

LABOR MANAGEMENT PROCEDURES (LMP)

ACRONYMS & ABBREVIATIONS

Project	Project Center for Advancement in Restoration and Modernization Capacity (CARMC)
CARMC	Center for Advancement in Restoration and Modernization Capacity
KSEI	Kyiv School of Economics Institute
MoI	The Ministry for Communities, Territories and Infrastructure Development of Ukraine (Ministry of Infrastructure)
PIU	Project Implementation Unit
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
LMP	Labor Management Procedure
WB	World Bank (International Bank for Reconstruction and Development)

1. Introduction.

This Labor Management Procedure (LMP) is developed taking into account the World Bank Environmental and Social Framework, namely, the Environmental and Social Standard 2: Labor and Working Conditions and within the framework of the legislation of Ukraine for the Center for Advancement in Restoration and Modernization Capacity (CARMC) Project (hereinafter – Project).

The project's main objective: to enhance the capacity of Ukrainian government authorities, local governments, self-government bodies, and civil society organizations in managing recovery projects with a focus on innovation, transparency, efficiency, and coordination; to create a community of specialists united by the common goal of effective recovery and to equip them with the necessary knowledge and skills.

Main components are Information center, Training hub and Community building.

LMP activities are implemented during the entire period of the Project implementation and can be updated if necessary.

2. Overview of the use of labor under the Project.

Environmental and Social Standard 2: Labor and Working Conditions classifies employees into the following categories:

- employees directly involved in the project (direct workers);
- contracted employees (contracted workers);
- employees of primary suppliers (primary supply workers);
- employees engaged in public works (community workers)

It is assumed that the Project will include workers directly involved in the Project (personnel) and contracted workers (contractors):

- PERSONNEL
 - Executive Vice President
 - Development Director
 - Project Manager

- Grant Manager
- Education Lead
- Manager of the program development
- Curriculum methodologist
- Training coordinator 1
- Training coordinator 2
- Manager of the information center
- Data analyst
- Interpreter specialist
- Manager of the community building projects
- Engagement coordinator
- Event manager
- Communication Manager
- PR coordinator
- Subtotal Personnel
- CONTRACTORS
 - Ukrainian lecturers Decision makers course
 - International lecturers Decision makers course
 - Ukrainian lecturers Training for trainers course
 - International lecturers Training for trainers course
 - Ukrainian lecturers PM main course

The risk of child or forced labor is not anticipated beforehand (as this risk is not relevant for the territories controlled by Ukraine¹, due to the requirements of national legislation). However, the PIU Environmental and Social Consultant will supervise the work of the contractors, subcontractors, and contract workers.

3. Assessment of key potential labor risks.

The assessment of key potential labor risks was carried out in accordance with the requirements of the Environmental and Social Standard 2: Labor and Working Conditions. Activities supported by the Project will take place in conditions of considerable instability beyond the direct control of Kyiv School of Economics Institute, and will include health, safety and security risks associated with the Russian military invasion. First of all, this concerns the risks posed by missile attacks by the Russian Federation on the territory of Ukraine, including territories far from the front line.

Western Ukraine is relatively distant from the current conflict zones in the eastern part of the country, reducing the direct risk of an active war attack. While the risk of an active war attack in Western Ukraine is lower compared to other regions, the ongoing conflict in the east could potentially escalate and affect neighboring areas. The security infrastructure in Western Ukraine is generally more developed compared to other regions, with better access to emergency services and communication networks. The overall risk of a direct active war attack in Western Ukraine is relatively low, but the potential for indirect impact from the conflict in the east increases the risk to a moderate level.

Central Ukraine is geographically closer to the conflict zones in the east compared to Western Ukraine, increasing the potential risk of spillover effects from the ongoing conflict. The risk of an active war attack in Central Ukraine remains relatively low but is influenced by the overall security situation in the country and the potential for escalation. Central Ukraine faces a moderate risk of

¹ The areas of Ukraine that are currently controlled by government of Ukraine

indirect impact from the conflict in the east, including the potential for localized violence or unrest, particularly in areas closer to the conflict zones.

