CODE OF CONDUCT

For Contractors, Subcontractors, Workers, Supervisors and Other Project Personnel

WORLD BANK-FUNDED INFRASTRUCTURE / CONSTRUCTION PROJECT GHANA

INTRODUCTION

This Code of Conduct (Code) sets minimum standards of behaviour for people engaged in or working in connection Projects in Berekum, Ghana. It aims to ensure that project work is carried out safely, ethically, respectfully, inclusively, and with due care for workers, communities, children, the environment, and project assets.

The Code supports implementation of the project's Environmental and Social Management Plan (ESMP), Contractor's Environmental and Social Management Plan (C-ESMP), Labour Management Procedures (LMP), Environmental and Social Commitment Plan (ESCP), stakeholder engagement and grievance arrangements, and other applicable contract documents. It is intended to be included in relevant bidding and contract documents and explained to each covered person before work begins.

The Code is informed by the World Bank Environmental and Social Framework, particularly ESS2 (Labour and Working Conditions) and ESS4 (Community Health and Safety), where applicable to the project, and by relevant Ghanaian law. The project team must confirm which standards and project instruments apply to the specific financing and contract.

SCOPE AND APPLICATION

This Code applies throughout the project worksite and to project-related conduct, including during transport, accommodation, community engagement, off-site work, training, meetings, and other activities connected with the project.

- Contractor owners, directors, managers, site managers, supervisors, forepersons and administrative staff.
- Skilled and unskilled workers, labourers, apprentices and temporary personnel engaged for the works.
- Subcontractors and their employees, consultants and other personnel where required by the contract.
- Drivers, plant and machinery operators, equipment handlers, logistics personnel and delivery personnel while performing project duties.
- Security personnel engaged by or for the project, subject to applicable security arrangements and law.
- Any other personnel identified in the contract or project procedures as subject to this Code.

The Contractor shall flow down equivalent requirements to subcontractors and labour providers; communicate the Code in a language and format workers understand; provide induction and refresher training; obtain signed or thumbprinted acknowledgements; display key rules and reporting contacts at appropriate locations; and monitor compliance. A worker's signature does not waive any legal right.

GENERAL STANDARDS OF BEHAVIOUR

- Act honestly, professionally, responsibly and respectfully at all times.
- Comply with applicable Ghanaian law, contract requirements, approved project procedures, permits, and lawful site instructions.
- Respect the dignity, rights, privacy, culture and lawful beliefs of workers and community members.

- Use respectful language. Do not threaten, intimidate, humiliate, bully, harass or physically assault anyone.
- Cooperate with authorised supervisors, safety personnel, inspectors and project representatives, without obstructing lawful inspections.
- Protect project equipment, materials, records, vehicles and other property; use them only for authorised purposes.
- Disclose relevant conflicts of interest and do not seek or accept bribes, kickbacks, improper gifts or personal benefits connected with project decisions.
- Do not steal, defraud, falsify records, misuse project resources or knowingly provide false information.
- Protect confidential information and personal data. Share information only with authorised people for legitimate purposes.
- Do not engage in conduct that creates avoidable risks to workers or the public or undermines trust in the project.

OCCUPATIONAL HEALTH AND SAFETY

Every person has a duty to work safely, follow the site's occupational health and safety (OHS) arrangements, and avoid exposing others to preventable risk.

- Complete site induction, task-specific instruction and any required competency assessment before starting relevant work.
- Wear, use and maintain the personal protective equipment (PPE) required for the task, including safety boots, helmets, high-visibility clothing, eye/ear protection, gloves, fall protection or respiratory protection as applicable.
- Follow approved method statements, risk assessments, permit-to-work systems, traffic plans, lifting plans, excavation controls, working-at-height procedures and lock-out/isolation arrangements where applicable.
- Operate vehicles, tools, plant and machinery only if authorised, trained, competent and fit for duty. Never remove guards or bypass interlocks.
- Do not work while impaired by alcohol, illegal drugs, or any substance or condition that makes the task unsafe. Notify the supervisor if unfit for duty.
- Immediately report hazards, unsafe instructions, near misses, injuries, occupational illness, spills, fires and other incidents to the designated person. In an emergency, raise the alarm and contact emergency services as appropriate.
- Do not tamper with fire extinguishers, first-aid equipment, barriers, signs, alarms, fall-protection systems or other safety controls.
- Keep work areas, access routes, storage areas and emergency exits orderly and unobstructed. Use designated toilets, washing facilities, drinking water points and waste containers.
- Follow emergency response, evacuation, muster-point and incident-command instructions. Do not re-enter an unsafe area until authorised.
- Do not put yourself or others at risk to complete work faster. Stop work and report the issue where there is an imminent and serious danger, in accordance with site procedures.
- Use safe lifting techniques and suitable mechanical aids; do not enter confined spaces, trenches or restricted areas without authorisation and required controls.

