

Part III Annex M

Worker Management Plan

Version 2.0

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Yara Dallol Potash Project, Danakil Depression, Ethiopia

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LIST OF ACRONYMS

| Abbreviation | Full Definition |
|--------------|---|
| AfDB | African Development Bank |
| CHSSP | Community Health, Safety and Security Plan |
| EBRD | European Bank for Reconstruction and Development |
| ESMP | Environmental and Social Management Plan |
| HIV / AIDS | Human Immuno-deficiency Virus / Acquired Immune Deficiency Syndrome |
| OHS | Occupational Health and Safety |
| QHSSE | Quality Health, Safety, Security and Environmental |
| HR | Human Resources |
| IMCP | Integrated Mine Closure Plan |
| IFC | International Finance Corporation |
| ILO | International Labour Organization |
| MOLSA | Ministry of Labour and Social Affairs |
| MoM | Ministry of Mines |
| OHS | Occupational Health and Safety |
| PPE | Personal Protective Equipment |
| SPRP | Sourcing, Procurement and Recruitment Plan |
| WkMP | Worker Management Plan |

DEFINITIONS

The following definitions are of relevance within this report:

- **Decommissioning** - this is the process by which options for the final status of project structures at the end of their working life are assessed for their dismantling, physical removal, disposal or modification (if beneficial usage of existing Project infrastructure is a component of the closure scheme).
- **Employer** - the organisation Yara Dallol BV, which utilises the services of someone for remuneration or compensation in return.
- **Employee** - any person, excluding an independent contractor, who works for another person and who receives, or is entitled to receive, remuneration and refers to any other person who in any manner assists in carrying out or conducting the business of an employer and the term “employer” has a corresponding meaning.
- **Post-Closure** - this is the phase after decommissioning and closure where activities are reduced to monitoring and maintaining specific areas until a positive and predictable trend is established.
- **Recruitment** - the process of advertising, selecting and appointing a suitable candidate for a vacant position.
- **Contractors** - persons working for external companies (or employed by an employment agency) that are under contract to carryout for the unit, but not being part of the unit’s workforce.

Yara International is a leading global fertilizer company with sales of fertilizer to about 150 countries globally. As part of Yara International's overall upstream strategy, the company is exploring for suitable raw sources that can be developed and used as a source to Yara International's global fertilizer production and directly as finished product in its product portfolio. To complement these upstream processes, Yara International has recently started a subsidiary company, Yara Dallol BV, which is involved in the exploration and mining development of potash concessions in Ethiopia. These concessions are located in the Danakil Depression, Afar National Regional State (ANRS), Ethiopia. Yara International, through its Ethiopian subsidiary, proposes to develop a potash mine – the Yara Dallol Potash Project (hereafter referred to as the Project) within three concession areas.

As part of the environmental approval process for the Project a suite of environmental and social management plans is needed to address the issues identified in the Environmental and Social Impact Assessment (ESIA). Several management plans have been developed to address impacts identified in the ESIA and are implemented as part of an environmental management system for the Yara Dallol Potash Project.

Several activities associated with the Project may impact upon the health safety and security of the local community. This Worker Management Plan (WkMP) has been compiled to address the specific impacts that are anticipated to occur as a result of planned mining developments as identified in the ESIA. This plan sets out a formal system by which Yara Dallol BV can manage and implement mitigation measures that will avoid or reduce the significance of impacts related to community health, safety and security.

1.1 POLICY STATEMENT AND OBJECTIVES

1.1.1 Policy Statement

This WkMP has been compiled within the context of the Project and it is being guided by the Yara Dallol BV Health, Environment, Safety, Quality and Product Stewardship Policy as set out in *Box 1.1*. This Policy is a high-level corporate statement of intent and establishes the principles to be followed in the management of environmental and Occupational Health and Safety (OHS) issues.

COMPANY COMMITMENT

Yara Dallol BV's aim is to establish sustainable growth and the creation of shareholder and societal value. Yara Dallol BV affirms to its stakeholders, including employees, customers and the public, its commitment to continuously improve and reach standards of excellence in Health Environment, Safety, Quality and Product Stewardship through their operations.

ENVIRONMENTAL POLICY

Yara Dallol BV will manage their business in a life cycle perspective. In its operations Yara Dallol BV will contribute to eco-efficiency by continuously improving energy consumption and reducing waste, emissions and discharges. Waste which is generated will be handled and disposed of safely and responsibly.

Yara Dallol BV will design their products and develop product applications to have the minimum adverse effect on the environment throughout their lifecycle.

HEALTH AND SAFETY

Injuries and occupational illnesses, as well as safety and environmental incidents, are preventable, and Yara Dallol BV's goal for each of these is zero incidents. Yara Dallol BV will encourage their employees to adopt a healthy, safe life-style for themselves and their families.

Yara Dallol BV will be prepared for emergencies and cooperate with local authorities to establish and improve their emergency preparedness.

1.1.2**Objectives**

This Management Plan has been developed taking into account the requirements of Ethiopian labour law, International Finance Corporation (IFC) Performance Standard 2 and the International Labour Organisation's (ILO) core conventions, and seeks to:

- Establish arrangements to appropriately manage and protect the OHS and welfare of Yara Dallol BV's workforce including both employees and contractors and others who may be exposed to risks associated with Yara Dallol BV's operations and activities.
- Ensure that employees understand their rights in relation to labour and working conditions.
- Allow employees to exercise their right to freedom of association and collective bargaining.
- Provide employees and contractors with a feedback mechanism for them to raise feedback, concerns, complaints and grievances and to receive information on the response and any associated corrective action.
- Prevent discrimination in hiring, remuneration, access to training, promotion, termination, and retirement on the grounds of race, national or social origin, caste, birth, religion, disability, gender, sexual orientation,

union membership, political opinions and age and promote equal opportunities. This applies equally to employees and non-employees.