Southern-Eastern Ukraine is the epicenter of the ongoing conflict, with frequent military clashes and security incidents reported in the region. The risk of an active war attack in Southern-Eastern Ukraine remains high. The security infrastructure has been severely impacted by the conflict, with limited access to essential services and higher levels of insecurity compared to other regions. Southern-Eastern Ukraine faces a significant risk of direct active war attacks, including shelling, artillery fire.

The Emergency Preparedness and Response Plans at the local level will be prepared to avoid this risk. Guidance for workers on what they should do in the event of small-arms attack, artillery shelling, mortar fire, or airstrikes:

- Upon hearing the sound of air alarm, artillery fire or airstrikes, seek immediate shelter.
- Move to designated safe zones or areas with reinforced structures.
- Follow established evacuation procedures if instructed to do so by emergency services or authorities.
- Evacuate calmly and quickly to designated assembly points.
- Keep a battery-powered or hand-cranked emergency radio to stay informed about the situation.
- Follow official announcements and instructions from local authorities.
- If trained, provide first aid to injured individuals while waiting for professional medical assistance.
- Use available first aid kits and equipment.
- Assist colleagues, especially those with mobility challenges, in reaching safety.
- Work as a team to ensure everyone is accounted for and safe.

Labor risks associated with the war in Ukraine. Assessing potential labor risks in light of the Russian military invasion in Ukraine unveils a specific and critical challenge— the prospect of employees being officially recruited and mobilized into the Ukrainian army. Given the nature of the conflict, there is a legal framework for conscription, and employees may be called upon to serve as part of their civic duty. This situation can significantly impact project continuity, as skilled employees are redirected to fulfill national defense requirements, underscoring the need for employers to navigate these legal obligations and strategically manage workforce deployment amid these exceptional circumstances.

Labor risks, including the influx of labor and related gender-based violence, as well as child labor, are considered low due to modern Ukrainian legislation on labor and working conditions and PIU compliance with the requirements of the Constitution of Ukraine (Article 43 prohibits forced labor), and the Labor Code of Ukraine (Article 31 prohibits workers from performing tasks not discussed in their employment contracts, and Article 188 prohibits child labor). The PIU Environmental and Social Consultant responsible for overseeing contractors will monitor and report on the absence of forced labor and gender-based violence. A Local Project-oriented Grievance Redress Mechanism (GRM) will be established to receive worker and community grievances due to the influx of labor (if any).

Risks of overtime work. In Ukraine, working hours are not counted and there is no compensation for overtime, despite the legislation in force provides for compensation for hours worked. There is also a risk of non-payment to persons without contracts. The Project PIU will attempt to address

these risks through: (1) conviction that all direct part-time workers should enter into contracts with overtime provisions; (2) establishment of grievance mechanisms for direct or contracted workers.

Based on the assessment, the risk of SEA (Sexual Exploitation and Abuse) / SH (Sexual Harassment) at KSEI can be categorized as low, considering factors such as the lack of reported incidents, the presence of existing policies and training programs.

Mitigation Measures include:

- A comprehensive review and updating of existing policies and procedures related to SEA/SH, ensuring they are accessible and effectively communicated to all members of the KSEI community.
- Training programs on SEA/SH prevention and response.
- Confidential reporting mechanisms for individuals to report incidents of SEA/SH without fear of retaliation.
- Access to support services for individuals who experience SEA/SH, including counseling, medical assistance, and legal advice, with an emphasis on confidentiality and victim-centered support.
- Awareness campaigns and workshops on promoting respectful behavior, gender equality, and zero tolerance for SEA/SH, involving all members of the KSEI community.

