor shall prepare specific Health and Safety Management Plan (HSMP), Specific Environmental and Social Management Plan (ESMP), HIV/AIDS awareness programme, Road Safety Awareness Programme, Traffic Management Plan (TMP), Borrow pit and Quarry Operation Plan, Occupational Health and Safety Awareness Programme of the proposed road project prior to the actual execution of the construction works based on the Design and Environmental and Social Impact Assessment Reports;
3. c) The Contractor and its subsidiaries shall comply with applicable health and safety requirements (including wearing prescribed Personal Protective Equipment (PPE),

preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment);

4. d) The Contractor and its subsidiaries shall provide temporary speed calming measures, temporary speed limit signs to the highly populated areas such as at road sections under construction, approach to trading centers, villages, school premises and health centers and ensure that drivers observe speed limits for safety of other road users;
5. e) The Contractor and subsidiaries are required to review the road levels before construction starts in order to blend aesthetically the horizontal and vertical alignment of the road with reference to the natural ground levels in order to allow communities to access their homes social amenities and businesses smoothly by providing proper access roads and crossing slabs to deep open drains to avoid storm water flowing into adjacent houses;
6. The Contractor and its subsidiaries are required to avoid unnecessary clearance of trees and vegetation, avoid conflicts of water resources use with respective communities.
7. he Contractor and its subsidiaries are required to make every effort to avoid water, air, soil pollution, land degradation and any related harmful that can damage the environment. Also all construction activities should strive to attain the high environmental standards;
8. The Contractor and its subsidiaries are required to ensure safety of its workers and experts by providing them the required Personal Protective Equipment (PPE) to ensure safety. The standard safety signs and road marking should be provided during and after completion of road construction activities to ensure safety for all road users;
9. he Contractor and its subsidiaries are required to provide sanitations facilities along the construction corridor (for example, to ensure workers use safe drinking water, specified decent sanitary services provided by their employer and not open areas);
10. The Contractor and its subsidiaries after completion of construction activities are required to landscape and reinstate all the damaged areas through tree and grass planting to control soil erosion as stipulated in the ''Environmental Code of Practice for Road Works, 2009''. Among others, such damaged areas are borrow pits, quarry sites, road diversion, stockpiled material yards, workshop, crusher sites, batching plant, asphalt mixing plant, water dams or reservoir, waste dump area and used fresh/fuel oils storage areas and campsites along the construction corridor.
11. The Contractor and its subsidiaries are prohibited to practice any kind of discrimination (for example to job seekers on the basis of family status, ethnicity, race, gender, religion, language, marital status, birth, age, disability, or political conviction);
12. The Contractor and its subsidiaries shall adhere to the labour laws during labour recruitment to ensure skilled and unskilled laborers are given specified work Contracts, registered with National Social Security Schemes and contribute to ''Pay as You Earn (PAYEE)'' tax;
13. The Contractor and its subsidiaries are required to interact with the community members (for example, to convey an attitude of respect and non-discrimination);

14. The Contractor and its subsidiaries are prohibited of the sexual harassment (for example, to prohibit the use of abusive language or filthy behavior, in particular towards women or children, that is sexually provocative, demeaning or culturally inappropriate);

    The Contractor and its subsidiaries are prohibited to conduct any violence or exploitation (for example, the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliation, degrading or exploitative behavior);

15. The Contractor and its subsidiaries are required to protect children (including prohibitions against child labor, abuse, defilement, or otherwise unacceptable behaviors with children, and ensuring their safety in project areas);
16. The Contractor and its subsidiaries are required to avoid 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);
17. The Contractor and its subsidiaries are required to protect, provide safe equipment's and proper use of construction properties found along construction corridor and campsites (for example, to prohibit theft of construction equipment and material, carelessness or waste);
18. The Contractor and its subsidiaries are prohibited to demolish or relocate any affected properties followed by the construction corridor prior to effecting compensation to the Project Affected Persons (PAPs);
19. Non retaliation against workers who report violations of the Code, if that report is made in good faith; and
20. All workers and Contractor's Experts are responsible to read, accept and sign the requirements of this Code of Conduct as condition of employment and any violation of this Code can result to serious contractual measures to be taken including contract termination, dismissal, or referral to legal authorities.

CONTRACTOR CERTIFICATION:

I agree/I do not Agree.....