- Manage disciplinary practices and retrenchment in a manner that treats those affected individuals with respect and dignity and without threat, abuse or ill-treatment.
- Design and manage accommodation provided for use by Yara Dallol BV's workforce (including contractors) in a manner that prevents or minimises the risk of harm to health and safety.
- Ban the use or support of child, forced or compulsory labour in direct operations and in the supply chain.
- Ensure working hours do not exceed legal and industry standards and conditions of employment including remuneration are fair, equitable and are in line with industry norms.

1.2 *PURPOSE AND SCOPE*

The WkMP has been developed with the purpose of protecting the health, safety and wellbeing of Yara Dallol BV's workforce, whilst also working to promote equal opportunity and non-discrimination in Yara Dallol BV and its contractor's workforce management. This will be done within the context of meeting national requirements and standards, and the requirements of the IFC Performance Standards (IFC PS), as set out in *Section 2.2*.

The scope of this WkMP covers construction, operational and decommissioning/closure phases of the Project. It is further applicable across the entire workforce at all skills levels, and deals with all aspects relating to Yara Dallol BV's employees including recruitment, labour and accommodation conditions, management of worker relationships and OHS. The WkMP also includes measures related to the management of workers engaged by third parties, and also the management of workforce-related risks within the supply chain.

1.3 *LINKAGE TO OTHER ENVIRONMENTAL AND SOCIAL PLANS*

The management measures identified in the WkMP relate to the Community Health, Safety and Security Plan (CHSSP), Sourcing, Procurement and Recruitment Plan (SPRP) and the Integrated Mine Closure Plan (IMCP), as shown in *Table 1.1*

Table 1.1 Linkage to other Management Plans

| Management Plan | Overlap of this Plan with Content of Other Plans |
|--|---|
| SOCIAL MANAGEMENT PLANS | |
| Community Health, Safety and Security Plan (CHSSP) | The worker Code of Conduct addressed in the WkMP is of relevance for how workers will interact with neighbouring communities, and for the management of impacts where workers interact with non-Yara Dallol BV employees and neighbouring communities. |
| Sourcing, Procurement and Recruitment Plan (SPRP) | The measures recommended in the WkMP include the screening and auditing of suppliers and contractors to meet OHS and labour standards. Therefore measures identified in the SPRP should work to complement those in the WkMP, and ensure that suppliers and contractors comply with Project requirements. |
| CLOSURE PLANS | |
| Integrated Mine Closure Plan (IMCP) | The IMCP will include measures that are relevant for the downscaling of the workforce and potential impacts related to worker redundancy. |

A summary of the legal requirements and standards relevant to the WkMP are presented below.

2.1 NATIONAL LEGISLATION AND POLICY

The national legislation and policy relevant to the WkMP are discussed in the following sections below.

2.1.1 *The Ethiopian Constitution*

The Ethiopia Constitution covers the 'Rights of Labour', including the rights of workers "to form associations to improve their conditions of employment and economic well-being.

The general principles of labour rights in the Ethiopian Constitution include:

- The right of the security of the person (Article 16);
- The prohibition against inhuman treatment and forced and compulsory labour (Article 18);
- Freedom of association (Article 31);
- The right to express grievances (Article 42 (1) b);
- Equality of women in the labour force (Article 35); and
- Prevention of exploitative practices with regards to child labour, and prohibition of child entering into hazardous or harmful practices to his or her education, health or well-being (Article 36).

2.1.2 *Labour Proclamation (Amended n^o 494 /2006)*

The Labour Proclamation is the principal national legislation on labour issues. It covers all establishments with one or more workers and addresses a wide range of issues, such as employment relations and contracts, obligations of employers and workers, wages and working time, working conditions and occupational safety and health, occupational injuries, labour disputes and conciliation.

The Proclamation also sets out provisions for the labour inspection service, giving inspectors wide-ranging duties and enforcement powers and prohibiting obstruction of inspectors in performing their duties. The

Proclamation was amended in 2006 to give workers the right to severance pay where their employment contracts are terminated because of HIV/AIDS.

2.1.3 *Occupational Health and Safety Directive (2008)*

This Directive has made both general and specific provisions regarding to:

- Health and safety;
- Arrangements in the workplace;
- Ambient working conditions;
- Hazardous jobs or undertakings; and
- Specific occupations and processes and requirements (machinery and process guards).

The Directive also identifies general duties of employers, and the duties and rights of workers including organizational measures such as a safety and health policy and arrangements, and for personal protective equipment (PPE). The Directive also includes measures for controlling a wide range of risks, including chemicals, noise and machinery and makes specific provisions for the recording and notifying of occupational accidents and diseases. The Ethiopia Health Policy (1993) also included OHS promotion in its priorities.

2.1.4 *Institutional Framework*

The Ministry of Labour and Social Affairs (MOLSA) is responsible for developing and promoting peaceful industrial relations by ensuring successful management of labour conditions and health and safety in the working environment, both at the national and regional level.

The regional Bureaus of Labour and Social Affairs (BOLSA) are responsible for conducting inspections on labour standards for private enterprises within each region.

2.2 *IFC STANDARDS*

The WkMP has been guided by international good practice regarding workforce management and OHS. Yara Dallol BV have committed to meeting the International Finance Corporation Environmental and Social Performance Standards (*IFC Performance Standards*). In practical terms, this means that Yara Dallol BV and its contractors will satisfy the requirements of IFC PS 2.

IFC PS 2 recognises that the pursuit of economic growth through employment creation and income generation should be accompanied by the protection of the fundamental rights of workers. The IFC General and Project Specific Environmental, Health, and Safety (EHS) Standards are also of relevance to the WkMP and the relevant requirements have been incorporated herein.