4. Overview of national legislation.

Ukraine has a progressive legislative framework on labor protection and safety. The Constitution of Ukraine provides for the right to work and the opportunity to earn a living by performing work that was chosen at will (Article 43). Article 43 of the Constitution of Ukraine guarantees a safe and healthy professional environment, as well as a salary not lower than that determined by the Law; it prohibits the employment of women and minors in jobs that are dangerous to health. Article 43 also provides for the protection of citizens against unlawful dismissal from work and provides for timely remuneration for work performed. The right of workers to strike is also guaranteed by the Constitution of Ukraine (Article 44). Article 45 of the Constitution guarantees the right to breaks, holidays and rest. Social protection of employees is also guaranteed by Article 46 of the Constitution of Ukraine.

All constitutional provisions are supported by such laws of Ukraine with appropriate amendments:

The Labor Code of Ukraine (initial Law No. 322-VIII, adopted on December 10, 1971);

Law of Ukraine 'On Holidays' (Law No. 504/96-VR, adopted on November 15, 1996);

Law of Ukraine 'On wages' (Law No. 108/95-VR, adopted on March 24, 1995);

Law of Ukraine 'On trade unions, their rights and guarantees of activity' (Law No. 1045-XIV, adopted on September 15, 1999);

Law of Ukraine 'On Labor Protection' (Law No. 2694-XII, adopted on October 14, 1992).

The requirements for health and safety at work in Ukraine are stipulated by the Law of Ukraine 'On Labor Protection', which specifies in detail the basic constitutional provisions on the rights of workers to protect their lives, health at the work, proper, safe and healthy working conditions and the regulation of the relationship between employer and employee on safety, occupational hygiene and working conditions. In addition, the Law establishes a uniform labor protection procedure in Ukraine.

Every legal and natural person shall comply with the provisions of this Law when hiring employees or part-time/assignment-based employees.

The law gives workers the right to refuse work if the working conditions are hazardous to their life and health (Article 6). Workers have the right to benefits and compensation for harsh and dangerous working conditions and for damage caused by violations of labor protection rules (Article 7). It has been established that the Social Insurance Fund for Occupational Accidents and Diseases of Ukraine shall compensate for damage to the health of an employee or in the event of his death. In addition, according to the Collective Labor Agreement, the employer may pay additional compensation to the injured persons or their family members from their own funds (Article 9).

This Law also regulates the protection of certain categories of workers: women, minors and persons with disabilities (Articles 10-12). In particular, the Law prohibits the employment of women in hazardous and dangerous working conditions, underground works, except for non-physical work and work related to the provision of sanitary and amenity services. It is also prohibited to hire women to lift and transport things with a weight exceeding the established limits.

A separate section of the Law is devoted to the regulation of relationship in labor protection and management (Chapter 3). This chapter defines the system of state authorities and institutions responsible for ensuring compliance with labor legislation and legal protection of labor safety.

The Law provides for penalties for non-compliance and violation of the provisions of the Law.

Types of employment contracts. Employment contracts are defined by the Labor Code (for example, Article 21). An employment contract is a contract that enters into force between the employee and the owner of the enterprise/institution, according to which the employee performs the tasks/works defined by the agreement.

Article 23 of the Labor Code of Ukraine defines the following types of employment contracts based on the contract length:

- Open-ended employment contract. This type of contract is most common in Ukraine. In addition, this type of contract is governed by the Labor Code and the above-mentioned labor legislation of Ukraine, the internal rules of the Company and the collective agreement.
- Term contract. The only difference between this type of contract and the former is that the Parties limit their cooperation to a certain period of time, based on the type of activity performed.
- Assignment-based contract. A special type of contract may be entered into to provide an assignment-based service where special skills or short-term support are required. This special form of contract is actually a service contract. Using this type of agreement, the parties agree and acknowledge that all terms of their cooperation are contained in the contract (agreement).

Probation. According to Article 27 of the Labor Code of Ukraine, the probationary period for permanent employees may not exceed three consecutive months. In some cases, it may last up to six consecutive months, but this must be agreed with the Primary Trade Union Organization.