- Follow site traffic controls, speed limits, seat-belt requirements, reversing procedures and pedestrian segregation measures.

RESPECTFUL WORKPLACE AND NON-DISCRIMINATION

All workers must be treated fairly and with dignity. Discrimination, harassment, bullying and retaliation are prohibited. No person may be disadvantaged unlawfully because of sex, disability, age, ethnicity, race, religion, social or economic background, union or worker-representation activity, employment status, or another characteristic protected by applicable law.

- Do not use slurs, insults, humiliating jokes, degrading language or threats.
- Do not bully, isolate, intimidate, repeatedly demean or abuse authority over another person.
- Do not make unwanted sexual comments, gestures, messages or advances, or engage in inappropriate touching.
- Respect reasonable privacy, personal boundaries and access to sanitation and welfare facilities.
- Do not retaliate against anyone who raises a concern in good faith, participates in an investigation, refuses unsafe work under applicable procedures, or seeks assistance.
- Raise workplace concerns through the grievance channels without fear of punishment.

SEXUAL EXPLOITATION AND ABUSE, SEXUAL HARASSMENT AND GENDER-BASED VIOLENCE

The project adopts a zero-tolerance approach to sexual exploitation and abuse (SEA), sexual harassment (SH), and other prohibited gender-based violence connected with project work. All personnel must comply with the project's approved SEA/SH risk mitigation and response procedures and applicable law.

Prohibited conduct

- Sexual exploitation or abuse of any worker, community member or project-affected person.
- Sexual harassment in the workplace, at project sites, in project transport or accommodation, during recruitment, at meetings, or in any project-related activity.
- Any sexual activity with a person under 18 years of age, regardless of the age of consent under local law. A claim of mistaken age is not an acceptable justification under this Code.
- Offering, promising, giving, requesting or accepting money, employment, goods, services, contracts, assistance or project benefits in exchange for sexual activity or sexual favours.
- Unwanted sexual advances, coercion, threats, intimidation, stalking, sexualised insults, sexually explicit messages or images, or unwanted touching.
- Using a position of authority, employment influence, control over wages, recruitment, accommodation, benefits or services to pressure someone into sexual activity.
- Retaliation, intimidation or interference directed at a person who reports or is suspected of reporting SEA/SH, or who assists a survivor.
- Domestic or other gender-based violence by project personnel where it is connected with project work or is otherwise addressed by applicable law or project requirements.

Survivor-centred handling

Anyone receiving a SEA/SH disclosure or allegation must respond calmly and respectfully, listen without blame, avoid pressing for unnecessary details, explain available options, and promptly contact the designated safeguarding focal point through the confidential procedure. Do not promise absolute secrecy; explain that information will be shared only with authorised persons on a need-to-know basis, consistent with safety, consent, law and approved procedures.

- Do not investigate a SEA/SH allegation yourself, confront the alleged perpetrator on the survivor's behalf, or conduct informal mediation.
- Do not require the survivor to report publicly, submit a written statement, or disclose sensitive details to a direct supervisor or unauthorised person.
- Prioritise immediate safety and urgent medical, psychosocial, protection or other support where requested and available.
- Respect the survivor's choices and informed consent to the extent permitted by law and approved procedures. Explain any applicable mandatory reporting limits in a safe and sensitive way.
- Keep identifying information and case records separate from routine grievance logs, securely stored and access-restricted.
- Apply interim protective measures without presuming guilt, and prevent retaliation or unnecessary contact with the alleged perpetrator.
- Refer to competent authorities or specialist services in accordance with the approved referral pathway, survivor safety, applicable law and project procedures.

