REPUBLIC OF AZERBAIJAN

MINISTRY OF ECONOMY

LIVABLE BAKU PROJECT

PROJECT-LEVEL

LABOR MANAGEMENT PROCEDURES

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This document has been prepared in accordance with the World Bank's Environmental and Social Framework, specifically Environmental and Social Standard 2 on Labor and Working Conditions. It constitutes the overarching Project-Level Labor Management Procedures for the Livable Baku Project, covering all categories of project workers across all four Project components.

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ABBREVIATIONS AND ACRONYMS

ASWRA	Azerbaijan State Water Resources Agency
AZN	Azerbaijani Manat
C-ESMP	Contractor's Environmental and Social Management Plan
CoC	Code of Conduct
EBRD	European Bank for Reconstruction and Development
EHS	Environment, Health, and Safety
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
GIIP	Good International Industry Practice
HRAs	High Risk Assessments
IFC	International Finance Corporation
ILO	International Labor Organization
LC	Labor Code of the Republic of Azerbaijan
LFG	Landfill Gas
LMP	Labor Management Procedures
LTIFR	Lost Time Injury Frequency Rate
MRF	Material Recovery Facility
MoE	Ministry of Economy of the Republic of Azerbaijan
MENR	Ministry of Ecology and Natural Resources of the Republic of Azerbaijan
OHS	Occupational Health and Safety
PIU	Project Implementation Unit

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PPE	Personal Protective Equipment
RSLF	Regional Sanitary Landfill
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
SCUPA	State Committee for Urban Planning and Architecture
SOCAR	State Oil Company of the Republic of Azerbaijan
TRIR	Total Recordable Incident Rate
WB	World Bank
WGM	Worker Grievance Mechanism
WTS	Waste Transfer Station

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1. INTRODUCTION AND PROJECT DESCRIPTION

1.1 Project Overview

The Livable Baku Project (the "Project") is a World Bank-financed operation being prepared by the Government of the Republic of Azerbaijan through the Ministry of Economy (MoE). The Project aims to improve the quality, disaster- and climate-resilience of public spaces, buildings, and local infrastructure in Greater Baku, and comprises four components:

Component 1 – Integrated Solid Waste Management: Construction of the Gala Waste Transfer Station (WTS) and Material Recovery Facility (MRF) in the Baku Waste Shed; and the Absheron Regional Sanitary Landfill (RSLF) and four WTSs (Sumgait, Khizi-Sitalchay, Khizi-Findigan, Shamakhi-Goylerdag) in the Absheron Waste Shed.

Component 2 – Remediation of Polluted Lakes and Sites: Remediation of three urban lakes (Zigh, Khojasan, and Boyukshor) and two to three oil-contaminated sites in the Absheron area, to be identified during Project implementation, affected by decades of hydrocarbon contamination from legacy oil extraction; and associated green/blue infrastructure works.

Component 3 – Institutional Strengthening: Capacity building for MoE, Ministry of Ecology and Natural Resources (MENR), Azerbaijan State Water Resources Agency (ASWRA), State Committee on Urban Planning and Architecture (SCUPA), State Oil Company of the Republic of Azerbaijan (SOCAR), Tamiz Shahar, and other Project counterparts.

Component 4 – Project Management, Monitoring, and Evaluation: Project Implementation Unit (PIU) staffing, audits, financial management, monitoring, and evaluation.

Both Components 1 and 2 involve substantial civil works, each with distinct occupational health and safety (OHS) risk profiles. Component 1 entails construction and operation of solid waste management infrastructure involving hazardous waste handling. Component 2 involves remediation of hard-oil contaminated sites with significant risks from exposure to hydrocarbons, heavy metals, and other hazardous substances. The two to three oil-contaminated sites to be financed under Component 2 have not yet been confirmed, they will be identified during Project implementation, and the site-specific labor and OHS requirements for each confirmed site will be prepared under the site-specific ESF instruments. No mobilization of workers shall take place at any unconfirmed site.

1.2 Objective and Scope of the LMP

This Project-Level LMP document has been prepared in compliance with World Bank Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions. The LMP:

- Establishes the overarching framework for managing all categories of project workers in accordance with national legislation and ESS2;
- Identifies key labor risks specific to the Livable Baku Project and sets out mitigation measures;
- Defines terms and conditions of employment, non-discrimination and equal opportunity policies, OHS requirements, and worker grievance mechanisms;
- Establishes contractor management requirements and primary supply chain due diligence procedures; and
- Provides the umbrella framework within which the site-specific LMPs for Component 1 (Solid Waste Management) and Component 2 (Remediation of Polluted Lakes and Sites) are embedded.

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Tiered LMP structure: This Project-Level LMP is Tier 1. The site-specific LMPs constitute Tier 2. Site-specific OHS management plans and contractor's Environmental and Social Management Plan (C-ESMPs) constitute Tier 3. All Tier 2 and Tier 3 instruments must be fully consistent with this Project-Level LMP and may not apply standards that are less protective of workers than those set out here. Site-specific LMPs, contractor's OHS management plans and C-ESMPs may add site-specific details or impose more stringent requirements, but may not omit, dilute or contradict any obligation contained in this document. Each site-specific instrument will be screened against this LMP by the PIU Social and Environmental Specialists using a documented consistency check, and no site-specific instrument will be adopted, and no contractor will be permitted to mobilize, before the PIU has confirmed consistency and the World Bank has issued its no-objection. Where an inconsistency is identified after adoption, the provision more protective of workers prevails, and the site-specific instrument is corrected within 30 days.

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2. OVERVIEW OF LABOR USE ON THE PROJECT

2.1 Categories of Project Workers

The Livable Baku Project will involve the following categories of workers, as defined by ESS2:

(a) Direct Workers

Direct workers are persons employed or engaged directly by the implementing agency (MoE/PIU) to work on Project-related activities. For the Livable Baku Project, direct workers include:

- PIU core staff: Project coordinator, environmental specialist, social specialists, civil engineer, community liaison officer, communication officer, financial management specialist, procurement specialist, monitoring and evaluation specialist, and administrative support staff engaged directly by the PIU under the project;
- Individual consultants engaged directly by the PIU under the project (e.g., trainer, gender consultant under this assignment); and
- Government employees seconded to the PIU from MoE or other agencies.

Estimated number of direct workers: approximately 11–15 PIU core staff plus individual consultants under the Project. The PIU will update these estimates at each of the following points, and will reissue this section accordingly: (i) on completion of detailed design for each sub-project; (ii) on award of each major civil works contract, using the contractor's mobilization plan and manpower histogram.

(b) Contracted Workers

Contracted workers are persons employed or engaged through third parties (contractors or subcontractors) to perform work directly related to the Project. For the Livable Baku Project, contracted workers include:

- Civil works contractors and their subcontractors for construction of the Absheron RSLF, Gala WTS/MRF, Sumgait WTS, Khizi Sitalchay WTS, Khizi Findigan WTS, and Shamakhi WTS (Component 1);
- Civil works contractors for remediation works at Zigh, Khojasan, and Boyukshor Lakes and the two to three oil-contaminated sites to be identified in the Absheron area (Component 2);
- Firms engaged under the Project activities (e.g. Feasibility Studies (FSs), Environmental and Social Impact Assessments (ESIAs), ESF instruments, event managements); and
- Operation and maintenance service providers for WTSs, the landfill, and post-remediation infrastructure.

Estimated number of contracted workers (indicative, to be confirmed from final designs and civil works contracts):

- Component 1: construction – approximately 200-500 workers across all sites at peak;
- Component 2: lake remediation – approximately 100-300 workers at peak per lake site depending on remediation technology, and oil-sludge remediation – approximately 50-150 workers per site during excavation and transport phases.

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(c) Community Workers

Community workers are community members who provide labor, typically as a contribution to a project that benefits their community. For the Livable Baku Project, the use of community labor is not currently anticipated. However, if community labor programs are identified during implementation (e.g., for site maintenance or greening activities), this LMP will be updated accordingly to address the specific protections required under ESS2 for community workers.

(d) Primary Supply Chain Workers

Primary supply chain workers are workers employed by suppliers of primary materials to the Project (e.g., aggregate, steel, concrete, equipment, fuel). ESS2 requires the Borrower to assess the risks of child labor, forced labor, and serious safety issues in the primary supply chain. Primary supply chain due diligence procedures are described in Section 9 of this LMP.

Table 1: Categories and Estimated Numbers of Project Workers

Worker Category	Description / Examples	Estimated Numbers	Phase
Direct Workers	PIU staff; individual consultants; government secondees	11–15 staff + consultants	All phases
Contracted Workers – Component 1 (Civil Works)	Landfill + 5 WTS + 1 MRF construction contractors/subcontractors	200–500 at peak	Construction
Contracted Workers – Component 2 (Civil Works)	Lakes and oil-contaminated sites remediation contractors (dredging, capping, demolition, excavation and transport, and revegetation)	Lake remediation – 250–400 at peak Oil-sludge remediation – 50-150 workers per site at peak	Remediation + Construction
Contracted Workers – Consulting	FS and ESIA firms; ESF consultant	50–100 consultants	Preparation + Construction
Operations and Maintenance (O&M) workers	WTS/Landfill operators; lake maintenance staff	TBC – post-construction	Operation
Community Workers	Not anticipated at this stage	N/A	N/A
Primary Supply Chain Workers	Materials suppliers (aggregates, steel, concrete, fuel)	TBC – assessed through due diligence	Construction

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Table 1a: Site-Level Workforce Evidence Base, Assumptions and Data Status (indicative)

Sub-project site	Construction workforce (indicative peak)	Operational workforce	Basis / assumption	Source and status
Component 1 - Integrated Solid Waste Management				
Absheron Regional Sanitary Landfill (97.6 ha)	158-232 personnel at peak at Absheron RSLF (landfill, MRF and composting plant)	88-110 permanent posts at Absheron RSLF (landfill, MRF and composting plant)	Provisional figure scaled from comparable regional landfill cells; assumes phased cell construction rather than full build-out, and excluded workers of municipal collections, haulages, suppliers, PIU and supervision staff.	Absheron Waste Shed FS (21 August 2026).
Gala MRF and WTS	Not separately quantified in the FS.	89 permanent posts: 64 core, plus 23 reserve. Management 6; Technical and Maintenance 19; Operations 43; Ancillary 21.	Two-shift operating regime; reserve pool covers leave, sickness and shift rotation. Figures are for the combined MRF and WTS.	Qala-MR FS (6 July 2026)
Sumgait WTS and MRF	23-47 personnel at peak.	11-15 permanent posts at WTS and MRF. Existing Sumgait Cleaning Department employs 769 staff, of whom 521 are engaged in street cleaning and waste collection.	Consolidation of collection and transfer operations is expected to change the composition of this workforce. Redundancy risk is credible and is addressed by the Retrenchment Plan requirement in Section 5.8.	Absheron Waste Shed FS (21 August 2026).

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Sub-project site	Construction workforce (indicative peak)	Operational workforce	Basis / assumption	Source and status
Khizi Sitalchay WTS	15-20 personnel at peak.	3-5 permanent posts at WTS.	Small-format transfer stations; assumes a single shift and predominantly local recruitment.	Absheron Waste Shed FS (21 August 2026).
Khizi Finigan WTS	15-20 personnel at peak.	3-5 permanent posts at WTS.	Small-format transfer stations; assumes a single shift and predominantly local recruitment.	Absheron Waste Shed FS (21 August 2026).
Shamakhi Goylardag WTS	25-35 personnel at peak.	6-8 permanent posts at WTS.	Small-format transfer stations; assumes a single shift and predominantly local recruitment.	Absheron Waste Shed FS (21 August 2026).
Component 2 - Lakes and Oil-Contaminated Sites Remediation				
Zigh Lake	185-295 workers	15-30 permanent posts	Assumes dredging with mechanical dewatering and on-site treatment; excludes haulage subcontractor staff, which are counted under transport.	FS Zigh Lake (8 July 2026)
Khojasan Lake	195-325 workers	20-40 permanent posts	Assumes a comparable remediation train to Zigh, scaled for the larger footprint.	FS Khojasan (29 July 2026).
Boyukshor Lake	250–400 workers	20-40 permanent posts	Assumes a comparable remediation train to Boyukshor,	FS Boyukshor (18 August 2026).