Ethiopia has ratified several of the International Labour Organisation's (ILO) conventions. Of relevance are the following:

- Forced Labour Convention, 1930 (No. 29);
- Freedom of Association and Protection of the Right to Organise Convention, 1949 (No. 87);
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
- Equal Remuneration Convention, 1951 (No. 100);
- Abolition of Forced Labour Convention, 1957 (No. 105);
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111);
- Minimum Age Convention, 1973, (No. 138);
- Occupational Safety and Health Convention, 1991 (No. 155); and
- Worst Forms of Child Labour Convention, 2003 (No. 182).

With respect to this Plan, Yara Dallol BV has the responsibility to provide workforce and management and to structure and coordinate workforce health and safety management procedures for the Yara Dallol Potash Project. The roles and responsibilities within Yara Dallol BV for the implementation of the WkMP are presented in Table 3.1 *Responsible Parties and Roles and Responsibilities*

Table 3.1 *Responsible Parties and Roles and Responsibilities*

| Responsible Parties | Roles and Responsibilities |
|----------------------------------|--|
| Human Resources Manager | Responsible for the development and implementation of procedures and protocols relating to labour and working conditions. |
| Dallol General Manager | Responsible for signing off various policies and procedures developed for the management of the workforce and their health and safety. |
| Health and Safety Manager | Responsible for the implementation and management of all measures in relation to OHS inclusive in the WkMP |

4 IMPACT MANAGEMENT

4.1 SUMMARY OF IMPACT MANAGEMENT

As with any project of this scale and nature, there are certain impacts that cannot be entirely eliminated, i.e. residual impacts after implementing mitigation measures. With respect to impact mitigation, the Project subscribes to the philosophy of impact avoidance (by changes to project planning and/or design) and impact reduction (to reduce impacts that cannot be avoided to acceptable levels). What follows, is a description of the potential residual impacts and the mitigation measures proposed to reduce them to acceptable levels. The plan seeks to address potential impacts related to inadequate:

- Labour and working conditions;
- Accommodation conditions; and
- Occupational Health and Safety (OHS).

The WkMP also relates to impacts associated with interaction between the workforce and local communities namely in relation to:

- Transmission of HIV/AIDS and other sexually transmitted infections (STIs) and other vector borne and communicable diseases;
- Tension and conflict between communities and employees and contractors;
- Localised inflation driven by increased demand for products and services as a result of the presence of the Yara Dallol BV workforce in the area; and
- Health and safety accidents and incidents associated with Project activities, such as increased vehicle movement on public roads, etc.

4.2 MANAGEMENT DURING CONSTRUCTION

4.2.1 Impacts

The impacts during construction will be similar to those identified in *Section 4.1*. The impacts during construction relevant to the WkMP are:

- Exposure of workforce (including contractors) to potential harm, injury, ill-health and to enjoyment of human rights, etc.
- Exposure of the workforce (including contractors) to poor accommodation standards (both in design and operation).

- Exposure of workforce (including contractors) to inadequate OHS standards.
- Conflict and tension associated with interaction between the workforce (including contractors) and local communities.

4.2.2 *Objectives and Targets*

The objective of the WkMP during construction will be consistent with those established in *Section 1.1.2. Table 7.1* identifies the specific targets required to ensure proper management of impacts.

4.2.3 *Management Actions*

During construction the management of impacts related to labour and accommodation conditions and OHS for the Yara Dallol BV workforce (including contractors and supply chain) will focus on the establishment of relevant policies and monitoring systems and corrective actions. These will include:

- The development of an OHS management system and OHS monitoring and surveillance programme.
- Fitness-for-work health screening.
- The development of a worker health awareness programme.
- The development of worker engagement procedures.
- Development of a worker feedback mechanism.
- The development of relevant Human Resource (HR) policies and procedures.
- The development of auditing programme for contractors and supply chain; and
- The development of a worker code of conduct.

Specific details surrounding the management actions required are included within *Table 7.1*.

Contractor Control System

Yara Dallol BV will develop a contractor control system that establishes clear accountabilities and responsibilities to ensure active engagement of contractors, and provide a consistent process to avoid, eliminate, reduce, minimize or offset environmental, labour and community impacts and risks to the Project.

This system will recognise that risks vary from contractor to contractor depending on the scope of work, the activities involved and the sensitive receptors and resources that may be impacted in the area of work. A risk based approach is therefore essential in determining which control measures are most important for the contractor to implement and manage. The risk based approach is utilised at three stages:

- Applicability of management plans to individual scopes of work (internal review and assessment);
- Tender review of control measures; and
- Pre commencement-work review.

Yara Dallol BV will consider during the qualification and selection process the ability of the contractor to understand and meet the requirements of the ESIA Management Plans. As part of this process contractors will be provided with the relevant management plans. The evaluation process will consider their ability to conform to the management plans.

During contract award, Yara Dallol BV will conduct a 'commence-work' review to refine, clarify, prioritise and focus on the key legislation, standards, risks and commitments as relevant to contractor's scope of work ensure that they meet set standards. New control measures that are identified will be discussed and agreed for inclusion into the relevant plans.

Contractors will be required to establish OHS management arrangements in coordination with Yara Dallol BV to ensure conformance to the management plans and other contractual commitments. These may include development of procedures and work instructions; training, definition of Key Performance Indicators (KPIs), monitoring and auditing schedules, reporting requirements, management reviews etc.

4.3 *MANAGEMENT DURING OPERATION*

4.3.1 *Impacts*

The impacts during operation are likely to be similar to those identified in *Section 4.2.1*; however, the nature of the impacts may vary due to changes in labour requirements due to changes in activities. The extent and scale of these impacts will be less than during construction due to a reduction in the size of the workforce and a more limited use of contractors. Impacts will include:

- Exposure of workforce (including contractors) to potential harm, injury, ill-health and to enjoyment of human rights, etc.

- Exposure of the workforce (including contractors) to poor accommodation standards (both in design and operation).
- Exposure of workforce (including contractors) to health and safety incidents.
- Conflict and tension associated with interaction between the workforce (including contractors) and local communities.