CHILD PROTECTION AND PROHIBITION OF CHILD LABOUR

- Do not employ, recruit or engage any person below the minimum age permitted by applicable Ghanaian law and the project's applicable requirements.
- The Contractor shall verify age using lawful, appropriate documentation before engagement and keep records securely.
- No person under 18 may be assigned hazardous work or any work prohibited for young persons under applicable law or project requirements.
- Do not expose children to construction hazards, machinery, excavations, traffic, hazardous substances, sexual exploitation, abuse, harassment or other unsafe interactions.
- Do not invite children onto a worksite or into worker accommodation except where expressly authorised under a safe, controlled project procedure.
- Report child-protection concerns promptly to [DESIGNATED CHILD-SAFEGUARDING CONTACT] and the appropriate competent service or authority in accordance with approved procedures. Do not interview a child repeatedly or investigate the concern yourself.

Relevant legal references include the Children's Act, 1998 (Act 560), as amended, and the Labour Act, 2003 (Act 651), subject to confirmation of current applicable provisions by the project's legal adviser.

FORCED LABOUR AND HUMAN TRAFFICKING

- Forced, bonded or compulsory labour, human trafficking, coercive recruitment, debt bondage and involuntary servitude are prohibited.
- Do not confiscate or unlawfully retain identity documents, passports, work permits, bank cards or personal property.
- Workers must not be charged unlawful recruitment fees or be threatened, confined or coerced into continuing employment.
- Workers must receive clear information about employment terms, wages, hours, leave, deductions and termination in a language they understand.
- Pay wages and benefits lawfully and on time; any deductions must have a lawful basis and comply with applicable law.
- Workers must be able to leave employment in accordance with applicable law and agreed lawful notice requirements, without threats or unlawful penalties.
- Report suspected forced labour, trafficking or coercive recruitment and the appropriate authority through safe channels.

ENVIRONMENTAL PROTECTION AND COMMUNITY RELATIONS

- Dispose of solid, hazardous and liquid waste only at designated or authorised locations and in accordance with site procedures.
- Do not dump waste indiscriminately, burn waste in the open, or discharge cement washout, fuel, oil, chemicals or sewage into drains, soil or water bodies.
- Store fuels, oils, chemicals and hazardous materials safely, with appropriate labelling, containment and spill-response arrangements.
- Prevent unnecessary tree cutting, vegetation clearance, erosion, sediment runoff and damage to watercourses or habitats.
- Follow dust, noise, vibration and working-hours controls in the C-ESMP and applicable permits; maintain equipment to reduce emissions and nuisance.
- Respect residents, traditional authorities, businesses, schools, health facilities, public institutions and other community members.
- Maintain safe access, barriers, warning signs and traffic management around works, especially near homes, schools, markets, health facilities and pedestrian routes.
- Do not enter private property, take photographs of people, or use community facilities without permission or lawful authority.
- Do not threaten, insult, harass or discriminate against community members, or make unauthorised promises about jobs, compensation, contracts or project benefits.
- Report environmental incidents, accidental damage, community complaints, blocked access, dangerous conditions and damage to public utilities promptly.
- Protect cultural heritage and chance finds: stop work in the affected area, secure it without disturbance, and notify the supervisor in accordance with the chance-find procedure.

PROHIBITED CONDUCT

Prohibited conduct	Minimum required response
Theft, fraud, bribery, corruption, kickbacks or deliberate falsification of records	Report to the designated manager/compliance channel; preserve relevant records.
Fighting, assault, threats, intimidation or bullying	Make the area safe, report promptly and apply fair disciplinary procedures.
SEA/SH, sexual exploitation, abuse, harassment or gender-based violence	Use the confidential safeguarding pathway; protect safety and privacy; no informal mediation.
Child labour, hazardous work by a child, forced labour or human trafficking	Stop the prohibited practice safely and refer to designated safeguarding/labour personnel and competent authorities as required.
Discrimination, retaliation, harassment or victimisation	Report through worker grievance or safeguarding channels; protect the complainant from retaliation.
Possession, use or distribution of illegal drugs at work; alcohol/substance impairment while working	Remove from safety-sensitive duty where necessary and manage under law and site procedures.
Reckless driving or unsafe operation of machinery, tools or equipment	Stop unsafe activity, secure equipment and report to the supervisor.
Tampering with PPE, guards, barriers, alarms or other safety controls	Stop work if unsafe; restore controls only by authorised competent persons.
Unauthorised disclosure or misuse of confidential or personal information	Report to the responsible manager/data-protection contact and limit further disclosure.
Unlawful entry, property damage, indiscriminate waste disposal or environmental contamination	Stop or contain the activity where safe, report and implement corrective action.
Retaliation against complainants, witnesses, whistleblowers or persons assisting an inquiry	Report immediately; implement protective measures and investigate fairly.
Any other conduct prohibited by applicable law, the contract or approved project procedures	Refer to the responsible manager and follow lawful, fair and proportionate procedures.