Wages and deductions. The Law of Ukraine 'On Wages' (Article 1) defines wages as remuneration calculated in monetary terms, which the employer pays to the employee for the work performed by him under the employment contract. Remuneration consists of the basic salary - remuneration for work performed in accordance with the established labor standard (working hours, efficiency of work, etc.) and additional wages - remuneration for excellent performance or efficiency or for harmful working conditions. According to Article 3 of the aforementioned Law, the minimum wage is determined by the monthly or hourly wage rate determined by legislation. If the salary of an

employee who performs work for a month is lower than the minimum wage, the employer makes an additional payment up to the minimum wage. Since January 1, 2024 the minimum wage is UAH 7,100 (about USD 187). Usually, employers automatically deduct personal income tax and health and social insurance contributions from wages and transfer them to the relevant fiscal authorities.

Working hours. Labor Code of Ukraine (Article 51) provides a standard 40-hour working week. Reduced working hours are defined as: (a) for employees aged 16 to 18 - 36 hours per week; (b) for persons aged 15 to 16 (students aged 14 to 15 working during the holidays) - 24 hours per week; (c) for workers performing work in hazardous working conditions - no more than 36 hours per week.

The law also provides for the reduction of working hours for certain categories of workers (teachers, doctors, etc.). This reduction can be compensated by enterprises and organizations for women raising children under the age of 14 or children with disabilities.

According to Article 54 of the Labor Code of Ukraine, fixed working hours (shifts) are reduced by one hour when working at night.

Night work shall be equivalent to day work if required by production conditions, in particular continuous production, as well as shift work during a six-day week with one day off. Night working hours are from 22:00 p.m. to 06:00a.m.

Night work by women is not permitted except in those sectors of the national economy where this is particularly necessary and permitted as a temporary measure. Pregnant women and women raising children under three years of age may not be engaged in night work, overtime work, or work on weekends or business trips. Women raising children between the ages of 3 and 14 or children with disabilities may not be employed in overtime work or go on business trips without their consent. (Labor Code of Ukraine, Articles 175-177).

Breaks. Workers must have a break for rest and meal. Breaks should not last more than two hours. Break is not included in the working time. Breaks for rest and meal are usually granted four hours after the start of work. The start and end time of the break is established by internal rules. Employees use break time at their own discretion. During this time, they may be absent from the workplace. (Article 66 of the Labor Code of Ukraine).

Weekends and vacations. For a five-day working week, employees have two days off per week and for a six-day working week one day off. Uninterrupted weekly rest shall be at least forty-two hours.

Work on weekends is prohibited. The employment of certain workers on such days is permitted with the authorization of the elected body of the trade union organization (trade union representative) of the enterprise, institution or organization and only in exceptional cases specified by law.

Engagement of individual employees on weekends is permitted in such exceptional cases: (a) to prevent or deal with the consequences of natural disasters, epidemics, epizootics, industrial accidents and their immediate consequences; (b) to prevent accidents that threaten or may threaten the life or normal life of people, may cause loss or damage to property; (c) to perform unforeseen emergency works, on which further normal operation of the enterprise, institution or organization of both the whole and their individual subdivisions depends; (d) to perform urgent work in order to avoid or prevent the downtime of rental equipment or the accumulation of cargo at points of departure and destination.

Employees are engaged to work on weekends on the basis of a written order (order) of the owner or an authorized body.

Work on a holiday may be compensated by agreement of the parties by providing another day of rest or in cash in double amount. (Labor Code of Ukraine, Articles 66-71).

Employees of enterprises, institutions or organizations, regardless of their ownership and sector, as well as those working under an employment contract with individual entrepreneurs, have the right to annual (basic and additional) leave without loss of employment (position) and salaries for these periods.

The Law of Ukraine 'On Vacations' defines types of leave: 1) annual leave: basic leave; additional annual leave for work in harmful and difficult working conditions; additional annual leave for irregular working hours; etc. (Labor Code of Ukraine, Article 77); 2) leave for education, pregnancy and childbirth; 3) research leave; 4) maternity leave; 2) leave without compensation.

