

GOVERNMENT OF BELIZE

MINISTRY OF FINANCE CENTRAL EXECUTING UNIT



LABOUR MANAGEMENT PROCEDURE (LMP) Project: Belize Blue Cities and Beyond Program

Prepared by the Central Executing Unit



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QUALITY MANAGEMENT

GOVERNMENT OF BELIZE MINISTRY OF FINANCE CENTRAL EXECUTING UNIT

Labour Management Procedure (LMP) for Project - P181064 - Belize Blue Cities and Beyond Program (BBCB)

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ABBREVIATIONS (ABB.) AND ACRONYMS

ABB.	EXPLANATION
BBCB	Belize Blue Cities and Beyond Program
BBEDPSIP	Belize Blue Economy Development Policy, Strategy and Implementation Plan
BWS	Belize Water Services
CEU	Central Executing Unit
CERC	Contingent Emergency Response Component
COAST	Caribbean Oceans and Aquaculture Sustainability Facility
CoC	Code of Conduct
ESF	Environment and Social Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standards for the World Bank
ESSp	Environmental and Social Specialist at the Central Executing Unit, MOF
GCC	General Conditions of Contract
GEF	Global Environmental Facility from the United Nations
GIIP	Good International Industry Practices
GOB	Government of Belize
GRM	Grievances Redress Mechanism
ILO	International Labour Organization
LMP	Labour Management Procedure
MBEMC	Ministry of Blue Economy and Marine Conservation
MEP	Maritime Economy Plan
MOF	Ministry of Finance
NEMO	National Emergency Management Organization
OHS	Occupational Health and Safety
PPE	Personal Protection Equipment
RCA	Root Cause Analysis
SCAP	Safeguard Corrective Action Plan
SDG's	Sustainable Development Goals
SEP	Stakeholders Engagement Plan
SOGI	Sexual Orientation and Gender Identity
UNCTAD	United Nations Conference on Trade and Development
WB	World Bank Group



I. EXECUTIVE SUMMARY

The Government of Belize (GOB), with the support of the World Bank (WB), has endeavored on a **Belize Blue Cities and Beyond (BBCB) Project (P181064)**; it aims to improve Belize's management capacity for sustainable development of its blue economy and to increase access to climate resilient and sustainable water and sanitation services in targeted coastal areas of Belize.

The WB has classified this Program as Category "B" where the environmental and social impacts are likely moderate, temporary, and localized, for which mitigation measures are readily available. The identified impacts correspond to direct impacts because, according to the analysis, the Project will not have indirect effects, nor will it contribute to their generation.

Several management plans have been developed to address impacts identified in the Environmental and Social Commitment Plan (ESCP) for the BBCB Project. The purpose of this Labour Management Procedure (LMP) is to predict, identify, assess, and correct potential risks and impacts that the activities of the projects could cause, and to ensure that the Contractors hired under this Program to execute the Project Activities comply with the requirements established in the Environmental and Social Standards (ESS) contained in the WB Environmental and Social Framework (ESF), including international best practices and Government of Belize (GOB) regulations and guidelines.

Several activities associated with BBCB Project may impact upon the health and safety of the coastal communities. This has been compiled to address the specific impacts that are anticipated to occur because of planned developments as identified in the Environmental and Social Commitment Plan (ESCP). This Plan sets out a formal system by which the CEU can manage and implement mitigation measures that will avoid or reduce the significance of impacts related to community health, safety and security.

One of the mandatory documents to be prepared for the WB funded Project P181064: Belize Blue Cities and Beyond, hereinafter referred to as "the Project" is the Labour Management Procedure (LMP). The LMP of the Project has been prepared in accordance with the relevant national legislation, the Environmental and Social Standard #2 (ESS#2) of the World Bank (WB) Environmental and Social Framework (ESF) and the relevant Good International Industry Practices (GIIP).

The purpose of this Labour Management Procedure is to facilitate the planning and implementation of BBCB Project by identifying the main Labour requirements, the associated risks, and the procedures and resources necessary to address the project-related Labour issues.

All personnel involved in this Project are required to receive training in equipment operation, machinery use, and equipment operation in accordance with prevailing regulations throughout all project areas.



The program, in general, will prohibit the recruitment of children and practice forced Labour. It will primarily follow national legislation. Furthermore, it will arrange for awareness-raising activities and be added with periodic monitoring to ensure that the standards set in this procedure are met.

This LMP is a ‘live’ document and will need to be amended periodically considering operational changes and lessons experienced during project implementation.

II. INTRODUCTION

The World Bank’s Environmental and Social Framework (ESF) sets out the World Bank’s commitment to sustainable development through a World Bank Policy and a set of Environmental and Social Standards (ESS) that are designed to support Borrowers’ Projects, with the aim of ending extreme poverty and promoting shared prosperity. The ESS sets out the mandatory requirements that apply to the Borrower and projects. They present a set of guidelines and instructions with the objective of fostering efficient and effective identification and mitigation of potentially adverse Environmental and Social Impacts that may occur during the development and execution of the Projects.

The Labour Management procedures set out the way in which project workers will be managed, in accordance with the requirements of national law and the Environmental and Social Standard 2 ESS#2. The procedures address the way in which this ESS-WB will apply to different categories of project workers including direct workers, and the way in which the Ministry of Finance (MOF) will manage the project workers, including participating FIs, and contractors and any of their subcontractors.

The requirements included in the LMP will be systematically integrated into the legal requirements of the Program, the tender documents and the contracts of the contracting companies and suppliers.

The LMP is a dynamic document and should therefore be revised and updated as necessary during the life cycle of the Program.

The LMP presents the guidelines and minimum contents for the labor management and working conditions of the Program to be fulfilled by the main contractors, the companies involved such as the executing agency. The responsibility for ensuring compliance with this procedure shall be the responsibility of the Central Executing Unit (CEU) of the MOF.

The LMP is governed by the principles of equality, opportunity and fair treatment ensuring that no employment decisions will be made based on personal characteristics outside the requirements inherent to the job, refraining from discrimination in any aspect of the employment relationship, such as recruitment and hiring, remuneration (wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, dismissal or retirement and disciplinary practices. Measures shall be taken to prevent and address violence, harassment,



intimidation, and/or exploitation, especially regarding women, persons of diverse sexual orientations and gender identities and persons with disabilities. Under no conditions shall child or forced labor be permitted.

A safe and healthy work environment shall be ensured, considering the risks inherent in the Program and specific hazards for women, persons of diverse sexual orientations and gender identities, persons with disabilities, children (of working age, in accordance with this Standard). Measures shall also be taken to prevent accidents, injuries and illnesses that may arise from, be associated with, or occur during work, minimizing, to a reasonable extent practicable, the causes of hazard factors.

II.1. Objectives

This LMP seeks to achieve the following specific objectives:

- Promote the fair treatment, non-discrimination, and equal opportunity of workers irrespective of sex, race or ethnic identity.
- Establish, maintain, and improve worker-management relationships.
- Protect workers, including vulnerable categories of workers such as women, persons with disabilities, workers in the supply chain, etc.
- Promote safe and healthy working conditions, and the health of workers.
- Avoid the use of all forms of forced and child Labour.
- Promote efficiency by improving workers' productivity and their quality of work life.
- Provide measures and actions for managing Labour in keeping with guiding principles and national and international requirements, promoting compliance with national employment and Labour Laws.
- Provide project workers with accessible means to raise workplace grievances.
- Ensure Code of Conduct for workers is developed and signed by all workers.
- Support the principles of freedom of association and collective bargaining of project.

The LMP aims to promote fair and equitable Labour practices during the execution of the Project activities to ensure fair treatment, non-discrimination, and equal opportunity for workers. The Project aims to protect the rights of project workers and to ensure management and control of activities that may pose a risk to the workers.

III. PROJECT DESCRIPTION

The Government of Belize is implementing a new Investment Financing Project - **Belize Blue Cities and Beyond Program (BBCB)**, with financing from the World Bank (WB). This BBCB aims to improve Belize's management capacity for Sustainable Development of its Coastal Areas and Blue Economy, increase safe water supply and reduce land-based pollution discharges at targeted Coastal Areas, and provide immediate and effective response to an eligible emergency. The project will support four components: i) Policy Development and Capacity Building; ii) Water, Sanitation, and Waste Management; iii) Project Management; and iv) CERC. It will be executed by the Central Executing Unit from the Ministry of Finance (MOF) with the main stakeholders the



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Belize Water Services (BWS) and the Three Municipalities involved. This project will be executed in three locations: Belize City, San Pedro Town, and Punta Gorda Town.

The Environmental and Social Risk classification is **Substantial** under the World Bank's Environmental and Social Framework. The beneficiaries of this project would be individuals and families small-, medium- and large-scale business and others civil society members, among others. It is estimated that approximately 100,000 people will benefit directly from this funding, with more benefiting indirectly. The details of the stakeholders are elaborated under the Stakeholder Engagement Plan (SEP).

This Project will also identify critical investment needs in key Blue Economic sectors of the Country; promote coordinated interventions across Ministries and jurisdictions and develop a financing plan to mobilize resources from the public and private sectors and development partners. This program is expected to serve as a coordination platform to support Belize's Blue Economy development beyond this Project. As part of the proposed financing plan, sustainable financing mechanisms such as blue carbon, linked sustainability bonds, and parametric insurance under the Caribbean Oceans and Aquaculture Sustainability Facility (COAST) will be explored along with bilateral and multilateral donor financing mechanisms. Figure 1 below shows the CEU Team.

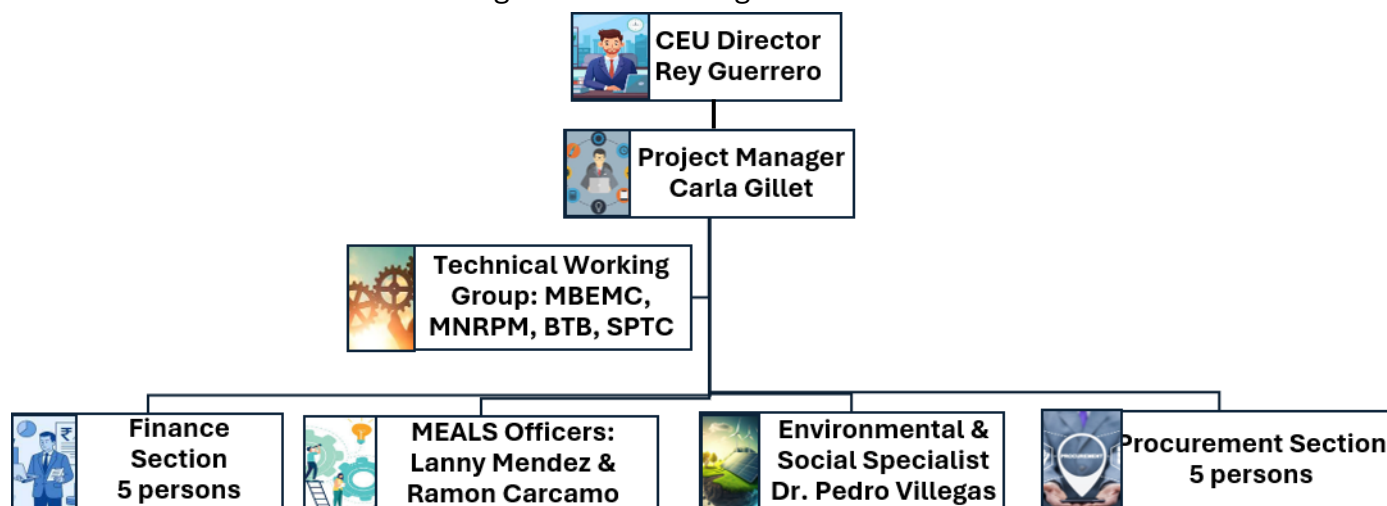


Figure 1. Project Management Unit (PMU) from the Central Executing Unit (CEU).

The main projects components are the following:

Component 1: Policy Development and Capacity Building. This component will focus on four subcomponents:

- 1.1. Policy Development will support Belize to refine its Land-use Planning, Sustainable Tourism Development, and Environmental Policies.
- 1.2. Capacity Building will support Belizean stakeholders to develop their technical capacity in Blue Economy related topics like Blue Asset Monitoring, Sustainable Financing, Sustainable Tourism, Knowledge exchange, and other Blue Economy topics.



- 1.3. Carbon Market Readiness will include regulations, standards, Digital Infrastructure and guidelines to respond to Carbon Market Readiness.
- 1.4. Blue Economy Investment Program will support the identification of critical investments needed for the sustainable development of key Blue Economy Sectors in Belize

Component 2: Water, Sanitation and Waste Management. This component will support the following subcomponents:

- 2.1. Belize City Wastewater Treatment Plant (WWTP) Upgrade will help renovate the existing and only WWTP of Belize City.
- 2.2. Expansion of water supply in South San Pedro will expand the existing drinking water distribution system to meet current and future potable water demand for the residents and businesses of South San Pedro area.
- 2.3. Waste management pilot in San Pedro will support San Pedro Town Council to pilot a waste separation and recycling program.
- 2.4. Stormwater Drainage Network Upgrade in Punta Gorda Town, Toledo District.

Component 3: Project Management will support the Central Executing Unit (CEU) of the Ministry of Finance (MOF) to coordinate overall project implementation and manage the implementation of project activities under Component 1 and Subcomponent 2.3. Belize Water Services (BWS) will manage Subcomponents 2.1 and 2.2 as a part of its own investment program and will not request specific project financing for its project management activities.

Component 4: Contingent Emergency Response Component (CERC) will allow for rapid reallocation of uncommitted project funds in the event of an eligible emergency as defined in OP 8.00.

IV. REGULATORY AND INSTITUTIONAL FRAMEWORK

Various National laws, policies, systems, standards and international good practice codes are applicable to the implementation of this Plan. Such requirements are outlined in the following sections. The Project needs to comply with the Environmental and Social Framework (ESF) of the World Bank comprising the Environmental and Social Standards (ESS) as well as national labour-related legislation.

The CEU and all contractors are required to comply with all relevant International and National Legislation and regulatory requirements related to Occupational Health and Safety (OHS). Whilst contractors are required to verify the latest regulatory requirements themselves an indicative list of Belizean National Legislation. Project Team must also ensure that relevant requirements for the Project established by national and local governments are followed.

III.1. National Legislation

III.1.1. Brief overview of Belize Labour Legislation on Occupational Health and Safety

Belize's Occupational Health and Safety (OHS) framework is currently in transition. As of the date of this LMP, the primary statutory instruments governing OHS are:



- **Factories Act, Chapter 296, Revised Edition 2020:** The primary OHS legislation in force. It applies to "factories" as defined, broadly, premises where persons are employed in manual labor and machinery is used for manufacturing or processing purposes. The Factories Act requires employers to take "reasonable care" for the safety and health of employees, maintain safe premises, provide adequate sanitation facilities, ensure proper ventilation and lighting, and guard dangerous machinery. It establishes minimum requirements for notification of accidents and permits inspections by labor officers.
- **Labour Act, Chapter 297 (OHS-relevant provisions):** Includes general obligations on employers to provide safe working conditions, and provisions on working hours, rest periods, and health-related leave that have indirect OHS relevance.
- **Workmen's Compensation Act, Chapter 303, Revised Edition 2020:** Governs employer liability and compensation for work-related injuries, illnesses, and fatalities. Employers are liable for compensation for personal injury arising out of and in the course of employment. The Act covers medical expenses, compensation calculations (including for death and permanent disability), and occupational diseases. It mandates compulsory employer insurance against compensation claims and establishes procedures for reporting accidents and claiming compensation.
- **Social Security Act (Chapter 44):** Provides a national social insurance scheme that covers, among other things, employment injury benefits, including temporary and permanent incapacity payments, supplementing the Workmen's Compensation framework.