Name and Signature of an Authorized Person of the Company..... Name of the

Company.....

Address of the Company.....

Address and Stamp of the Company .....

APPENDIX B:

ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY (ESHS) - TECHNICAL SPECIFICATIONS / EMPLOYER REQUIREMENTS

The Technical Specification/Employer's requirements have been prepared to guide the undertaking of the Environmental, Social, Health and Safety (ESHS)" for the proposed road projects. The Technical Specification/Employer requirements are subject to the variations and

additions as deemed necessary by the Employer. Among others, the Technical Specification to be included in the Bidding Documents are as follows:

1. a) The Qualified Environmental and /or Social Specialist and Health & Safety Officers shall be employed by the Contractor before the actual execution of the construction works. The Environmental and /or Social Specialist and Health & Safety Officers will be responsible for preparation of the Specific Environmental and Social Management Plan (ESMP); Borrow pit and Quarry Operation Plan, Specific Health and Safety Management Plan (HSMP); Environmental Awareness Program, HIV/AIDS Awareness Program, Occupational Health and Safety Awareness Programme and Road Safety Awareness Program.
2. b) The working permits shall be obtained by Contractor and its subsidiaries prior to the actual works of the construction activities. The permits among others shall include; Working Permit for Non-Resident experts, Water-Use Permit, EIA Permit, Working Permit in Protected Areas, OSHA Permit, Explosive Use Permit and other permits required by the National Laws. The obtained permits and their status shall be reported regularly.
3. c) The Specific Environmental and Social Management Plan (ESMP) shall be prepared and submitted to Client for approval prior to the execution of the proposed road project. The ESMP among others shall include sub-plans such as Environmental Management Plan, Monitoring Management Plan, Emergency Preparedness Plan, Waste Management Plan, Grievances Preparedness Plan, Borrow Pits and Quarry site Operations Plan and Reinstatement Plan.
4. d) The specific Health and Safety Management Plan (HSMP) shall be prepared and submitted to the Client for approval prior to the execution of the proposed road project. The HSMP among others shall include sub-plans such as the Occupational Health and Safety Awareness Program, Traffic Management Plan, Monitoring Management Plan, Emergency Preparedness Plan, Accident Management Plan. The Occupational Health and Safety Awareness Program shall cover among others, proper use of First Aid Kits, Fire marshal training, Proper use of PPE equipment's, emergency First Aid delivery, self-prevention of epidemic and pandemic diseases including Malaria, diarrhea and tuberculosis.
5. e) The Traffic Management Plan (TMP) shall be prepared and submitted to the Engineer for approval prior to commencement of the construction works to ensure smooth traffic flow and improve safety of road users, adjacent communities especially children, the elderly and people with disabilities during construction period. This plan shall include but not limited to the methods of protection of communities, give details of operation hours,

types and number of safety devices, details of the location and design of diversion roads; temporary structures, barricades, temporary signs, flagmen, signals and other physical features necessary to accommodate traffic flow during construction;

6. f) The HIV/AIDS awareness program shall be prepared and submitted to the Client for approval prior to be implemented to the communities at all villages/street/centers and to all project workers along the road project. The program shall cover among others, Training on HIV/AIDS Prevention and control, HIV awareness and Counselling, VTC and Testing, capacity building to peer educator/mentor. The program activities shall be reported quarterly.
7. g) The Road Safety Awareness Program shall be prepared and submitted to Client for approval prior to be implemented to communities at all villages/street/centers along the road project to road users, and to all project workers. The program shall cover among others, traffic management, proper use of road signs, safe driving to drivers and cyclic, safe use of road to pedestrians, regular sensitization on accidents risks, control measures to the Machines' operators, construction sequencing, public information announcements, use of traffic control devices and other activities designed to minimize traffic disruption. The programme activities shall be reported quarterly.
8. h) Labour recruitment for both (skilled and unskilled) shall adhere to the Labour Laws during the project implementation and ensure the laborers are given the Contracts, registered with National Social Security Schemes and contribute to ''Pay as You Earn (PAYEE) Tax''. The Monthly Progress Report should be produced reflecting the number of skilled and unskilled labour, number Contracts provided, gender consideration, types of social security schemes chosen.(workers are free to choose their preferred schemes).
9. i) Vegetation (grasses) and Trees shall be planted along the road project in harmony with the road categories and function. The Vegetation, (trees and grasses) shall be planted at the exhausted areas such as borrow pits, quarry areas, campsite, diversion and stockpiled materials at storage yards in the major villages streets and centers. Monthly Progress reports should be produced reflecting a number of trees planted, area covered with grass and shrubs, number of villages along the road planted with trees, number of borrow pits and quarry site planted with trees/grass.
10. j) The air quality baseline data shall be obtained along the road project during the mobilization phase prior to the execution of the actual, construction works. The air quality analysis shall be done at the major villages/street/centers along the project road during the construction at least twice a year (during dry and wet season) as stipulated in the ''Environmental Code of Practice for Road Works of 2009''. The air quality data shall be reported quarterly.
11. k) The water quality baseline data shall be obtained along the road project during the mobilization phase prior to the execution of the actual construction works. The analysis shall be done to all water bodies during road construction at least twice a year (during dry and wet season) as stipulated in the ''Environmental Code of Practice for Road Works of 2009''. The water quality data shall be reported quarterly.