4.3.2 *Objectives and Targets*

The objectives during operation will be to maintain the achievement of objectives identified in *Section 1.1.2* and to prepare for Project phase transition from construction to operations. Although the majority of the construction workforce will be on short-term contracts, it is anticipated that a significant number will be recruited from the local area.

In addition to the objectives mentioned in *Section 1.1.2*, the following should be achieved:

- Management of impacts associated with downscaling of the workforce.
- Continuation of procedures and systems implemented during construction, and tailored as well as develop new procedures to meet workforce requirements and changes during the operations phase; and
- Ensure that all new workers and contractors are provided with or have developed policies and procedures on labour and working conditions and OHS standards.

Table 7.1 identifies relevant targets for impact management during operations.

4.3.3 *Management Actions*

During operations the management of impacts related to labour and accommodation conditions and OHS for the Yara Dallol BV workforce (including contractors and supply chain) will focus on the maintaining and monitoring the implementation of relevant policies. Specifically these will include:

- The development of an OHS management system and OHS monitoring and surveillance programme;
- Fitness-for-work health screening;
- The development of a worker health awareness programme;
- The development of worker engagement procedures;

- Development of a worker feedback mechanism;
- The development of relevant HR policies and procedures;
- The development of auditing programme for contractors and supply chain; and
- The development of a worker code of conduct.

Specific details surrounding the management actions required are included within *Table 7.1*

4.4 *MANAGEMENT FOR DECOMMISSIONING AND CLOSURE*

4.4.1 *Impacts*

The cessation of mining activities during decommissioning and closure will result in a significant downsizing of the workforce and issues associated with redundancy and accompanying economic impacts locally will be significant.

4.4.2 *Objectives and Targets*

The objectives during decommissioning and closure will be to continue to maintain the objectives identified (*Section 4.2.2*). Given that job losses will occur, objectives and targets will focus on the training personnel to extend their skill sets to get employed in alternative livelihoods.

To develop a retrenchment plan (well in advance of retrenchments), which identifies the negative impacts of retrenchment and identifies mitigation measures to address these as far as is practicable (further details on the development of a retrenchment plan are included in *Table 7.1*).

Table 7.1 identifies relevant targets for impact management during decommissioning and closure.

4.4.3 *Management Actions*

During closure the management of impacts related to labour and accommodation conditions and OHS for the Yara Dallol BV workforce (including contractors and supply chain) will focus on maintaining and monitoring relevant policies while planning for retrenchment. The management actions will be similar to those during construction and discussed in *Section 4.3.3* but will also include:

- Development of a retrenchment plan in advance of decommissioning and closure; and

- Engagement with workers and local communities well in advance of planned decommissioning and closure activities.

Specific details surrounding the management actions required are included within *Table 7.1*

In order to verify the management measures, Yara Dallol BV will require several monitoring systems as part of its overall Environmental and Social Management System (ES-MS). These will include the following:

- **Human Resources Employee Database** - this will track the data about employees working for Yara Dallol BV including wages, benefits, working hours, eligibility for overtime etc. The database will also record information on the personal details of employees (such as home address, next of kin/emergency contact); their job description, role and responsibilities, training records and training needs, and details of health surveillance.
- **Contractor Database** - this will be used to record the range of primary and secondary contractors for the Project. The database will record a summary of their scope of work, business origins, the results of biannual auditing programmes, details of the origins of their employees (home village in the local area, Afar, Ethiopian, expatriate), their respective positions; training received, PPE given, and date of fitness to work health screening. The database will also identify any gaps (such as training needs) that require addressing, and assess the success of previous actions to address gaps in the timeframes identified.
- **Supply Chain Database** - this will be used to monitor the primary supply chain and record results of risk assessments for incidents of child and / or forced labour and significant safety issues.
- **Worker Feedback System** - the worker feedback system will log all grievances, issues and concerns raised by workers during engagement sessions. The system will also include areas to record information on measures to address issues, timeframes, personnel responsible and any subsequent feedback that is required.
- **Accident and Incident Recording, Reporting and Investigation System** - this will be used to record number and type of accidents and incidents including near misses occurring in the workplace both at site and in offices, details and outcomes of any required investigation; corrective actions required to address incidents, and trend analysis to detect themes such as the recurrence of type of incidents. In addition the system should identify roles and responsibilities for recording, reporting and investigating incidents and for corrective action planning.
- **Health Surveillance and Monitoring System** - this system will be used to record details of similar exposure groups in the workforce including the nature of health exposures; the exposure monitoring plan; results of monitoring campaigns; and actions to be taken to address any cases of

detected exceedances of workplace exposure limits, recognising that air quality is poor in the area due to levels of particulate matter. Information, data and records relating to the health surveillance carried out on individuals including the nature and type of exposures and any related health effects shall be held Human Resources Employee Database. Information obtained from exposure monitoring and surveillance campaigns can be used to tailor health awareness and training programmes for the workforce.

5.1 COMMUNITY FEEDBACK, COMPLAINTS AND GRIEVANCES

Community complaints and concerns will be captured and addressed through External Yara Dallol BV's Feedback and Grievance Mechanism (refer to *Stakeholder Engagement Programme in Annex C of Part II of this ESIA*). The procedure has been designed to provide a simple, fair and transparent process for all external parties to provide feedback and to raise grievances.

6 *REPORTING AND DOCUMENTATION*

6.1 *GOVERNMENT/AUTHORITY REPORTING*

Yara Dallol BV will comply with any Ethiopian Government reporting requirements relating to worker management.

6.2 *INTERNAL REPORTING*

Yara Dallol BV will develop an internal reporting programme relating to worker management. Internal management reports will be published on at least six monthly basis.

6.3 *COMMUNITY REPORTING*

On a six monthly basis internal reporting, a summary report suitable for digestion by a non-technical community audience will be developed and disclosed on an annual basis. This report will focus upon graphical representation of information, and in particular outcomes of any community complaints and those actions taken to remedy significant impacts. This will be undertaken in non-technical languages and in suitable local languages in a culturally appropriate manner.