The total duration of annual basic and additional leave may not exceed 59 calendar days, and for workers employed in the mining industry - 69 calendar days (Article 10 of the Law 'On Vacations').

Annual basic leave is granted to employees for a period of not less than 24 calendar days per completed working year calculated from the date of conclusion of the employment contract. Employees with 18 or more years of service are granted annual basic leave within 31 calendar days (Labor Code of Ukraine, Articles 74-75).

In addition to annual leave, employers must provide other paid and unpaid leave or compensatory time off/sick leave during the calendar year.

National festivals, weekends and public holidays coinciding with leave are not included in the leave period when calculating the days of annual paid leave (Labor Code of Ukraine, Articles 77-78).

Overtime. The employer may order overtime work in cases related to national defense or emergency situations. Article 61 of the Labor Code defines in detail the circumstances in which an employer may request overtime work.

According to Article 62 of the Labor Code of Ukraine, the following categories of people should not be involved in overtime work: (1) pregnant women and women with children under the age of three (Labor Code of Ukraine, Article 176); (2) persons under 18 years of age (Labor Code of Ukraine, Article 192); (3) employees who study full-time or undergo in-service training (Labor Code of Ukraine, Article 220); etc.

Women who raise children between three and fourteen years of age or have a child with disability may work overtime only with their consent (Labor Code of Ukraine, Article 177).

Overtime must not exceed four hours for the next two days and 120 hours per year for each employee. The owner or the body authorized by him must keep records of overtime work of each worker (Labor Code, Article 65).

Overtime is paid at twice the normal hourly rate (Labor Code of Ukraine, Article 106).

Labor disputes. The Labor Code of Ukraine contains provisions allowing employees to resolve individual and collective disputes between an employer and employee(s) regarding the terms of an employment agreement or other aspects of work, including safety and health at work (Articles 221 - 241).

Labor disputes may be dealt with by special labor commissions for labor disputes or courts.

The procedure for consideration of labor disputes by the commission is provided for in Articles 223 - 230 of the Labor Code of Ukraine. If the parties disagree with the recommendations of the Commission, the conflict is resolved in the courts. The procedure for consideration of labor disputes by courts is provided for in Articles 231 - 241 of the Labor Code.

Today, the requirements for the creation, maintenance, operation, and accounting of the fund of civil protection protective structures are established by:

- the Code of Civil Protection of Ukraine;
- the Procedure for the creation, maintenance of the fund of protective structures for civil protection and its accounting, approved by the resolution of the Cabinet of Ministers of Ukraine dated March 10, 2017 No. 138;
- by the order of the Ministry of Internal Affairs dated 07/09/2018 No. 579 "On approval of requirements for the use and accounting of the fund of protective structures for civil protection", registered in the Ministry of Justice of Ukraine on July 30, 2018 under No. 879/32331.

Also the State Service of Ukraine for Emergency Situations, by letter dated 14.06.2022 No. 03-1870/162-2, approved Recommendations regarding the organization of shelters in the objects of the fund of protective structures for civil protection of personnel and children (pupils, students) of educational institutions.

Additionally, the Law of Ukraine "On the Organization of Labor Relations in Martial Law," dated 03/15/2022, No. 2136-IX, regulates labor relations during martial law.

5. Environmental and Social Standard 2: Labor and Working Conditions and differences.

5.1. Environmental and Social Standard 2: Labor and Working Conditions.

The World Bank's employee and safety requirements are defined in the Environmental and Social Standard 2: Labor and Working Conditions, whose main tasks are:

- Promotion of occupational health and safety;
- Promotion of fair treatment, non-discrimination and equal opportunities for the Project employees;
- Strong protection of Project employees, including vulnerable persons such as women, persons with disabilities, children (working age, in accordance with this ESS) and migrant workers, contract workers, community workers and primary supply workers, respectively;
- Prevent all forms of forced labor and child labor;
- Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national legislation; and
- Provide Project employees with accessible means to raise problematic issues arising in the workplace.

