

Simplified Labor Management Procedures

**4.787,2 kWe / 4 kWp Solar (Photovoltaic)
Power Plant Project
of Karaman Municipality**

Date of Issue: 05 November 2024

1. OVERVIEW OF LABOR USE ON THE PROJECT

In accordance with the requirements of World Bank's Environmental and Social Standard 2 (ESS 2) on Labor and Working Conditions, a simplified LMP have been developed for 4.787,2 kWe / 4 kWp Solar (Photovoltaic) Power Plant Project of Karaman Municipality ("subproject"). The LMP sets out the ways in which Karaman Municipality will manage all subproject workers in relation to the associated risks and impacts. The objectives of the LMP are to: identify the different types of subproject workers that are likely to be involved in the subproject; identify, analyze and evaluate the labor-related risks and impacts for subproject activities; provide procedures to meet the requirements of ESS 2 on Labor and Working Conditions, ESS 4 on Community Health and Safety, and applicable national legislation.

The Labor Management Procedures apply to all subproject workers, irrespective of contracts being full-time, part-time, temporary or casual. The types of workers that will be included in the subproject are listed below:

Number of Project Workers: The total number of workers to be employed on the project, and the different types of workers:

- **Direct workers** –There will be 6 people directly assigned for the project. These are 1 manager, 3 technical experts, 1 engineer and 1 OHS expert.
- **Contracted workers** – A total of 35 people will be contracted for this project. The construction team will consist of 2 engineers, 4 supervisors, 18 laborers (who will be subcontracted from a subcontractor company), 1 secretary, 1 accountant, 2 drivers, and 2 administrative personnel. Additionally, the site supervision consultant team will include 1 project manager, 1 electrical engineer, 1 environmental engineer, 1 OHS expert, and 1 social expert. In addition to these, 6 construction supervision experts will be rented from a consultancy company, supplementing the total workforce.
- **Community workers** – 2 people will work to evaluate and finalize project related grievances.
- **Primary supply workers** – 6 people will work to supply project contracts.

Characteristics of Project Workers: The project workforce will primarily consist of local, adult workers of working age, with all employees meeting the minimum legal age of 18, in accordance with national labor laws and international standards. Efforts will be made to create employment opportunities for women and to prioritize hiring from the local community, supporting local economic development and fostering inclusivity within the workforce.

Timing of Labor Requirements: The construction activities are planned to be completed within 9 months, requiring a larger, temporary workforce for tasks such as site preparation, civil works, and equipment installation. This phase will involve various skilled and unskilled roles, including equipment operators, electricians, construction labourers, and quality control staff, who will primarily be located at the project site.

Following construction, the project will transition into an operational phase with a projected 30-year working period. During this long-term phase, the workforce needs will decrease, focusing on specialized roles for regular maintenance, monitoring, and operations. These roles will

include technicians, maintenance engineers, and administrative staff, with a continued emphasis on local employment and gender-inclusive hiring practices where feasible.

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The following potential labor risks are identified under the subproject:

Project Activities:

- Use of child labor or forced labor.
- Unsafe work environment and poor working conditions.
- Workplace injuries and accidents, particularly when operating construction equipment, when working at height on building construction, and when handling heavy equipment and materials.
- Risks from exposure to hazardous substances (dust, cement, chemicals used in construction etc.)

Key Labor Risks:

- Violation of worker's rights: Terms and conditions of employment of workers may not be consistent with national legislation or World Bank standards.
- Violation of worker's rights: Non-discrimination and equal opportunity of workers may not be consistent with national legislation or World Bank standards.
- Sexual exploitation and abuse/sexual harassment (SEA/SH) risks for workers.
- SEA/SH risks for community members, from workers from outside the subproject areas.
- Conflicts between workers and communities.
- Transmission of epidemic disease among workers or nearby communities, especially if workers are not hired locally and arrive to civil works locations from elsewhere or if epidemic disease-specific precautions are not in place at work sites and worker accommodation sites.

3. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

In compliance with Labor Law No. 4857, the following measures will be implemented to ensure fair working conditions in alignment with national regulations and international standards:

- Prohibition of employing individuals under the age of 18, thereby upholding child labor restrictions.
- Elimination of forced labor practices and establishment of a Human Resources Policy that adheres to the European Convention on Human Rights and the Turkish Constitution.
- Prohibition of discrimination in business relations on the basis of language, race, gender, political opinion, philosophical belief, or religion, ensuring equal opportunity and fair treatment for all workers.