Table 7.1 Management Measures for Construction, Operation and Decommissioning/Closure

| Phase | | | Objective | Mitigation Measures | Monitoring Plan | Responsibility |
|---------------------------------------|-----------|-----------------------------|---|--|---|--|
| Construction | Operation | Decommissioning and Closure | | | | |
| OCCUPATIONAL HEALTH AND SAFETY | | | | | | |
| ✓ | ✓ | ✓ | Review and update the existing OHS Management System | <ul style="list-style-type: none"> Review OHS Management System to align with the requirements of IFC PS 2 and national standards; including requirements associated with the protection of contractors. The OHS Management System should provide the framework for managing all OHS issues and management programs (risk assessment, training etc.) Review and update existing OHS operating procedures to ensure that they meet the necessary national and international requirements. Develop specific operating procedures related to OHS as required. | <ul style="list-style-type: none"> Presence of Comprehensive OHS Management System Annual Review Identified gaps actioned Presence of Comprehensive OHS operating procedures Annual Review Identified gaps actioned | <ul style="list-style-type: none"> Dallol General Manager Health and Safety Manager |
| ✓ | ✓ | ✓ | Develop and implement a Hazard Identification and Risk Assessment procedure | <ul style="list-style-type: none"> Develop and implement a task based Hazard Identification and Risk Assessment to analyse and manage OHS risks related to construction and operations activities. Develop time-bound OHS Action Plan to assess and action any OHS risks identified as part of the risk assessment. | <ul style="list-style-type: none"> Presence of an Organisational Hazard Identification and Risk Assessment Procedure Annual Review Presence of OHS risk action plans Six-monthly Review | <ul style="list-style-type: none"> Dallol General Manager Health and Safety Manager Contractor Health and Safety Manager Health and Safety Manager Contractor Health and Safety Manager |
| | | | Implement OHS training programme | <ul style="list-style-type: none"> Develop OHS training plan based on policies, procedures and risk / hazard assessment to define OHS training requirements for staff Provide OHS training to all workers as part of the recruitment and induction procedures. Deliver role specific OHS training for workers assigned to tasks associated with specific OHS risks. Training will be based on the task based Hazard Identification and Risk Assessment (this may include safe storage and handling etc.). Provide staff basic hygiene and sanitation training, including training on food hygiene standards. Provide specific sexual health training including HIV/AIDS awareness and prevention program, which will include voluntary testing, the provision of condoms in suitable locations etc. | <ul style="list-style-type: none"> Presence of OHS training plan Percentage of workers that receive OHS training Percentage of workers that have completed training Percentage of workers that receive hygiene and sanitation training Percentage of workers that receive sexual health training | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety Manager Human Resources Manager Health and Safety Manager Contractor Health and Safety Manager Health and Safety Manager Contractor Health and Safety Manager Onsite Medical Officer Project Manager HR Manager Health and Safety Manager Contractor Health and Safety Manager Onsite Medical Officer |
| ✓ | ✓ | ✓ | Provide workforce suitable PPE | <ul style="list-style-type: none"> Provide suitable Personal Protective Equipment (PPE) for workforce based on task based Hazard Identification and Risk Assessment. Provide relevant training on PPE use. Audit PPE use on monthly basis. | <ul style="list-style-type: none"> Percentage of workers that receive PPE Percentage of workers that receive training in use of PPE Appropriate use of PPE (assessed through regular monthly audits by OHS Manager) | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety Manager |

| Phase | | | Objective | Mitigation Measures | Monitoring Plan | Responsibility |
|--------------|-----------|-----------------------------|---|---|--|--|
| Construction | Operation | Decommissioning and Closure | | | | |
| ✓ | ✓ | ✓ | Develop relevant safety signage | <ul style="list-style-type: none"> Utilise visual safety warning signs, including those for electrical and mechanical equipment, and chemical hazards. | <ul style="list-style-type: none"> Appropriate warning signs erected (assessed through third party OHS audit) Number of incidents reported and recorded | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety Manager |
| ✓ | ✓ | ✓ | Monitor OHS risks and incidents | <ul style="list-style-type: none"> Develop and implement OHS monitoring programme to be implemented throughout the life of mine. This should include a monitoring plan that sets out the objectives, frequency and nature of monitoring to be undertaken and corrective actions that will be taken. Routine safety checks carried out on construction sites (construction) and plant and facilities (operation), and decommissioning sites (decommissioning and closure) in line with standard safety procedures. Safety check should include assessment of equipment functionality, PPE usage and staff adhering to procedures. Ensure continuous improvement of OHS and worker wellbeing through effective monitoring and response to incidents and trends identified. | <ul style="list-style-type: none"> Presence of OHS monitoring and surveillance plan Implementation of OHS monitoring and surveillance programme Number of OHS events recorded Number of OHS events closed out Recorded number of safety checks conducted Number of incidents Number of treated incidents Number of recurrent incidents | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety Manager Health and Safety Manager Contractor Health and Safety Manager Health and Safety Manager Contractor Health and Safety Manager Onsite Medical Officer |
| | | | Develop pre-employment worker fitness for work health screening protocol | <ul style="list-style-type: none"> Ensure all Project personnel (and contractors) undertake fitness for work screening prior to employment. | <ul style="list-style-type: none"> Percentage of workers and contractors who have undergone screening | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety Manager Human Resources Manager |
| ✓ | ✓ | ✓ | Develop worker health screening and monitoring programme | <ul style="list-style-type: none"> Implement annual health and fitness monitoring programme where workers (including long-term contractors) have routine annual check-ups. | <ul style="list-style-type: none"> Percentage of relevant workers that complete annual check-ups | <ul style="list-style-type: none"> Health and Safety Manager Onsite Medical Officer |
| ✓ | ✓ | ✓ | Develop and implement HIV / AIDS policy (based on voluntary testing, non-discrimination, no stigma and support) | <ul style="list-style-type: none"> Establish policy and procedure for addressing HIV/AIDS issues in the workplace. Provide support and counselling for workers and their families living with HIV / AIDS. Implement a voluntary testing programme. Prevention and protection of workers living with HIV against harassment. Refer to CHSSMP in <i>Annex J of Part III</i> of this ESIA | <ul style="list-style-type: none"> Annual policy review Percentage of workers that receive counselling Percentage of workers voluntarily tested Percentage of HIV positive workers that receive treatment Refer to CHSSMP in <i>Annex J of Part III</i> of this ESIA | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety Manager Onsite Medical Officer |
| ✓ | ✓ | ✓ | Develop and implement safe driving policy | <ul style="list-style-type: none"> Develop Driving Policy that provides the driving requirements, speed limits, non-stopping requirements, safety protocols etc. Provide training to employees on safe driving standards including driving speeds, hours and policies regarding unauthorised stopping. Refer to CHSSMP in <i>Annex J of Part III</i> of this ESIA Provide worker fatigue and stress management programme for long haul truck drivers | <ul style="list-style-type: none"> Presence of policy Annual review of policy Percentage of relevant driving staff who receive training related to safe driving. Number of recorded health and safety or grievances recorded related to driving. Implementation of programme Refer to CHSSMP in <i>Annex J of Part III</i> of this ESIA | <ul style="list-style-type: none"> Dallol General Manager Health and Safety Manager Refer to CHSSMP in <i>Annex J of Part III</i> of this ESIA Health and Safety Manager Contractor Health and Safety Manager Health and Safety Manager Contractor Health and Safety Manager Dallol General Manager |
| ✓ | ✓ | ✓ | Develop worker engagement procedure | <ul style="list-style-type: none"> Supervisors implement tailored toolbox talks on daily basis during team meetings to address common OHS risks. Develop worker feedback mechanism to enable workers to raise issues, grievances and make suggestions. | <ul style="list-style-type: none"> Daily toolbox talks held with all workers Worker feedback mechanism developed Number of issues received and addressed | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety Manager HR Manager |