Forthcoming Legislation: OSH Bill, 2025. The Occupational Safety and Health (OSH) Bill, 2025 was introduced in the House of Representatives on June 27, 2025, and is currently under review by a House committee. Once enacted, it will supersede the Factories Act and extend OHS protections to all workplaces and sectors, not only factories. Key provisions of the Bill include: a) Establishment of a National OHS Authority and an OHS Inspectorate with enhanced enforcement powers; b) Creation of a National OHS Advisory Committee within the Ministry of Labour; c) Mandatory risk assessments for all workplaces; d) Requirements for employers to provide personal protective equipment (PPE) and conduct regular safety training; e) Whistleblower protections for workers reporting OHS violations; f) Mandatory reporting of workplace accidents and occupational diseases; g) Formation of workplace safety committees; and h) Alignment with ILO Conventions No. 155 (Occupational Health and Safety) and No. 187 (Promotional Framework for Occupational Health and Safety) and Belize's Decent Work Country Programme 2024–2029. Until the OSH Bill is enacted and in force, the Factories Act remains the operative OHS statute. This creates a gap in coverage for sectors outside the narrow "factory" definition, including construction, water and sanitation infrastructure, and field-based project activities.

The Labour Act and Factories Act do not contain construction specific OHS regulations. In the absence of a national construction safety code, the reference standard for construction OHS in Belize for World Bank-financed projects is the WBG Environmental, Health, and Safety (EHS) Gen-



eral Guidelines and the WBG EHS Guidelines for Water and Sanitation, which establish internationally recognized requirements for construction site safety, working at heights, electrical safety, confined space entry, and hazardous materials management.

Institutional Enforcement: OHS enforcement is the responsibility of the Department of Labour under the Ministry of Rural Transformation, Community Development, Labour and Local Government. Labor inspectors are empowered to inspect workplaces, investigate complaints, and issue compliance notices.

III.1.2. Brief Overview of Belize Labor Legislation: Terms and Conditions

The principal legislation governing terms and conditions of employment in Belize is the Labour Act, Chapter 297, Revised Edition 2020 (hereinafter "the Labour Act"), as amended most recently by the Labour (Amendment) Act, 2020 (No. 25 of 2020). Supplementary legislation includes the Social Security Act (Chapter 44), the Equal Pay Act (Chapter 302.01), the Wages Councils Act (Chapter 302), and the Trade Unions Act (Chapter 300). Belize has also ratified several International Labour Organization (ILO) Conventions under the ILO Conventions Act, including those covering forced labour, child labour, equal remuneration, and non-discrimination in employment.

➤ **Employment Contracts:** The Labour Act requires employment contracts to be in writing when:

- i) Employment is for a period exceeding three months.
- ii) Terms deviate significantly from standard conditions for comparable work.
- iii) A contract executed outside Belize involves a Belizean entity. Contracts must specify, at minimum: the names and addresses of both parties, a job description, salary and payment frequency, standard working hours, start (and where applicable, end) dates, the length of any probation period, notice requirements for termination, and leave entitlements.

A mandatory probationary period of two weeks applies at the commencement of employment, during which either party may terminate without notice. Employers may specify longer probation periods up to a maximum of six months; however, benefits, including paid leave, accrue during any probation period exceeding two weeks.

➤ **Wages:** The Labour Act regulates wages, including the timing, method, and form of payment. Wages must be paid in legal tender at regular intervals, directly to the worker. Deductions are restricted to those explicitly authorized by law. A national minimum hourly wage of BZ\$5.00 (approximately US\$2.50) took effect on January 1, 2025, pursuant to government order under the Wages Councils Act.

➤ **Working Hours:** The standard workweek under the Labour Act is 45 hours, structured as either 9 hours per day over five days, or 7.5 hours per day over six days. Workers are guaranteed at least one full rest day per week. For shifts exceeding five consecutive hours, meal breaks are mandated. Employers are required to maintain accurate records of working hours.



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- **Overtime:** Overtime compensation is set at 150% of the regular rate for hours worked beyond 45 per week or 9 per day. Work performed on rest days, or public holidays requires employee consent and additional compensation. Work on Christmas Day, Good Friday, and Easter Monday are compensated at double the ordinary rate. Employers may not mandate overtime except in emergency situations.

Leave Entitlements: The Labour Act provides for the following leave categories:

- **Annual Leave:** Private employers normally give two weeks (10 working days) of paid annual leave/vacation after one year of continuous service, increasing to three weeks after five years. GOB workers are entitled to four weeks (20 working days). Leave may be taken as a single block or, by mutual agreement, in two separate periods, that is the norm.
- **Public Holidays:** Thirteen official public holidays, for which employees receive full pay.
- **Sick Leave:** After 60 days of employment, employees are entitled to up to 16 working days of paid sick leave annually, with medical certification required. The employer covers the difference between any Social Security Board payments and the employee's basic rate.
- **Maternity Leave:** Female workers are entitled to 14 weeks of maternity leave in total (typically 8 weeks pre-delivery and 6 weeks post-delivery), with social security benefits and full employer pay.
- **Compassionate Leave:** Brief periods for family emergencies may be negotiated between employer and employee.
- **Leave Without Pay:** The 2020 Amendment (No. 25 of 2020) introduced provisions for leave of absence without pay under special circumstances (e.g., declared States of Public Emergency), contingent on employee agreement.
- **Termination:** Employers may dismiss employees without specifying cause, but discriminatory or retaliatory termination is prohibited. Notice periods (15 days) and severance pay apply, except in cases of "good and sufficient cause" (such as gross misconduct), which permits summary dismissal without notice or severance.
- **Non-Discrimination and Equal Pay:** The Equal Pay Act (Chapter 302.01) requires equal remuneration for men and women performing work of equal value. The Labour Act prohibits discrimination in employment on grounds of race, sex, religion, or political affiliation. The National Gender Policy (2013) provides additional policy direction on gender equality in the workplace.
- **Child Labor and Forced Labor:** The Families and Children Act (Chapter 173) sets the minimum working age at 14 years for non-hazardous work, with higher restrictions on hazardous work. The Belize National Child Labour Policy and Strategy (2022–2025) aligns national policy with ILO Convention 182 on the worst forms of child Labour. Forced Labour is prohibited under the Labour Act and under Belize's international obligations through ratified ILO Conventions.



- **The Labour Act Chapter 297 - Revised Edition 2011 and the Amendment Act from 2020** establishes the conditions for labour relations between contractors and their workers (hiring of employees, conditions of employment, payment of wages, disputes resolution, etc.). It is aligned with the International Labour Organization Conventions Act Chapter 304:01 - Revised Edition from 2003 that governs the relationship between contractors and their workers. They include, among others, minimum age, right of association, minimum wage, freedom of association and protection of the right to organize, abolition of forced labour, protection against radiation, paid vacations, etc.
- **The National Occupational Health and Safety Bill;** it is a projected National Law that aims to regulate worker's safety and health. Although it is not yet a law, the provisions of this bill serve as an excellent guide for good practices.
- **The National Gender Policy** aims to identify the inequalities experienced by both men and women and suggests actions for the correction of gender disparities. This ensures that every citizen has an equal opportunity to participate fully in all actions that have a positive impact on human development.

The requirements of the Belizean Laws and Regulations with regards to Labour Management are summarized in the Figure 2 below.

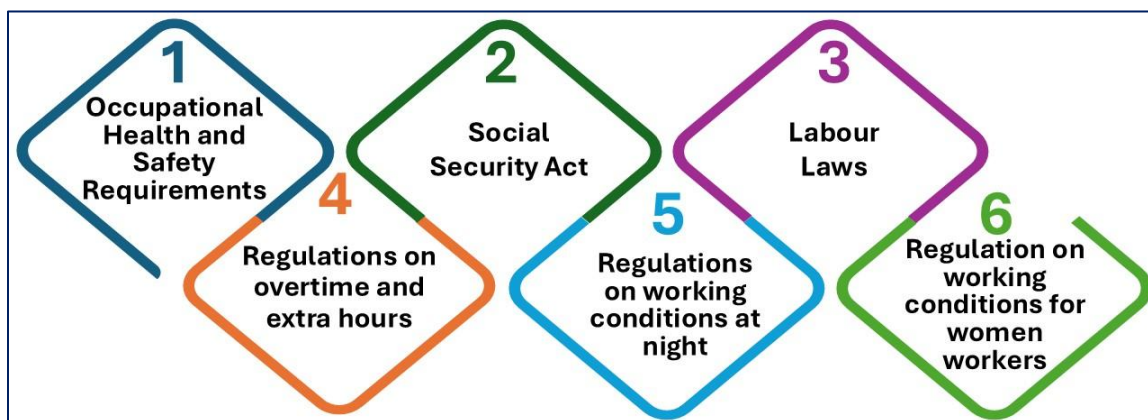


Figure 2. Requirements of Belizean Laws and Regulations with regards to Labour Management.

III.2. International Requirements

The World Bank Environmental and Social Standards (ESS) set the requirements to be met by the WB funded projects with respect to the identification, evaluation and mitigation of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. These standards also set out the Bank's commitment to sustainable development with the aim of ending poverty and promoting shared prosperity. Some relevant international policies, requirements and standards are the following:

- **United Nations Universal Declaration of Human Rights:** The Universal Declaration of Human Rights is a milestone document in the history of human rights. It sets out, for the first time,



fundamental human rights to be universally protected and it has been translated into over 500 languages. The Declaration is widely recognized as having inspired, and paved the way for, the adoption of more than seventy human rights treaties, applied today on a permanent basis at global and regional levels (all containing references to it in their preambles).

- **ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up:** The Declaration on Fundamental Principles and Rights at Work and its Follow-Up was originally adopted by the International Labor Conference in June 1998. Over the subsequent twenty-four years it has become a key international benchmark of labour standards in the context of globalization.

The International Labor Organization (ILO) contributes to this legal framework by elaborating and promoting international labour standards aimed at making sure that economic growth and development go together with the creation of decent work. International labour standards are first and foremost about the development of people as human beings. International labour standards are legal instruments drawn up by the ILO's constituents (governments, employers and workers) and setting out basic principles and rights at work.

ILO states that minimum wage and working-time standards, and respect for equality, can translate into greater satisfaction and improved performance for workers and reduced staff turnover. Investment in vocational training can result in a better trained workforce and higher employment levels. Safety standards can reduce costly accidents and expenditure on health care. In addition, employment protection can encourage workers to take risks and to innovate. Social protection, such as unemployment schemes, and active labour market policies can facilitate labour market flexibility and make economic liberalization and privatization sustainable and more acceptable to the public. Freedom of association and collective bargaining can lead to better labour-management consultation and cooperation, thereby improving working conditions, reducing the number of costly labour conflicts and enhancing social stability.

III.3. Compliance with the WB Environmental and Social Standards

There 3 relevant Environmental and Social Standards that are applicable to this Labour Management Procedures, they are ESS#2, ESS#4 and ESS#10.

ESS#4: Community Health, Safety and Security, which outlines a project's responsibility to avoid or minimize the risks and impacts that may arise from proposed project activities, paying particular attention to vulnerable groups. Focused attention and effort should be made in specific areas where a project could exacerbate an already sensitive local situation and stress scarce local resources potentially leading to further conflict.

ESS#10: Stakeholder Engagement and Information Disclosure, which guide the overall implementation of this Project and sets out the general principles of participation and a collaborative strategy to identify Stakeholders and plan its equal participatory process.



ESS#2: Labor and Working Conditions. ESS#2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Project team can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. The objectives of ESS#2 are to:

- a) Promote safety and health at work.
- b) Promote the fair treatment, non-discrimination and equal opportunity of project workers.
- c) Protect workers including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with ESS#2) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- d) Prevent the use of all forms of forced labour and child labour.
- e) Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- f) Provide project workers with accessible means to raise workplace concerns. The applicability and scope of application of ESS#2 depends on the environmental and social assessment described in ESS#1 and the type of employment relationship between the Borrower and the project workers. Accordingly, relevant aspects of ESS#2 will apply to the Project itself.

III.4. GAP Analysis

The most significant gap between Belize law and ESS#2 is in occupational health and safety, where the operative statute (the Factories Act) does not regulate the construction industry in a comprehensive way, and the OHS Bill 2025 has not yet been enacted. This means that for the BBCB project, there is effectively no national OHS regulatory standard applicable to civil works that meets ESS#2 requirements. The WBG EHS Guidelines must serve as the operative reference standard and must be contractually required of all works contractors.

The second area of substantive gap is in worker GRM and contractor flow-down, where national law provides recourse through labour inspectors and courts, channels that are not practically accessible to construction workers in Belize City, San Pedro, or Punta Gorda, and does not require employer-level grievance mechanisms. The LMP's worker's GRM fills this gap.

Freedom of association and incident reporting to the Bank are additional procedural gaps, both correctable through LMP and ESCP provisions. All other ESS#2 requirements are either substantially aligned with national law or addressable through project-level measures already included or recommended for inclusion in the LMP.

The following table analyzes identified gaps between the Belize legislative framework (Labour Act Chapter 297, Factories Act Chapter 296, Workmen's Compensation Act Chapter 303, OSH Bill 2025 — not yet in force) and the requirements of ESS#2: Labor and Working Conditions of the World Bank's Environmental and Social Framework (2017). Where a gap exists, the project-level measure to bridge it is indicated. Table 3 provides a detailed description of the Gap Analysis.



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Table 3. Detailed description of the Gap Analysis.

ESS#2 Requirement	Belize Legal Provision	Assessment	Gap	Project-Level Measure
Terms and conditions documented for all workers	Labour Act Ch. 297, s. 13–22 requires written contracts for engagements over 3 months and specifies minimum content	Partially aligned	The Labour Act sets minimum standards but focuses on formal contracts. It does not explicitly require that terms and conditions for publicly funded project workers be documented in an instrument such as an LMP. Government employees may also be subject to Public Service Regulations rather than the Labour Act, which may create a parallel (and weaker) framework for CEU direct staff.	The LMP shall document or cross-reference terms and conditions for all direct CEU project workers and shall require contractors to provide written contracts to all contracted workers prior to commencement of work.
Wages at least at national minimum	Labour Act; Minimum wage BZ\$5.00/hr. as of January 1, 2025	Aligned	None. The national minimum wage is established and enforced.	Monitor contractor payroll records during supervision; include wage verification in contractor compliance audits.
Working hours consistent with national law and international standards (	Labour Act s. 57–70: 45-hr week, 1 rest day, overtime at 1.5x	Substantially aligned	The Labour Act's 45-hour standard workweek is consistent with ILO norms. However, the Labour Act allows unlimited overtime with worker consent except in emergencies, which may not provide adequate protection in practice for subcontracted workers.	Contractor ESMPs specifies maximum overtime limits (e.g., no more than 12 hours/day or 60 hours/week in any sustained period) and record overtime hours.
Non-discrimination and equal opportunity	Equal Pay Act Ch. 302.01; Labour Act anti-discrimination provisions; National Gender Policy (2013)	Aligned	None for formal provisions. However, enforcement in practice, particularly for migrant, indigenous, and women workers in construction, is limited.	The LMP CoC and GRM shall provide accessible channels for discrimination complaints. The CEU E&S team shall monitor employment data disaggregated by gender and, where applicable, ethnicity.
Prohibition on forced and child labor	Families and Children Act Ch. 173 (minimum age 14); Labour Act; ratified ILO Conventions	Aligned for formal provisions	The statutory minimum working age (14 for non-hazardous work) is below the ESS#2 standard (15) and the ILO Minimum Age Convention (No. 138) threshold of 15 (or 14 for developing countries under conditions). For hazardous work — which civil work can constitute — the minimum age should be 18. The Families and Children Act provides for higher age limits for hazardous work, which aligns with ESS#2 Para 19, but is not operationalized in construction-specific regulation.	The LMP and all contractor ESMPs shall prohibit employment of people under 18 years on civil work (hazardous work). Contractors shall verify age through documentation prior to hiring and maintain age-verification records.