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Sub-project site	Construction workforce (indicative peak)	Operational workforce	Basis / assumption	Source and status
			scaled for the larger footprint	
Oil-contaminated sites (Absheron area; two to three sites to be identified)	50-150 per site at peak.	Not available	Workforce sizes are driven by the area and sludge volume of each site, which will be established once the sites are confirmed. Assumes mechanical excavation with off-site disposal.	Indicative – to be confirmed by the site-specific FS and ESIAs.

2.2 Characteristics of the Workforce

Based on the nature of the Project activities and the characteristics of the labor market in Azerbaijan, the workforce is expected to have the following characteristics:

- The majority of **unskilled and semi-skilled workers for civil works** (Component 1 and Component 2) are expected to be recruited locally from the project-affected communities/villages in Absheron, Khizi, Shamakhi, Sumgait, Khazar, Sabunchu, Surakhani, Binagadi rayons. This will be encouraged by a local hiring preference policy to be included in civil works contracts. To give this commitment practical force, all civil works contracts under the Project will include a binding obligation for contractors to recruit at least 30% of their construction workforce from residents of the project-affected communities/villages in Absheron, Khizi, Shamakhi, Sumgait, Khazar, Sabunchu, Surakhani, Binagadi rayons. Any local resident hired under this requirement must be engaged on a formal written contract, paid in line with the applicable rates, and covered by the same OHS and welfare standards as all other workers. Contractors must submit a monthly labour log to the PIU disaggregated by origin (local vs. non-local) to enable compliance monitoring. Where a contractor cannot meet the 30% threshold because of a documented local skills shortage, a written justification must be submitted to the PIU within 14 days of workforce mobilisation, together with a corrective plan.
- **Skilled technical workers** (engineers, equipment operators, environmental specialists) may be sourced from Baku, Sumgait or other regions of Azerbaijan.
- **Specialized workers for lake and oil-sludge remediation activities** (dredging operators, hazardous waste technicians, oil sludge excavation specialists, contaminated material transport crews, bitumen/tar handling technicians, and environmental monitoring specialists) may include international or foreign workers, particularly for early phases at the oil-contaminated sites, where hard oil sludge with high total petroleum hydrocarbon concentrations is expected and specialist contaminated land remediation expertise will be required.

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- **All workers are required to be at least 18 years of age.** An age verification mechanism will be established as part of the hiring process for all contractor and sub-contractor workforces.
- **The Project will actively promote gender-inclusive hiring.** The Project will actively promote gender-inclusive hiring, with specific measures to promote women in technical and supervisory roles.
- Migrant workers (domestic or international) may be engaged, particularly for specialized roles in Component 2. Specific protections for migrant workers are incorporated in Section 5 of this LMP.

2.3 Timing of Labor Requirements

Labor requirements will vary significantly by project phase. The key phases and associated labor needs are:

- **Preparation Phase (2025 – 2027):** PIU staff and individual consultants; consulting firms under the Project activities. Relatively small workforce (50–70 persons).
- **Construction Phase (estimated 2028–2030):** Peak workforce during civil works construction. Significant labor forces at WTS/landfill/MRF sites (Component 1) and lake and oil-sludge remediation sites (Component 2), with construction activities likely proceeding in parallel across multiple sites.
- **Operation Phase (from 2031 onwards):** Operational and maintenance workforce for WTSs, Regional Landfill, and post-remediation lake monitoring and management infrastructure.

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3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

3.1 Overview

The Livable Baku Project is classified as High Risk. Labor risks are assessed as Substantial Risk for construction and remediation activities, requiring rigorous OHS management, contractor oversight, and monitoring. The following risk assessment is organized by risk category and by project stream.

3.2 Risks Common to All Project Activities

Table 2: Common Labor Risks Across All Project Activities

Risk Category	Description	Risk Level	Likelihood	Severity	Mitigation measures	Responsible party	Linked monitoring indicator
OHS – General construction hazards	Working at height; excavation; heavy machinery; struck-by and caught-between incidents; traffic; manual handling. Common to all civil works sites.	SUBSTANTIAL	Likely	Major (fatality or permanent disability credible)	Mandatory site-specific OHS Management Plan approved before mobilization (Section 6.2); minimum 8-hour induction before first site entry; documented job hazard analysis and safe work method statements for every high-risk activity; permit-to-work for work at height, excavation, confined space and hot work; PPE provided free of charge and enforced; traffic management plan at every site; monthly documented OHS inspection; 24-hour incident reporting; stop-work authority for every worker	Contractor (primary); PIU Environmental Specialist (verification); World Bank (supervision)	Total Recordable Incident Rate (TRIR); Lost Time Injury Frequency Rate (LTIFR); fatalities (zero); % inducted before start; monthly inspection completion
Non-compliance	Underpayment; excessive	MODERATE	Likely	Moderate	Written contract in a language the worker understands before work	Contractor; PIU Social	% with written contracts; %

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with terms and conditions	working hours; failure to pay overtime; informal employment practices. Risk elevated for sub-contractors.				begins; wage rates at or above the statutory minimum; payment at least monthly, in full, by bank transfer where practicable; overtime voluntary and paid at premium rates; no unauthorized deductions; quarterly payroll and contract-register audit by the PIU; the same terms cascade contractually to every subcontractor tier (Section 7.2).	Specialist (payroll and contract audit)	paid at or above minimum wage; payroll audit findings
Child and forced labor	Azerbaijan has national prohibitions. Risk is LOW for direct and contracted workers but requires due diligence for primary supply chain.	LOW–MODERATE	Unlikely	Major	Age verification against national identity documents before engagement, with copies retained on file; worker register with dates of birth; prohibition on retention of identity documents; the eleven ILO forced-labor indicators used as the screening checklist (Section 5.4); primary supply chain screening and audit (Section 9), with quarrying and aggregate extraction treated as high risk by default.	Contractor; PIU Social Specialist; suppliers (supply chain)	Child labor incidents (zero); % suppliers screened; audit findings
Gender-based violence (GBV)/Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH)	Influx of workers to rural/per-urban sites (Khizi, Shamakhi) increases GBV/SEA/SH risk. Power imbalances on construction sites. Risk is assessed as	LOW–MODERATE	Possible	Major	Code of Conduct (CoC) with explicit SEA/SH prohibitions signed by every worker before site entry; mandatory SEA/SH induction and refresher training; separate confidential reporting channel with a survivor-centred response and no mediation of SEA/SH cases; referral to service providers within 24 hours; alleged perpetrator removed from site, never the survivor; worker accommodation sited and managed under Section 3.4;	Contractor; PIU Social Specialist / SEA/SH Focal Person; SEA/SH service providers	SEA/SH complaints referred within 24h; % CoC signed; % SEA/SH induction completed

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	LOW–MODERATE overall.				implementation of the Project SEA/SH Action Plan.		
Migrant and foreign worker vulnerability	Foreign/domestic migrant workers may face language barriers, unfamiliarity with rights, risk of debt bondage or document retention.	MODERATE	Possible	Moderate	Recruitment through the contractor only, with no third-party recruitment fees charged to workers; contracts, inductions, safety signage and grievance materials in a language each worker understands; prohibition on retention of passports or identity documents; accommodation inspected against the IFC/EBRD Workers' Accommodation standard; migrant workers specifically covered by the worker grievance mechanism and told how to use it at induction.	Contractor; PIU Social Specialist	% migrant workers with contracts in a comprehended language; accommodation inspection score
Retaliation for raising grievances	Workers on construction sites may fear retaliation for raising OHS or labor rights complaints, particularly through contractor chains.	MODERATE	Possible	Moderate	Written anti-retaliation guarantee in the CoC and in every contract; anonymous reporting through tamper-evident boxes at every site; a reporting route that bypasses the worker's own supervisor and contractor entirely; retaliation treated as a dismissible CoC breach; PIU tracks the ratio of grievances raised through contractor channels versus PIU channels as an early warning of suppression.	PIU Social Specialist (mechanism owner); Contractor Grievance Officer	Grievances received / resolved / pending; substantiated retaliation cases (zero)

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3.3 Component 1 – Specific Risks: Integrated Solid Waste Management

Construction and operation of solid waste management infrastructure involve specific OHS and social risks do not present in standard construction projects:

3.3.1 Construction Phase – WTS/MRF and Landfill

- **Construction in proximity to operational dumpsites** (existing dumpsite areas at Sumgait): dust, bioaerosols, and odors. Risk of vector-borne diseases at dumpsite margins.
- **Demolition and clearing of existing informal structures:** risk of encountering asbestos-containing materials, heavy metals, or unknown hazardous wastes.
- **Working with heavy construction machinery in constrained areas**. Traffic management challenges at urban WTS sites (Sumgait, Gala).
- **Night work requirements:** risk of increased accident rates under low-visibility conditions.

3.3.2 Operation Phase – WTS/MRF and Landfill

- **Exposure to municipal solid waste:** risk of cuts, punctures, biological hazards (bacteria, viruses, fungi), and disease vectors.
- **Leachate and landfill gas management:** chronic exposure risk to methane, hydrogen sulfide, and volatile organic compounds at the Absheron Regional Landfill.
- **Heavy vehicle operations:** high risk of pedestrian-vehicle collisions at WTS tipping floors and landfill working faces.
- **Fire and explosion risks at sorting and landfill facilities:** spontaneous combustion of waste, Landfill Gas (LFG) ignition.
- **Psychosocial risks:** waste management work can carry social stigma; workers may experience social discrimination or poor mental health outcomes if not adequately supported.

3.3.3 GBV/SEA/SH Risk – Solid Waste Management Facilities

- Project-level SEA/SH risk rating is assessed as MODERATE overall. Labor-influx estimate and worker-camp locations to be confirmed from ESIA.

Mitigation of SEA/SH risk on this Project is governed by the Livable Baku Project-level SEA/SH Action Plan, which is a companion instrument to this Project-level LMP and is contractually binding on every contractor and subcontractor. The following requirements apply to all labor engaged on the activities described in this sub-section.

- **Survivor-centered approach.** Every response to a report of SEA/SH is governed by four principles: the safety of the person reporting, confidentiality, respect for that person's dignity and choices, and non-discrimination. The person who reports decides what happens next, including whether to seek medical, psychosocial, legal or police assistance; no step is taken without their informed consent, save where a child is involved and mandatory reporting under Azerbaijani law applies. The Project does not require a survivor to prove an allegation in order to be referred to services.
- **Mandatory contractor protocols.** Before mobilization each contractor must: adopt the Project CoC and obtain a signed copy from every worker; deliver SEA/SH induction to every worker before first site entry, with documented refreshers at least quarterly; appoint a SEA/SH focal point who is not a line supervisor and, where the workforce includes women, is female; prohibit workers from entering residential areas and from

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any contact with children in the course of Project work; and demonstrate that accommodation, transport and site layout have been designed to reduce contact risk. Failure to maintain these protocols is a contractual breach attracting the sanctions ladder in Section 7.2.

- **Linkage with national service providers.** Before works begin at each site the PIU will complete and disclose a mapped referral pathway naming the accessible service providers for that locality health facilities able to provide clinical management of sexual assault within 72 hours, psychosocial support, legal aid and shelter together with the State Committee for Family, Women and Children Affairs and, where the person reporting chooses, the police. Only service providers that are operational and verified as able to deliver the relevant services will be named in the referral pathway. The mapping is verified before mobilization and refreshed at least annually. Referral is made within 24 hours of a report.
- Reporting. Any SEA/SH allegation is notified to the PIU immediately and to the World Bank, in anonymized form, within 48 hours, consistent with the Environmental and Social Incident Response Toolkit. Case records are held only by the PIU Social Specialist / SEA/SH Focal Person; contractors are never given identifying information.