Environmental and Social Standard 2: Labor and Working Conditions applies to PIU consultants and contractors (full-time or part-time, temporary, assignment-based and migrant). If government civil servants are employed in connection with the Project, whether full-time or part-time, they will remain bound by the terms of their existing public sector employment agreement or arrangement unless due legal procedure is followed to transfer their employment or involve in the Project. The Environmental and Social Standard 2: Labor and Working Conditions will not apply to civil servants.

Project employees will be provided with clear and understandable information and documentation on the terms and conditions of employment. Information and documentation will determine their rights in accordance with national labor laws and requirements of the Environmental and Social Standard 2: Labor and Working Conditions (which will include collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits. This information will be provided at the beginning of the employment relationship and if there are significant changes.

For more information on WB environmental and social standards, see the links below: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>.

5.2. Differences.

The legislation of Ukraine on labor protection and labor safety is progressive and reflects all key requirements of the Environmental and Social Standard 2: Labor and Working Conditions. However, workers' awareness of their labor and occupational safety rights remains low. Enforcement of labor rights at the enterprise level and staff and worker capacity development remain major challenges.

6. Responsible staff.

Kyiv School of Economics Institute coordinates the implementation of the Project as a whole. To develop and implement contracts with contractors, subcontractors and supervising organizations, PIU will, where necessary, engage a procurement consultant, an environmental and social guarantee consultant, a financial management consultant, a consultant for the development and support of medical infrastructure.

The PIU Environmental and Social Specialist will be responsible for the following issues:

- Implementation and editing of this LMP.
- Ensuring that all contracts with contractors are drawn up in accordance with the provisions of this LMP.
- Monitoring to ensure that contractors and personnel meet their obligations in terms of observing labor rights and occupational safety, as required by the legislation of Ukraine.
- Monitoring how contractors follow the work organization procedure.
- Monitoring compliance with occupational safety and security at all workplaces in accordance with labor protection legislation.
- Ensuring that the grievance redress mechanism is established and implemented for Project employees and that employees are informed of its purpose and use.
- Regular monitoring and reporting on occupational safety and health.

7. Employee's age.

The Labor Code of Ukraine (Article 188) prohibits the employment of young people under the age of 16. Young people under the age of 16 who have reached the age of 14 are allowed to be employed for educational purposes in workplace without risks to their health and during extracurricular hours. An exception is also made for the employment of a person who has reached the age of 15 with the consent of one of the parents or the person in loco parentis.

Contractors will be required to verify and establish the age of all workers. This will require workers to provide official documentation, which may include a birth certificate, national identity card, passport or medical record or school certificate. If a minor under the minimum age for employment is found to be working under the Project, measures will be taken to immediately terminate such employment or to engage such minor in a responsible manner, taking into account the best interest of the latter.

8. Conditions.

The conditions of employment of workers will be in accordance with the internal labor rules of contractors and suppliers and will be regulated by the Labor Code of Ukraine and other relevant legislation.

The conditions will be clearly stated in written contracts for all types of Project employees (full-time or part-time) and shall be communicated to them before starting work.

During the period of martial law, special working conditions and other labor relations may apply, taking into account the Law of Ukraine 'On the Organization of Labor Relations under Martial Law' dated March 15, 2022 (with subsequent amendments).

The procedure for organizing the work of contractors will determine the conditions of employment of contractors and subcontractors. These conditions will, as a minimum, correspond to this LMP, the Labor Code of Ukraine and will be reflected in standard contracts.