- Assurance of workers' rights to collective bargaining, as stipulated by Law No. 6356 on Trade Unions and Collective Bargaining Agreements, and in compliance with Labor Law No. 4857.
- Provision of written employment contracts to all employees, detailing job roles, working hours, wages, benefits, rights, and responsibilities to promote transparency and accountability.
- Access to an effective and functional Grievance Mechanism (GM) for all workers to address any concerns or violations of labor rights.

Labor Law No. 4857 is applicable across all workplaces, covering all employers, employees, employer representatives, and worker representatives, irrespective of business sector or activity.

4. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

This section highlights the key aspects of national labor legislation concerning occupational health and safety (OHS) and its application to the various categories of workers identified in Section 1, specifically in the context of Karaman Municipality's initiatives. Karaman Municipality is committed to adhering to national OHS regulations to ensure the safety and well-being of all workers involved in the project.

In line with ESS2, paragraphs 24 to 30, the municipality will implement comprehensive OHS measures that address the specific risks associated with different job roles, particularly those that may involve hazardous activities. This includes ensuring that all workers receive appropriate training and protective equipment to mitigate risks of workplace injuries and accidents. Furthermore, Karaman Municipality will establish protocols for regular monitoring and reporting of OHS conditions, enabling the identification and rectification of any hazards promptly. The municipality's commitment to OHS not only fulfills legal obligations but also promotes a culture of safety and health among all workers, thereby enhancing productivity and overall project success. By integrating OHS principles into every aspect of project management, Karaman Municipality aims to create a safe working environment that prioritizes the health and safety of all individuals engaged in the project.

5. RESPONSIBLE STAFF

This section outlines the roles and responsibilities of Karaman Municipality and the Karaman Municipality Project Implementation Unit (PIU) in managing various aspects of the project. Karaman Municipality will be responsible for the engagement and management of project workers, ensuring that local labor laws and international standards are upheld throughout the workforce. The PIU will oversee the engagement and management of contractors and subcontractors, ensuring compliance with all contractual obligations and quality standards. Additionally, the PIU will implement and monitor occupational health and safety (OHS) protocols to create a safe working environment for all workers. Training programs will be developed and conducted by the municipality to enhance the skills and competencies of the workforce. Furthermore, Karaman Municipality will establish a robust mechanism for

addressing worker grievances, providing a clear and accessible process for workers to voice their concerns and seek resolution. Through these measures, Karaman Municipality and the PIU aim to foster a fair, safe, and productive work environment for all project participants.

6. POLICIES AND PROCEDURES

General Applicable Procedures

Karaman Municipality and contractors will apply the following guidelines when dealing with workers:

- 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; access to training; job assignment; promotion; termination of employment or retirement; or disciplinary practices.
- Harassment, intimidation and/or exploitation will be prevented or addressed appropriately.
- Special measures of protection and assistance to remedy discrimination or selection for a particular job will not be deemed as discrimination.
- Vulnerable subproject workers will be provided with special protection.
- Karaman Municipality and contractors will provide job / employment contracts with clear terms and conditions including rights related to hours of work, wages, overtime, compensation and benefits, annual holiday and sick leave, maternity leave and family leave. Code of Conduct included in this LMP will be applicable for all subproject workers.
- Karaman Municipality will ensure compliance with the Code of Conduct including providing briefings/awareness raising on the Code.
- Karaman Municipality and contractors will ensure compliance with occupational health and safety procedures and epidemic disease specific procedures (see below) including that the workers are properly trained in application of the standards that are relevant to the work.
- Karaman Municipality and retained contractors will ensure no person under the age of 18 shall be employed. Age verification of all workers will be conducted by the contractors.
- Karaman Municipality will recruit contractors and labor locally to the extent that they are available.
- Workers shall be recruited voluntarily, and no worker is forced or coerced into work.
- Karaman Municipality will supervise and monitor to ensure compliance with the above requirements.
- All workers will be made aware of the Worker's Grievance Mechanism (see below) to raise work related grievances, including any sensitive and serious grievances on SEA/SH.

Occupational Health and Safety (OHS) Procedures

The objective of the procedure is to achieve and maintain a healthy and safe work environment for all subproject workers (contracted workers and community workers) and the host community.