3.3.4 Social Risks – Waste Picker Transition

The 2026 Absheron Waste Shed baseline survey identified persons engaged in waste collection on an informal basis at three of the five affected dumpsite locations – Sumgait, Gobustan, and Khizi. No waste picker activity was documented at the Shamakhi site during the survey, though informal activity cannot be excluded. The transition of these informal workers away from dumpsite-based livelihoods presents the following **specific labor-related social risks**:

- **Changes in the waste management system may affect the livelihood opportunities of those who earn income from this activity**;
- **Resistance to formalization and risk of informal workers** being excluded from the formal waste management workforce if recruitment processes are not designed inclusively;
- **Risk of deterioration in the socio-economic situation of affected persons where transition support measures are not organized in a timely and needs-based manner;** and
- **Gender dimension:** women are often disproportionately represented among construction and waste management and may face barriers to accessing formal employment opportunities.
- **Community mistrust and misinformation risk:** the Sumgayit baseline survey observed a limited level of participation in the survey. This indicates the importance of organizing the information and registration process on the basis of the principles of voluntariness, confidentiality and trust, as well as of maintaining regular and clear communication with the community. This risk requires dedicated pre-construction trust-building engagement efforts.

Measures to address these risks are detailed in the Waste Picker Transition Program, to be prepared as part of this LMP and in the RPF. Key commitments include: a minimum of three months' advance notice before any dumpsite closure or access restriction, livelihood assessment covering income levels, skills and degree of dependence on waste picking as the primary income source and develop a transition program in consultation with the waste pickers themselves, which may include formal employment in the WTSs and RLF-2 and upgraded

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sorting facility or MRF, skills training in waste classification and equipment operation, referral to social protection programs, or micro-enterprise support for those who prefer an alternative livelihood. The program should provide transitional income support for a minimum of six months during the transition period, benchmarked against documented pre-displacement earnings and, at a minimum the applicable local minimum wage.

3.3.5 Waste Picker Transition Programme – Design Requirements

The Waste Picker Transition Programme will be prepared by the PIU before any affected dumpsite is closed or its access restricted, and will be disclosed with the relevant site-specific instruments. It comprises the following mandatory elements.

- **Formalization pathway - priority access to Project employment.** Censused waste pickers aged 18 and over receive priority consideration for positions at the Materials Recovery Facility, the waste transfer stations and the regional landfill. To make this real rather than nominal, recruitment for those positions will apply adjusted criteria: no formal educational qualification requirement for entry-level sorting and handling roles; no requirement for prior formal employment records; literacy-independent application and testing procedures; and assistance with obtaining identity documents, tax registration and social insurance enrolment where these are missing. Contractors and operators will be given a contractual quota of positions reserved for censused pickers, and the quota will be reported on monthly.
- **Pre-employment training and bridging support.** Vocational and safety training covering machine-assisted sorting, PPE use, hazard recognition, hygiene and workplace conduct, delivered before facility commissioning and paid at a stipend so that attendance does not require the worker to forgo income. A transitional income bridge is provided for the period between site closure and facility employment, so that closure does not create a livelihood gap.
- **Alternative livelihood support for those not entering formal employment.** Not every picker will want or be able to take a facility job, particularly women and older pickers. For these individuals, the program provides alternative livelihood grants, support for entry into the wider recyclables value chain as independent collectors or aggregators operating outside the restricted footprint, and referral to state social protection. Entitlements are set out in the Project-level RPF; this Project-level LMP governs the employment pathway only.
- **NGO and social worker involvement.** The Sumgait survey recorded a limited level of participation. This finding indicates the importance of ensuring confidentiality, voluntariness and trust in the census and consultation process. The census and the transition programme will therefore be delivered with a qualified social worker or an experienced local NGO engaged by the PIU, working alongside but institutionally separate from the contractor and the operator. Their role is to build trust ahead of the census, accompany individuals through registration and documentation, provide a channel through which concerns can be raised without approaching the contractor, and verify independently that the census achieved coverage. A female social worker will be part of every survey team so that women pickers can be interviewed separately and in private.
- **Occupational health monitoring.** Informal picking involves prolonged unprotected exposure to sharps, biological hazards, heavy metals, bioaerosols and dumpsite fires. Every censused picker entering Project employment will receive a baseline occupational health examination at Project cost before starting work, covering respiratory function, dermatological and musculoskeletal condition, tetanus and hepatitis B immunisation status, and, where indicated, heavy metal screening. Immunisation will be offered free of charge. Thereafter, health surveillance is annual and is recorded in the confidential health file described in Section 6.2. A baseline

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examination is offered on the same terms to censused pickers who do not enter employment, because the exposure has already occurred and the Project should not condition health screening on employment status.

- **Grievance access and monitoring.** Censused pickers have access to the Worker Grievance Mechanism in Section 8 from the date of the census, whether or not they are yet employed, and to the Project Grievance Redress Mechanism (GRM) under the SEP. Program performance is reported semi-annually against: number censused; number offered employment; number employed and retained at 6 and 12 months, disaggregated by sex and age band; number receiving alternative livelihood support; number of baseline health examinations completed; and grievances received from this group.

3.4 Component 2 – Specific Risks: Lakes and Oil-Contaminated Sites Remediation

Remediation of severely contaminated lakes and oil-sludge sites involves some of the most hazardous labor conditions in the construction sector. The three lake sites (Zigh, Khojasan, Boyukshor) involve sediment dredging and capping in aquatic environments. The two to three oil-sludge sites involve excavation of dense hard oil sludge with very high TPH concentrations, requiring a distinct and more stringent hazard management approach. The following risks apply across both lake and oil site remediation:

Hazardous Substance Exposure

- **Hydrocarbon contamination:** workers engaged in sediment dredging, capping, or excavation at Zigh, Khojasan, and Boyukshor Lakes face risk of skin contact and inhalation exposure to petroleum hydrocarbons such as Total Petroleum Hydrocarbons (TPH), Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX), polycyclic aromatic hydrocarbons (PAHs).
- **Heavy metals:** elevated levels of lead, chromium, arsenic, and other heavy metals in lake sediments and surrounding soils present chronic exposure risks.
- **Hydrogen sulfide (H_2S):** anaerobic conditions in contaminated sediments generate H2S, which is acutely toxic and can be fatal at concentrations above 100 ppm. Risk is CRITICAL for dredging and sediment handling operations.
- **Volatile organic compounds (VOCs):** off gassing from disturbed contaminated sediments during dredging and excavation.
- **Polychlorinated Biphenyls (PCBs) and other Persistent Organic Pollutants (POPs):** potentially present in legacy oil extraction waste at Boyukshor and Zigh sites.

3.4.1 Physical Hazards – Dredging and Dewatering

- **Drowning and water-related accidents:** dredging operations involve working over water or on unstable, water-saturated ground. Risk for operators of dredging equipment.
- **Confined space entry:** dewatering pits, retention ponds, and utility tunnels at remediation sites may constitute confined spaces requiring strict entry procedures.
- **Subsidence and ground instability:** contaminated sites with deep sediment layers or legacy oil wells may have unstable subsurface conditions. Risk of ground collapse during excavation.

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- **Bund and containment failure:** failure of perimeter bunds at water-retention areas during dredging could result in uncontrolled release of contaminated material and worker injury.

3.4.2 Oil-Contaminated Site Remediation

- **Legacy oil well abandonment:** workers involved in decommissioning abandoned oil wells face risks of blowout, fire, and explosion. Only certified well abandonment specialists may perform this work.
- **Pipeline decommissioning (coordination with SOCAR):** risk of residual hydrocarbons in decommissioned pipelines. Hot work permits required.
- **Hard oil sludge excavation:** workers engaged in mechanical excavation of dense bituminous sludge face inhalation exposure to high-concentration hydrocarbon vapours, VOCs, polycyclic aromatic hydrocarbons (PAHs), and hydrogen sulphide. Respiratory protection is mandatory for all workers within the exclusion zone. Dermal exposure to oil sludge at these concentrations carries carcinogenic risk - impermeable coveralls and gloves are non-negotiable PPE.
- **Scale of the oil-contaminated sites:** the volume of contaminated material at these sites creates logistics and transport risks distinct from the lake sites. Heavy vehicle movements for sludge transport will be extensive; traffic safety management and driver fatigue protocols must be part of the site-specific OHS plan. Where a third party is already operating on a confirmed site (for example, a commercial operator extracting tar for bitumen production) that operator must be brought under the Project's OHS regime through a formal contractor interface agreement before any Project works begin.
- **Demolition works at oil-contaminated sites:** where a confirmed site has informal residential structures adjacent to or within the contaminated footprint, measures concerning such structures may be determined in accordance with the procedures set out in this plan where a technical assessment establishes the need. Demolition of residential buildings is classified as HIGH OHS RISK under WBG EHS Guidelines. The following additional requirements apply: structural survey before any if and possible demolition; asbestos survey and separate asbestos management plan if asbestos-containing materials are identified; residents are informed and consulted before any possible demolition commences, and their rights, safety and the applicable support measures are provided in accordance with the approved Resettlement Plan. Workers must not begin demolition while residents remain in adjacent structures.
- **Contaminated material transport:** excavated oil sludge and contaminated soil from the oil-contaminated sites will require transport to approved disposal or treatment facilities. Vehicles must be sealed or covered to prevent spillage; routes must avoid sensitive receptors (schools, hospitals, markets); drivers must be trained in spill response; and load tracking records must be maintained to verify disposal chain of custody.

3.4.3 GBV/SEA/SH Risk – Lake and Oil-Contaminated Site Remediation

Project-level SEA/SH risk rating is assessed as MODERATE overall. Mitigation of SEA/SH risk on this Project is governed by the Livable Baku Project SEA/SH Action Plan, which is a companion instrument to this Project-level LMP and is contractually binding on every contractor and subcontractor. The following requirements apply to all labor engaged on the activities described in this sub-section.

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- **Survivor-centred approach.** Every response to a report of SEA/SH is governed by four principles: the safety of the person reporting, confidentiality, respect for that person's dignity and choices, and non-discrimination. The person who reports decides what happens next, including whether to seek medical, psychosocial, legal or police assistance; no step is taken without their informed consent, save where a child is involved and mandatory reporting under Azerbaijani law applies. The Project does not require a survivor to prove an allegation in order to be referred to services.
- **Mandatory contractor protocols.** Before mobilization each contractor must: adopt the Project CoC and obtain a signed copy from every worker; deliver SEA/SH induction to every worker before first site entry, with documented refreshers at least quarterly; appoint a SEA/SH focal point who is not a line supervisor and, where the workforce includes women; prohibit workers from entering residential areas and from any contact with children in the course of Project work; and demonstrate that accommodation, transport and site layout have been designed to reduce contact risk. Failure to maintain these protocols is a contractual breach attracting the sanctions ladder in Section 7.2.
- **Linkage with national service providers.** Before works begin at each site the PIU will complete and disclose a mapped referral pathway naming the accessible service providers for that locality: health facilities able to provide clinical management of sexual assault within 72 hours, psychosocial support, legal aid and shelter together with the State Committee for Family, Women and Children Affairs and, where the person reporting chooses, the police. Only service providers that are operational and verified as able to deliver the relevant services will be named in the referral pathway. The mapping is verified before mobilization and refreshed at least annually. Referral is made within 24 hours of a report.
- **Reporting.** Any SEA/SH allegation is notified to the PIU immediately and to the World Bank, in anonymized form, within 48 hours, consistent with the Environmental and Social Incident Response Toolkit. Case records are held only by the PIU Social Specialist / SEA/SH Focal Person; contractors are never given identifying information.

Detailed site-specific risk assessments, including Health Risk Assessments (HRAs) for workers at each lake and oil-contaminated site will be provided in the site-specific LMPs as ESIA outputs.