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ESS#2 Requirement	Belize Legal Provision	Assessment	Gap	Project-Level Measure
Worker GRM is accessible to all project workers	Labour Act provides for labor dispute resolution and recourse to Labour inspectors and courts. No statutory requirement for employer-level GRMs.	Gap	National law does not require an employer-level worker GRM. Recourse is to labor inspectors and the court system, which are not readily accessible to construction workers in remote or island-based locations.	LMP has established a multi-channel worker GRM with dedicated channels for direct workers and contracted workers. This compensates for the absence of a statutory employer-level GRM requirement.
Freedom of association and collective bargaining	Trade Unions Act Ch. 300; Trade Disputes (Arbitration and Inquiry) Act Ch. 299; Settlement of Disputes in Essential Services Act Ch. 298	Partially aligned	Belize law formally guarantees freedom of association and collective bargaining. However, public sector employees (who may include CEU staff) and certain essential services workers face restrictions on strike action that do not fully align with ILO Convention 87 (Freedom of Association) and Convention 98 (Right to Organize and Collective Bargaining). Construction workers are generally not in the restricted category.	The LMP should note this potential gap for any CEU staff classified as public servants and document project-level compensating measures (e.g., open-door policy, worker representation in the GRM Grievance Committee) to enable collective concerns to be raised consistently with ESS#2 intent.
OHS management system with risk assessment, prevention hierarchy, PPE, incident reporting	Factories Act Ch. 296 (general "reasonable care" standard); Workmen's Compensation Act Ch. 303 (injury compensation). OSH Bill 2025 has not yet enacted.	Significant gap	The Factories Act is the operative OHS statute and applies only to "factories." Construction sites and water/sanitation infrastructure works are not factories under this definition. There is accordingly no statutory requirement in force for: formal risk assessments; a hierarchy of controls; mandatory PPE provision beyond general safety obligations; site-specific OHS plans; or mandatory real-time reporting of dangerous occurrences. The OSH Bill 2025 will close this gap once enacted, but it is not yet law.	This is the most significant national law / ESS#2 gap. The LMP and all contractor ESMPs shall apply the WBG EHS General Guidelines and the WBG EHS Guidelines for Water and Sanitation as the operative OHS standard. All civil works contractors shall be required to prepare site-specific OHS plans prior to mobilization. OHS plans shall include hazard identification and risk assessment, hierarchy of controls, emergency response procedures, PPE requirements, incident recording and reporting.
Serious incident reporting to the employer and to the Bank	Workmen's Compensation Act Ch. 303 requires reporting of work accidents to the Workmen's Compensation Department. No requirement to notify a financing institution.	Gap	National law requires accident reporting to national authorities but imposes no obligation toward a financing institution such as the World Bank.	The LMP (and ESCP) shall establish a formal OHS serious incident reporting protocol requiring immediate notification to the CEU Project Manager and notification to the WB TTL within 24–48 hours for fatalities, severe injuries, and dangerous occurrences.



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ESS#2 Requirement	Belize Legal Provision	Assessment	Gap	Project-Level Measure
Contractor management — flow-down of ESS#2 requirements	Labour Act and Workmen's Compensation Act obligations apply to all employers, including contractors, under national law. No specific requirement for a principal employer to flow down E&S standards to sub-contractors.	Gap	National law does not require principal employers (here, the CEU) to impose ESS#2 equivalent standards on contractors through contractual mechanisms. Sub-contractors hired by prime contractors may operate outside the direct supervisory chain of CEU.	Bidding documents, contracts, and sub-contracts shall include ESS#2 compliance clauses, require contractor ESMPs, and make CEU (and Bank) supervision access a contractual right. Contractor compliance shall be monitored through regular site visits, payroll audits, and review of OHS incident logs.
Primary supply chain — no forced/child labor in inputs	No national legislation requires supply chain labor due diligence by project promoters.	Gap	Belize has no supply chain due diligence law analogous to ESS#2	Procurement documents shall include basic supply chain labor certifications for major input suppliers (certification of no forced/child labor, spot-check provisions).

The Project Team will include in the bidding documents specific OHS standard requirements that all contractors will meet under this project. The standards will be consistent with local regulations, EHS guidelines, ESS#2, Protocols and GIIP. This will be evidenced by the inclusion of this requirement in standard bidding documents and by the approved ESMP for each contract. The following OHS standard requirements should be borne in mind are shown in Figure 3.

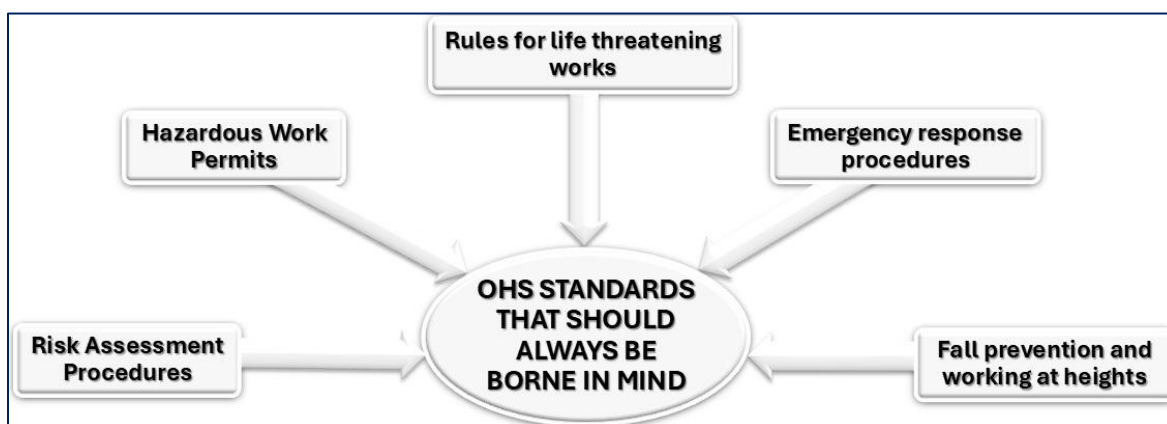


Figure 3. Some OHS Standards that should always be borne in mind.

Other OHS requirements to be considered are the following:

- Extreme working conditions: working at heights, hot work, working on energized lines, working within confined spaces, etc.
- Excavation safety, ladders and scaffolding safety; welding and cutting safety; Cranes, Dericks, and forklifts safety; power and hand tools safety.



- Respiratory prevention to chemical and airborne hazards (including dust, silica and asbestos); Electrical safety (hazardous energies control, safe distance work, wiring and design protection, grounding, circuit protection, arc fault protection, PPE etc.); hazards communication; Noise and vibration safety; Steel erection safety; fire safety; material handling safety; concrete and masonry safety.
- PPE and other protective gear including training on usage.

V. PURPOSE AND SCOPE OF THE LABOUR MANAGEMENT PROCEDURE

V.1. Purpose

The purpose of this LMP is to facilitate planning for the Project and help identify the resources necessary to address the Labour issues associated with the Project. The LMP helps to:

- (a) Identify the different types of project workers that are likely to be involved in the project, and
- (b) Set out the ways of meeting the requirements of ESS#2 that apply to the different types of workers.

The LMP defines the minimum requirements of BBCB Project for Labour Management throughout the Project. The LMP aims to promote fair and equitable Labour practices during the execution of the Project activities to ensure fair treatment, non-discrimination and equal opportunity for workers. The Project aims to protect the rights of project workers and to ensure management and control of activities that may pose a risk to the Labour.

V.2. Scope

This Labour Management Procedure (LMP) was prepared in line with the requirements of the World Bank's Environment and Social Standards #2 – Labour and Working Conditions. The objectives of the ESS#2 are as follows:

- To promote safety and health at work.
- To promote fair treatment, non-discrimination, and equal opportunity for project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities and children (of working age, in accordance with this ESS-WB) contracted workers, community workers and primary supply workers, as appropriate.
- To prevent the use of all forms of forced Labour and child Labour.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law and as defined by the International Labour Organization (ILO).
- To provide project workers with accessible means to raise workplace concerns.

This standard (ESS#2) applies to:

- **Direct workers:** they are the people employed or hired directly to work specifically in relation to this Project. The direct workers employed or hired by the Project are paid directly with the Project Budget and are subjected to GOB instructions and day-to-day control.



- **Contracted workers:** they are persons engaged through third parties to perform work related to core functions of the Project for a considerable period where that third party exercises continuous control over the work, working conditions and treatment of the worker in relation to the project (The core functions of the project are those corresponding to the construction, production and service processes that are essential for a specific activity, without which it could not continue).
- **Main supply chain workers:** They are workers in the main supply chain. They provide goods, services, and materials for the project, where the supplier exercises control over this worker for the work conditions and treatment of the worker (Primary suppliers are those that continuously supply goods or materials essential to the core functions of the project.) The Risk Assessment Template for Primary Supplier Workers is provided in Annex 8.

Where public employees are working in connection with the Project on either full-time or part-time basis, they will be subject to the terms and conditions of their existing public sector employment agreement or arrangement established by GOB, unless their employment or hiring has been effectively legally transferred¹ to the Project. ESS#2 will not apply to such government civil servants, except for the provisions of paragraphs 17 to 20 (Protecting the Work Force) and paragraphs 24 to 30 (Occupational).

Health and Safety).

VI. DESCRIPTION OF THE PROJECT'S WORKFORCE

This section provides an overview of the expected Labour needs and characteristics of project workers to be engaged under the project; there will be direct and contracted workers only and other government workers assigned to the project stationed at the CEU.

VI.1. Identification and characterization of workers involved in this Project.

Depending on the activities foreseen in this project, it is estimated that the organization of the workforce involved will be as follows:

1. **Direct workers:** In accordance with the organizational structure foreseen for this Program, it is considered that the direct hiring of personnel under the modality of contracting services will be coordinated by the CEU and are mostly linked to the hiring of personnel to carry out the supervision, technical inspections, and environmental and social monitoring of the works.
2. **Contracted workers:** It is expected that the largest number of staff will be employed in this category. They are the contracting companies that will carry out the infrastructure works foreseen in this project, as well as Supervision Firms.

¹ Such transfer will be conducted in accordance with all legal requirements and transferred workers will be subject to all requirements of this ESS.



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3. **Primary supply workers:** They are basically the personnel employed by the companies' supplying inputs and infrastructure linked to the works foreseen by the Program. The Program must carry out due diligence to ensure that input produced under conditions of forced labor is not procured and that the working conditions of suppliers comply with current regulations with their personnel.

Table 4. Number of workers expected to be employed by the project, broken down by category:

Item	Direct Workers (CEU Staff)	Contracted Workers	Primary Supply Workers	Community Workers
1. Number of Project Workers	6 CEU staff members, directly employed by the CEU under the MoF. These positions are already in place as of project inception.	Approximately 100 workers engaged through contractors and sub-contractors for the delivery of civil works and related services under the project. This number is an estimate and will be confirmed and updated as contracts are awarded.	A limited number of workers are expected to be engaged through primary suppliers providing essential goods and materials for the project (e.g., construction materials, equipment). The exact number is to be confirmed upon contract award.	No community workers are expected to be engaged under this project.
2. Characteristics of Project Workers	All 6 CEU staff are Belizean nationals. The team comprises both women and men, with a target of approximately 50% female representation at the management and specialist level. All CEU staff are skilled professionals aged 18 years and above. Roles include: (1) Project Manager; (2) Project Engineer; (3) Procurement Specialist; (4) Financial Specialist; (5) Environmental and Social Specialist; (6) Monitoring and Evaluation Specialist.	Workers are expected to be predominantly Belizean nationals. The workforce will include both men and women; however, consistent with sector norms in construction and civil works, most workers, particularly those in lower-skilled and manual labor roles, are expected to be men. All workers must be 18 years of age or older, in compliance with ESS#2 and Belizean national law. Skilled, semi-skilled, and unskilled workers will be engaged depending on the nature of works.	Characteristics will depend on the nature of supply contracts. Workers are expected to be national (Belizean), aged 18 and above.	Not applicable.



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Item	Direct Workers (CEU Staff)	Contracted Workers	Primary Supply Workers	Community Workers
3. Timing of Labor Requirements	CEU staff are already in place and operational from project inception, working full-time (40 hours per week, Monday–Friday) for a minimum contract duration of 2 years.	Contractor mobilization commenced in the first quarter of 2026 (Q1 2026), covering preparatory and pre-construction activities. The main workforce will be deployed progressively during the construction phase across project sites in coastal urban areas. The peak labor demand is expected during active civil work. Labor requirements will be sequenced in line with the construction schedule and contract awards and will be updated in this LMP as contracting progresses.	Engagement of primary supply workers will follow contractor procurement timelines and is expected to run concurrent with construction activities.	Not applicable.
4. Contracted Workers	Not applicable (CEU staff are direct workers).	Contracted workers will be engaged by civil works contractors and sub-contractors awarded contracts under the project. Contractors are responsible for recruitment, terms and conditions of employment, OHS, and compliance with this LMP and with ESS#2 requirements. Contracts will include binding labor management obligations, including adherence to the project's Code of Conduct, OHS standards, prohibition of child and forced labor, non-discrimination, and access to the project's Worker Grievance Redress Mechanism (GRM). Contractors and sub-contractors must submit their own labor management plans for CEU review prior to mobilization. The CEU Environmental and Social Specialist, And Supervising Firm will oversee contractor compliance.	Primary suppliers will be required to meet minimum labor standards as a condition of contract, including prohibition of child and forced labor and basic OHS requirements, consistent with ESS#2, paragraph 31.	Not applicable.



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Item	Direct Workers (CEU Staff)	Contracted Workers	Primary Supplier Workers	Community Workers
5. Migrant Workers	Not applicable (all CEU staff are Belizean nationals).	While the project anticipates that most contracted workers will be Belizean nationals, the use of migrant workers (domestic or international) remains a possibility depending on the availability of specialized skills locally. The number of migrant workers is to be determined (TBD) and will be monitored in coordination with contractors throughout project implementation. Contractors will be required to report on the nationality and origin of their workforce to the CEU. The project's Worker GRM is accessible to all workers regardless of nationality or migration status, and specific considerations for migrant workers (including language access and non-discrimination) will be applied.	To be monitored as applicable, consistent with contractor obligations.	Not applicable.

The different types of workers linked to this project are summarized in Figure 4.

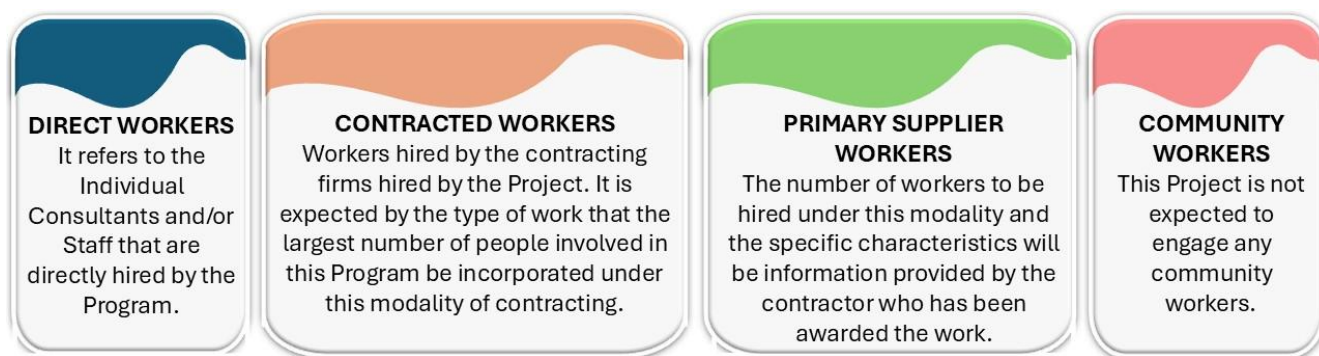


Figure 4. Summary of the types of workers linked to this Project.