- On procurement for contractors, Karaman Municipality will avail the ESMF to the aspiring contractors so that contractors include the budgetary requirements for OHS measures in their respective bids.
- The contractor will develop and maintain an OHS management system that is consistent with the scope of work, which must include measures and procedures to address all the following topics listed below and in accordance with local legislation and GIIP (as defined by World Bank Group EHSGs). The management system must be consistent with the duration of contract and this LMP.
- Contractor will conduct workplace hazards identification and adopt all applicable E&S risk mitigation measures in accordance with local legislation requirements and WBG EHSGs.
- Contractor designates a responsible person to oversee OHS related issues at the subproject site and define OHS roles and responsibilities for task leaders and contract managers.
- Contractor should put in place processes for workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and danger to their life or health, without fear of retaliation.
- Contractor provides preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances informed by assessment and plan. Whenever PPEs are required for the work, it must be provided at no cost for the workers.
- Contractor should assess workers' exposure to hazardous agents (noise, vibration, heat, cold, vapors, chemicals, airborne contaminants etc.) and adopt adequate control measures in accordance with local regulations and WB EHSGs.
- Contractors provides facilities appropriate to the circumstances of the work, including access to canteens, hygiene facilities, and appropriate areas for rest. Where accommodation services are provided to subproject workers, policies will be put in place and implemented on the management and quality of accommodation to protect and promote the health, safety, and well-being of the subproject workers, and to provide access to or provision of services that accommodate their physical, social and cultural needs.
- Contractor provides for appropriate training/induction of subproject workers and maintenance of training records on OHS subjects.
- Contractor documents and reports on occupational incidents, diseases and incidents as per ESMF guidance.
- Contractor provides emergency prevention and preparedness and response arrangements to emergency situations including and not limited to workplace accidents, workplace illnesses, flooding, fire outbreak, disease outbreak, labor unrest and security.
- Contractor provides remedies for adverse impacts such as occupational injuries, deaths, disability and disease in accordance with local regulatory requirements and Good International Industry Practices.
- Contractor shall maintain all such record for activities related to the safety health and environmental management for inspection by Karaman Municipality or the World Bank.

Epidemic Disease Procedures

- Contractors should ensure that workers are hired locally to the extent possible.
- Contractors should provide training to all workers on signs and symptoms of epidemic disease, how it is spread, how to protect themselves (including regular handwashing and social distancing) and what to do if they or other people have symptoms, as well

as policies and procedures listed here. Training of workers should be conducted regularly, providing workers with a clear understanding of how they are expected to behave and carry out their work duties. Training should address issues of discrimination or prejudice if a worker becomes ill and provide an understanding of the trajectory of the virus, where workers return to work following infection.

- A summary of basic guidelines and epidemic disease symptoms should be displayed at all civil works sites, with images and text in relevant ethnic languages.
- Workers who are sick or showing possible symptoms should not be allowed on work site, should be isolated and referred to local medical facilities immediately.
- Contractors should review worker accommodation arrangements to see if they are adequate and designed to reduce contact with the community.
- Contractors should review work arrangements, tasks and hours to allow social distancing.
- Contractors should provide workers with appropriate forms of personal protective equipment.
- Contractors should ensure handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places at the work site.
- Karaman Municipality and contractors should together implement a communication strategy with the community in relation to epidemic disease issues on the site.

7. AGE OF EMPLOYMENT

To comply with ESS2 requirements and protect young workers, the following guidelines and procedures are established for the project:

Minimum Age for Employment

- The minimum age for employment on this project is set at **18 years**.

Age Verification Process

- All candidates for project work will undergo an age verification process as part of the recruitment procedure.
- Acceptable documents for verification include government-issued IDs, birth certificates, school records, or any other official documentation proving age.
- In cases where documents are not available, candidates may be asked to provide a witness statement from a legal guardian or community leader to attest to their age.

Procedure if Underage Workers Are Found

- If workers under the minimum legal age are identified on the project, immediate steps will be taken to:
 - Suspend their employment until further verification is conducted.
 - Engage with local child welfare authorities to ensure the well-being of the worker and their transition out of employment.
 - Conduct a thorough review of recruitment procedures to prevent future occurrences.
 - Document and report the incident according to internal and external (e.g., local labor authority) protocols.

Risk Assessments for Workers Aged Between Minimum Age and 18

- For workers between the minimum age and 18, a risk assessment will be conducted to ensure their roles are non-hazardous and in compliance with ESS2.
- The assessment will consider factors such as work environment, hours, exposure to dangerous equipment or substances, and physical demands of the role.

- Supervisors will receive specific training to monitor and support young workers, ensuring adherence to safety standards and responding to potential risks promptly.