REPORTING MISCONDUCT AND GRIEVANCE MECHANISMS

Reports may be made by workers, subcontractors, community members or other affected persons. Reporting channels must be accessible, safe, free from retaliation and communicated during induction and community engagement. Anonymous reports should be accepted where feasible, although limited details may affect follow-up.

Concern / report type	Initial reporting channel	Key handling requirement
Immediate danger, injury, fire or serious environmental incident	Emergency Coordinator / Site Manager	Raise alarm; make area safe if possible; obtain medical/emergency assistance; notify project management promptly.
Routine workplace concern or employment grievance	Worker Grievance Officer:	Record securely, acknowledge receipt, assess, respond within project procedure timelines, and explain appeal/escalation options.
SEA/SH or other sensitive safeguarding concern	Safeguarding Focal Point	Confidential, survivor-centred response; share only on a need-to-know basis; do not put case details in the routine grievance register.
Community complaint or property/environmental damage	Community Liaison Officer:	Log the concern, assess safety and impacts, coordinate response, communicate next steps and document resolution.
Serious misconduct involving the supervisor or designated contact	Alternative contact	Provide an escalation route independent of the person complained about.

Minimum handling steps

1. Receive the concern respectfully, without blame or retaliation. Explain available options and any limits to confidentiality.
2. Assess whether urgent safety, medical, child-protection or environmental measures are needed and act promptly.
3. Record only information necessary for the relevant process. Use a reference number and restrict access to records.
4. Refer sensitive allegations to the designated safeguarding focal point and approved response pathway. Do not investigate SEA/SH through routine grievance procedures.
5. For other allegations, assign an impartial person to assess and investigate fairly, preserve relevant evidence and give affected persons a reasonable opportunity to be heard.
6. Document action, referrals, corrective measures and closure status. Communicate the outcome to the complainant to the extent appropriate and lawful.
7. Allow escalation or appeal under the project grievance procedure. The project mechanism does not prevent anyone from approaching competent authorities or exercising legal rights.

Project-specific response timelines, appeal steps, referral services and mandatory reporting obligations must be inserted from the approved grievance and SEA/SH procedures. Do not publish sensitive case details or place identifiable SEA/SH information in general site reports.

DISCIPLINARY MEASURES AND ENFORCEMENT

A breach may result in proportionate action, taking account of seriousness, risk, intent, previous conduct, applicable law, employment terms, the contract and fair procedure. Depending on the circumstances, measures may include:

- Coaching, counselling or a verbal warning where appropriate and lawful.
- Written warning and/or mandatory refresher training.
- Removal from a task, restriction from a work area or reassignment as an interim safety measure.
- Suspension or termination of employment in accordance with applicable law, contractual terms and fair procedure.
- Removal from the project site where justified and lawfully implemented.
- Termination or other contractual remedies against a subcontractor where justified under the contract.
- Referral to police, labour, child-protection, environmental or other competent authorities where required or appropriate.

Serious allegations must be addressed promptly. Interim measures are risk-management steps and must not be treated as a final finding of guilt. The Contractor shall investigate non-SEA/SH allegations fairly, impartially and without unreasonable delay; preserve relevant evidence; maintain confidentiality; document findings and corrective action; and give the affected person a fair opportunity to respond, consistent with law.

SEA/SH cases must be handled under the approved safeguarding procedure and survivor-centred approach. Do not use informal mediation or require a survivor to confront the alleged perpetrator. Do not impose unlawful fines, unlawful wage deductions or automatic penalties inconsistent with applicable law. Disciplinary action does not replace any legal reporting obligation.

TRAINING AND ACKNOWLEDGEMENT

- Every covered person must receive and understand the Code before commencing work or project-related duties.
- Training must use a language and delivery method understood by participants, taking account of literacy, disability and accessibility needs.
- Induction must cover OHS, emergency arrangements, environmental controls, respectful conduct, SEA/SH prohibitions, child protection, forced labour, reporting routes and non-retaliation.
- Refresher training must be provided periodically and when work activities, risks, personnel or procedures change, and following relevant lessons learned.
- Workers must be allowed to ask questions and must receive a copy or accessible version of the Code and reporting contacts.
- The Contractor shall maintain signed or thumbprinted acknowledgements and training attendance records securely, with access limited to authorised personnel.