VI.2. Age of Employment

In accordance with the Constitution of Belize, no child below the age of eighteen years shall be engaged in any employment. For BBCB Project, employment of children under 18 years of age will be strictly prohibited. Contractors will be required to verify and identify the minimum age of all



workers through government identification documents, like Passport, Birth Certificate, Social Security Card, Voters ID and other National Identification Cards. The proposed age verification process is presented in Annex 7.

The ESMF includes OHS management and mitigation provisions. The OHS measures consider the WB General Environment, Health and Safety Guidelines (EHSGs), the EHSGs for Health Care Facilities and other Good International Industry Practices (GIIP). OHS specifications will also be included in the procurement documents and contracts with contractors. The ESMF factors OHS requirements for contract workers that will be involved in civil works such as codes of conduct, safety trainings, gender and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) sensitization trainings.

A child under the minimum age of 14 established in accordance with this paragraph will not be employed or engaged in connection with the project. A child over the minimum age and under the age of 18 may be employed or engaged in connection with the project only under the following specific conditions:

- a) The work is not considered as hazardous (as defined ahead).
- b) An appropriate risk assessment is conducted.
- c) Prior to the work commencing the Project conducts regular monitoring of health, working conditions, hours of work and the other requirement of ESS#2.

A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development. Work considered hazardous for children is work that, by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety, or morals of children. Examples of hazardous work activities prohibited for children include work:

- i) With exposure to physical, psychological or sexual abuse.
- ii) Underground, underwater, working at heights or in confined spaces.
- iii) With dangerous machinery, equipment or tools, or involving handling or transport of heavy loads.
- iv) In unhealthy environments exposing children to hazardous substances, agents, or processes, or to temperatures, noise or vibration damaging to health.
- v) Under difficult conditions such as working for long hours, during the night or in confinement on the premises of the employer.

VI.3. Management of Contractors

It is mandated that all hired Contractors execute the management of the contract in a manner that is acceptable to the client and in accordance with the World Bank rules and regulations as it relates to ESS#2, specifically relating to the selection process for contractors, management of



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labour issues, including health and safety, procedures for managing and monitoring of performance for contractors, as well as reporting on workers under the project.

The PMU (CEU) will require that all contractors engaged on the project operate in a manner consistent with the requirements of the ESS, including the specific requirements set out in the ESCP. The PMU will manage all contractors in an effective manner, including:

- a) Assessing the environmental and social risks and impacts associated with such contracts;
- b) Ascertaining that contractors engaged in connection with the project are legitimate and reliable enterprises, and have knowledge and accordance with their contractual commitment;
- c) Incorporating all relevant aspects of the ESCP into tender documents;
- d) Contractually requiring contractors to apply the relevant aspects of the ESCP and the relevant management tools, and including appropriate and effective non-compliance remedies;
- e) Monitoring contractor compliance with their contractual commitments; and tractors to have equivalent arrangements with their subcontractors.

In line with the above, and as relevant:

-  **Information on Public Records:** The Contractors must have in place information on corporate registers and documents relating to the violation of applicable law, including reports from labour inspectorates and other enforcement bodies.
-  **Certification and approval of Business and Workers:** Documentation of approved business licenses, registration, permits and other approvals and workers' certification/permits and training to perform the work.
-  **Health and Safety:** Document and have in place labour management systems relating to organizational health and safety, including at minimum: A functioning grievance mechanism accessible to all workers and the public; Incident records, including root cause analysis for each incident and a corresponding corrective and mitigation action plan; Records of first aid cases and high-potential near misses, together with the remedial and preventive measures taken or required; Establishment of a safety committee, with records of its composition and meeting minutes. .
-  **Workers Payroll Records:** Documentation of the number of hours work and pay received inclusive of all payments made on their behalf, for example payment made to the National Insurance Scheme and other entitlements regardless of the workers being engaged on a short- or long-term assignment or fulltime or part time worker.

The Supervision Firm will be responsible for:

- i) Day-to-day verification of contractor's compliance with LMP obligations and site-specific ESMPs.
- ii) Supervision Firms have authority to issue non-compliance notices to contractors and escalate unresolved issues to the CEU.
- iii) LMP obligations are included in Supervision Firm TORs and contracts.



- iv) A coordination mechanism will be established between Supervision Firms and the CEU ESSp for consolidated LMP compliance reporting.

VII. ASSESSMENT OF POSSIBLE OCCUPATIONAL HAZARDS

Depending on the activities to be carried out by the staff on the project, the main risks for each of the most relevant jobs must be identified.

The existing risks involve adopting measures for the prevention of accidents and incidents with the development of safe working methods, with a correct choice and training of personnel to perform such work, in addition to using the appropriate tools and Personal Protection Equipment (PPE).

The following Table 1 provides a summary of the main activities, with the possible risks identified and those responsible.

VIII. DESCRIPTION OF PREVENTION AND MITIGATION MEASURES TO ADDRESS POSSIBLE RISKS IN THE WORKPLACE

Based on the identification of the main risks by activity group, the priority measures to prevent and minimize the risks identified are detailed below.

VIII.1. Prevention and mitigation measures in the workplace

The main actions to prevent and mitigate possible risks at the workplace are the following:

- Implement hygiene, health and safety standards and conditions.
- Training and awareness on health and safety, non-discrimination, and prevention of gender-based violence, prevention of child exploitation, forced labor, prevention of discrimination and/or violence against people from indigenous communities or vulnerable groups in compliance with the code of conduct.



Table 1. Example of activities and risks identified for this Project.

Activity Group	Activity	Location	Risks identified	Responsible
Management and Administration	Planning, designing, execution and implementation, evaluation, and monitoring of Projects	Office: CEU	No specific and significant risks are identified. Possible risks related to occupational health and safety in internal environments (ergonomic risks, accidents, stress, mental load, psychophysical factors). For all Project activities, the risk of discrimination and harassment is present, and for which the Code of Conduct will apply.	CEU
Training and Awareness for people hired by the contractor	- Train, inform and raise awareness especially among construction personnel both orally and in writing about the expected environmental and social problems, the implementation and control of environmental and social protection measures and the specific and relevant aspects applicable to the execution of projects in accordance with current environmental and social regulations and regulations. - Conduct gender-sensitive training and code of conduct for all contracted personnel, including the management staff of the contractor company. - Have updated the technical file of the personnel with the training carried out and the elements of security and personal protection delivered.	Workshops and offices	No specific and considerable risks are identified if the facilities of the workshops comply with current regulations. Possible risks linked to occupational health and safety in internal environments (accidents, stress, mental load, psychophysical factors).	Contractor (ESSp-CEU)



Activity Group	Activity	Location	Risks identified	Responsible
Civil works of infrastructure and equipment	Carrying out interventions for improvement of water systems	Project Locations	Specific risks are identified that can be avoided with the corresponding security measures and protocols. In workshops and place of work: - Risks of gender-based violence. - Occupational and community accident risks. In the recruitment processes: - Exclusion of local labor and discrimination. - Influx of labor from outside the place. In the execution of the planned works: Occupational hazards: - Accidents and falls of different levels. - Falling objects. - Road accidents (circulation of trucks and machinery). - Risks related to Child and Forced labour in the primary supply chain. - Temporary hearing loss due to operation of equipment and machinery. Ergonomic risks: - Forced posture; Repetitive motion; Cargo handling; Application of forces: Overexertion.	Contractor Company
Construction supervision	Supervise the environmental and social management plan, occupational safety, and health; monitor environmental, social, health and safety risks, their impacts and actions taken (including in the field, if necessary).	Office/Field activities at the site of implementation of the works	In the Office: No specific and considerable risks are identified. Possible risks linked to occupational health and safety in internal environments (accidents, stress, mental load, psychophysical factors). In the field: Risks linked to accidents in the work area. They can be minimized if PPE is properly used.	CEU & Construction Inspection



VIII.2. Prevention and mitigation measures in staff recruitment processes

The main actions to prevent and mitigate possible risks during staff recruitment processes are the following:

- The contractor will seek to approach its recruitment process with a gender perspective, seeking to provide equal opportunities for men and women.
- Personnel with criminal records related to sexual crimes, sexual harassment, prostitution, and trafficking in persons will not be hired to protect the integrity of the population linked to the work.
- The contractor will try to prioritize the local skilled and unskilled local labor, especially the beneficiary parties of the works and surrounding localities.
- Non-discrimination requires that the contractor not make employment-related decisions based on personal characteristics, such as gender, race, ethnic, social, and indigenous origin, religion, political opinion, nationality, disability, and sexual orientation that are not related to job requirements. They cannot affect equality of opportunity or treatment in employment.
- The contractor shall implement the Code of Conduct and provide training for its knowledge and understanding. The proposed content of the Code of Conduct (CoC) is presented in Annex 1. This Code is aimed at ensuring respectful and harmonious ties in the workplace in which the Program and its projects will be developed, to ensure a work environment free of discrimination and/or gender-based violence (GBV), gender identity, sexual orientation, cultural identity, religion, ethnic or national origin, trade union membership, disability or any other discrimination typified in current legislation.

VIII.3. Prevention and mitigation measures in the execution of civil works of infrastructure and equipment of the Project

The main actions to prevent and mitigate possible risks during the execution of civil work are the following:

- Review the environment in which the tasks will be developed. If power poles, hazardous materials tanks or other items are present in adjacent areas, because they could catch fire or fall on workers in the event of evacuation.
- Provision of the required Personal Protection Equipment (PPE) for all workers.
- Tools and machinery shall be in perfect working conditions.
- Training and advisory programs for the people employed by the contractor on the inherent risks of their tasks and the mitigation measures, actions, and good practices to be implemented to ensure the health, safety and hygiene of the employees, the population, and the protection of the environment.
- Inform all workers about the established Code of Conduct.
- Evaluate and continuously monitor the state of gas, electricity, and water facilities near the intervention area.



- Examine the distribution of workspaces verifying that there are no elements that could interfere with a rapid evacuation.
- Identify safe working areas.
- Determine accessibility to fire protection equipment, emergency lights, first aid equipment, etc., they should always be in place of easy access.
- Define the resources available to avoid and respond to an emergency.
- Make an inventory of the security elements that the organization has: fire extinguishers, first aid kit, oil spill kit, etc.
- In the case of works carried out in the vicinity of routes, traffic management measures, proper signaling and extreme communication program to the community must be put in place.

VIII.4. Protocols and procedures to address cases of gender-based violence during the life cycle of the Project

The Contractor will establish reporting procedures, protocol for responses to unacceptable conduct and internal accountability measures in situations of gender-based violence within the framework of the operation.

In terms of prevention, in addition to urging the development of actions aimed at dismantling all types of situations of inequality, discrimination and exclusion in the workplace, actions can be implemented to raise awareness and train on gender issues. The training program will be defined according to the demands of the different work teams.

To address cases of gender violence, immediate contact should be made with local authorities who are experts in the field, to ensure adequate treatment of the victim of violence, providing specific advice and accompaniment.

VIII.5. Grievance Redress Mechanism (GRM) for Project Labor Management

The Program has a Grievance Redress Mechanism (GRM), and at the same time the LMP has a simultaneous mechanism that aims to arbitrate the means and mechanisms to facilitate the reception of concerns exclusively (queries, claims, complaints, suggestions) of workers linked to the Project and resolve them to anticipate and avoid potential conflicts. Likewise, workers may appeal directly to the court, applying the general system in force in the Country. The suggested Grievance Form is presented in Annex 2.

VIII.5.1. Principles of the GRM for the Labour Management Procedure

Project will have a Feedback/Claims Management System (Grievance Database presented in Annex 3) that includes input/reception, analysis, monitoring, resolution and return to the people who are working linked to the Project. The principles that the system will observe are the same as those that govern the general GRM of the Program:

- The interaction/claims management system will have mechanisms in accordance with the



local context and the sociocultural characteristics of the people involved in each project, with special consideration and respect for the most vulnerable groups (young people, women, people with disabilities, among others).

- The complaint procedures, the process that will follow, the deadline and the resolution mechanisms will be widely disseminated for your knowledge by the interested parties, that is, by direct workers, contractors, and primary suppliers.
- In all cases, a record will be kept of the reception, analysis and resolution of claims and conflicts.

VIII.5.2. GRM Guidelines

In general, the mechanism will follow the following guidelines:

- **Proportional:** The Mechanism will proportionally consider the level of risk and possible negative impacts on the affected areas.
- **Culturally appropriate:** The Mechanism will be designed to consider the local customs of the area.
- **Accessible:** The Mechanism will be designed in a clear and simple way so that it is understandable to all people. There will be no cost related to it.
- **Anonymous:** The complainant may remain anonymous, if it does not interfere with the possible solution to the complaint or problem. Anonymity is distinguished from confidentiality in that it is an anonymous complaint, the personal data (name, address) of the complainant is recorded but not published.
- **Confidential:** The Program will respect the confidentiality of the complaint. Information and details about a confidential report will only be shared internally, and only when it is necessary to report or coordinate with the authorities.
- **Transparent:** The process and operation of the Mechanism will be transparent, predictable, and readily available for use by the population.

VIII.5.3. Management of the specific GRM for the Labor Management of the Project

The procedure begins with the presentation of the consultation, claim, complaint and / or suggestions (orally or written) by any worker linked to the works. The process ends with the closure and agreement in the resolution of both parties (the claimant and the contractor). The process will be documented by means of a record (in a physical and/or digitized file).

Complaints received of receipt enabled during the implementation of the Project must be attended and classified.

The claims received via the contractors of each work, or agencies of the municipal jurisdiction (if applicable) must be redirected to the CEU for management.



VIII.5.4. Reception and registration of claims for the labor management of the Project

There are several ways to submit the claims, for example:

- At the office of contractors (specific modality for operators and employees)
- Using the established Grievances Boxes available in the Municipalities.
- At the CEU Office, specifically for direct employees, contractors, and workers in the main supply chain.
- By dedicated telephone hotline to +501 822-4106
- Dedicated WhatsApp: +501 670-0996
- By dedicated email address to: grievance@ceu.mof.gov.bz
- By the Project office located at the Sir Edney Cain Building, Ministry of Finance 2nd floor, where one person is designated to receive and filter messages.
- By completion of an online form available at: <https://mof.gov.bz/ceu-environmental-and-social-grievance-submission-form/>.
- Other ways to be defined during the execution of the Program.

In addition to the project's overall worker's grievance mechanism, each contractor and subcontractor engaged on the project must establish and maintain its own grievance mechanism specifically for its direct and contracted workers, consistent with the requirements of ESS#2. This mechanism must be accessible, transparent, and free of charge to all workers, and must allow grievances to be raised through multiple channels (for example, a dedicated hotline, suggestion boxes, designated grievance focal points, or in-person reporting to a supervisor or human resources representative) so that workers with varying levels of literacy or comfort with formal reporting can still come forward. The mechanism must be designed to address workplace concerns promptly and effectively, including but not limited to wages and benefits, working conditions, occupational health and safety, disciplinary actions, and allegations of discrimination, harassment, or abuse, including sexual exploitation, abuse, and harassment (SEA/SH). It must guarantee confidentiality and protection from retaliation for any worker who raises a grievance, and, where SEA/SH concerns are involved, must follow a survivor-centred approach with clear referral pathways to appropriate support services. The contractor is responsible for informing all workers of the mechanism's existence and procedures at the time of hiring and periodically thereafter, including in languages and formats workers can understand. The contractor must maintain a log of all grievances received, the status of each case, the resolution provided, and the time taken to resolve it, and must make these records available to the project's implementing agency for review and consolidated reporting. Where a worker's grievance cannot be resolved at the contractor level or the worker is not satisfied with the outcome, they must retain the ability to escalate the grievance to the project's overarching grievance mechanism without any adverse consequence.



VIII.5.5. Claims evaluation

All claims that enter through the various channels must be registered and managed considering the criterion of proportionality (level of risk and possible negative impacts). In the case of a claim related to employees of the contractor, it will be considered and responded to by the Contractor company with supervision of CEU.