3.5 Labor Influx and Associated Community Risks

Works under both Project Components will proceed concurrently at sites distributed across the Absheron peninsula as well as four districts - Absheron, Sumgait, Khizi, Shamakhi and Gobustan. Several of these are small or predominantly rural: Gobustan district is 78.2 per cent rural with a total population of about 44,500, and Khizi has a population of about 16,200. A construction workforce of even 50 to 80 people at a transfer station in such a district may represent a significant share of the local labor market and may affect interactions with the community. At the larger Component 2 sites the numbers are substantially greater - 185 to 295 workers at Zigh and 195 to 325 at Khojasan, and 250 to 400 at Boyukshor at peak and the specialized nature of dredging, hazardous waste handling, oil-sludge excavation and legacy well decommissioning means a meaningful share of those workers cannot be recruited locally.

The Project therefore expects an influx of workers who are engaged in the sectors for a certain period under the Project, who can stay away from their place of residence and who are in daily contact with local communities, is expected. These factors are considered in assessing the social risks associated with the flow of labor. The source of risk is not the origin or gender of

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the workers; the main focus is on managing the socio-economic disparities between the temporary workforce and local communities and ensuring accountability mechanisms.

3.5.1 Assessment of Risks

- **Sexual exploitation, abuse and harassment.** The temporary accommodation of the workforce, regular contact with local communities, socio-economic differences and insufficient oversight mechanisms may increase the likelihood of these risks arising. Preventive child protection measures should be applied, taking into account children's daily movement routes, their use of public spaces and possible points of contact with Project sites. Although the overall risk for the project is assessed to be lower, the risk for Component 1 sites in rural areas and at the oil-contaminated lakes and sites considered MODERATE and is managed under the Project-level SEA/SH Action Plan.
- **Community tensions over employment.** The most common and most immediate source of conflict on projects of this type is the perception that outsiders have taken jobs that local people expected. In Khizi, Shamakhi and Gobustan, where the labor market is limited, it is important that information about vacancies and selection criteria is disclosed in a timely and clear manner. Conducting the selection process in a transparent and verifiable manner, together with accessible application and grievance channels, serves to reduce this risk.
- **Community health and safety.** Risks include communicable disease transmission in both directions between the workforce and the community, including transmitted infections; road safety risk from heavy vehicle movements on village roads not designed for them, particularly on the oil-sludge haulage routes from the oil-contaminated sites and access roads; and exposure of residents to contaminated material carried off site on vehicles, clothing or equipment.
- **Child protection.** During labor influx, children may gain unauthorized access to Project sites, exposure to hazardous activities and have their education disrupted. This shall be taken into account, and site access control, awareness-raising and community liaison measures shall be implemented to prevent such occurrences.
- **Displacement of informal livelihoods.** Workforce presence at and around subproject sites may affect the existing activities of waste pickers, land users, and farmers and their access to the sites. These impacts shall be assessed in advance and the applicable entitlements and support measures shall be provided on the basis of the RPF and the site-specific instruments. Contractors are prohibited from restricting access to any site before completion of the census, establishment of the cut-off date, and implementation of the entitlement measures set out in the Project-level RPF.

3.5.2 Mitigation and Management Requirements

- **Minimize the influx in the first place.** Each contractor must submit, as part of its C-ESMP and before mobilization, a Labor Influx Management Plan setting out the number of workers to be brought in from outside the district, the roles concerned, and what has been done to reduce that number. Local recruitment is the primary mitigation: all unskilled and semi-skilled positions must be recruited from the affected districts unless the contractor demonstrates in writing that the skills are not available locally.
- **Transparent and verifiable local recruitment.** Vacancies, selection criteria, the application process and the recruitment timetable must be publicly advertised in each affected settlement through the channels identified in the site-specific SEP, in Azerbaijani, and with sufficient notice. Recruitment through unofficial intermediaries is prohibited, as is the charging of any recruitment fee to a worker. The contractor maintains and reports monthly a recruitment register showing applications, hires and rejections disaggregated by sex, district of origin and settlement. The PIU will verify these registers quarterly, including through random spot checks of worker IDs and

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origin documents, and the results will be included in the semi-annual E&S reports submitted to the World Bank. Recruitment outcomes will be communicated to affected communities.

- **Code of Conduct and behavioural rules.** Every worker signs the CoC in Annex 1 before site entry. It prohibits acts of sexual exploitation and abuse against persons under 18, as well as other unacceptable behaviors, regardless of national law or the age of consent; entry into residential areas outside the scope of work, contact with children in the course of Project work, possession or consumption of alcohol or drugs on site or in Project accommodation and vehicles, and any behaviour that would bring the Project into disrepute in the host community. Sanctions escalate to dismissal and removal from all Project sites.
- **Induction and continuing awareness.** Induction for every worker covers the CoC, SEA/SH, cultural norms and expected behaviour in the host community, community health and safety, the worker grievance mechanism and the anti-retaliation guarantee. Refreshers are delivered at least semi-annually and after any CoC incident.
- **Traffic and community safety.** Haulage routes, timings and speed limits are agreed with each affected settlement and set out in a site Traffic Management Plan, with school opening and closing times taken into account. Movements of contaminated material through settlements are minimized and, where unavoidable, are covered, wheel-washed. Community consultation on routing is conducted under the project site-specific SEPs.
- **Worker health screening and community health.** Contractors provide health services to their own workforce so that the Project does not displace demand onto local clinics, deliver an awareness program on communicable infections, and ensure that vector, waste and sanitation management at sites do not create hazard for the host settlements.

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4. OVERVIEW OF LABOR LEGISLATION AND REGULATORY FRAMEWORK

4.1 Key National Legislation

Labor legislation in Azerbaijan is primarily governed by the Constitution of the Republic of Azerbaijan and the Labor Code (LC), adopted on 1 February 1999 (Law No. 618-IQ) and amended multiple times thereafter. Relevant legislation farmwork includes:

- **Constitution of the Republic of Azerbaijan (1995):** Article 35 guarantees the right to freely choose one's employment; prohibits forced labor; guarantees the right to work in safe and hygienic conditions; and guarantees minimum wage and social protection.
- **Labor Code of the Republic of Azerbaijan (1999):** The primary legislation governing employment relationships between employees and employers. Covers terms and conditions, wages, working hours, leave, non-discrimination, OHS, dispute resolution, and termination.
- **Law on Combatting Human Trafficking (2005):** Prohibits forced labor and establishes criminal penalties.
- **Criminal Code of the Republic of Azerbaijan (1999):** Defines forced labor as a criminal offence; establishes penalties of 4–12 years' imprisonment.
- **Law on Social Insurance (1997):** Governs employee social insurance contributions and benefits (sickness, maternity, disability, retirement).
- **Decree of the President on Minimum Wage (December 23, 2024):** Minimum wage set at 400 AZN per month (approximately 235 USD as of June 2026).
- **Labor Inspection under the Ministry of Labor and Social Protection:** Responsible for oversight and enforcement of the Labor Code.

4.2 Key Provisions of the Labor Code Relevant to the Livable Baku Project

4.2.1 Employment Contracts

The Labor Code requires all employment relationships to be documented in a written employment contract. Contracts must specify – position/function; wage and benefits; working conditions; employment period (indefinite or fixed-term); and other relevant information. Contracts must be provided in writing in duplicate, one copy to each party. Probationary periods may not exceed 3 months.

4.2.2 Wages and Deductions

The statutory minimum wage is 400 AZN/month (235 $). Wages must be paid in Azerbaijani Manats via bank deposit or specified delivery. Deductions are permitted only with written employee consent or by law (e.g. taxes, social insurance, court orders). Overtime must be compensated at a minimum rate of twice the standard hourly wage (time-based) or at the relevant piece-rate (piecework).

4.2.3 Working Hours and Rest

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Standard working hours are 8 hours/day and 40 hours/week (5-day week). Workers in hazardous conditions: maximum 36 hours/week. Workers under 18: maximum 24 hours/week. Overtime is capped at 4 hours in any two consecutive days and limited to specific exceptional circumstances. All workers are entitled to a minimum of 21 calendar days of paid annual leave (more for certain categories). Pregnant women, women with children under 3, and workers under 18 are protected from overtime and night work.

4.2.4 Non-Discrimination and Equal Treatment

The Labor Code prohibits discrimination on grounds of citizenship, gender, race, religion, political affiliation, social origin, property status, or other circumstances unrelated to professional qualifications. Equal treatment principles apply to recruitment, pay, working conditions, promotion, and termination. Sexual harassment is addressed under general workplace dignity and protection provisions, and employers are expected to ensure a safe and respectful working environment, including handling complaints through internal or legal mechanisms.

4.2.5 Workers' Organizations

Employees have the right to freely form and join trade unions. The Labor Code allows collective bargaining between trade unions and employers and recognizes collective agreements as a key labor regulation tool. Labor disputes may be resolved through conciliation procedures, trade union involvement, mediation mechanisms, or through courts, which remain the main binding dispute resolution body.

4.2.6 Child Labor

Employment of persons under 15 years of age is prohibited. Workers aged 15–18 may be employed with restrictions to protect health, safety, and education, including prohibition of hazardous work, night work, overtime, and work in harmful environments such as alcohol-serving establishments. Working hours for minors are limited by law, and additional safeguards such as parental consent and medical suitability apply.

4.2.7 Forced Labor

Forced or compulsory labor is strictly prohibited under the Constitution, Labor Code, and Criminal Code of Azerbaijan. Employment must be based on voluntary agreement through formal labor contracts. Violations are subject to criminal liability, including imprisonment, and the legal framework fully supports a zero-tolerance approach to forced labor.

Azerbaijan is a member of the International Labor Organization (ILO) and has ratified the eight fundamental ILO Conventions, which are the core international labor standards and relevant to this Livable Baku Project:

ILO Convention No. 87 – Freedom of Association and Protection of the Right to Organize

- ILO Convention No. 98 – Right to Organize and Collective Bargaining

Forced labor

- ILO Convention No. 29 – Forced Labor
- ILO Convention No. 105 – Abolition of Forced Labor

Child labor

- ILO Convention No. 138 – Minimum Age
- ILO Convention No. 182 – Worst Forms of Child Labor

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Equality and non-discrimination

- ILO Convention No. 100 – Equal Remuneration
- ILO Convention No. 111 – Discrimination (Employment and Occupation)

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4.3 Gap Analysis: Azerbaijan Labor Code vs. WB ESS2

Table 3: Gap Analysis – Azerbaijan Labor Code vs. WB ESS2

ESS2 Requirement	National Framework Status	Gap-Filling Measure	Responsible party	Timeline	Verification / monitoring period
Non-discrimination: ESS2 applies to all workers regardless of nationality, ethnicity, religion, political affiliation, disability, gender, sexual orientation	LC covers most protected characteristics; no explicit protection for sexual orientation or disability in employment context	Project's non-discrimination policy (Section 5.2) expands protections to all grounds covered by ESS2; CoC reinforces	PIU Social Specialist; contractor HR function	Policy in force from Project effectiveness; applied at every recruitment round	Recruitment and payroll register audit and review of grievance data, quarterly
Foreign/migrant workers: ESS2 requires equivalent protection for all workers; LC has limited application to foreign workers in certain contexts	LC does not fully apply to foreign workers entering employment through foreign employment agreements	All workers on project sites (regardless of nationality) will be covered by ESS2-compliant terms and conditions as contractual obligations on contractors	PIU Social Specialist; contractor HR function	At mobilization and on each new engagement of a non-national worker	Contract register review and language-comprehension spot checks, quarterly
Grievance mechanism: ESS2 requires accessible worker grievance mechanism at project level	General dispute resolution through courts/administrative; no project-specific worker GRM required	Dedicated Worker Grievance Mechanism established in Section 8 of this LMP	PIU Social Specialist; contractor Grievance Officer	Operational before the first worker mobilizes at each site	WGM register and grievance response times, monthly; effectiveness review annually

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Primary supply chain: ESS2 requires due diligence for forced/child labor risks	Not specifically required under national law	Primary supply chain screening procedures established in Section 9	Contractor (screening and audit); PIU E&S Specialists (verification)	Desktop screening within 3 months of each civil works contract award; audits thereafter and on trigger	Supplier screening register and audit reports, annually and on trigger
OHS – contaminated site standards: WBG EHS Guidelines for Hazardous Waste and Contaminated Land	National OHS law does not specifically address contaminated site remediation to WBG standard	WBG EHS Guidelines for Hazardous Waste Management and Onshore Oil & Gas adopted as binding minimum standard	Contractor OHS Manager; PIU Environmental Specialist	OHS Management Plan approved before mobilisation; standards applied throughout works	Monthly contractor OHS inspection reports; semi-annual independent OHS audit
GBV/SEA/SH: ESS2 requires proportionate measures to prevent and address GBV/SEA/SH risks, including Codes of Conduct, worker training, confidential grievance mechanisms, and safe reporting procedures	Labor Code prohibits discrimination and addresses sexual harassment in employment relationships; however, it does not require project-specific Codes of Conduct, GBV/SEA/SH prevention measures, confidential or anonymous reporting channels, or survivor-centered response procedures	The Project will adopt and enforce a CoC for all workers (Annex 1) containing GBV/SEA/SH prohibitions and sanctions; provide mandatory worker training; establish confidential and anonymous reporting channels through the Project GRM; and implement referral procedures consistent with ESS2 and Good Practice Note on SEA/SH	PIU Social Specialist / SEA/SH Focal Person; contractor SEA/SH focal point	CoC signed and induction completed before site entry; referral pathway mapped and verified before works begin at each site	Percentage of CoC signed and SEA/SH induction completed, and referrals made within 24 hours, monthly

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5. POLICIES AND PROCEDURES FOR MANAGING PROJECT WORKERS

5.1 Terms and Conditions of Employment

The following **terms and conditions apply to all Project workers,** regardless of worker category. These requirements are minimum standards, contractors may adopt more favorable terms as agreed in collective or individual contracts:

5.1.1 All workers will have written employment contracts or equivalent engagement letters before commencing work. Contracts will be in a language understood by the worker (Azerbaijani and, where required other languages).