Compliance with ESS2 (Paragraphs 17-19)

- This plan complies with ESS2 standards, ensuring that young workers are protected from exploitative or hazardous employment conditions.

8. TERMS AND CONDITIONS

In accordance with Turkish labor laws and project-specific requirements, the following terms and conditions apply:

1. Wages, Hours, and Provisions

- **Wages:** Project wages are determined according to Turkish minimum wage regulations and any relevant sectoral agreements. Where possible, wages will be set at competitive rates above the minimum wage to attract and retain qualified workers. Compensation will be provided fairly and transparently, in line with industry standards and project requirements.
- **Overtime Pay:** Overtime will be compensated at 1.5 times the normal hourly wage, as per Turkish labor law.
- **Meal and Transportation Allowance:** The project will provide allowances or direct support for meals and, where needed, transportation to the worksite.

2. Maximum Working Hours

- **Standard Work Hours:** The project follows the Turkish Labor Law, which sets standard work hours at **45 hours per week**.
- **Daily Working Hours:** Workers may work up to 9 hours per day unless specific exemptions apply.
- **Rest Periods:** Workers will receive at least 24 hours of continuous rest per week, typically on Sundays, as required by law.

3. Collective Agreements

- **Collective Labor Agreements (CLA):** If the project falls within a sector covered by a Collective Labor Agreement (CLA), these agreements will be honored. Relevant CLAs will be made available to workers, and provisions from these agreements, such as wage adjustments, benefits, and leave entitlements, will be applied accordingly.
- **Union Representation:** Workers have the right to form or join trade unions and engage in collective bargaining, as protected by Turkish law. Project management will maintain open channels of communication with union representatives to address worker concerns promptly.

4. Other Specific Terms and Conditions

- **Leave Entitlements:** Workers are entitled to annual leave based on their length of service, as specified by Turkish labor law (e.g., 14 days after one year of service).
- **Health and Safety Provisions:** Comprehensive health and safety training will be provided to all workers. Necessary personal protective equipment (PPE) will be supplied, and adherence to safety protocols will be strictly enforced.
- **Grievance Mechanism:** A grievance mechanism will be established, allowing workers to raise concerns anonymously and without fear of retaliation.

- **Termination and Severance:** Termination processes, severance pay, and final compensation will be in strict compliance with Turkish law to ensure fair treatment for workers.
- **Worker Accommodation:** If accommodations are provided for workers, contractors will ensure that they are provided in good hygiene standards, with fresh drinking water, clean beds, restrooms and showers, clean bedrooms, good illumination, lockers, proper ventilation, safe electrical installation, fire and lightening protection, separate cooking and eating areas. There will be separate facilities provided for men and women. The contractors will be liable to comply with "Workers' Accommodation: Processes and Standards: A guidance Note" by IFC and the EBRD.

These terms and conditions are designed to align with both Turkish labor standards and ESS2 requirements, ensuring that workers' rights and well-being are prioritized on the project.

9. GRIEVANCE MECHANISM

There will be a specific Workers Grievance Mechanism (Worker GM) for subproject workers as per the process outlined below. This considers culturally appropriate ways of handling the concerns of direct and contracted workers. Processes for documenting complaints and concerns have been specified, including time commitments to resolve issues. Workers will be informed about the relevant Worker GM upon their recruitment and their right to redress, confidentiality and protection against any reprisals from the employer will be stated in the contract.

Routine Grievances

The process for the Worker GM is as follows:

- Any worker may report their grievance in person, by phone, text message, mail or email (including anonymously if required) to the contractor as the initial focal point for information and raising grievances. For complaints that were satisfactorily resolved by the aggrieved worker or contractor within one week of receipt of complaint, the incident and resultant resolution will be logged and reported monthly to the subproject coordinator of PIU.
- If the grievance is not resolved within one week, the contractor (or the complainant directly) will refer the issue to the social focal person. The social focal person will work to address and resolve the complaint and inform the worker as promptly as possible, in particular if the complaint is related to something urgent that may cause harm or exposure to the person, such as lack of PPE needed to prevent epidemic disease transmission. For non-urgent complaints, the social focal point will aim to resolve complaints within 2 weeks. For complaints that were satisfactorily resolved by the social focal point, the incident and resultant resolution will be logged by the social focal person and reported monthly to subproject coordinator as part of regular reporting. Where the complaint has not been resolved, the social focal person will refer to PIU coordinator at Karaman Municipality for further action or resolution.

The workers will preserve all rights to refer matters to relevant judicial proceedings as provided under national labor law.