CEU must also resolve all complaints and queries related to the works of the projects of the Program that occur in the labor field of its offices and dependencies. After receiving a claim, it must be evaluated by CEU in terms of severity, safety implications, complexity, and impact, among others, to take immediate action as appropriate. Complaints must be answered in a timely manner according to the urgency of the order.

If the claim or complaint is rejected, the worker will be informed of the decision and the reasons for it. To this end, pertinent, relevant, and understandable information will be provided according to the sociocultural characteristics of the workers.

If possible, if additional information is required for the correct evaluation of the complaint, the CEU team will contact the worker to obtain the necessary information.

The file must include, together with the complaint, a summary of the procedures and steps taken. Registration information will be updated periodically to reflect the status of the case until the complaint has been finalized.

VIII.5.6. Conflict resolution

In all cases the CEU must ensure that the attention of claims and the resolution of conflicts are carried out in an adequate and timely manner, and that all workers linked to the projects of the Program have satisfactory management of their claim.

VIII.5.7. Responding to complaints

All claims will be dealt with within a maximum of 30 calendar days. The established deadlines can be adjusted by the CEU.

VIII.5.8. Monitoring and documentation

The CEU will be responsible for maintaining an up-to-date GRM Database with all documentation and information related to complaints that are submitted as part of labor management. This team is also responsible for following up on the complaint processing process, in coordination with the areas involved, and for facilitating the participation of the worker in the process.

The complaint registry must demonstrate that all these actions and processes were carried out in accordance with this document. It will include the following basic information:

- Date on which the complaint was registered.
- Person responsible for resolving the complaint.
- Information on the corrective measures proposed/communicated by the complainant if



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applicable.

- Date on which the complaint was closed.
- The date of the reply was sent to the complainant, etc.

The entire GRM process is illustrated in Figure 6. If the complainant is not satisfied with the response and proposed measures, further Mediation will be required as summarized in Figure 7.

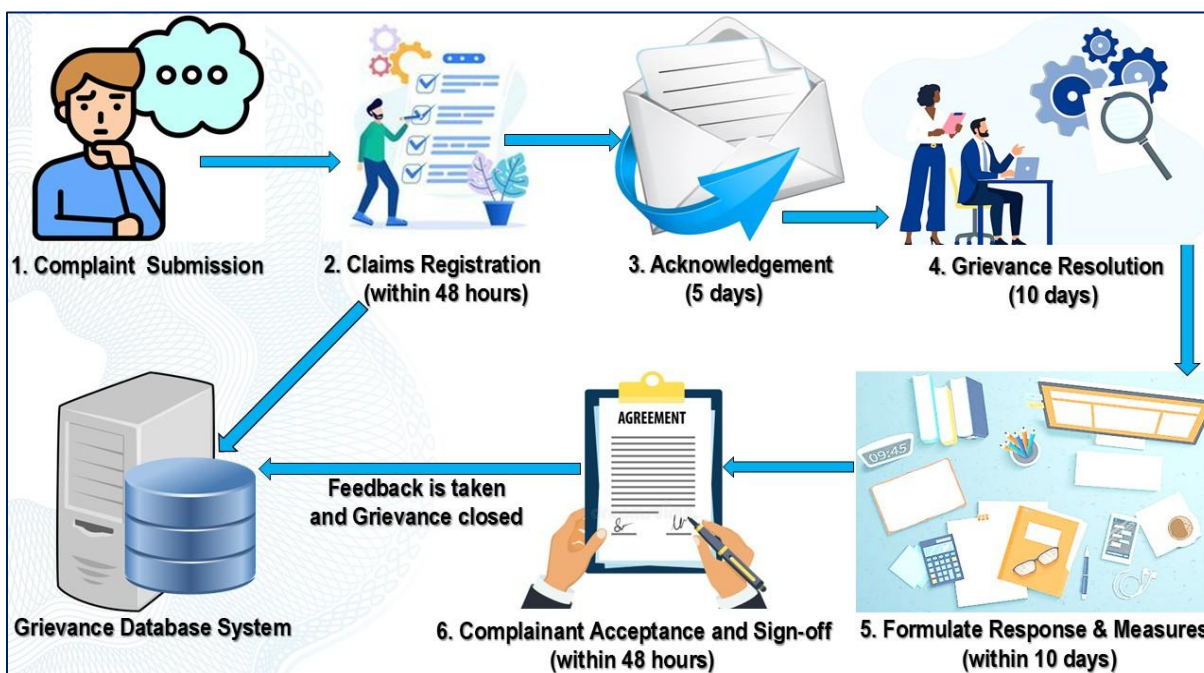


Figure 6. Summary of the GRM Process for the Projects executed by the CEU.

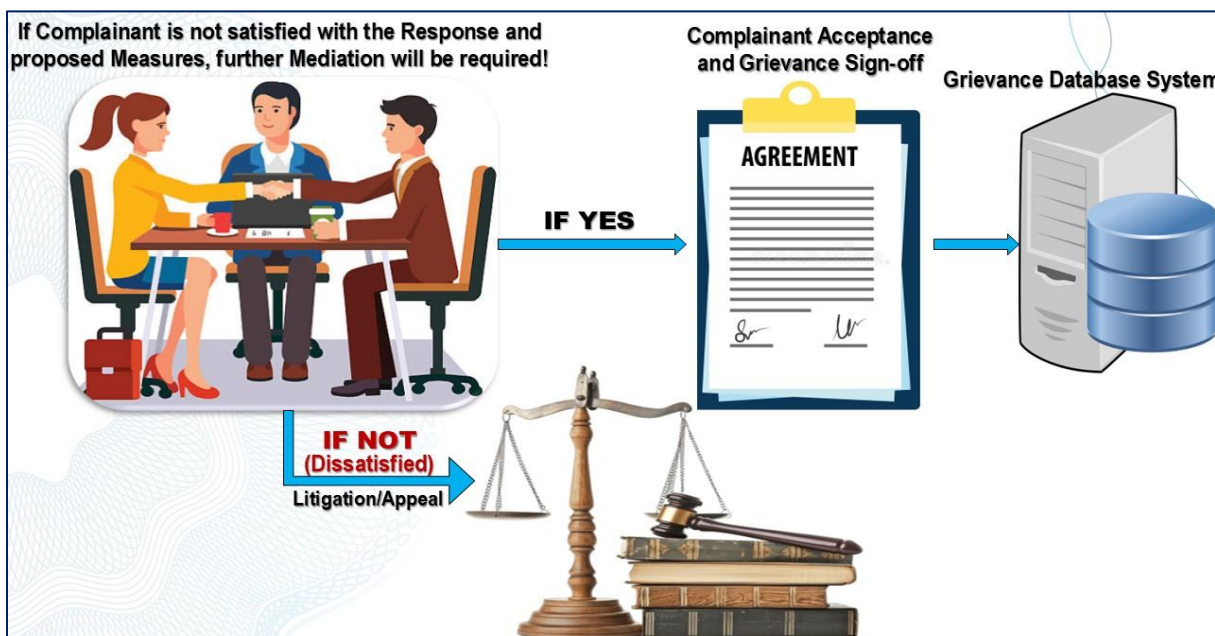


Figure 7. Additional GRM steps if the complainant is not satisfied with the response and measures.



Any complaint closed with compliance by the complainant must be monitored for a reasonable period to verify that the reasons for the complaint or claim were effectively resolved. The estimated period for this purpose is six months from the response and/or solution to the claim.

VIII.5.9. Deadlines

All complaints must be registered, and the proposed solution must be communicated to the interested party within the stipulated period (30 days is suggested). The deadlines set can be adjusted by the CEU.

VIII.5.10. Grievance Committee (GC)

The Grievance Committee (GC) will be established to address complaints logged in the grievance register. The GC shall comprise the following:

- ☐ CEU Representative with the power to make decisions (CEU Director).
- ☐ One Representative of the Institutional Stakeholders.
- ☐ Project Manager.
- ☐ CEU Designated Person to manage the whole process.
- ☐ Representative from External Stakeholders

VIII.5.11. Addressing Sexual Exploitation and Abuse & Sexual Harassment Incidents

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

The GRM will specify an individual who will be responsible for dealing with any SEA/SH issues, should they arise. A list of SEA/SH service providers will be kept available by the project. The GRM should assist SEA/SH survivors by referring them to Services Providers for support immediately after receiving a complaint directly from a survivor. The list of SEA/SH service providers will be available after the project effectiveness and before the start of project activities.

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

- **Sexual Abuse (SEA)** is an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions
- **Sexual Exploitation (SE)** refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.



- **Sexual harassment (SH)** is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.
- **Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) service provider:** An organization offering specific services for SEA/SH survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.
- **Survivor-centred approach:** It is based on a set of principles and skills designed to guide professionals, regardless of their role, in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centred approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

The SEA/SH Grievances can be received through any of the available channels and will be considered as **“High-profile Grievances”**, that if not resolved promptly may represent significant risks to the environment or community. A list of SEA/SH service providers will be kept available by the Project. Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant, and applying the survivor-centred approach (The survivor-centred approach is based on a set of principles and skills designed to guide professionals, regardless of their role in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centred approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions). Any cases of SEA/SH brought through the GRM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The WB will be notified as soon as the Project Manager and the E&S specialist learn about the complaint.

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

A) Action 1: Complaint Intake and Referral

If the survivor gives consent, the CEU Environmental and Social Specialist (ESSp) or other designated Specialist, fills in a complaint form excluding any information that can identify the survivor



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

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

GBV Referral Pathway provides Frontline Persons responding to GBV with a one-stop guide that includes all services presently being offered in Belize. It supports coordination among service providers to meet the needs of survivors. It not only coordinates service delivery and facilitates survivor's access to services in "normal" times but also can be used during emergencies and development contexts (See Belize Referral Pathway in Annex 5).

It promotes the use of a survivor-centred approach that ensures survivors are active participants in defining their needs and deciding what options best meet their needs. Services providers can use it to advocate for survivor's access to services, monitor service delivery, and follow up with survivors.

The goal is NOT to increase the number of cases referred to, but to improve the quality and timeliness of care received.

It is a flexible mechanism that safely links survivors to supportive and competent services in a timely way and includes any or all the following: Health, Psychosocial, Security and Protection, Legal/Justice, and/or Economic Reintegration support.

In addition to the Referral, Pathway, a GBV Companion for Non-GBV Persons was also developed to support community persons who can lend support. This tool will provide guidance on the processes and what they can and cannot do. It's a small, compact document that fits in small spaces for easy retrieval.



B) Action 2: Incident Reporting

The ESSp from the CEU needs to report the anonymized SEA/SH incident as soon as it becomes known, within 48 hours maximum, to the Project Manager who will in turn inform the World Bank Task Team Leader (TTL) directly to the TTL no later than forty-eight (48) hours after learning of the incident or accident and consistent with the Project's ESCP (See OHS and Incident reporting procedure is provided in Annex 6).

Complaint Forms and other detailed information should be filed in a safe location by the CEU ESSp. Neither the CEU ESSp nor the Project Manager should seek additional information from the survivor.

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

As long as the SEA/SH remains open the CEU ESSp and/or Project Manager should update the World Bank TTL on the measures taken to close the incident.

C) Action 3: Grievance Verification and Investigation

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

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to a project, Project actors are:

- a) People employed or engaged directly by the GOB, including the project proponent and the project implementing agencies to work specifically in relation to the project (direct workers).
- b) People employed or engaged through third parties (Project staff, subcontractors, brokers, agents, or intermediaries) to perform work related to core functions of the project, regardless of location (contracted workers).
- c) People employed or engaged by the Borrower's primary suppliers (primary supply workers).
- d) People employed or engaged in providing community labour such as voluntary services or participation in project activities and processes (community workers), the verification committee discusses appropriate actions to be recommended to the appropriate party i.e., the employer of the perpetrator, which could be the CEU or a contractor. The CEU will ask contractors to take



appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labour legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

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

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in the Country legal system, the CEU ESSp should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the courts, not the SEA/SH verification committee. Unlike other types of issues, the CEU Safeguards Specialist does not conduct investigations, make any announcements, or judge the veracity of an allegation.

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

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

The GRM will also immediately notify both the Implementing Agency and the World Bank of any SEA/SH complaints **with the consent of the survivor**.

VIII.6. LMP Budget

The proposed budget for the successful implementation of this LMP is presented in Table 2.

Table 2. Proposed budget for the successful implementation of this LMP.

Budget Category	Specific Cost Item	USD – annual	Cost Driver
Staffing	CEU Environmental and Social Specialist (ESSp) time allocated to LMP implementation, oversight, and reporting Contractors are required to factor in the corresponding costs at their own level, ensuring these are reflected in their bid pricing-	10,000	Percentage of ESSp FTE dedicated to Labour/SEA-SH matters over project duration
Workers GRM	Operation and maintenance of the worker GRM: Intake, logging, tracking, resolution, and reporting- Contractors are required to factor in the corresponding costs at their own level, ensuring these are reflected in their bid pricing (See Annex 4 for detailed GRM Budget). This budget will be	40,000	Estimated case volume × administrative time; database maintenance/software if applicable. Hotline service fee;



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Budget Category	Specific Cost Item	USD – annual	Cost Driver
	shared for the 3 WB funded Project executed by the CEU.		materials production cost per site
Code of Conduct (CoC)	Printing, translation, and distribution of the CoC (Annex 1) to all direct and contracted workers - Contractors are required to factor in the corresponding costs at their own level, ensuring these are reflected in their bid pricing-	5,000	Per-worker distribution and signature tracking cost
Training	OHS training for direct and contracted workers (site-specific hazard awareness, PPE use, emergency response). Training includes SEA/SH awareness for all project workers, supervisors, and community liaison staff; Refresher/ongoing training for CEU and contractor staff on GRM handling and referral pathways - Contractors are required to factor in the corresponding costs at their own level, ensuring these are reflected in their bid pricing-	10,000	Per-worker training cost × frequency (e.g., annual refreshers)
Supervision	Supervision of contractors by PMU E&S/Labour specialists — periodic site supervision visits to verify contractor compliance with LMP obligations (worker terms and conditions, OHS provisions, CoC implementation, GRM functionality) across the three worksites- Contractors are required to factor in the corresponding costs at their own level, ensuring these are reflected in their bid pricing.	30,000	PMU specialist time (days) × frequency of supervision visits × number of contractor sites
Total		95,000	



IX. MONITORING AND EVALUATION

Table 3 below summarizes the envisaged Performance Indicators such as the proposed Monitoring Measures for this LMP

Table 3. Performance Indicators and proposed Monitoring Measures for this LMP.

PERFORMANCE INDICATORS	TARGET ACTION THRESHOLD	MONITORING MEASURE
Number of non-compliance with Community Health Safety and Security measures as identified in envisaged measures to protect the local community during Project execution stage that are resolved within 15 working days.	Minimize and target zero per annum	Tracked continuously, reported quarterly.
Percentage of workers who have signed the established Code of Conduct before start working.	100% of all Project Workers (direct and contracted).	Measured at the start of any new contract or hiring phase and reported quarterly.
Total number of Grievances from local communities as reflected by the established GRM split in received and responded on time, closed and open.	Minimize the number of Grievances	Monitored monthly, reported quarterly.
Percentage of workers who have completed mandatory OHS training before starting work.	100% of all Project Workers (direct and contracted).	Measured at the start of any new contract or hiring phase and reported quarterly.
Number of accidents/incidents during the execution of the Project.	Minimize and target zero per annum	Monitored monthly, reported quarterly.
Number of OHS site inspections conducted by the PMU and the Supervising Firm per month.	Minimum of 2 inspections per active construction site per month.	Monitored monthly, reported quarterly.
Number of personnel using PPE according to the risk of activity	100% of all Project Workers (direct and contracted).	Monitored monthly, reported quarterly.
Number of workers with Medical and Labour Insurance.	100% of all project workers (direct and contracted).	Monitored monthly, reported quarterly.