5.1.2 Contracts will clearly specify – role/position; wage or salary; payment schedule; working hours and overtime arrangements; leave entitlements; OHS rights and responsibilities; GRM access; and notice/termination conditions.

5.1.3 Wages will be paid at the agreed frequency (at least monthly), on time, and in full. No wage deductions will be made without the worker's explicit written consent except as legally required.

5.1.4 All wages will meet or exceed the national statutory minimum wage (400 AZN/month as of 2026). For roles involving hazardous conditions (contaminated site remediation, landfill management), a hazard pay supplement will apply.

5.1.5 Working hours will not exceed 40 hours/week (standard) or 36 hours/week for hazardous roles. Overtime will be voluntary, limited to exceptional circumstances, and compensated at a minimum rate of twice the standard hourly wage.

5.1.6 Workers in hazardous roles will receive at least 25 days of paid annual leave per year (above the statutory 21-day minimum), reflecting the heightened physical and psychological demands of the work.

5.1.7 All workers will be entitled to social security benefits including health insurance and workplace injury compensation as required by Azerbaijani law.

5.1.8 **Transparent hiring procedures:** Recruitment for all Project positions, at every contractor and subcontractor tier, follows a documented and auditable process. The following requirements are contractual:

- Vacancies are publicly advertised in each affected district before recruitment begins, with sufficient notice, using the communication channels identified in the site-specific SEPs. Advertisements state the role, the essential and desirable criteria, the wage range, the expected duration of the engagement, the application method and the closing date.
- Selection criteria are set out in writing before applications are received and are applied consistently. Selection decisions are recorded, with the reason for each appointment and each rejection.
- No recruitment fee, deposit, commission or payment of any kind may be charged to a worker or applicant, by the employer or by any intermediary. Recruitment through unofficial intermediaries is prohibited. Where a labor supply agency is used, the contractor remains fully responsible for that agency's compliance with this Project-level LMP.
- Entry-level and unskilled positions must not carry formal educational qualification requirements that have no bearing on the work, and application procedures must be usable by applicants with limited literacy, so that censused waste pickers and other disadvantaged applicants are not excluded in practice.
- A recruitment register is maintained by each contractor and submitted to the PIU monthly, showing applications, interviews, appointments and rejections

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disaggregated by sex, age band, district and settlement of origin, and whether the applicant is a censused waste picker. The PIU audits this register quarterly.

5.1.9. Documentation requirements:

- Each employer maintains, for every worker at every tier, a personnel file containing: the signed written contract or engagement letter; proof of age verified against a national identity document, with a copy retained; the signed CoC; records of induction and OHS and SEA/SH training with dates; records of PPE issued; payroll and working-time records including overtime; leave records; social insurance registration; occupational health examination records held confidentially and separately; and records of any disciplinary action or grievance involving that worker.
- Records are retained for the duration of the engagement and for at least three years afterwards, are kept at the site to which the worker is assigned or are retrievable within 24 hours, and are made available on request to the PIU and to the World Bank, subject to the confidentiality of health and grievance records.
- Contracts, Codes of Conduct, safety instructions, payslips and grievance materials are provided in a language each worker understands. Where a worker's literacy is limited, the contents are explained orally in the presence of a witness of the worker's choosing and this is recorded.
- Identity documents are never retained by the employer. Where a document must be copied for verification, the original is returned to the worker immediately.

5.2 Non-Discrimination and Equal Opportunity

The Project maintains a strict non-discrimination policy. **No worker or job applicant will be discriminated against on the basis of:**

5.2.1 Gender and other personal characteristics provided for under ESS2

5.2.2 Race, ethnicity, religion, or national origin

5.2.3 Disability or health status

5.2.4 Political affiliation or union membership

5.2.5 Age (provided the worker meets minimum age requirements)

5.2.6 Pregnancy or family status

5.2.7 Any other characteristic unrelated to professional qualifications and job requirements

The following **specific measures will be implemented to promote equal opportunity**:

5.2.8 Job advertisements will use gender-neutral language and specify that women, persons with disabilities, and members of vulnerable communities are encouraged to apply.

5.2.9 Gender-inclusive hiring will be actively promoted across the project workforce, with specific sub-targets for technical and supervisory roles.

5.2.10 Wages for equivalent work must be equal for women and men. All PIU and contractor payrolls will be reviewed semi-annually for unexplained gender wage gaps.

5.2.11 Reasonable workplace accommodations will be provided for workers with disabilities.

5.2.12 Pregnant workers and women with children under 3 will be protected from overtime, night work, and work in hazardous conditions as required by the Labor Code. Maternity leave entitlements (126–180 calendar days) will be fully honored.

5.2.13 **Non-discrimination checks in recruitment**:

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- Job advertisements and person specifications are screened by the PIU Social Specialist, before publication for the first recruitment round of each contract and on a sample basis thereafter, to confirm that they contain no direct or indirect discrimination, including gender-coded language, requirements unrelated to the work, or exclusions based on any characteristic listed in Section 5.2.
- Questions about pregnancy, marital status, family plans, religion, political affiliation or trade union membership are prohibited at interview and in application forms.
- Interview panels for positions at supervisory level and above will include at least one woman wherever the contractor's establishment makes this possible.
- The PIU reviews recruitment outcome data quarterly against the applicant pool to identify any pattern of disparate outcome by sex or district. Where a pattern is identified, the contractor is required to explain it and, if it is not objectively justified, to take corrective action.

5.3 Workers' Organizations

Consistent with ESS2, the Project recognizes workers' rights to form and join workers' organizations of their choosing and to bargain collectively, in line with Azerbaijani law. Azerbaijan's Labor Code guarantees workers' rights to form and join trade unions and to bargain collectively, rights reinforced by ILO Conventions No. 87 and No. 98, both ratified by Azerbaijan. In practice, trade union activity in the construction and waste sectors is limited in Azerbaijan, but the Project treats this as a reason to strengthen not weaken, worker protections. The absence of strong union representation makes the Worker GRM (Section 8) all the more important as an independent channel. The following minimum requirements apply to all contractors:

5.3.1 Workers will not be required as a condition of employment to refrain from union membership or collective bargaining activity;

5.3.2 Contractors will not interfere with, obstruct, or penalize workers for participating in legitimate union activities; and

5.3.3 Contractors will not restrict Project workers from developing alternative mechanisms to express grievances and protect their rights regarding working conditions and terms of employment.

5.3.4 Where trade unions are active at project sites, the PIU will engage constructively with elected worker representatives and will not obstruct collective bargaining. Where no union is present, which is common on construction sites in Azerbaijan, contractors are encouraged to establish a worker representative committee at each major site, elected by the workers themselves, as a practical channel for collective concerns. Worker committees complement but do not replace the Worker GRM.

5.4 Child Labor and Forced Labor

5.4.1 Child Labor

The Project maintains a zero-tolerance policy for child labor. No person under 18 years of age will be employed on this Project in any capacity, including at WTS, landfill, and lake oil-contaminated remediation sites where all work is classified as hazardous. Contractors must:

5.4.1 Verify the age of all workers before engagement through review of national identification documents;

5.4.2 Maintain a register of all workers with dates of birth and copies of age verification documents;

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5.4.3 Report any instance of identified child labor to the PIU immediately; and

5.4.4 Establish procedures to ensure sub-contractors at all tiers apply equivalent age verification requirements.

Note: May 2026 site survey identified the minor's participation in waste collection activities in the Shamakhi (Guneshli) dumpsite. The matter shall be assessed within the framework of the child protection measures provided for in the Project-level RPF, the requirements of national legislation and cooperation with the relevant authorities, and appropriate measures shall be taken to support children's continued school attendance and the social protection of their households. Remediation shall include school re-enrolment support and appropriate measures to prevent loss of essential household income.

Children identified through the initial or subsequent census, surveys, or grievance mechanisms shall not be recruited or engaged in Project employment. Priority employment under the Waste Picker Transition Programme is restricted to verified, censused waste pickers aged 18 years or above.

5.5 Forced Labor

The ILO has identified eleven indicators that, individually or in combination, point to the presence of forced labor. Contractors, subcontractors and primary suppliers working on this Project are required to screen their operations against these indicators and report any suspected case to the PIU without delay. The indicators are:

5.5.1 Abuse of vulnerability - workers recruited or retained by exploiting precarious migration status, debt, or social exclusion;

5.5.2 Deception - workers misled about the nature of the work, its location, the employer, or the actual working conditions;

5.5.3 Restriction of movement - workers confined to the worksite or accommodation and unable to leave freely;

5.5.4 Isolation - workers denied contact with their families or the outside world;

5.5.5 Physical and sexual violence - threats or acts of violence used to coerce workers;

5.5.6 Intimidation and threats - threats of denunciation to authorities, dismissal, or other retaliation;

5.5.7 Retention of identity documents - passports, work permits, or other ID withheld by the employer;

5.5.8 Withholding of wages - wages delayed, reduced without consent, or paid to a third party;

5.5.9 Debt bondage - workers told they must work off recruitment fees, transport costs, or accommodation charges;

5.5.10 Abusive living and working conditions - accommodation or working conditions clearly below the legal minimum;

5.5.11 Excessive overtime -- hours exceeding legal limits without adequate compensation or rest.

The Project maintains a zero-tolerance policy for all forms of forced or compulsory labor, including debt bondage and human trafficking. Contractors must ensure:

5.5.12 All workers engage voluntarily and may terminate their employment with reasonable notice without penalty;

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5.5.13 Workers are not required to lodge deposits or identity documents as a condition of employment;

5.5.14 Workers are not required to pay recruitment fees or related costs (these must be borne by the employer);

5.5.15 Workers are informed of their right to leave at the start of their engagement; and

5.5.16 Any credible allegation of forced labor or human trafficking is reported immediately to the PIU and competent national authorities.

5.5.17 No employer, contractor, subcontractor or labor supply agency engaged on this Project may take, hold, retain or destroy a worker's passport, national identity card, work permit, residence permit, professional certificate, bank card or any other personal document, whether at recruitment, on arrival, during the engagement or at its end, and whether or not the worker consents. Where a document must be sighted or copied to verify age, identity or the right to work, it is copied in the worker's presence and returned immediately. Retention of a worker's documents is a Category 1 breach under the sanctions ladder in Section 7.2 and is reported to the PIU immediately.