Each grievance record should be allocated a unique number reflecting year, sequence and township of received complaint. Complaint records (letter, email, record of conversation)

should be stored together, electronically or in hard copy. The PIU's social focal Point, who will be responsible for undertaking a monthly review of all grievances to analyze and respond to any common issues arising. The Focal Person will also be responsible for oversight, monitoring and reporting on the Worker GM.

Serious Grievances

In case a worker experiences serious mistreatment such as harassment, intimidation, abuse, violence, discrimination or injustice at the workplace, the worker may raise the case, verbally or in writing directly to the contractor or Karaman Municipality – at different levels. The contractor will immediately refer the case to Karaman Municipality] The Karaman Municipality will immediately investigate the case respecting confidentiality and anonymity of the worker.

Upon subproject effectiveness, the Karaman Municipality will designate a Focal Person or Persons for Serious Grievances. These Focal Persons will receive training in investigating serious grievances, relevant laws and regulations, and World Bank standards including the rights of people who file a grievance. Karaman Municipality and the World Bank will jointly develop culturally sensitive and locally appropriate roles and responsibilities, and procedures.

In case a direct worker or civil servant has a serious grievance, the staff may directly contact verbally or in writing the Focal Person for Serious Grievances.

All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.

10. CONTRACTOR MANAGEMENT

The objective of this procedure is to ensure that Karaman Municipality has contractual power to administer oversight and action against contractors for non-compliance with the LMP.

- Karaman Municipality will make available relevant documentation to inform the contractor about requirements for effective implementation of the LMP.
- Karaman Municipality will include the provisions of the ESMF, LMP and other relevant documents into the specification section of the bidding documents. The contractors will be required to comply with these specifications.
- The contractor will raise worker awareness on the Code and Conduct.
- The contractor will show evidence of OHS and Emergency Preparedness procedures.
- Karaman Municipality will monitor contract's E&S performance during its regular site visits utilizing contractor reporting or external monitoring/supervision consultants where available. Where appropriate, Karaman Municipality may withhold contractor's payment or apply other contractual remedies as appropriate until corrective action(s) is/are implemented on significant non-compliance with the LMP, such as failure to notify Karaman Municipality of incidents and accidents.

11. COMMUNITY WORKERS

Community workers include people [Those residing in Karaman district and employed under the subproject]. The objective of this procedure is to ensure the community workers offer their labor voluntarily and that they agree to the terms and conditions of employment.

Karaman Municipality PIU and contractors using community workers will apply the following guidelines when dealing with community workers:

- Karaman Municipality will develop standard working times, remuneration systems (depending on the type of work), methods of payment, timing of payment, and community worker Code of Conduct, which will apply to all subproject activities.
- Karaman Municipality and contractors should consult communities and document their community meetings where members agree to conditions of community worker recruitment. The agreement should include details on nature of work, working times, age restrictions (18 and above), remuneration amount, method of payment, timing of payment, individual signatory or representative signatory of meeting resolution
- Contractors will have the terms and conditions discussed, explained, negotiated and documented through joint community meetings, with each community employee showing consent through signing the attendance register of the meeting which made the employment resolutions.
- Karaman Municipality and contractors train community workers on key LMP issues, including SEA/SH, OHS, epidemic diseases, safe use of equipment and lifting techniques, and the relevant grievance mechanisms.

12. PRIMARY SUPPLY WORKERS

The objective of the procedure is to ensure that labor-related risks, especially child and forced labor as well as serious safety issues to the subproject from primary supply workers are managed. Karaman Municipality and all contractors will undertake the following measures:

- Procure supplies from legally constituted suppliers.
- To the extent feasible, conduct due diligence to ensure that primary suppliers conduct age verifications, employ workers without any force or coercion, and maintain basic OHS systems.

13. CODE OF CONDUCT

- Treat women, children (persons under the age of 18), and men with respect regardless of ethnicity, language, religion, political or other opinion, national, social origin, citizenship status, property, disability, birth or other status.
- Do not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Do not participate in sexual activity with community members.
- Do not engage in sexual favors or other forms of humiliating, degrading or exploitative behavior.
- Do not engage in any activity that will constitute payment for sex with members of the communities surrounding the workplace.
- Report through the Worker GM suspected or actual gender-based violence against a person of any gender by a fellow worker or any breaches of this Code of Conduct.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass women, children or a vulnerable person through these mediums.
- Comply with all relevant local legislation.
- Engaging in any of the prohibited activities above can be cause for termination of employment, criminal liability, and/or other sanctions.