l) The dust control shall be done by water sprinkling at the construction site, borrow pits and quarry site access road, quarry site, diversion road and along the major centers at least three time per day during dry season. Wet crushing shall be deployed. The dust control measures shall be reported in monthly and quarterly progress reports.

13. m) Noise and vibration shall be avoided at the major villages/street/centers along the road project during construction phase. The impacts shall be avoided by conducting regular maintenance of operation vehicles and machinery, blasting works shall be done during day time after notifying the communities along the area as stipulated into ''Environmental Code of Practice for Road Works of 2009''. The noise and vibration control measures shall be reported in monthly progress reports.
14. n) Solid waste collection and separation or sorting shall be done on construction site, campsites, workshop and other project facilities in accordance to standard stipulated into ''Environmental code of practice for Road Works, 2009''. The hazardous solid waste shall be collected for disposal by authorized dealer. Other waste shall be disposed in the authorized dumpsite or managed at site. The solid waste control measures shall be reported in the monthly progress reports.
15. o) Liquid waste collection shall be done on construction site, campsites, workshop and other project facilities in accordance with the standard stipulated in the ''Environmental Code of Practice for Road Works of 2009''. The hazardous liquid waste shall be collected by the authorized dealer for disposal. Waste water from toilets and kitchen, cafeteria shall be managed on site through septic tanks and souk away pits. The liquid waste control measures shall be reported in the progress reports.
16. p) Prepare Grievance Redress Mechanism for resolving grievances related to the road project. Prepare a grievance register form for registering all the grievances that may arise during the construction. The progress report shall be prepared indicating how the grievances were resolved.
17. q) The PPE shall be provided to all workers on site and ensure proper regular use of them by workers measures to enforce the use of PPE should be applied. The PPE shall include groves, gumboot, overall, sun google, ear musk, reflective jackets, helmet, safety signs and other as necessary. The provision and the use of PPE to workers shall be reported in the monthly progress reports.
18. r) Temporally speed calming measures, road signs, barricades and warning signals shall be installed to the highly populated areas such as at road section under works, approach to trading centers, streets, villages, school premises and health centers on the road project. The installed road signs, barricades and warning signals shall be standard and reflective. Damaged and vandalized road signs shall be replaced immediately within 3 days. Any accident that may occur on daily basis shall be reported to the traffic police and accidents records must be kept and reported. Status of road safety measures shall be reported on monthly basis.

s) The Billboard signs shall be installed at the begging and the end of the project and among others the billboard shall include a message on HIV/AIDS prevention. Other billboards with HIV/AIDS and Environmental management massage shall be installed at all major junctions along the project.

APPENDIX D: METRICS FOR PROGRESS REPORTS

The following are minimum contents of the monthly and progress reports that reflect the employer's Environmental, Social, Health and Safety policies and /or the ESHS requirements of the project. The Contractor shall be responsible for preparation of the monthly and quarterly progress reports as per Contract requirement. The contents of the project ESHS reports should be determined by the ESHS risks of the Works and not necessarily by the scale of Works.