No person may be penalised for asking a good-faith question about the Code or requesting that it be explained in a language they understand.

SECTION 14: MANAGEMENT RESPONSIBILITIES

Role	Responsibilities
Contractor / senior management	Adopt and enforce the Code; provide resources, training and accessible reporting channels; flow down requirements to subcontractors; ensure fair employment practices; protect complainants from retaliation; monitor compliance and report as required by the contract.
Site Manager / supervisors	Lead by example; brief teams; verify that workers are inducted and competent; enforce PPE and safe methods; respond to immediate hazards; report incidents and alleged breaches; avoid suppressing complaints or retaliating.
Environmental and Social (E&S) Safeguards Officer	Monitor ESMP/C-ESMP and community requirements; coordinate environmental and social incident reporting; maintain appropriate records; track corrective actions; refer safeguarding matters to the designated focal point.
Occupational Health and Safety Officer	Support risk assessments, toolbox talks, inspections, incident response, PPE compliance, emergency drills and corrective actions.
Safeguarding / SEA/SH Focal Point	Maintain the confidential reporting route and approved referral directory; receive and refer concerns safely; protect confidentiality; coordinate survivor-centred response in line with approved procedures; ensure restricted record access.
Worker Grievance Officer	Operate the worker grievance mechanism; log routine complaints securely; acknowledge and track cases; explain escalation options; monitor non-retaliation; keep SEA/SH records separate.
Subcontractors / labour providers	Communicate and enforce the Code for their personnel; provide required training and records; promptly notify the Contractor of incidents; cooperate with corrective actions and lawful inquiries.
Workers and other covered personnel	Follow the Code and site procedures; use PPE; treat others respectfully; report hazards, incidents and misconduct; cooperate honestly with lawful inquiries; avoid retaliation and protect confidential information.
Supervising Consultant / PIU / Implementing Agency	Provide oversight under the contract and project instruments; review performance and incident reports; verify corrective action; ensure reporting and escalation arrangements are functioning; take contractual or project-level action within their authority.

REVIEW AND COMPLIANCE

The Contractor and Implementing Agency shall review this Code at suitable intervals and whenever there are material changes to project activities, applicable law, contractual requirements, risk assessments, incidents, or the approved ESMP, C-ESMP, LMP, ESCP, grievance arrangements or SEA/SH procedures. Revisions must be communicated to affected personnel and acknowledged where appropriate.

Compliance with this Code does not remove or reduce any obligation under Ghanaian law, permits, employment agreements, the works contract, World Bank requirements applicable to the project, or approved project instruments. Where project-specific requirements are more detailed, they must be incorporated into implementation and training.

Reference framework for project verification

- World Bank Environmental and Social Framework (ESF), including ESS2: Labour and Working Conditions and ESS4: Community Health and Safety, where applicable.
- Ghana Labour Act, 2003 (Act 651), as amended and applicable regulations.
- Ghana Children's Act, 1998 (Act 560), as amended, including provisions on child labour and hazardous work.
- Other applicable Ghanaian laws and regulations on occupational safety, public health, environmental protection, criminal conduct, data protection, disability and non-discrimination, as confirmed by project legal review.
- Project-specific ESMP, C-ESMP, LMP, ESCP, SEP, grievance procedures, SEA/SH action and response procedures, emergency plans, permits and contract requirements.

Legal and standards note: The references above identify the framework to check; they are not an exhaustive legal opinion. Before approval, the Implementing Agency / PIU should confirm the current consolidated laws, applicable regulations, project-specific World Bank requirements and contract clauses with qualified legal and environmental/social specialists.

ANNEX A MISCONDUCT REPORTING FORM

Use this form for general misconduct, OHS, environmental or routine grievance reports. For SEA/SH or other sensitive safeguarding cases, use the separate confidential case-management procedure and restricted form/register approved by the project. Do not enter detailed survivor narratives or identifying sensitive information in this general form.