X. CONCLUSION

As initially indicated, this document is dynamic in nature, therefore the specific procedures for the implementation of this Labor Management Procedure such as the Grievance Redress Mechanism will be strengthened during the implementation of this Project.

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ANNEX 1. MODEL AND SUGGESTED CONTENT OF THE CODE OF CONDUCT

A. Model Standard Code of Conduct for Workers

We are the Contractor company **[Name of the company Contractor]**. We have signed a contract with **[Employer Name]** to **[Job Description: Consultant, Site Supervision, Skilled Construction Worker, Watchman, Office Assistant, etc.]**.

These activities will take place at **[Site where the work will be carried out]**. Our contract obliges us to implement measures to address environmental and social risks related to assigned work activities, including risks of sexual exploitation, sexual abuse, and harassment.

This Code of Conduct is part of our measures to address environmental and social risks related to the construction site **[of the Project P181064 - Belize Blue Cities and Beyond Program]**. It applies to all the personnel at the managerial, administrative, or technical level, workers and other employees at the Construction Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and to any other personnel who support us in the execution of the Works and in the administration and management of the Program. All these individuals are referred to as "Contractor Personnel" and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior we require of all Contractor and executing agency personnel.

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

Contractor/CEU personnel shall:

1. Carry out his duties competently and diligently.
2. Comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and welfare of other contractor personnel and any other person.
3. Maintain a safe working environment including:
 - ensure that workplaces, machinery, equipment, and processes under the control of each person are safe and free from health risk.
 - use the required personal protective equipment.
 - use appropriate measures relating to chemical, physical and biological substances, and agents; and
 - Follow applicable emergency operating procedures.
4. Bring up work situations that he/she believes are unsafe or healthy and move away from work situations that he/she reasonably believes pose an imminent danger to his/her life or health.
5. Do not use violence and treat others with respect, and do not discriminate against specific



groups such as women children and people with disabilities.

6. Not engaging in sexual harassment, which means unwanted sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with the contractor's or Employer's other personnel.
7. Not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. In Bank-financed operations/projects, sexual exploitation occurs when access to Bank-financed Goods, Works, Consulting or Non-Consulting services is used to extract sexual gain.
8. Not engage in sexual abuse, which means actual or threatened physical intrusion of a sexual nature, either by force or under unequal or coercive conditions.
9. Not engage in any form of sexual activity with people under the age of 18, except in the case of a pre-existing marriage.
10. To complete the relevant training courses to be given in relation to the environmental and social aspects of the Contract, including health and safety, sexual exploitation and abuse (SA) and sexual harassment (SA) matters.
11. Not to retaliate against anyone who reports violations of this Code of Conduct, either to us or to the Employer, or anyone who makes use of the Contractor's Staff Grievance Management Mechanism or the Program Grievance Management Mechanism.
12. In special cases such as chance finds, training should be given on the heritage value of places and objects for the country. Avoiding looting by carelessness or lack of vigilance.

B. RAISE CONCERNS

If any person observes behavior that they believe may represent a violation of this Code of Conduct, or that otherwise concerns them, they should raise the issue promptly. This can be done in any of the following ways:

1. Contact **[Name of the Contractor/CEU's ESSp]** with relevant experience in handling cases of sexual exploitation, sexual abuse, and harassment, or if such person is not required under the Contract, another person designated by the Contractor to deal with these matters] in writing at this address **[Contact address]** or by telephone at **[Phone Number]** or in person at **[Place of contact]**.
2. Call **[Phone number]** to contact the contractor/CEU hotline and leave a message.

The identity of the person shall be kept confidential unless the necessary allegations are reported under national law. Anonymous complaints or denunciations may also be filed and given all due and appropriate consideration. We take all reports of potential misconduct seriously and will investigate and take appropriate action. We will provide recommendations to service providers who can help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises good faith concern for any behavior



prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

C. CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Staff may result in serious consequences, including contract termination and possible referral to legal authorities.

D. FOR CONTRACTED PERSONNEL

I have received a copy of this Code of Conduct written in a language I understand. I understand that, if I have any questions about this Code of Conduct, I may contact my Contractor or the CEU contact person with relevant experience (including sexual exploitation, abuse, and harassment cases in handling those types of case cases), requesting an explanation.

E. GRIEVANCE REDRESS MECHANISM

The Grievance Redress Mechanism (GRM) has been established by the CEU as required under the Environmental and Social Framework of the Bank. The GRM is publicly disclosed through the Ministry of Finance Website (www.mof.gov.bz) and is described in the GRM Manual and in the SEP. The GRM is free of charge, accessible without retribution, and can receive anonymous complaints. People can also submit Grievances at the phone ([+501 822-4106](tel:+5018224106)), by WhatsApp ([+501 670-0996](tel:+5016700996)) or email (grievances@ceu.mof.gov.bz)

All Project Affected Persons (PAP's) are fully covered by the GRM Process and are expected to be informed of the GRM and their right to use it. The Environmental and Social Specialist from the CEU will serve as the primary GRM focal point. Grievances will be acknowledged within 5 business days and resolved, where possible, within 30 days. Unresolved grievances will be escalated to the CEU Director and, if required, to the Bank.

All grievances received through the GRM will be tracked in a Grievance Database maintained by the CEU Environmental and Social Specialist. The log will record the date received, complainant identity (or "anonymous"), nature of complaint, actions taken, resolution, and date of resolution, and it will also be reported to the Bank as part of quarterly/semester compliance reports. The roll out of the Grievance Mechanism to community members will be the responsibility of the Ministry of Finance through the Central Executing Unit (CEU); explanations of the process to community members will be led by the Project Managers.

Name of the staff member:

Signature:

Date:

Countersignature of the authorized representative of the Contractor / CEU:

Signature:

Date:



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ANNEX 2. GRIEVANCE FORM FOR WORLD BANK PROJECT P181064 - BELIZE BLUE CITIES AND BEYOND PROGRAM

Project Name or Project Operation Number:			
Name:		Gender:	
Email:		Phone Number:	
Address:			
Ethnicity:		Age Group:	☐ 18-25 ☐ 26-35 ☐ 36-45 ☐ 46-55 ☐ 55+
Complainant Category	☐ Community Member ☐ Business Owner/Vendor ☐ Local Leader ☐ Farmer ☐ GOB Worker ☐ CSO/NGO ☐ Teacher ☐ Fisherfolks ☐ Tourism Sector Employee ☐ Employer ☐ OTHER		
Grievance Description <i>What happened?</i> <i>Where did it happen?</i> <i>Who did it happen to?</i> <i>Result of the problem?</i>			
Date of the Incident/ Grievance		☐ One time Incident/Grievance (Date: _____) ☐ Happened more than one time (How many times? _____) ☐ On-going (currently experiencing the problem)	
Expectations <i>What would you like to see happen to resolve the issue?</i>			
Request for Confidentiality/Anonymity:		☐ YES ☐ NO	
Declaration:	☐ I confirm that the information provided is accurate to the best of my knowledge.		

Grievant Signature:		Date:	
Indicate how you prefer to be contacted	☐ Mobile Line/WhatsApp ☐ Telephone Landline ☐ Email ☐ In Person		

FOR OFFICIAL USE ONLY			
Grievance Number:			
Received by (GOB Officer):		Date:	
Grievance Received through:	☐ Email ☐ In Person ☐ Telephone Call ☐ CEU Office ☐ Grievance Box in the Municipality Other _____		
Grievance will proceed. If no, the reason			
Action to be taken to address this grievance and timeline of implementation:			
Date for the GRM Committee Meeting:		Has the Grievance been resolved: (if yes include close date, if no include reason	
Name of the Designated Person:		Signature:	



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**ANNEX 3. GRIEVANCE MECHANISM DATABASE FOR WORLD BANK FUNDED PROJECT P181064 - BELIZE
BLUE CITIES AND BEYOND PROGRAM**

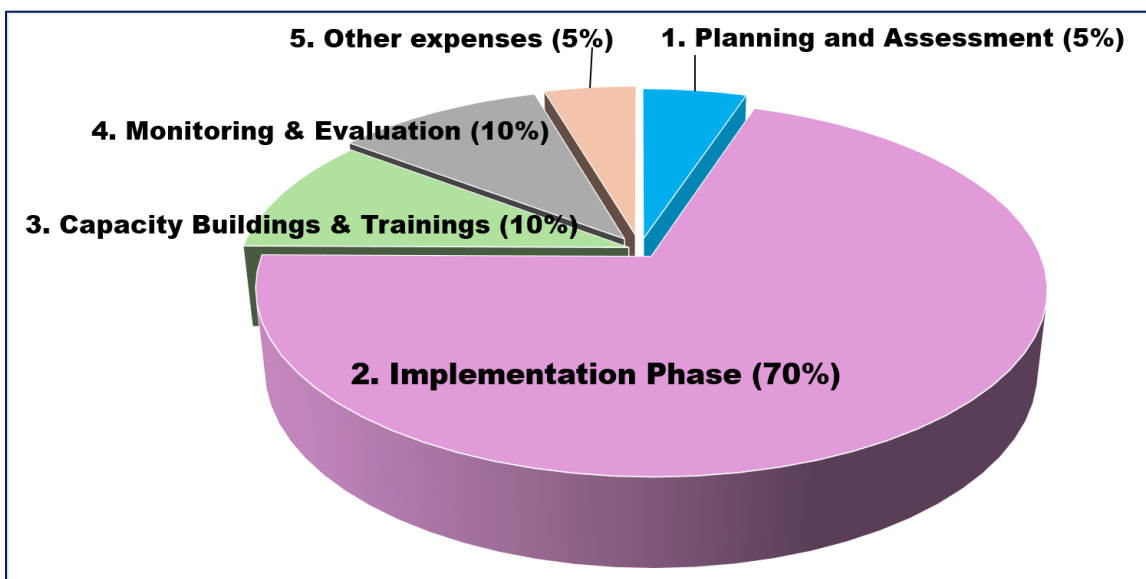
**GRIEVANCE MECHANISM DATABASE FOR WORLD BANK FUNDED PROJECT
P181064 - BELIZE BLUE CITIES AND BEYOND PROGRAM**

Nu.	Date Submitted	Full Name	Phone Number	Residence Place	Complaint Description	Grievance Deadline	Resolution Proposal
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							



ANNEX 4. DETAILED BUDGET FOR GRM IMPLEMENTATION AND TRAININGS IN U\$D

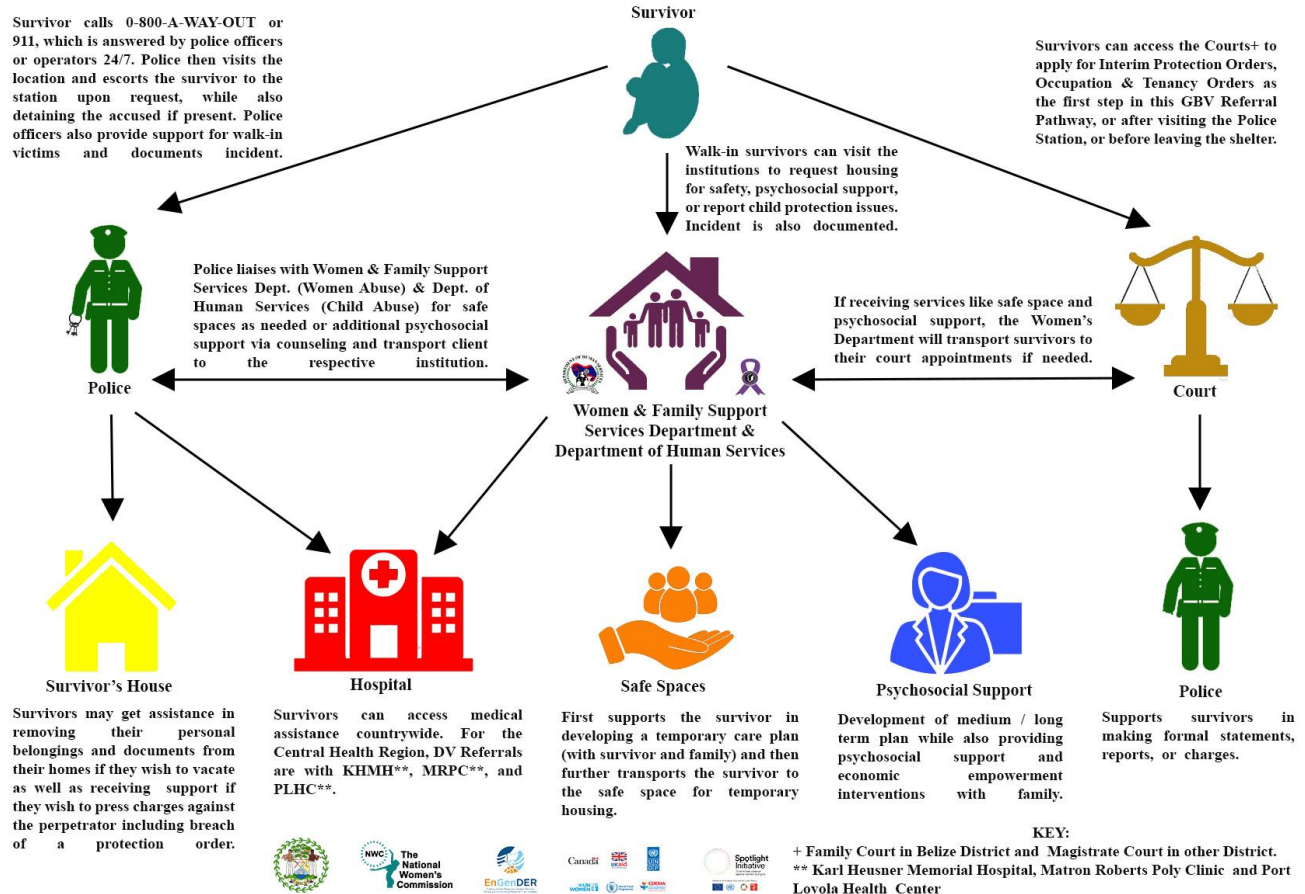
BUDGET CATEGORIES	Quantity	Unit Costs	Times/ Years	Total Costs (U\$D)
1. Trainings				
1a. Training in social/environmental issues	2	2,500	2	5,000
1b. Training on Gender-Based Violence (GBV)	2	2,500	2	5,000
2. Implementation of the Grievance Redress Mechanism (GRM) Process				
2a. Training of GRM committees	1	3,000	1	3,000
2b. Grievance boxes in Towns/Villages	10	100	4	4,000
2c. GRM communication materials	2	1,000	2	4,000
2d. Grievance Investigations/Site Visits	2	1,500	4	12,000
2e. GRM Information System (setting up or maintenance)	1	1,000	2	2,000
2f. Other GRM Logistical Costs (GRM Committee Meetings)	1	250	36	9,000
3. Other expenses				
7a. Travel expenses and DSA	12	500	4	6,000
TOTAL LMP BUDGET				50,000 U\$D





ANNEX 5. BELIZE REFERRAL PATHWAY.

Gender-based Violence Referral Pathway





ANNEX 6. OHS PROCEDURES AND INCIDENT REPORTING.

The required OHS procedures will be developed by the Contractors/Consultants hired under this Project covering the following:

- ✚ Compliance with all national and international OHS legislation that are applicable to Belize and the World Bank
- ✚ Compliance with the Environmental and Social Standards of the World Bank.
- ✚ World Bank Environmental Health and Safety (EHS) Guidelines: ([https://www.documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS- Guidelines.pdf](https://www.documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf)).
- ✚ Prevention of injury and ill health of all project workers.
- ✚ Identification and assessment of hazards.
- ✚ Measures to manage the hazards including establishment of safety systems, processes and performance.
- ✚ Continuous improvement of Safety Systems.
- ✚ Prevention of use of faulty equipment or sub-standard equipment.
- ✚ Training and awareness.