| Phase | | | Objective | Mitigation Measures | Monitoring Plan | Responsibility |
|--------------------------|-----------|-----------------------------|---|--|---|--|
| Construction | Operation | Decommissioning and Closure | | | | |
| | | | | <ul style="list-style-type: none"> Establish monthly internal communications through Project meetings to discuss OHS performance. | <ul style="list-style-type: none"> Meetings held monthly Number of incidents reported Number of incidents closed out | <ul style="list-style-type: none"> Health and Safety Manager HR Manager |
| LABOUR CONDITIONS | | | | | | |
| ✓ | ✓ | ✓ | Develop and implement Human Resources policies and protocols | <ul style="list-style-type: none"> Develop and implement Human Resources policies and protocols that meet the Ethiopian legal requirements, as well as the requirements of IFC PS2. Policies and procedures should include range of relevant topics such as working hours, contracting terms, wages, leave, equality and diversity, retrenchment, collective bargaining, hiring and recruitment etc. Monitor and audit implementation of HR policies and procedures including contractor performance based on HR Audit Action Plan. | <ul style="list-style-type: none"> Presence of HR policies and protocols Annual review of policy HR Audit Action Plan (annual review) Percentage completion of audits undertaken | <ul style="list-style-type: none"> Dallol General Manager Human Resources Manager |
| ✓ | ✓ | ✓ | Deliver workforce training on human resources policies and procedures | <ul style="list-style-type: none"> Train workforce on all HR policies and protocols within induction training program. Annex policies to workers contracts of employment. Provide training to all existing workforce on HR policies and labour standards. | <ul style="list-style-type: none"> Number of workers that receive induction on HR and HR policies Record of information provided Percentage of workers that receive training | <ul style="list-style-type: none"> HR Manager HR Manager Dallol General Manager Human Resources Manager |
| ✓ | ✓ | ✓ | Implement limits on working hours and overtime | <ul style="list-style-type: none"> Develop and implement a policy on working hours and overtime in adherence with Ethiopian legislation and industry good practice (as appropriate to different job categories). Employ an appropriate number of workers to avoid undue pressure on hours worked by employees. Monitor working hours and exercise control of overtime, and any payment of overtime premiums, to ensure that the limits set in the law and company policy are understood and respected Develop mechanisms to monitor the correct implementation by contractors of procedures on hours and overtime. Develop key reporting indicators on hours for contractors (number of hours work, volume of overtime by category of personnel). Ensure that all workers understand that they may lodge grievances or contact trade union representatives in relation to excessive working hours. | <ul style="list-style-type: none"> Average man hours for key worker categories Average hours of overtime (in particular jobs where overtime poses a risk) Worker check-in and out procedure to monitor working hours in place Presence of monitoring mechanisms Implementation of monitoring mechanisms Presence of Workforce Grievance Procedures Number of grievances raised related to hours worked / overtime etc. | <ul style="list-style-type: none"> Dallol General Manager HR Manager Dallol General Manager HR Manager Dallol General Manager HR Manager Dallol General Manager HR Manager |
| ✓ | ✓ | ✓ | Ensure suitable framework for delivery of fair wages and benefits | <ul style="list-style-type: none"> Implement policies on wages and benefits in line with the country legislation and industry good practice (as appropriate to different job categories). Ensure that workers understand the contents of their contracts related to wages and benefits through suitable engagement, training and dissemination of relevant information in suitable local languages. Ensure timely payment of wages and benefits and provide payslips to all workers. Review daily worker rates to ensure that it allows workers to both meet basic needs (housing, energy, nutrition, clothing, health care, education, potable water, childcare and transportation) and provide some discretionary income. | <ul style="list-style-type: none"> Wages and benefits framework for different worker categories. Annual Review Percentage of contracts that include wages and benefits in relevant languages. Percentage of staff engaged on wages and benefits prior to starting work. Percentage of workers to receive payslips and payment within defined timeframe Record of the review of daily workers rates (against wages framework) | <ul style="list-style-type: none"> Dallol General Manager HR Manager Dallol General Manager HR Manager |