9. Grievance Redress Mechanism.

Any employee can submit a complaint by the following methods:

1. By e-mail: carmc@kse.org.ua
2. Through the Grievance Submission Form:
 - a. In English: [Grievance Submission Form - English](#)
 - b. In Ukrainian: [Grievance Submission Form - Ukrainian](#)
3. In writing to the project manager: Email - ipitsenko@kse.org.ua, Phone - +380986941367
4. In person: Complaints to project staff (through project meetings)
5. Via complaint box or the Grievance Submission Form ([Grievance Submission Form - English](#), [Grievance Submission Form - Ukrainian](#)) for anonymous complaints. Anonymous complaints may be submitted without personal details. A response to the anonymous complaint investigation will be published on the website.

Confidentiality will be ensured in all instances, including when the person making the complaint is known.

Complaints must:

- Identify the subject of the complaint
- Identify the individual submitting the complaint (except anonymous complaints).
- If the complaint is submitted by a representative, include the name, signature, contact details, and written proof of authority of the representative.

Supporting evidence is not necessary but may be helpful in reviewing and resolving the complaint. The complaint may also include suggestions on how the individuals believe the complaint could be resolved. All complaints will be treated as confidential. KSEI will not disclose any personal data that may reveal the identity of complainants without their consent.

It should be emphasized that this GRM is not an alternative/substitute for the legal/judicial system for receiving and handling complaints. However, it is established to mediate and find appropriate solutions to work-related complaints without proceeding to higher levels of review. However, all workers always had rights under Ukrainian law, including access to the judicial/legal complaint management system. GRM will not prevent Project employees from applying judicial procedures.

Sexual Exploitation and Abuse (SEA) represent grave breaches of the right to safety, security and dignity of persons. KSEI is committed to taking all necessary action to prevent, mitigate the risks of and respond to sexual misconduct and to put the protection, rights and dignity of victims at the forefront.

Addressing complaints related to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) within a labor management procedure involves specific steps to ensure a safe and respectful work environment for all employees. Here's a procedure tailored for addressing these complaints within a labor management framework:

When an employee experiences or witnesses SEA or SH, they can initiate the complaint process by above methods.

KSEI ensures confidentiality throughout the complaint process to protect the privacy and well-being of the complainant. The organization offers immediate support to the individual, including access to counseling services, medical assistance, and guidance on legal options.

Upon receiving a complaint, KSEI initiates an investigation led by trained personnel or an external investigator. The investigation process is impartial, thorough, and conducted in a timely manner. Investigators gather relevant evidence, including witness statements, documentation, and electronic communications, to assess the validity of the complaint.

Based on the investigation, KSEI determines whether the complaint is substantiated or unsubstantiated. Findings are documented, and confidentiality is maintained throughout the process. If the complaint is substantiated, KSEI takes appropriate action against the perpetrator in accordance with its policies and applicable laws.

Throughout the process, KSEI prioritizes the support and protection of the victim. Measures are implemented to prevent retaliation and ensure the victim's safety and well-being.

KSEI communicates the outcomes of the investigation and any actions taken to the complainant, the accused individual, and relevant stakeholders.

The Grievance Redress Service (GRS) is an avenue for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment. The GRS enhances the World Bank's responsiveness and accountability to project-affected communities by ensuring that grievances are promptly reviewed and addressed. Any individual or community who believes that a World Bank-financed project has or is likely to, adversely affect them can submit a complaint. Complaints must be in writing and addressed to the GRS. They can be sent by the following methods:

- Online, access the online form
- By email to grievances@worldbank.org
- By letter or by hand delivery to the World Bank Headquarters in Washington D.C., United States or any World Bank Country Office – print and use this form (DOCX).

For more information on WB GRS, see the links below:
<https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

10. Contract management.

PIU will direct and monitor the proper treatment of workers by their contractors, focusing on the contractors' compliance with their contractual agreements (obligations, representations and warranties) and employee management procedures. This may include periodic audits, inspections and/or spot checks of Project sites or work sites and/or human resource management and contractor reports. Human resource management records and contractor reports may include: (a) representative samples of employment contracts or arrangements between third parties and contractors; (b) records of complaints received and their resolution; (c) records of cases of non-compliance with national legislation; and (d) records of health and safety awareness briefings for contracted employees.