Environmental incidents or non-compliances with contract requirements, including contamination, pollution or damage of ground water or surface water supplies; health and safety incidents, accidents, injuries and all fatalities that require treatments;

Interactions with the Regulators: identify agency, dates, subjects, outcomes (report the negative if none)

Status of relevant permits acquisition: full site inspections (by area: road section, work camp, accommodations, quarries, borrow areas, spoil areas, clinic, HIV/AIDS center, community centers, etc.);

Status of relevant permits and consents: number required, number received, actions taken for those not acquired:

- List of areas/facilities with permit required (quarries, water, asphalt and batch plants), dates of application, dates issued (actions to follow up if not issued), dates submitted to the Resident Engineer (or equivalent), status of the area (waiting for permits, working abandoned without following the Reclamation Decommission Plan being implemented, etc);
- List of areas with landowner agreements required (borrow and spoil areas, camp sites) dates of agreements, dates submitted to Resident Engineer (or equivalent);
- Identify major activities undertaken in each area being reported monthly and highlights of environmental and social protection (land clearing, boundary marking, topsoil

salvage, traffic management, decommissioning planning, decommissioning implementation);

- For quarries; status of relocation and compensation (completed, or details of monthly activities and current status).

Health and Safety supervision:

•Safety officer: number of days worked, number of full inspections & partial inspections, reports to construction/project management;

•Number of workers, work hours, metric of PPE use (percentage of workers with full and or partial, Personal Protection Equipment (PPE) etc.) workers violations

d) observed (by type of violation, PPE or otherwise), warning given , repeated warnings given, follow-up actions taken (if any);

5. e) Workers conditions and accommodations;
    - •Number of skilled and unskilled labour and their gender;
    - •Number of day workers, and campsite workers;
    - •Types and number of provided basic services to workers; e.g. drinking water, Hearth services;
    - •Dates of last inspections, and highlights of inspection including status of accommodations' compliance with national laws and good practice, including sanitation hygiene, space, etc;
    - •Number of received complaints, solved and unsolved complaints.
    - •Actions taken or recommended to improve the conditions;
6. f) Provide HIV/ AIDS status; health services, information and/or training, location of clinic, number of non-safety disease or illness treatments and diagnosis.
7. g) Provide Gender issues (for experts and local separately); number of female workers received training on road safety for using flag signs, percentage of workforce, gender issues raised and addressed (cross-reference grievances or other sections as needed);
8. h) **Environmental and Social Training**;
    - •Number of new workers, number of workers received induction training, dates of induction training ;
    - •Number of dates of toolbox talks, number of workers received Occupational Health and Safety (OHS) training, environmental and social training;
    - •Number and dates of HIV/AIDS sensitization training, number of workers received training (being reported monthly);
9. i) **Environmental and Social Supervision:**
    - •Environmentalist: days worked areas inspected and numbers of inspections of each (road section, campsite, accommodations, quarries, borrow areas, spoil disposal areas, swamps, forest crossing etc.) Highlights of activities/findings (including violations of the environmental and/or social best practices, actions

taken), report to environmental and/or social specialist/construction/site management;

- •Sociologist: days worked, number of partial and full site inspections (by area: road section, work camp, accommodations, quarries, borrow areas, spoil areas, clinic, HIV/AIDS center, community centers, etc.); highlights of activities (including violations of environmental and/or social requirements observed , actions taken) report to environmental and/or social specialist/construction/site management.

•Health and Safety persons: days worked (full site inspections at road construction sections, campsite, quarries, borrow areas, spoil areas, diversion, workshop etc.) number of injuries and accident per day, number PPE used per month, number of road signs installed at site and used etc.), report to environmental and/or social specialist/construction/site management.

Grievances: There shall be a grievance register special form for registering all the grievances happening during construction, Number of complaints registered by dates, solved and unresolved by date, how received, to whom referred to for action, resolution and date (if completed), data resolution reported to complainant, any required follow-up (Cross-reference other sections as needed):

Workers and Community Grievances Traffic and vehicles/equipment:

- Traffic accidents involving project vehicles and equipment; provide date, location, damage, cause, follow-up;
- Accidents involving non-project vehicles or property (also reported under immediate metrics): provide date, location, damage, cause, follow-up:
- Overall condition of vehicles/equipment (subjective judgment by environmentalist); non-routine repairs and maintenance needed to improve safety and/or environmental performance (to control smoke, etc.).