| Phase | | | Objective | Mitigation Measures | Monitoring Plan | Responsibility |
|--------------|-----------|-----------------------------|---|---|--|--|
| Construction | Operation | Decommissioning and Closure | | | | |
| | | | | <ul style="list-style-type: none"> Benchmark daily worker rates against the wages of permanent unskilled workers in the project and other companies. Benchmark wages in the industry and areas of operation using interviews with local communities and workers. Develop a mechanism for periodic review of wages in consultation with workers' representatives and based on a series of objective criteria. | <ul style="list-style-type: none"> Record of the benchmarking exercise (six-monthly) Record of the wages surveys Record of engagements Annual review held Number of grievances received related to wages | <ul style="list-style-type: none"> Dallol General Manager HR Manager |
| ✓ | ✓ | ✓ | Create an environment favourable to the development of healthy worker / management relationships based on workers representation, consultation and participation, and strengthening the capacities of union representatives to act on behalf of those who they represent. | <ul style="list-style-type: none"> Promote an open dialogue with trade union representatives. Take measures to support trade union representatives' understanding of their role and to develop their capacities in the field of labour rights and negotiation. Formalise the procedures around communication and exchange of information with union representatives to ensure that information needed for meaningful discussion or negotiation is received in a timely fashion. Develop a framework to determine areas for consultation with trade union representatives. | <ul style="list-style-type: none"> Creation of a worker forum Number of meetings held (worker forum) Number of issues raised Presence of quarterly communications/ consultation between Yara Dallol BV and trade unions | <ul style="list-style-type: none"> Dallol General Manager HR Manager |
| ✓ | ✓ | ✓ | Develop and implement a retrenchment policy to be used in the event of large-scale retrenchment. | <ul style="list-style-type: none"> Develop a retrenchment policy and plan based on IFC PS 2, including: seeking alternatives to retrenchment, consultation with workers, non-discrimination, compliance with national law and collective bargaining agreements, and ensuring that all relevant payments are made to workers. Provide HR staff suitable adequate information and training to manage the retrenchment correctly. Develop and implement communication timetables to inform employees as the Project progress and implications for direct, indirect, and induced employment. Ensure that human resources staffs have received adequate information and training to manage the retrenchment correctly. Develop and implement communication timetables to prepare employees and the broader community of Project transitions (especially retrenchments) and implications for direct, indirect, and induced employment. | <ul style="list-style-type: none"> Presence of updated Retrenchment Plan in advance of planned retrenchment (6 months ahead of planned retrenchment or as close to this time-frame as is practicable) Demonstrable liaison with worker representatives and forums regarding planned retrenchment Percentage of HR staff receiving relevant training Percentage of HR staff receiving relevant training Record of engagements undertaken | <ul style="list-style-type: none"> Dallol General Manager HR Manager |
| | | ✓ | Develop a sustainable decommissioning and closure process | <ul style="list-style-type: none"> Develop a plan to support local workers to diversify and develop alternative and sustainable livelihoods following mine closure. Determine the post mining land use that affects the closure design. | <ul style="list-style-type: none"> IMCP includes plan for development of alternative and sustainable livelihoods for workers post closure Above-mentioned plan is updated annually Number of workers to secure alternate employment post decommissioning | <ul style="list-style-type: none"> Dallol General Manager HR Manager |
| ✓ | ✓ | ✓ | Ensure an adequate approach to managing grievances is available to the Project workforce. | <ul style="list-style-type: none"> Establish and operate a Grievance Procedure designed to receive and respond to all concerns of internal and external stakeholders. Grievances will be addressed with no cost to the party that raised the concern and without retribution. The Grievance Procedures will not impede access to other judicial or administrative remedies available to affected parties. | <ul style="list-style-type: none"> Presence of the Workforce Grievance Procedures Implementation of the Workforce Grievance Procedures | <ul style="list-style-type: none"> Dallol General Manager HR Manager |
| ✓ | ✓ | ✓ | Implement culturally appropriate worker feedback mechanism/s. | <ul style="list-style-type: none"> Ensure that the feedback mechanism is adequately communicated to workers at the time of recruitment and periodically thereafter. Ensure that relevant personnel are trained and designated to receive and respond to feedback. | <ul style="list-style-type: none"> Worker feedback mechanism in place Number of issues raised Number of issues addressed Percentage of relevant personnel that receive training | <ul style="list-style-type: none"> Dallol General Manager HR Manager |