Worker verification checks

5.5.18 The PIU verifies compliance with the child labor and forced labor prohibitions through the following checks, which are carried out at every active site and extend to every subcontractor tier:

- Documentary check at engagement: age verified against a national identity document before the worker starts, with the verification recorded and dated in the worker register.
- Monthly reconciliation by the contractor of the worker register against the site access log and the payroll, so that any person working on site who does not appear in both is identified. Persons working on site without an entry in the worker register are removed from site until their status is regularized.
- Quarterly unannounced PIU site check comprising: physical inspection for apparently underage workers; confidential individual interviews with a random sample of workers, including subcontracted and migrant workers, conducted away from supervisors and where necessary through an independent interpreter; and screening against the eleven ILO forced-labor indicators listed above.
- Any credible indicator identified through these checks triggers immediate suspension of the practice concerned, notification of the World Bank, an investigation led by the PIU rather than the contractor, and remediation directed at the affected workers.

5.6 Code of Conduct

All project workers (direct and contracted) must read, understand, and sign the Project's CoC before commencing work. The CoC (Annex 1 to this Project-level LMP) covers:

5.6.1 Compliance with all applicable national laws and project ESF instruments;

5.6.2 Non-discrimination and respectful treatment of colleagues, community members, and project-affected persons;

5.6.3 Zero tolerance for sexual exploitation, abuse, or harassment (SEA/SH) – including specific definitions of prohibited behaviors;

5.6.4 Zero tolerance for child sexual abuse material and child exploitation;

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5.6.5 Prohibition of violence, intimidation, or threats toward workers or community members;

5.6.6 Alcohol and drug prohibition on working sites and in project vehicles;

5.6.7 Safe and responsible handling of project equipment, materials, and vehicles;

5.6.8 Prohibition of unauthorized entry into community areas or private property;

5.6.9 Obligation to report violations of the CoC to supervisors or through the GRM; and

5.6.10 Consequences of CoC violations, including disciplinary action up to and including dismissal and referral to authorities.

The CoC will be available in Azerbaijani (and in English for international staff). It will be explained verbally during worker induction. Supervisors are responsible for enforcing the CoC and modeling appropriate behavior.

5.7 Worker Health and Wellbeing

The Project commits to supporting the health and wellbeing of all workers, beyond the minimum OHS requirements. Key measures include:

5.7.1 Access to clean drinking water, adequate sanitation facilities, and rest areas at all project sites;

5.7.2 Regular health monitoring for workers in high-exposure roles (contaminated site remediation);

5.7.3 Mental health and psychosocial support resources for workers in psychologically demanding roles (waste management, contaminated site remediation);

5.7.4 HIV/AIDS awareness and prevention information provided during induction;

5.7.5 Emergency medical response capability at all active construction/remediation sites; and

5.7.6 Prohibition of physical punishment or psychological harassment in the workplace.

5.7.7 Where worker accommodation (camps) is provided, it will meet the standards of the IFC Guidance Note on Workers' Accommodation and applicable WBG EHS Guidelines; [TBC - whether worker camps will be used on any Component 1 and Component 2 package].

5.8 Retrenchment

5.8.1. ESS2 requires that, where the Project may result in retrenchment, a retrenchment plan is prepared based on the principle of non-discrimination and in consultation with workers and their organizations. Where retrenchment risk arises:

- **Consolidation of municipal cleaning and collection operations:** the Sumgait Cleaning Department currently employs 769 staff, of whom 521 are engaged in street cleaning and waste collection. The introduction of a waste transfer station, revised collection routes, and mechanized waste handling is expected to change the number and composition of positions required. Similar risks may arise in other municipalities within the Absheron waste shed as waste collection services are reorganized and will be assessed through the preparation of site-specific ESF instruments.
- **Closure of existing dumpsites:** Persons formally employed at dumpsites that are closed or repurposed may lose their positions. This is distinct from the position of informal waste pickers, whose loss of livelihood is not retrenchment and is addressed through the Waste Picker Transition Program in Section 3.3 and the Project-level RPF.

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- **End of construction and remediation contracts**: Completion of works will end the engagement of locally recruited construction workers. Contractors must address demobilization in the Labor Influx Management Plan required by Section 3.4, including notice, final payment and, where the workforce is large relative to the local labor market, advance notification to the district employment service.

5.8.2. Retrenchment Plan will be prepared by the PIU, in consultation with the affected employer and with the affected workers and any workers' organization representing them, and cleared by the World Bank, before any Project-related retrenchment decision takes effect. The Plan must, as a minimum, contain the following:

- An analysis of alternatives to retrenchment considered and the reasons for rejecting them, including redeployment to the new facilities, retraining for the roles the reorganised service will require, phased transition, natural attrition and voluntary departure.
- The number of posts affected, by function, grade, sex and age band, and the number of persons affected, so that any disproportionate effect on women or older workers is visible before decisions are made.
- Selection criteria that are objective, documented, applied consistently and free from discrimination on any ground listed in Section 5.2. Selection may not be based on sex, age, disability, pregnancy, trade union membership or activity, or on a worker's use of the grievance mechanism.
- A consultation process with affected workers and their representatives which begins before decisions are finalised and is capable of influencing them, with a record of what was raised and how it was addressed.
- Notice periods and severance entitlements at least equal to those required by the Labor Code and by any applicable collective agreement or individual contract, with all payments made in full and on time and confirmed by the PIU before the engagement ends.
- Transition support proportionate to the scale of the retrenchment: retraining for roles at the new facilities, priority consideration for vacancies arising in the reorganised service and at the MRF, landfill and transfer stations, job search assistance, and referral to state employment and social protection services.
- Access to the Worker Grievance Mechanism in Section 8 for all affected workers throughout the process and for at least six months after the engagement ends, and an express guarantee against retaliation for raising a concern about the retrenchment process.
- Monitoring of outcomes for at least twelve months after retrenchment, reporting the number retrenched, redeployed, retrained and re-employed, disaggregated by sex and age band, and grievances received from this group.

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6. OCCUPATIONAL HEALTH AND SAFETY

6.1 OHS Policy and Standards

The Project requires all civil works and remediation activities to be conducted in full compliance with:

6.1.1 World Bank Group Environmental, Health, and Safety (EHS) General Guidelines (2007, updated);

6.1.2 WBG EHS Guidelines for Waste Management Facilities (2007) – applicable to all Component 1 sites;

6.1.3 WBG EHS Guidelines for Onshore Oil and Gas Development – applicable to legacy oil infrastructure decommissioning and contaminated site remediation at Component 2 sites;

6.1.4 WBG EHS Guidelines for Hazardous Materials Management – applicable to sediment handling, contaminated soil excavation, and laboratory activities at Component 2 sites;

6.1.5 Azerbaijan Labor Code (Section IX: Labor protection. Chapters 33 – 36, Articles 207 – 239) and associated regulations; and

6.1.6 ISO 45001:2018 (Occupational Health and Safety Management Systems) – as a framework for contractors OHS management systems.

6.2 OHS Management Requirements for Contractors

All civil works contractors must, as a minimum, comply with the following OHS requirements, which will be incorporated as binding obligations in all civil works contracts:

6.2.1 Develop and implement a site-specific OHS Management Plan as part of the Contractor's ESMP (C-ESMP), submitted to PIU for review and approval prior to commencement of works;

6.2.2 Appoint a qualified OHS Manager at each construction site to oversee OHS compliance and incident management;

6.2.3 Conduct documented risk assessments for all work activities before commencement, and develop and implement safe work method statements (SWMS) for all high-risk activities;

6.2.4 Establish and enforce site entry requirements (PPE, induction, access control);

6.2.5 Conduct worker OHS induction training (minimum 8 hours) before workers begin site activities, covering site-specific hazards, emergency procedures, PPE use, and GRM access;

6.2.6 Provide and maintain all required PPE at no cost to workers, and enforce consistent use;

6.2.7 Establish emergency response procedures and maintain first aid facilities and emergency response equipment at all sites;

6.2.8 Report all OHS incidents (accidents, near misses, occupational diseases) to the PIU within 24 hours of occurrence; and

6.2.9 Conduct a minimum of monthly OHS inspections at each active site, with written reports submitted to the PIU.

6.2.10 Pre-mobilization requirements: No contractor may mobilize plant, materials or personnel to any Project site before the PIU has confirmed in writing that each of the following is in place:

- Site-specific OHS Management Plan, forming part of the C-ESMP, reviewed by the PIU and, where required, cleared by the World Bank.

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- Qualified OHS Manager appointed and present on site, with documented competence appropriate to the hazards concerned.
- Documented job hazard analyses and safe work method statements for every high-risk activity planned in the first 90 days of works.
- Safety induction delivered to every worker, of not less than 8 hours, before that worker first enters the site, covering site-specific hazards, emergency procedures, PPE, the permit-to-work system, stop-work authority, the worker grievance mechanism, the anti-retaliation guarantee and the CoC. Induction attendance is recorded by name and retained. No worker enters the site without a recorded induction, and this applies equally to subcontractor and short-term workers.
- Worker fitness-for-work checks completed before engagement, appropriate to the role and the hazards: baseline occupational health examination for all workers; additionally, for workers assigned to hazardous roles, respiratory function testing and confirmation of fitness to wear respiratory protective equipment, including a face-fit test; audiometry where noise exposure is expected; and confirmation of fitness for work at height, in confined spaces or over water where applicable. Fitness checks establish fitness for the duties of the role and are never used as a means of screening out applicants on grounds unrelated to safe performance.
- PPE appropriate to the assessed hazards procured, issued, recorded and, for respiratory protection, individually fitted, before work begins.
- Emergency response arrangements in place and tested, including first aid provision, trained first aiders on each shift, an agreed casualty evacuation route and receiving hospital for each site, and, for Component 2 sites, gas detection, rescue equipment and arrangements for the clinical management of hydrogen sulphide and hydrocarbon exposure.

The PIU will use a documented pre-mobilization checklist (Annex 4) and will record the date of clearance for each site.

6.2.11 Site-level obligations during works:

- Hazard identification and risk assessment is a continuing obligation, not a pre-mobilisation exercise. Each contractor must submit its site hazard register and all new or revised job hazard analyses to the PIU monthly, and must submit any risk assessment relating to a newly identified hazard to the PIU within 5 working days of identification. Work on a newly identified high-risk activity may not begin until the assessment has been submitted.
- A permit-to-work system is operated for work at height, excavation, confined space entry, hot work, live services, lifting operations, work over or on water, and any work involving contaminated sediment, oil sludge or legacy well infrastructure. Permits are issued by the OHS Manager, are time-limited, and are auditable by the PIU at any time.
- Daily pre-start briefings covering the day's activities, hazards and controls, recorded by attendance.
- Exposure monitoring at Component 2 sites, including personal and area monitoring for hydrogen sulphide, volatile organic compounds, benzene and respirable dust, with results reported to the PIU monthly and to the affected workers individually. Work stops where exposure exceeds the applicable occupational exposure limit until controls are restored.

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- Every worker holds stop-work authority: any worker may stop work they reasonably believe to be unsafe, without any adverse consequence. Use of stop-work authority is recorded and reported, and any adverse treatment of a worker who exercises it is treated as retaliation under Section 8.4.
- Incident reporting to the PIU within 24 hours for all incidents including near misses; immediately for any fatality, serious injury, or incident with the potential to cause serious harm; and onward notification by the PIU to the World Bank within 48 hours for serious incidents, in accordance with the Environmental and Social Incident Response Toolkit. Root cause analysis and a corrective action plan with named owners and deadlines are submitted within 10 working days, and closure of each action is verified by the PIU.
- In addition, the contractor shall submit to the PIU a post-incident debriefing report within 14 calendar days of any fatality, serious injury, lost-time incident or high-potential near miss, setting out the sequence of events, the root cause analysis, the corrective and preventive actions with named owners and deadlines, the lessons learned, and how those lessons have been communicated to the workforce and to the other contractors working on the Project. Submission of the debriefing report is a contractual requirement, and the PIU verifies it before the corresponding incident file is closed.