Environmental mitigations and issues (what has been done):

- Dust: number of working bowsers, number of watering/day, number of complaints, warnings given by environmentalist, actions taken to resolve; highlights of quarry dust control (covers, sprays, operational status); % of rock/moram/spoil lorries with covers, actions taken for uncovered vehicles;
- Erosion control: controls implemented by location, status of water crossings, environmentalist inspections and results, actions taken to resolve issues, emergency repairs needed to control erosion/sedimentation;
- Quarries, borrow areas, spoil areas, asphalt plants, batch plants: identify major activities undertaken this month at each, and highlights of environmental and social protection; land clearing, boundary marking, topsoil salvage, traffic management, decommissioning planning, decommissioning implementation;

- Blasting; number of blasts (and locations), status of implementation of blasting plan (including notices, evacuations, etc.), incidents of off-site damage or complaints (cross-reference other sections as needed). Early warning to the communities and workers at the site.

- Liquid Waste, if any: material spilled, location, amount, actions taken, material disposal (report all spills that result in water or soil contamination).
- Waste management: types and quantities generated and managed, including amount taken offsite (and by whom) or reused/recycled/disposed on-site;
- Details of tree and grass plantings and other mitigation measures taken on site monthly;

- Compliance status for conditions of all relevant consents/permits, for the Work, (including quarries, water etc.): statement of compliance or listing of issues and actions taken (or to be taken) to reach the compliance;
- Compliance status of ESMP and HSMP requirements: statement of compliance or listing of issues and actions taken (or to be taken) to reach compliance;
- Other unresolved issues from previous months related to environmental and social: continued violations, continued failure of equipment, continued lack of vehicle covers, spills not dealt with, continued compensation or blasting issues, etc. Cross-reference other sections as needed.

Gender Based Violence (GBV) and Violence Against Children (VAC)

The Contractor(s) may employ workers and locals from other islands during the construction phase. The lack of employment opportunities for local people may generate resentment and may lead to disharmony and lack of local support for the Contractor. workers also pose a safety and social-cultural risk vis-à-vis issues such as gender-based violence (GBV), violence against children (VAC) and insensitivities to local culture. To address these concerns, the Contractor(s) will commit to utilising local men and women for labor where possible and upholding and enforcing an acceptable code of behaviour on all its personnel. Appropriate measures to promote cultural appreciation and understanding and locally appropriate behavior would be required.

Project Grievance Redress Mechanism (GRM)

97. Grievances are deemed most likely in relation to the impacts of project activities implemented in close proximity of publicly accessible areas. However, even in activities carried out within the closed confines of State utilities fenced compounds, excessive noise, unpleasant odours, or leaks of contaminated water through waterways etc., are issues that are sensitive to the surrounding population. Public complaints and grievances pertaining to those and any other impacts require a clearly defined mechanism through which they can be expressed and be responded to, as a first step towards their mitigation or resolution.

The following GRM is designed to address complaints received at site where activities are implemented agency. It recognizes that complaints are either directly addressed to the Site Engineer / Construction Site Supervisor.

Table 4: Grievance Redress Mechanism

Stage	Process
1	Often complaints are about nuisances on the construction site. The Aggrieved Party (AP) typically take his/her grievance to Construction Site Supervisor (CSS) who will endeavour to resolve it immediately. In other cases, the Complainant takes his grievance directly to the Utility company. In such cases, he/she will be referred GRM team.
2	Where Aggrieved Party (AP) is not satisfied, the Construction Site Supervisor (CSS) will refer the AP to the Project's Designated Contact Person (DCP). For complaints that were satisfactorily resolved by the CSS, he/she will inform the DCP and the DCP will log the grievance and the actions that were taken.
3	On receipt of the complaint, the Project DCP will endeavour to resolve it immediately. If unsuccessful, he/she then notify the General Manager.
4	The GM will address the complaint with 1 week. If unsuccessful, he/she will then inform the PIU (Project Manager)
	The PIU, if not able to resolve the issue satisfactorily, will refer the matter to the next sitting of the Project Steering Committee or otherwise convene an extraordinary meeting of the Project Steering Committee (PSC) if in his/her assessment, the issue warrants it.
5	If the matter remains unresolved with the intervention of the Project Steering Committee (PSC), the PIU will then advise the complainant of his/her legal options.

	He/She may then pursue his/her grievance with the Court which decision on the matter would be final.

CODE OF CONDUCT

FOR

LOT. 2 CONSTRUCTION AND REDEVELOPMENT OF BEREKUM EAST THURSDAY MARKET

DIAMOND VALLEY CONSTRUCTION LIMITED

P.O BOX 16, BEREKUM