| Phase | | | Objective | Mitigation Measures | Monitoring Plan | Responsibility |
|----------------------|-----------|-----------------------------|--|---|---|---|
| Construction | Operation | Decommissioning and Closure | | | | |
| ACCOMMODATION | | | | | | |
| ✓ | ✓ | ✓ | Develop clear, non-discriminatory accommodation policies and practices which adhere to IFC PS 2, and the IFC and EBRD Guidance Note on Worker's Accommodation. | <ul style="list-style-type: none"> Design and operate accommodation camps in accordance with international good practice on workers' accommodation and IFC / EBRD standards. | <ul style="list-style-type: none"> Audit accommodation camps on six monthly basis for compliance | <ul style="list-style-type: none"> HR Manager |
| | | | | <ul style="list-style-type: none"> Develop and implement policies related to closed camp procedures requiring staff to remain within camp where work activities do not require travel outside of Camp. | | |
| | | | | <ul style="list-style-type: none"> Adopt detailed clear, non-discriminatory, internal accommodation rules including disciplinary procedures. | <ul style="list-style-type: none"> Accommodation rules and policies developed Number of non-conformances addressed Number of non-conformances identified related to accommodation | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety General Manager |
| | | | | <ul style="list-style-type: none"> Ensure that policies are explained to all relevant workers upon recruitment and they are made aware of their rights and obligations. | | |
| | | | | <ul style="list-style-type: none"> Ensure that grievance and conflict resolution mechanism are available to all workers living in camp accommodation. | <ul style="list-style-type: none"> Implement the Workforce Grievance Procedures | <ul style="list-style-type: none"> HR Manager Health and Safety Manager Contractor Health and Safety |
| | | | | <ul style="list-style-type: none"> Ensure that all workers are made aware of their rights and obligations in camps. | <ul style="list-style-type: none"> Record of training received regarding accommodation | <ul style="list-style-type: none"> HR Manager |
| | | | | <ul style="list-style-type: none"> Consult the workers and their representatives on internal rules and policies and provision of facilities. | <ul style="list-style-type: none"> Record of engagements | <ul style="list-style-type: none"> HR Manager Health and Safety Manager Contractor Health and Safety |
| | | | | <ul style="list-style-type: none"> Conduct regular (monthly) inspections of workforce accommodation to ensure adherence to protocols. | <ul style="list-style-type: none"> Record of inspections undertaken Number of non-conformances identified related to accommodation | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety |
| ✓ | ✓ | ✓ | Implement accommodation policies and rules in adherence to IFC PS 2 and the IFC and EBRD Worker's Accommodation Guidance Note. | <ul style="list-style-type: none"> Training of relevant workers on the implementation and monitoring of accommodation standards. | <ul style="list-style-type: none"> Number of workers trained Number of accommodation inspections Number of gaps in accommodation identified Number of gaps reported and addressed | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety |
| ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> For workers and contractors ensure that all accommodation has adequate ventilation, air conditioning and light systems. | | |
| ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> Establish and maintain adequate occupation density for different types of accommodation, and ensure that this is the case for contractors. | | |
| ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> Ensure access to adequate and convenient supply of potable water. | | |
| ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> Accommodation regularly cleaned and kept clear of refuse. | | |
| ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> Provision of social collective spaces and adequate recreational areas for workers living on site. | | |
| ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> Ensure that both workers living onsite, and day workers are provided with places for religious observance taking into account gender considerations and the different faiths practiced. | | |
| ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> Provision of adequate sanitary and laundry facilities. | | |
| CONTRACTORS | | | | | | |
| ✓ | ✓ | ✓ | Develop pre-qualification screening procedure for all contractors and suppliers | <ul style="list-style-type: none"> Screening of all contractors and suppliers to assess whether their management of worker OHS and well-being is appropriate. | <ul style="list-style-type: none"> Number of screenings undertaken of total number of contractors hired Number of contractors rejected due to failure to meet worker OHS and well-being standards | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety Manager |
| ✓ | ✓ | ✓ | Develop and implement auditing programme for contractors and primary suppliers | <ul style="list-style-type: none"> Conduct risk assessment of contractors and primary suppliers for child labour, forced labour and safety concerns. | <ul style="list-style-type: none"> Number of risk assessments completed | |
| ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> Audit contractors for adherence to OHS, labour and accommodation standards. | <ul style="list-style-type: none"> Number of audits undertaken of total contractors Number of gaps identified Number of gaps addressed | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety Manager |

| Phase | | | Objective | Mitigation Measures | Monitoring Plan | Responsibility |
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| Construction | Operation | Decommissioning and Closure | | | | |
| | | | | | | <ul style="list-style-type: none"> Dallol General Manager |
| ✓ | ✓ | ✓ | Develop and implement Worker Code of Conduct | <ul style="list-style-type: none"> Work with local communities and worker representatives to develop a Worker Code of Conduct. This should include but not be limited to standards relating to interaction with local communities; discipline and behaviour within and outside of the camp; alcohol consumption; disciplinary procedures for non-conformance. | <ul style="list-style-type: none"> Evidence of consultation with local communities and worker representatives and the inclusion of their preferences as far as are practicable and appropriate. | <ul style="list-style-type: none"> HR Manager |
| ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> Ensure all workers are briefed upon recruitment of requirements and code of conduct for worker-worker interactions, and worker community interactions, with periodic updates thereafter as required. | <ul style="list-style-type: none"> Number of workers that receive induction on code of conduct and thereafter as required | <ul style="list-style-type: none"> Dallol General Manager Health and Safety Manager Contractor Health and Safety Manager |
| ✓ | ✓ | ✓ | | <ul style="list-style-type: none"> Implement and monitor adherence to Code of Conduct. | <ul style="list-style-type: none"> Number of incidents reported Number of incidents addressed | |
| ✓ | ✓ | ✓ | Develop Contractor Control System | <ul style="list-style-type: none"> Yara Dallol BV will develop an agreed Contractor Control Plan to distribute to tendering companies that outlines the process for contractor management. | <ul style="list-style-type: none"> Plan developed and distributed Percentage of tendering organisations receiving Contractor Control Plan | <ul style="list-style-type: none"> Health and Safety Manager Contractor Health and Safety Manager HR Manager |
| | | | | <ul style="list-style-type: none"> Yara Dallol BV will include detailed requirements (using a risk based approach) within tender documentation regarding environment, labour, health and safety and community relations performance. | <ul style="list-style-type: none"> Percentage of tender documents including relevant requirements | |
| | | | | <ul style="list-style-type: none"> Tendering contractors will be assessed according to responses to environment, labour, health and safety and community relations performance and planned activities. | <ul style="list-style-type: none"> Criteria for award of contracts agreed and documented | |
| | | | | <ul style="list-style-type: none"> Yara Dallol BV and contractors will perform commence-work reviews to develop implementation protocols and plans for contractor environment, labour, health and safety and community relations management. | <ul style="list-style-type: none"> Percentage of contractors with implementation protocols and plans agreed with Yara Dallol BV | |