Field	Entry
Reference number	[ASSIGN UNIQUE ID]
Date / time received	
Method received	☐ In person ☐ Phone ☐ Email ☐ Suggestion box ☐ Anonymous ☐ Other: _____
Reporter details (optional where permitted)	[Store separately if sensitive; do not disclose unnecessarily]
General category	☐ OHS ☐ Environmental ☐ Employment ☐ Community ☐ Conduct ☐ Child protection referral ☐ Other
Location / work area	
Brief non-sensitive summary	
Immediate safety measures taken	
Emergency / authority referral required?	☐ Yes ☐ No Details held in restricted record if sensitive
Responsible officer assigned	
Date acknowledged / next update due	
Referral status	☐ Not required ☐ Pending ☐ Referred ☐ Follow-up required
Action / corrective measure	
Outcome communicated (where appropriate)	☐ Yes ☐ No ☐ Not applicable
Closure status and date	☐ Open ☐ Under review ☐ Closed Date: _____
Reviewed / authorised by	

Confidentiality check: ☐ No sensitive details included in general register. ☐ Any restricted records stored separately with access limited to authorised personnel.

Officer signature: _____ Date: _____

ANNEX B: CONTRACTOR'S COMPLIANCE CHECKLIST

Complete at mobilisation and at the frequency required by the contract / project procedures. Record evidence and corrective actions.

No.	Verification item	Yes	No	N/A	Evidence / action owner / due date
1	Project fields and all reporting contacts completed and verified	☐	☐	☐	
2	Code incorporated into relevant contract / subcontract documents	☐	☐	☐	
3	All workers inducted before starting work	☐	☐	☐	
4	Signed / thumbprinted acknowledgements maintained securely	☐	☐	☐	
5	Training delivered in languages understood by workers	☐	☐	☐	
6	Refresher training and toolbox talks scheduled and recorded	☐	☐	☐	
7	Suitable PPE available, used and replaced as necessary	☐	☐	☐	
8	Risk assessments, method statements and permit systems in place as applicable	☐	☐	☐	
9	First aid, emergency contacts, evacuation and incident reporting arrangements operational	☐	☐	☐	
10	Worker grievance mechanism accessible and communicated	☐	☐	☐	
11	Confidential SEA/SH reporting channel and designated focal point operational	☐	☐	☐	
12	SEA/SH referral pathway verified; staff know not to investigate or mediate	☐	☐	☐	
13	Non-retaliation and confidentiality safeguards communicated	☐	☐	☐	
14	Age verification and controls against child labour implemented	☐	☐	☐	
15	Recruitment, wage and employment-term records support prevention of forced labour	☐	☐	☐	
16	Sanitation, drinking water, welfare and housekeeping arrangements adequate	☐	☐	☐	
17	Traffic management, barriers, signs and safe public access in place	☐	☐	☐	
18	Waste, dust, noise, spill prevention and environmental controls implemented	☐	☐	☐	

19	Incident, complaint and corrective-action logs maintained with access controls	☐	☐	☐	
20	Subcontractors monitored and non-compliance addressed fairly	☐	☐	☐	

Inspection date: _____ Completed by: _____
Position: _____

Key non-compliances / corrective actions:

_____
_____

Target completion date: _____ Verified closed by:
_____ Date: _____

ANNEX C: CONTACT AND ESCALATION REGISTER

Complete, verify and test all channels before site mobilisation. Provide accessible options for workers and community members who cannot safely use a phone, email or written form. Identify an alternative contact for complaints involving the primary contact.

Role / service	Name / organisation	Phone / safe contact	Email / office / location	Alternate / escalation contact
Contractor Site Manager				
OHS Officer				
Environmental and Social Safeguards Officer				
Safeguarding / SEA/SH Focal Point				
Worker Grievance Officer				
Community Liaison Officer				
Emergency Coordinator / First Aid Lead				
Supervising Consultant E&S contact				
PIU / Implementing Agency contact				

Independent / alternative complaint channel				
Nearest health facility / emergency service				
Child-protection / social welfare referral service				
Police / competent authority contact (as approved)				

Verification date: _____ Verified by: _____ Next verification date: _____

Confidentiality reminder: Do not list a survivor's name, incident details or case identifiers in this contact register. Keep sensitive case files separate and access-restricted.

PROJECT-SPECIFIC ADOPTION SIGN-OFF

By signing below, the authorised representatives confirm that this Code has been reviewed against the project's applicable legal, contractual and environmental/social requirements, that placeholders and contact channels have been completed, and that implementation responsibilities have been assigned. This sign-off is not a substitute for any formal approval required under the project or financing arrangements.

Party	Name / title	Signature	Date
Implementing Agency / PIU			
Contractor			
Supervising Consultant			