The Project will commit to safety considerations in all its activities and that of contractors, sub-contractors and beneficiaries. The project, including contractors will provide systems, processes, procedures, the necessary safety equipment and gears such as personal protective equipment, and training for all project employees so that all activities are conducted in a safe environment. It will also develop and implement systems, processes, policies, and services in compliance with national and international legal requirements including industry standards and best practices in relation to safety.

Workers will be responsible, subject to their roles, for the maintenance of a safe environment including the assessment of risks and actions to minimize, mitigate, and manage risks. Workers at all levels have the authority to stop any activity they consider to be a danger to themselves or other workers, the public or the environment. Workers in this situation must rely on the project's GRM, which lays out procedures and timeframes for resolution. The LMP also requires incidents and accidents to be logged and reported by the Project to the World Bank Environment and Social Incident Response Tool.

Following any significant workplace health and safety incident, the contractor shall be required to conduct a formal investigation to determine its root cause. This investigation must be initiated within a specified timeframe as agreed with the PMU, typically within 24 to 48 hours of the incident. The findings of the investigation must be documented in a formal Incident Investigation Report, which shall include a root cause analysis and a time-bound Corrective Action Plan (CAP) to prevent recurrence. This report will be submitted to the PMU for review. The PMU is responsible



for tracking the implementation and closure of all corrective actions. A summary of all significant incidents, the status of their investigations, and the implementation of corrective actions shall be included in the project's periodic Environmental and Social monitoring reports submitted to the World Bank. The PMU will report incidents and accidents to the World Bank as per the requirement of the ESCP.

There will be no retaliation to project workers for stop-work whistle blowing.

Environmental and Social Specialists attached to the PMU are responsible for the implementation and monitoring of the safety management systems of the project. The Environmental and Social Specialist (ESSp) will develop guidelines, instructions and training and awareness materials to support the OHS measures and procedures. The project will also ensure that all employees:

- Ascribe to the principle of not harming people.
- Understand that discrimination and SEA/SH will not be tolerated in the workplace.
- Are hired based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment.
- Receive training on Code of Conducts and OHS measures required under ESS#2.
- Sign Codes of Conduct.
- Always comply with the laws of the Country.
- Adhere to all health and safety measures as laid out in the ESS#2.

The subproject ESMPs will include OHS provisions and based on the ESMP requirements an Occupational, Health and Safety Plan (OHSP) must be prepared by the contractor and approved by the ESSp of the Supervision Firm prior to any works commencing on site. The OHSP must demonstrate the Contractor's understanding of how to manage safety and a commitment to providing a workplace that enables all work activities to be carried out safely. The OHSP must detail reasonably practicable measures to eliminate or minimize risks to the health, safety and welfare of workers, contractors, visitors, and anyone else who may be affected by the operations. The OHSP must be prepared based on the requirements detailed in the ESMP and in accordance with the World Bank's EHS Guidelines and the relevant country health and safety legislation.



PART B: INCIDENTS AND ACCIDENTS REPORTING FORM.

B1: INCIDENT DETAILS			
Date of Incident:	Time:	Date Reported to PMU:	Date Reported to WB:
Reported to PMU by:	Reported to WB by:	Notification Type: Email/'phone call/media notice/other:	
Full Name of Main Contractor:		Full Name of Subcontractor:	

Note: To be completed by the Contractor within 24 hours- for all type of incidents/accidents except SEA/SH and SOGI related incidents.

B2: TYPE OF INCIDENT (PLEASE CHECK ALL THAT APPLY) (SEE BELOW FOR DEFINITIONS)			
Fatality ☐	Lost Time Injury ☐	Displacement Without Due Process ☐	Child Labour ☐
Acts of Violence/Protest ☐	Disease Outbreaks ☐	Forced Labour ☐	Dam failure ☐
Unexpected Impacts on heritage resources ☐		Environmental pollution incident ☐	
Unexpected impacts on biodiversity resources ☐		Other ☐	

B3: DESCRIPTION/NARRATIVE OF INCIDENT
- What is the incident? - What were the conditions or circumstances under which the incident occurred (if known)? - Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions? - Is the incident still ongoing or is it contained? - Have any relevant authorities been informed?

B4: ACTIONS TAKEN TO CONTAIN THE INCIDENT			
Short Description of Action	Responsible Party	Expected Date	Status

For incidents involving a contractor:
Have the works been suspended (for example, under GCC of Works Contract)? Yes ☐; No ☐
Trading name of Contractor (if different from B1):
Please attach a copy of the instruction suspending the works.



B5: What support has been provided to affected people

Incident Types

The following are incident types to be reported using the environmental and social incident response process:

- **Fatality:** Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).
- **Lost Time Injury:** Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.
- **Acts of Violence/Protest:** Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.
- **Disease Outbreaks:** The occurrence of a disease is more than normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.
- **Displacement Without Due Process:** The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.
- **Child Labour:** An incident of child Labour occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.
- **Forced Labour:** An incident of forced Labour occurs when any work or service not voluntarily performed is exacted by an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory Labour, such as indentured Labour, bonded Labour, or similar Labour-contracting arrangements. This also includes incidents when trafficked people are employed in connection with a project.



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- **Unexpected Impacts on heritage resources:** An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas not foreseen or predicted as part of project design or the environmental or social assessment.
- **Unexpected impacts on biodiversity resources:** An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.
- **Environmental pollution incident:** Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24 hrs. or have resulted in harm to the environment.
- **Dam failure:** A sudden, rapid, and uncontrolled release of impounded water or material through overtopping or breakthrough of dam structures.
- **Other:** Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of Bank management.

Incident Form SEA/SH Part B: To be completed by the Contractor

B1: Incident Details		
Date of incident intake by the Project GRM:	Date Reported to PMU:	Date Reported to WB:
Reported to Project GRM by: ☐ Survivor ☐ Third party ☐ Anonymous ☐ TBD ☐ Other: _____ Is a record of this incident in GRM? <i>(If no, note how the allegation was received (verbally, via email, etc.)</i> Yes ☐ No ☐	Reported to PMU by: ☐ GRM operator ☐ Survivor ☐ Third party ☐ Anonymous ☐ TBD ☐ Other: _____	Reported to WBG by: ☐ PMU ☐ Survivor ☐ GRM operator ☐ Third party ☐ Anonymous ☐ TBD ☐ Other: _____

B2: Incident type (please check all that apply) See Appendix 1 for definitions		
Sexual exploitation ☐	Sexual abuse ☐	Sexual harassment ☐



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B3: Provide the following details from the GRM record	
Age of survivor (if recorded in GRM): Over 18 years ☐ Under 18 years ☐ Age of survivor (if known): _____	Has the National Legislation or mandatory reporting been followed? Yes ☐ No ☐ TBD ☐
Sex of survivor (if recorded in GRM): Male ☐ Female ☐ Other ☐	
Age of alleged perpetrator: Over 18 years ☐ Under 18 years ☐ Unknown ☐	Was the survivor referred to service provision?² Medical care: Yes, referral made ☐ No, referral declined or not needed ☐ No, service needed but not available ☐ Unknown ☐ Psychosocial support: Yes, referral made ☐ No, referral declined or not needed ☐ No, service needed but not available ☐ Unknown ☐ Legal Yes, referral made ☐ No, referral declined or not needed ☐ No, service needed but not available ☐ Unknown ☐ Other: _____ Yes, referral made ☐ No, referral declined or not needed ☐ No, service needed but not available ☐ Unknown ☐

² When a complaint is filed by a third party, or the survivor has not reached out to the project, the project may not be able to confirm this information. In these cases, it may not be advisable for the project GRM to attempt to reach the survivor, as this may jeopardize confidentiality, safety, and agency. Projects may attempt to find safe ways to pass on information indirectly (such as through broad efforts to inform) about services available.



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Is the survivor a project actor³ (as showed by the survivor or complainant and reported in the GRM)? Yes ☐ No ☐ TBD ☐ If yes, which category: PMU/Contractor ☐ Civil Servant ☐ Community Worker ☐ Contractor / Subcontracted ☐ Another Consultant worker ☐ If no, which category: Member of the Public ☐ Other ☐: _____	Is the alleged perpetrator a project actor (as showed by the survivor or complainant and reported in the GRM)? Yes ☐ No ☐ TBD ☐ If yes, which category: PMU ☐ Civil Servant ☐ Community Worker ☐ ☐ Contractor Subcontractor ☐ Another Consultant worker ☐ If no, which category: Member of the Public ☐ Other ☐: _____
--	---

B4: Basis for further action	
a) Has the survivor or a delegated representative provided informed consent to lodge a formal complaint? Yes ☐ No ☐ TBD ☐	c. Has the survivor provided informed consent to be part of an investigation into misconduct? Yes ☐ No ☐ TBD ☐
b) Does the employer have a suitable administrative process and capacity in place to investigate misconduct relating to SEA/SH in a survivor-centred way? Yes ☐ No ☐ TBD ☐	
If the answer to any of these questions is no or unknown, has the GRM assessed the risks and benefits of investigating the alleged misconduct, considering the survivor's safety and wellbeing? Yes ☐ No ☐ TBD ☐	
Will an investigation into misconduct be undertaken in addition to an investigation/review into adequacy of project systems, processes or procedures? Yes ☐ No ☐ TBD ☐	

³ For a definition of project actor, see [World Bank ESF Good Practice Note on Addressing SEA/SH in HD operations](#)



Appendix 1: Incident Types

Incident Type	Example
Sexual Exploitation: Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from a Bank financed Goods, Works, Non-consulting Services or Consulting Services is used to extract sexual gain.	• A community member is promised employment on the World Bank financed project site in exchange for sex. • A member of the project team connecting water lines to homes requests a sexual favour for access to water connection. • A project worker denies passage of a woman through the worksite unless she performs a sexual favour • A food security worker promises extra food ratio to beneficiaries who agree to have sex with him.
Sexual Abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. In Bank financed operations/projects, sexual abuse occurs when a project related worker (contractor staff, subcontractor staff, supervising firm) uses force or unequal power vis a vis a community member or colleague to perpetrate or threat to perpetrate an unwanted sexual act.	• A project worker sexually abuses a community member. • A project worker has a sexual relationship with a child • A project worker befriends a child, supporting her and/or her family in exchange of sexual favours. • A health staff touches a beneficiary inappropriately during a visit. • A teacher exchanges grades for sex with underage students. • A project worker stays in the cafeteria after dinner and sexually assaults a kitchen staff member.
Sexual Harassment: Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment. In Bank financed operations/projects, sexual harassment occurs within the context of a subcontractor or contractor and relates to employees of the company experiencing unwelcome sexual advances or requests for sexual favour or acts of a sexual nature that are offensive and humiliating among the same company's employees.	• A worker sends sexually explicit text messages to a coworker. • A colleague leaves an offensive picture that is sexually explicit on a co-worker's desk. • A site supervisor asks all female employees to greet him with a kiss on the cheek every day before work. • A project worker continuously invites a co-worker out for drinks or dinner after being told that they are not interested. • A supervisor for a subcontractor asks his female colleague to join him for a business dinner with the main contractor. After dinner he asks her to entertain "the boss" in his room as an appreciation for the contract and her work.



Appendix 2: Incidents related the Sexual Orientation and Gender Identity (SOGI).

Part B: To be completed by Contractor

B1: Incident Details		
Date of incident intake by the Project GRM:	Date Reported to PMU:	Date Reported to WB:
Reported to project/GRM by: ☐ Victim ¹ ☐ Third party ☐ Other: _____	Reported to PMU by: ☐ GRM operator ☐ Directly, by victim ¹ ☐ Directly, by third party ☐ Other: _____	Reported to WBG by: ☐ PMU ☐ Directly, by victim ¹ ☐ Directly, by third party ☐ Other: _____

Note: If reporting is by victim care must be taken to adhere to any requests for anonymity.

B2: Incident type requiring confidentiality (please check all that apply)	
Violence on basis of SOGI ☐	Discrimination on basis of SOGI ☐
Note: See Appendix 1 for definitions	

B3: Basis for further reporting	
a. Has the victim provided informed consent for this incident to be reported? Yes ☐ No ☐	b. Does National Legislation or mandatory reporting apply to this case? Yes ☐ No ☐ c. If yes, has it been reported? Yes ☐ No ☐
If the answer to both a. & b. questions is NO, further reporting of this allegation is not needed. However, further measures to strengthen SOGI prevention and mitigation on the project should be provided below.	

Further measures to strengthen SOGI prevention and mitigation		
Short Description of Action	Responsible Party	Expected Date
Increased training on Codes of Conduct (CoC) and non-discrimination based on SOGI		
Safety audit of Project site focussing on SOGI		
Verification all employees sign and understand CoC		
Strengthened awareness on project-related risks, CoC and how to report incidents for project-affected community		
Active outreach to local civil society organisations working with social and gender minorities to ensure continuous risk monitoring and adaptation		
Training for project supervisors on the need to follow guidelines of behaviour in CoC and their supervisory responsibilities		



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Plan to improve coverage/quality of service provision		
More training for GRM focal points		
Other (please detail)		

B4: If consent has been provided or national legislation mandates reporting of the incident as showed in B3, provide the following details from the available GRM record

Age of victim (if recorded in GRM):	
Sex of victim (as recorded in GRM):	Male ☐ Female ☐ Other ☐
Has the victim self-identified as sexual or gender minority or are there indications that the case is related to SOGI (i.e., use of homo- or transphobic language)?	Yes ☐ No ☐
Was the victim referred to service provision?	Yes ☐ No ☐
Is the alleged perpetrator employed by the project (as showed by the victim and reported in the GRM)?	Yes ☐ No ☐

B5: Basis for investigation

Has the victim provided informed consent for this incident to be investigated?	Yes ☐ No ☐
--	--



ANNEX 7. PROPOSED AGE VERIFICATION PROCESS.

A. Introduction

Not all work done by children should be classified as child labour that is to be targeted for elimination. Children's or adolescents' participation in work that does not affect their health and personal development or interfere with their schooling, is generally regarded as being something positive. This includes activities such as helping their parents around the home, assisting in a family business, or earning pocket money outside school hours and during school holidays. These kinds of activities contribute to children's development and to the welfare of their families; they provide them with skills and experience and help to prepare them to be productive members of society during their adult life <https://www.ilo.org/ipec/facts/lang-en/index.htm>.

ESS#2 refers to child labour as work done by a child over the minimum age and under the age of 18 that is likely to be hazardous⁴ or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

B. Format

The project will be guided by the *[name of the law]* of *[name of the country]* which states that the minimum age of employment in *[name of the country]* is *[mention the minimum age]* years old. In addition to *[name of the law mentioned above]*, *[name of the country]* is a signatory to the following international conventions related to the minimum age of employment:

[name all that apply, add, eliminate as pertinent]

- UN Convention on the Rights of the Child, Art. 32.
- ILO Convention 138 (Minimum Age) and 182 (Worst Forms of Child Labor).
- SDG 8, Target # 7: By 2025, end child labor.

Employees over the minimum age of *[age]* and under the age of *[age]* may be employed or engaged in connection with the project only under the following specific conditions:

- (a) The work is not likely to be hazardous and is not harmful to the child's health or physical, mental, spiritual, moral, or social development, and will not interfere with the child's education.
- (b) An appropriate risk assessment is conducted prior to the work commencing.

⁴ Work considered hazardous for children is work that, by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety, or morals of children. Examples of hazardous work activities prohibited for children include work: (a) with exposure to physical, psychological or sexual abuse; (b) underground, underwater, working at heights or in confined spaces; (c) with dangerous machinery, equipment or tools, or involving handling or transport of heavy loads; (d) in unhealthy environments exposing children to hazardous substances, agents, or processes, or to temperatures, noise or vibration damaging to health; or (e) under difficult conditions such as work for long hours, during the night or in confinement on the premises of the employer



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- (c) The Borrower conducts regular monitoring of health, working conditions, hours of work and the other requirement of ESS#2: Labor and working conditions.