6.2.12. Health surveillance is mandatory for all workers whose roles involve exposure to hazardous substances, biological hazards, noise, vibration or respirable dust, which includes substantially all Component 2 remediation roles and all waste handling and sorting roles under Component 1. It is provided at the employer's cost and in the worker's working time:

- Baseline examination before first exposure, establishing the worker's condition at the point of engagement.
- Periodic examination at least annually, and six-monthly for workers engaged in oil-sludge excavation, sediment dredging, dewatering or legacy well decommissioning. Content is matched to the exposure and includes, as applicable, respiratory function, dermatological assessment, audiometry, liver and renal function, and biological monitoring for heavy metals and hydrocarbon metabolites.
- Exit examination on completion of the engagement, so that any condition arising during Project work is documented before the worker leaves.
- Results are given to the worker and are held in a confidential medical file separate from the personnel file. The employer receives only a fitness-for-work determination, not clinical detail. Health data is never disclosed to the PIU, the World Bank or any third party in identifiable form; aggregate anonymised trends are reported to the PIU semi-annually so that emerging exposure patterns can be acted on.
- Where surveillance identifies an exposure-related effect, the worker is removed from further exposure without loss of pay or status, the underlying control failure is investigated, and all other workers with comparable exposure are screened. Immunisation appropriate to the hazard, including tetanus and hepatitis B for waste handling and remediation roles, is offered free of charge before exposure begins.

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6.3 Component 1 – OHS Requirements for Solid Waste Management

In addition to the general requirements above, the following OHS requirements apply specifically to Component 1 (WTS/MRF and Landfill construction and operation):

6.3.1 Construction Phase – WTS/MRF and Landfill

- Soil and groundwater sampling at former dumpsite areas (Sumgait, others) before excavation; exposure risk assessment to inform OHS controls;
- Bioaerosol monitoring at all active waste-handling and construction areas adjacent to existing dumps;
- Respiratory protection (minimum P3 filter half-mask) required for all workers in dusty conditions and areas with potential bioaerosol exposure;
- Heavy vehicle traffic management plans at all WTS sites; exclusion zones for pedestrian workers.

6.3.2 Operation Phase – WTS/MRF

- Mandatory PPE: cut-resistant gloves, steel-toed boots, high-visibility vests, respiratory protection in sorting areas;
- Sharps management protocol: designated disposal containers, mandatory sharps-resistant gloves for manual sorting workers;
- Biological hazard protocol: vaccination requirements (hepatitis A and B, tetanus), regular health screening;
- Ergonomic risk management for manual sorting tasks: work rotation, maximum continuous shift duration, ergonomic workstation design.

6.3.3 Operation Phase – Absheron Regional Landfill

- LFG monitoring program: continuous monitoring for methane and H2S in operational areas; gas exclusion zones; gas detection equipment required for landfill floor workers;
- Leachate management protocol: impermeable PPE (chemical-resistant boots, gloves) for leachate handling; skin contact and inhalation controls;
- Fire and explosion prevention: no open flame or hot work in LFG-affected areas without explicit gas-free certificate; fire suppression equipment permanently stationed at landfill working face;
- Heavy equipment traffic management: no pedestrian access to the active landfill working face during compactor or vehicle operations.

6.4 Component 2 – OHS Requirements for Lake and Oil-Contaminated Site Remediation

Lake and contaminated site remediation involves among the substantive OHS risk levels of all project activities. The following requirements apply:

6.4.1 Contaminated Sediment Handling

- Personal air sampling for all dredging and sediment handling workers: monitoring for BTEX, H2S, VOCs, and total hydrocarbons;
- H2S gas detection: all workers in dredging and dewatering areas must wear personal H2S monitors; operations halt immediately if H2S exceeds 1 ppm (action level) or 10 ppm (evacuation level);
- Respiratory protection: full-face air-purifying respirators with organic vapour/acid gas cartridges during dredging; SCBA for confined space entry;

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- Chemical-resistant PPE: full-body coveralls (Type B or C chemical protection), chemical-resistant gloves (nitrile or neoprene), chemical-resistant boots;
- Decontamination procedures: all workers must pass through a decontamination zone before leaving the exclusion area;
- Biological monitoring: pre-engagement baseline blood tests; annual monitoring for heavy metal biomarkers (blood lead, urinary arsenic, urinary chromium) for workers with regular sediment contact.

6.4.2 Dredging and Water Operations

- All workers on water (dredging barges, boats) must wear life jackets at all times (if required);
- Non-buoyancy of contaminated water: swimming strictly prohibited in remediation water bodies.

6.4.3 Confined Space Entry

- All confined space entries (dewatering pits, containment structures, utility vaults) require: atmospheric testing (O2, LEL, H2S, CO); entry permit; continuous atmospheric monitoring; means of emergency rescue.

6.4.4 Oil Well and Pipeline Decommissioning

- Only certified and licensed well abandonment contractors permitted to perform legacy oil well decommissioning;
- Hot work prohibited near oil wells or decommissioned pipelines without gas-free certificate;
- Coordination protocol with SOCAR required before any works within 50 meters of SOCAR infrastructure.

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7. CONTRACTOR MANAGEMENT PROCEDURES

7.1 Pre-Qualification and Selection

The Livable Baku PIU will embed LMP compliance requirements in all contractors pre-qualification criteria and tender documents. Minimum requirements for contractor pre-qualification include:

7.1.1 Demonstrated OHS management system (ISO 45001 certification preferred; or equivalent documented OHS management system);

7.1.2 Documented corporate policy on non-discrimination, child labor prohibition, and forced labor prohibition;

7.1.3 Evidence of previous compliance with labor standards on comparable projects (references; audit reports);

7.1.4 No documented history of serious or willful OHS violations in the past 5 years; and

7.1.5 Commitment to apply this Project-level LMP and the Project's CoC as contractual obligations at all sub-contractor tiers.

7.2 Contractual Requirements

All civil works and consulting contracts will include, as binding clauses:

7.1.6 The obligation to comply with all provisions of this Project-level LMP, the Project's CoC, and applicable national labor law;

7.1.7 The obligation to maintain written employment records for all workers, including age verification, contract copies, payroll records, and training records;

7.1.8 The obligation to prepare and implement a site-specific C-ESMP incorporating OHS and labor management provisions;

7.1.9 The obligation to establish a site-level worker grievance mechanism and escalate unresolved complaints to the PIU GRM;

7.1.10 The obligation to report all OHS incidents, labor rights violations, and CoC breaches to the PIU within 24 hours;

7.1.11 The right of the PIU (and World Bank, where applicable) to conduct unannounced OHS and labor compliance audits;

7.1.12 The obligation to extend equivalent Project-level LMP requirements to all sub-contractors at all tiers; and

7.1.13 Consequences of non-compliance: PIU may issue corrective action notices; repeated or serious non-compliance may result in contract termination.

7.3 Subcontractor Accountability and Cascading Obligations

The main contractor is fully and directly accountable to the PIU for labor and OHS performance at every subcontractor tier. Subcontracting transfers work; it does not transfer responsibility. The following obligations are contractual and must be reproduced in full in every subcontract:

- Every subcontract at every tier must incorporate this Project-Level LMP, the Project CoC, the Project-Level SEA/SH Action Plan requirements and the applicable C-ESMP as binding obligations, in identical or more stringent terms. A subcontract that omits them is void as against the Project and the work may be suspended.

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- No subcontractor may be engaged, and no subcontractor personnel may enter a Project site, before the main contractor has notified the PIU of the engagement, submitted the subcontractor's details and scope, and confirmed in writing that the subcontractor has been assessed against the pre-qualification criteria in Section 7.1. The PIU maintains a register of all approved subcontractors at all tiers for each site.
- The main contractor must verify subcontractor compliance rather than rely on assurances: monthly review of subcontractor worker registers, age verification records, payroll and working-time records; inclusion of subcontracted workers in site induction, PPE issue, health surveillance and grievance mechanism access on identical terms; and at least quarterly documented audit of each active subcontractor.
- Non-compliance by a subcontractor is treated as non-compliance by the main contractor. Where a subcontractor fails to remedy a breach, the main contractor must remedy it directly, including by paying wages owed to subcontracted workers and by removing the subcontractor from the site.
- Labor supply agencies, plant hire firms providing operators, security providers and haulage subcontractors are all subcontractors for these purposes. Haulage of contaminated material and site security are specifically included, because these are the functions most often placed outside the main contractor's labor management systems and, in the case of security, carry a distinct risk of community harm.

7.4 Performance Monitoring – Contractor Key Performance Indicators

Labor and OHS performance is measured, not asserted. Each contractor reports monthly against the indicators below; the PIU verifies them through site visits and register audits, and performance is a criterion in interim payment certification and in eligibility for future Project contracts.

Key performance indicator	Target	Verification
Local employment - percentage of unskilled and semi-skilled workers recruited from the affected districts	Reported monthly by site; contractor must justify in writing any position filled from outside the district	Recruitment register audit; payroll addresses; PIU quarterly audit
Employment of censused waste pickers	Meets or exceeds the reserved quota in the contract	Recruitment register cross-referenced to the verified census list
Promote gender-inclusive hiring across the Project workforce	Specific supports for women’s participation in technical and supervisory positions	HR register disaggregated by sex
Worker grievance mechanism usage and responsiveness	100% acknowledged within 3 days; at least 85% resolved within 21 days; zero substantiated retaliation cases	WGM register; PIU review of open and overdue cases; ratio of grievances raised through PIU channels versus contractor channels

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Key performance indicator	Target	Verification
OHS incidents - TRIR, LTIFR, fatalities	Zero fatalities. TRIR below 3.0 and LTIFR below 1.0 per 200,000 hours, to be confirmed with the World Bank	Incident register; monthly OHS report; semi-annual independent audit
Induction and CoC coverage	100% of workers, including subcontracted workers, inducted and CoC signed before first site entry	Induction register reconciled against site access log and payroll
SEA/SH training and referral performance	100% of workers trained; 100% of reports referred to services within 24 hours	Training register; confidential PIU sub-register
Corrective action closure	100% of corrective actions closed by the agreed deadline	Corrective action tracker maintained by the PIU
Wage compliance	100% of workers paid at or above the statutory minimum, in full and on time	Quarterly payroll audit; confidential worker interviews

7.5 Sanctions Ladder for Non-Compliance

Enforcement is graduated and is applied consistently. The PIU records every non-compliance, the category assigned, the action taken and the date of closure, and reports these in the semi-annual E&S monitoring report to the World Bank.

Stage	Trigger	Action
1. Written warning and corrective action notice	First instance of a minor or administrative non-compliance - for example incomplete registers, late monthly report, isolated PPE lapse	Written notice specifying the breach, the required remedy and a deadline of not more than 14 days. Contractor submits a corrective action plan with named owners. PIU verifies closure.
2. Formal notice and increased supervision	Failure to close a Stage 1 action by its deadline, or a repeat of the same breach within 6 months	Formal notice to contractor management; frequency of PIU site supervision increased at the contractor's cost; the breach is reported to the World Bank in the next monitoring report.
3. Financial consequence	Persistent non-compliance, or a substantial breach - for example wage underpayment, unregistered workers on site, failure to induct, failure to provide PPE, accommodation below standard	Withholding of the relevant portion of the interim payment certificate until the breach is remedied, and application of the liquidated damages or penalty provision in the contract. Withheld sums are not released until the PIU has verified remedy, including payment of any wages owed to workers.
4. Suspension of works and	Serious or willful breach - for example an imminent danger to life, retention of identity documents, a person under 18 found working on site, obstruction	Immediate suspension of the affected activity or of all works at the site until the breach is remedied, at the contractor's cost and risk with no entitlement to extension of time or additional payment.

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Stage	Trigger	Action
removal of personnel	of a PIU audit, retaliation against a worker who raised a grievance, or failure to report a serious incident	Removal of the individual or the subcontractor responsible from all Project sites. Notification to the World Bank.
5. Termination and exclusion	Failure to remedy a Stage 4 breach, repeated serious breaches, a substantiated SEA/SH case that the contractor failed to act on, or confirmed forced or child labor that the contractor concealed	Termination of the contract for default in accordance with its terms, and exclusion of the contractor and the responsible subcontractor from further Project contracts. Referral to the competent national authority where the conduct is a criminal offence, and to the World Bank.