The following process will be followed to verify the age of project workers:

All project employees will be asked to produce identification documents (ID) that are acceptable in local laws, employment, and human resources practices as “proof of age”. These forms of ID will be birth certificates, national drivers’ licenses, and national registration cards. In the absence of one of those forms of IDs the project will apply and document an age verification process. The age verification process will consist of alternative methods including copies of academic certificates, testimony/affidavits from officials of the schools attended, a medical examination, statements from family members and parish/village officials/local authorities. In addition, all documents will be cross-referenced and subjected to a verification process to ensure the validity of the documents. In instances where the documents are thought to be falsified the project will conduct the same process to ensure their authenticity. In all the processes the attendant care will be provided to ensure that the applicant or employee’s data are protected and their right to privacy is guaranteed. All copies of the IDs and documents pertaining to the applicant's age and other supporting materials will be kept in files with the human resources personnel.

Audits and controls of the process will be a requirement of the contractors and included in the contracts, in keeping with the **[Name of the Labor Code]**

If underage workers are found working on the project the following actions will be undertaken:

- In dependence of the context, consider proposing to **move to child to a lighter non-hazardous work**, or terminate the contract and services agreement immediately as per the *[state the name of the labor code, if any]*
- If possible and if the context/law permits it, schedule a meeting with the child and seek to determine the reasons for seeking employment.
- Refer the child to other support services including social services and the Ministry of **[name of the ministry, example, Education]**
- Leverage the services of Non-government and Community Based Organizations **[if available, give specific names of such organization]** to assist the child
- Consider employing another adult member of the family if the child’s family is determined to be vulnerable or in dire circumstances.

If applicable, state the following: **[Section [xx] of [name of the labour code]** stipulates: **[mention the measures that the labour code recommends applying in case of child labour as part of the workforce]**

The project may use one or more of the following methods for age verification. Check all that apply during the age verification process.

☐ Birth certificate	☐ National ID	☐ Medical certificate	☐ Interview	☐ School certificate	☐ Testimony
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In case child labour is found, the following report will be developed

1. Personal details (age, gender) without revealing confidential information like real names.
2. Type of involvement in child Labour mentioning the sector (e.g. agriculture, fishing, construction) and specific activity.
3. To the extent possible family socio-economic situation.
4. current opportunities and constraints.
5. Recommendation on measures to be taken.

If permitted, the following format will be used for age verification

1. Subproject name _____ Registration # _____

Observe height appearance, tone of voice, strength. If parents or guardians work in the project/sub project, we also ask them about the age of the child. Also, cross check educational information against other answers, given that girls and boys start school at 7. Ask the following questions, filling in the form.

2. What is your name? _____

3. How long have you been working here? _____

4. What is your age? _____

- 4.1 What is your educational level? _____

5. How many years since you left school? Did you drop out? _____

6. How many brothers and sisters do you have? ____ 6.1 Who is the oldest? _____

7. How many years difference between you and your younger sister/brother? _____

8. How many years difference between you and your older sister/brother? _____

9. What are your younger brothers and sisters doing? _____

10. What is your job at the project site? _____

11. When did your voice get lower? _____

- 11.1 When did you begin to develop a beard? _____



C. Context for the indigenous communities:

The focus of any child labour work in indigenous communities is that of community participation and respect for traditional culture and belief systems within the norms of universal human rights. The project will engage indigenous peoples in a participatory community driven process of responding to child labour and in finding the most culturally appropriate way to prevent child labour that values age old processes of tribal social cohesion and traditions and promotes common processes of keeping child labour in check.

The project will take into consideration some or all the following:
areas:

- a) Ethnic and tribal relationships.
- b) Indigenous governance systems i.e. councils of elders/chiefs.
- c) Traditional employment, occupation, and migration patterns.
- d) Reliance on forest/land produce.
- e) Borrowing practices.
- f) Community coping mechanisms.
- g) Indigenous knowledge.
- h) Customary laws/ dispute resolution.
- i) Cultural integrity and diversity.
- j) Culturally appropriate education.



ANNEX 8. RISK ASSESSMENT TEMPLATE FOR PRIMARY SUPPLIER WORKERS

Before engaging primary suppliers, the Project will conduct a proportionate-to the risk assessment and/or screening to identify potential risks of child labour, forced labour, and serious safety issues that may arise in relation to primary suppliers. Regarding primary supply workers, if significant risks of child labour or forced labour are identified, the Project will require the primary supplier to address those risks. If cases of Child labour or forced labour are identified, the Project will require the primary supplier to take appropriate steps to remedy them. If there is a significant risk of serious safety issues, the Project will require the relevant primary supplier to introduce procedures and mitigation measures to address such safety issues. These procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness. Where remedy is not possible, the Project will, within a reasonable period, shift to primary suppliers that can demonstrate compliance with the relevant requirements of ESS#2. The LMP will outline the roles and responsibilities for monitoring primary suppliers.

A. This Table is to be completed by the primary services suppliers.

#	SUPPLIER INFORMATION	DESCRIPTION
1	Supplier name:	
2	Contact person:	
3	Address:	
4	Phone number:	
5	Email:	

B. Risks and Impacts Classification.

#	Type of Risks	Likelihood	Impact			
			Low	Moderate	Substantial	High
1	Child labour	High				
		Substantial				
		Moderate				
		Low				
2	Forced Labor	High				
		Substantial				
		Moderate				
		Low				
3	Serious safety issues	High				
		Substantial				
		Moderate				
		Low				



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4	Other issues (name them)	High				
		Substantial				
		Moderate				
		Low				

C. Description of the Risks level.

#	Type of identified risk	Risk description based on the above rating
	Child labour	
	Forced labour	
	Serious safety issues	
	Other issues	

D. Mitigation measures.

#	RISK'S TYPES	INDICATIVE MITIGATION MEASURES	STATUS*			
			NR	R	P	C
1	Child Labour	Assess the supply chain to determine where child labour might be a risk.				
		Monitor primary supply chains to identify any new risks or incidents of Child Labour.				
		Verify the age of all workers according to Annex 7.				
		Primary suppliers have clear policies against Child Labour.				
		Primary suppliers engage local communities and raise awareness about the harmful effects of Child Labour.				
	Forced Labour	Assess the supply chain to determine where forced labour might be a risk.				
		Identify risks of forced labour in their primary supply chains.				
		Continuously monitor primary supply chains to identify any risks or incidents of forced labour.				
		Primary suppliers have health and safety plans in place -include provisions for adequate facilities and PPE for all workers.				
		Primary suppliers have Grievance mechanism in place that can be used by workers in the primary supply chain.				
		Primary suppliers must verify the employment conditions of their workers to ensure that no forced labour is employed.				
		Primary suppliers have clear policies against forced labour.				



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3	Serious safety issues	Assess the supply chain to determine where significant safety issues might arise.				
		Identify serious safety risks in their primary supply chains.				
		Continuously monitor primary supply chains to identify any new safety risks or incidents.				
		Ensure that primary suppliers have comprehensive health and safety plans in place.				
		Plans include provisions for adequate facilities, Personal Protective Equipment (PPE), and safety training for all workers to prevent life-threatening situations.				
		Grievance mechanism in place, that can be used by workers in the primary supply chain to report safety issues. This mechanism should be accessible and functional, allowing for anonymous reporting if necessary.				
		Primary suppliers are verifying their compliance with safety standards through regular inspections and audits.				
		Primary suppliers have clear policies on health and safety Policies are displayed and communicated to all workers.				
		Suppliers are promoting a culture of safety and ensure that all workers are aware of safety protocols.				
		Primary suppliers are engaging local communities to raise awareness about safety issues.				
		Monitor and assess if primary suppliers are following safety standards.				

*Status: R (Relevant) NR (Not relevant), In process (P), Completed (C)

E. Conclusions

Is it necessary for the Primary supplier to take additional appropriate steps to remedy any situation?	
Is there a need to terminate contracts with the supplier because of non-compliance - shifting to suppliers who can demonstrate compliance with the ESF standards?	



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Appendix 1. Primary supplier monitoring template

#	CONCEPT	ANSWER/ DESCRIPTION
1	Responsible Person/Team:	
2	Initial Risk Assessment conducted?	
3	Frequency of Monitoring and reporting (Monthly, quarterly, six monthly, etc.)	
4	Date of latest monitoring report	
5	Does the primary supplier understand and agree to comply with the Project Labor Management Procedures and relevant Environmental and Social Standards (ESS).	
6	Are specific clauses in contracts, in place that require compliance with child labour, forced labour, and safety standards?	
7	Does the project keep detailed records of all risk assessments, monitoring activities, and findings?	
8	Is/will the Project provide training and capacity-building programs for primary suppliers to enhance their understanding of labour standards and safety requirements.	
9	Is there a need to develop and implement corrective action plans (CAPs) for suppliers found to be non-compliant with labour standards or safety requirements?	
10	If the answer to the above is yes, describe the objective and key activities of the CAP.	
11	In case there is CAP, is the Project monitoring its implementation and verifying its effectiveness?	
12	Is there a need to transition to alternative suppliers that meet the relevant ESS requirements? If yes, why?	
13	Is the Project collecting feedback from suppliers and stakeholders to identify areas for improvement in the monitoring process?	
14	Based on the findings of the monitoring exercise, is there a need to update and refine the Labor Management Procedures? If yes, in what way?	

Note: Provide necessary details in Annexes

Prepared By: _____
Reviewed By: _____
Approved By: _____
Date: _____



ANNEX 9. GLOSSARY OF TERMS AND DEFINITIONS

TERM	DEFINITION
Child	Any person below the age of eighteen years
Child Labour	This term is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that: is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.
Community Workers	People employed or engaged in providing community/voluntarily labour
Compensation	Employees are entitled to minimum wage levels. Even if not on an hourly basis, businesses in Belize are required to compensate their employees through fair and transparent processes. Compensation must be understood by both parties, communicated in a written form and provided in an appropriate language.
Contracted Workers	People employed or engaged through third parties to perform work related to core functions of the project, regardless of location
Direct Workers	People employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project
Decent Work	Decent work sums up the aspirations of people in their working lives. It involves opportunities for work that is productive and delivers a fair income, security in the workplace and social protection for all, better prospects for personal development and social integration, freedom for people to express their concerns, organize and participate in the decisions that affect their lives and equality of opportunity and treatment for all women and men.
Force Labor	Work that is performed involuntarily and under the menace of any penalty. It refers to situations in which persons are coerced to work using violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities
Gender-based Violence	An umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts; coercion; and other deprivations of liberty
Gender Equality	Provision of equal opportunities to access, participate and use public services to all women and men
Grievances Mechanism	A grievance mechanism is a formal complaint process that can be used by individuals, workers, communities and/or civil society organizations that are being negatively affected by certain business activities and operations



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TERM	DEFINITION
Humane Treatment	The workplace shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measures, including any corporal punishment, mental or physical coercion, or verbal abuse of workers. The use or threat of physical or sexual violence, harassment and intimidation against a worker, his or her family, or close associates, is strictly prohibited. Disciplinary procedures should not include sanctions that result in wage deductions, reductions in benefits, or compulsory Labour.
International Labour Standards	They are legal instruments drawn up by ILO's constituents: governments, employers and workers, and setting out basic principles and rights at work. They are either Conventions or Protocols, which are legally binding international treaties that may be ratified by member states, or Recommendations, which serve as non-binding guidelines.
Labor and Working Conditions	Contractors will keep records of recruitment/employment, wages, leave, incidence etc., in accordance with specifications set out in Belize Labor Law. The Project Team may at any time require records to ensure that labour conditions are met. The Project Team review records against actuals at a minimum monthly and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the WB.
Migrant Workers	Workers who have migrated from one country to another or from one part of the country to another for purposes of employment
Primary Suppliers	Suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project
Sexual Abuse	Any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another
Sexual Harassment	Any form of unwanted verbal, non-verbal, or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, when creating an intimidating, hostile, degrading, humiliating, or offensive environment
Social Protection	It is defined by the ILO as the set of public measures that a society provides for its members to protect them against economic and social distress caused by the absence or a substantial reduction of income from work as a result of various contingencies (sickness, maternity, employment injury, unemployment, invalidity, old age or death of the breadwinner), the provision of health care and the provision of benefits for families with children.
Raising awareness	The project will take the initiative to organize sessions on raising awareness of the communities on issues relevant to the project's compliance and standards (e.g., labour standards). This, in addition to project's Communication Strategy, will ensure effective and efficient participation of different stakeholders of the project.



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TERM	DEFINITION
Occupational Health and Safety (OHS)	Given the nature of project interventions, project workers may be subject to some OHS concerns during civil/construction work, including, fall and struck by machines, spread of disease due to close interaction, fire and electrocution, traffic incidence etc. To address issues of OHS the bidding document and the contract agreement will stipulate measures so that Contractors ensure a safe working environment by providing training on safety, correct use of equipment, machine and equipment inspection, regular and informal toolbox talks, crisis management protocol, monitoring of working conditions, supply of PPE etc. Construction related OHS guidelines (for example ILO OSH 2001 - Guidelines on occupational safety and health management systems, ILO Code of Practice Safety and Health in Construction, 1991) may be referred to plan OHS management and implementation. Given the nature of this project, the workers may be subject to various work-related incidences including fire, stuck by machines, fall, lack of PPE, lack of OHS related training, etc. A risk hazard assessment must be carried out before commencing work, following the law of proportionality, by the Contractor. Contractors must engage a minimum of one safety representative. Smaller contracts may permit the safety representative to carry out other assignments as well. The safety representative ensures the day-to-day compliance with specified safety measures and records of any incidents. Minor incidents shall be reported to respective PMU monthly, serious incidents shall be reported immediately. Minor incidents will be reflected in the quarterly reports to the WB, major issues will be flagged to the World Bank immediately. The reporting criteria will follow ESCP guidelines (notice within 24 hours of occurring), and the Contractor will carry out a Root Cause Analysis (RCA) as well as develop and implement a Safeguard Corrective Action Plan (SCAP) with the assistance of the CEU. The Contractor is required to follow international best practices on OHS (for example ILO OSH 2001 - Guidelines on occupational safety and health management systems, ILO Code of Practice Safety and Health (1991).
The Project	Refers to the WB funded Project Blue Cities and Beyond Program
Unscrupulous Labor Practices	Workers may be selected not basing on inherent job requirement, women may be left out of employment opportunities, pay differentials and scope of advancement may be skewed to workers favoured by the employers. Noncompliance with labour law may generate unhealthy working relations and conditions. Contract bidding document and agreement will require following the provisions of labour law (especially referring to equal wage for equal work) and equal opportunity for all applicants, including women and persons with disability.



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TERM	DEFINITION
Workers Grievances	Contractors will be required to present a worker grievance redress mechanism (GRM) which responds to the minimum requirements in this LMP. The PMU’s Social focal point will review records monthly. Where worker concerns are not resolved, the PMU will keep abreast of the issue and reflect it in quarterly reports to the World Bank. Given the anticipated number of the project workers the labour GRM will be a separate undertaking apart from the Project level GRM, though personnel in the committees (GRC) on both the GRMs may have overlapping functions. Reporting Channels for the GRMs may also be same.
Workplace Equality	All workers, irrespective of their nationality or legal status, shall be treated fairly and equally. Migrant workers should benefit from conditions of work no less favorable than those available to nationals, including but not limited to wages, benefits, and accommodations. Migrant workers or their family members should not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.
Working Hours	In Belize, employers and employees are free to agree the number of hours worked per day. The nature of the maritime industry benefits from this flexibility and contract agreements reflect this. An employee’s hours of work must be agreed to by the employer and employee in their written employment agreement. Employees are under no obligation to accept extra hours of work not specified in their employment agreement. Under Belize’s Health and Safety Legislation, physical and mental fatigue is a hazard and must be actively managed against. Failure to do so can result in criminal liability.