7.6 Monitoring and Supervision

The PIU Environmental Specialist and Social Specialist will conduct the following monitoring activities:

7.6.1. Monthly site visits to each active construction/remediation site: review OHS incidents, worker complaints, CoC compliance, PPE use, and documentation;

7.6.2. Review of monthly contractor labor and OHS reports;

7.6.3. Semi-annual independent labor and OHS audits at a sample of active sites; and

7.6.4. Annual review of contractor labor compliance across all sites, with results reported in the semi-annual E&S monitoring report.

7.7 Labor Management Responsibility Matrix

The table below sets out responsibility for each key LMP obligation. "PIU" = MoE Project Implementation Unit; "Contractor" = civil works or consulting contractor; "Subcontractor" = subcontractor at any tier. P = Primary; S = Supporting; O = Oversight.

Table 4. Labor Management Responsibility Matrix

Labor Management Obligation	PIU	Contractor	Subcontractor
Prepare and update this Project-level LMP	P	S	
Prepare site-specific C-ESMP incorporating LMP	O	P	S
Age verification before any worker is engaged	O	P	P
Issue written contracts to all workers	O	P	P
Pay wages on time at or above 400 AZN/month	O	P	P
Enforce 40-h / 36-h (hazardous) working week	O	P	P

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Meet 30% local labour quota; report monthly	O	P	
OHS induction (min. 8 hours) before site entry	O	P	S
Provide and maintain PPE at no cost to workers	O	P	P
Report OHS incidents to PIU within 24 hours	O	P	P
Monthly OHS site inspections with written records	S	P	S
SEA/SH CoC, training, confidential channel	P/O	P	P
Operate site-level worker grievance mechanism	O	P	S
Refer unresolved complaints to PIU GRM	P	S	S
Primary supply chain due diligence screening	O	P	
Semi-annual independent labor and OHS audits	P	S	
Waste picker census and livelihood transition program	P	S	

Table 5: Contractor Reporting Requirements

Report	Content	Frequency	Submitted to
Monthly OHS/Labor Report	Incidents (accidents, near misses), worker headcount, complaints received, PPE compliance, training delivered	Monthly	PIU E&S Specialists
Semi-annual E&S Monitoring Report	Summary of labor indicators, GRM data, audit findings, corrective actions	Semi-annual	PIU → World Bank
Incident Report	Details of accident/near miss, root cause analysis, corrective actions	Within 24 hours of incident	PIU (24h); WB (48h for serious)
Annual CoC Compliance Report	Summary of CoC violations, disciplinary actions, SEA/SH cases	Annual	PIU → World Bank

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	(confidential), training completion		

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8. WORKER GRIEVANCE MECHANISM

8.1 Overview

A Worker Grievance Mechanism (WGM) is established for all Livable Baku Project workers (direct, contracted, and community workers) in compliance with ESS2. The WGM is distinct from the community-facing GRM described in the Project-Level SEP, though both are coordinated and escalated through the PIU. The WGM provides workers with a safe, confidential, and accessible avenue to raise concerns about:

8.1.1 Working conditions, wages, and employment contracts;

8.1.2 OHS hazards, incidents, or unsafe practices;

8.1.3 Discrimination, harassment (including SEA/SH), or intimidation in the workplace;

8.1.4 Child labor or forced labor concerns;

8.1.5 Code of Conduct violations by supervisors or colleagues; and

8.1.6 Any other labor-related concerns.

All project workers will be informed of the WGM during induction training and provided with the WGM contact details in writing. Use of the WGM is voluntary; workers retain the right to pursue grievances through national legal and administrative channels at any time.

8.2 WGM Channels

8.2.1 Site-level complaint box (anonymous): Locked, tamper-evident complaint boxes installed at all active project sites. Keys held only by PIU Environmental Specialist and Social Specialist (not by contractor supervisors).

8.2.2 Contractor-level Grievance Officer: Each contractor must designate a Grievance Officer (non-supervisory, gender-balanced where possible) to receive verbal complaints from workers and relay them to the PIU within 24 hours.

8.2.3 Direct contact with PIU Environmental Specialist and Social Specialist: Workers may contact the PIU directly (telephone, email, in-person).

8.2.4 PIU GRM channels: Workers may use any of the channels described in the Project-Level SEP GRM (Section 6 of SEP and Table 12).

8.2.5 SEA/SH confidential channel: Same dedicated channel described in the Project-level SEP (Table 12 and Section 6.4), managed by a trained female specialist.

8.3 WGM Process and Timelines

The WGM follows the same process steps as the GRM at Project-Level SEP (Section 6 of SEP – Table 13 – receipt, acknowledgement within 3 days, investigation, resolution within 21 days, escalation). For worker safety concerns classified as imminent hazards, the PIU may order immediate site work stoppage pending investigation. The contractor must acknowledge receipt of the complaint within 1 working day and provide a preliminary response within 5 working days.

8.4 Anti-Retaliation

Retaliation, intimidation, or penalization of any worker for raising a grievance is strictly prohibited and constitutes a serious breach of the Project's CoC and ESS2. Any report of retaliation will be investigated immediately by the PIU. Substantiated retaliation by a contractor

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may result in contract termination. Contractors must explicitly communicate the anti-retaliation policy to all workers during induction and post it prominently on-site notice boards.

8.5 Specialized Protocol for SEA/SH Complaints

SEA/SH complaints require handling that is clearly separate from other grievance types. The safety and dignity of the person who comes forward must take priority over all other considerations. The following protocol applies to any SEA/SH report, regardless of the channel through which it is received.

8.5.1 Confidentiality and Survivor-Centred Approach

The identity of the person who reports an SEA/SH incident will never be shared with the alleged perpetrator or with site management without that person's explicit, informed consent. All SEA/SH cases will be managed personally by the PIU Social Specialist/SEA/SH Focal Person (this post must be held by a woman). The first priority upon receiving a report is to connect the survivor with medical, psychosocial and legal support - not to investigate or allocate blame.

8.5.2 Reporting Channels

Workers may report SEA/SH through:

(a) a dedicated phone number held by the female PIU Social Specialist/SEA/SH Focal Person;

(b) a sealed SEA/SH drop-box at each site, separate from the general grievance box and with keys held only by the PIU Social Specialist/SEA/SH Focal Person; or

(c) direct approach to any female community liaison officer.

Anonymous reports are accepted. Acknowledgement within 24 hours where contact details are provided.

SEA/SH complaints may be reported through at least three accessible channels, including at least one that bypasses the contractor: the dedicated PIU contact (female Social Specialist/SEA/SH Focal Person), a sealed SEA/SH complaint box managed solely by the PIU, and a female community liaison officer or the independent social worker/NGO engaged under Section 3.3. Workers may also use the SEP GRM or report directly to a service provider. All reporting options are explained during induction, and workers are informed that they are never required to report through their supervisor or the contractor.

8.5.3 No Mediation or Contractor Investigation

SEA/SH cases are never subject to mediation, reconciliation, or other processes involving contact between the survivor and the alleged perpetrator. Contractors must not investigate or attempt to resolve SEA/SH allegations; their role is limited to maintaining confidentiality and immediately referring reports to the PIU without recording identifying information.

8.5.4 Survivor-Centred Referral

Access to the established referral pathway is offered within 24 hours, regardless of whether the survivor chooses to pursue an investigation or disclose their identity beyond the SEA/SH Focal Person. Support is available to both workers and community members. Mandatory reporting requirements for child survivors under Azerbaijani law are followed.

8.5.5. Mandatory actions include:

- Referral to support services within 24 hours of receiving the report;

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- Temporary site separation: the alleged perpetrator is removed from the site (not the survivor), and pending investigation;
- Investigation led by the PIU, not the contractor; contractor Grievance Officer may assist but not lead;
- If substantiated: dismissal of the perpetrator and, where the act is a criminal offence under Azerbaijani law, referral to law enforcement;
- All cases recorded in a confidential sub-register held exclusively by the PIU Social Specialist/SEA/SH Focal Person, anonymized aggregate data reported semi-annually.

8.5.6. SEA/SH Induction and Training

No worker may enter a project site without completing a mandatory SEA/SH induction. The induction must explain in plain language: what constitutes prohibited behaviour, how to report, and what the consequences are for perpetrators. It must be delivered in Azerbaijani, and where international workers are present in a language they genuinely understand. Contractors must translate the CoC accordingly. Quarterly refresher training is mandatory throughout the construction period.

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9. PRIMARY SUPPLY CHAIN DUE DILIGENCE

9.1 Scope

ESS2 requires the Borrower to assess and manage risks of child labor, forced labor, and serious safety issues in the primary supply chain. For the Livable Baku Project, primary supply chains are defined as direct suppliers of major construction materials and equipment, including:

- Aggregates, sand, and gravel (for concrete and earthworks);
- Steel and reinforcement materials;
- Concrete and prefabricated structural elements;
- Fuel for construction equipment;
- Specialized remediation equipment (dredges, geotextiles, contaminated material handling systems); and
- Engineered landfill liner systems (HDPE liners, drainage aggregates).

9.2 Due Diligence Procedures

Contractors will be required to implement the following primary supply chain due diligence:

9.2.1 For all primary suppliers, conduct a desktop screening assessment to identify supply chain labor risks, including country/region of origin, nature of work, known industry-specific risks (e.g. quarrying, steel production).

9.2.2 For suppliers identified as medium or high risk: require the supplier to complete a self-assessment questionnaire on labor practices; review for evidence of child labor, forced labor, or serious OHS violations.

9.2.3 For high-risk suppliers (particularly quarrying operations, given the known risks of child labor in aggregate extraction in some contexts): conduct or commission an on-site verification audit before awarding supply contracts.

9.2.4 Include contractual clauses in all supply contracts requiring: prohibition of child and forced labor; compliance with national labor law; right of PIU/WB to audit; and obligation to flow down requirements to sub-suppliers.

9.2.5 Report supply chain due diligence findings to PIU annually.

9.3 Supplier Screening, Audit and Replacement

9.3.1. **Screening at the point of engagement**: No primary supplier may be engaged before a documented screening has been completed and recorded in the contractor's supplier register, which is submitted to the PIU. Screening covers the supplier's legal status and registration; its labor force composition, including any use of subcontracted, seasonal or migrant labor; its age verification practice; recruitment practices and whether fees are charged to workers; wage and working-time practice; OHS management and incident history; the presence of any grievance mechanism; and, for extractive suppliers, the location and legal status of the extraction site. Labor and occupational health and safety risks at quarrying, aggregate and sand extraction sites shall be assessed with particular attention. Such suppliers are therefore treated as high risk by default and are screened through a site visit in addition to desktop review.

9.3.2. **Random audits**: Independently of risk rating, the PIU or its appointed auditor will conduct unannounced audits of a random sample of at least 20% of active primary

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suppliers each year, with a minimum of one supplier per major civil works contract. Random selection matters: a programme that audits only suppliers already identified as high risk cannot detect a mis-rating. Audits include a site visit, inspection of the worker register and age verification records, and confidential interviews with a sample of the supplier's workers conducted away from management.

9.3.3. **Complaint-triggered audits:** Any complaint received through the Project GRM, Worker GRM, or other channel that identifies a specific primary supplier shall trigger a targeted audit of that supplier within 30 calendar days of receipt, irrespective of the supplier's risk rating or scheduled audit cycle. The audit scope shall be proportionate to the complaint and shall, at a minimum, cover age verification and recruitment practices. The PIU shall document the audit, findings, and required corrective actions in the supplier register and monitor their implementation. The complainant shall be informed of the outcome, subject to confidentiality and the anti-retaliation provisions of Section 8.4. Audit findings and material corrective actions shall be reported in the next semi-annual E&S report to the World Bank.

9.3.4. **Corrective action and time-bound remediation:** Where an audit identifies non-compliance, the supplier is issued with a corrective action plan with named actions, owners and deadlines proportionate to the finding. Where child labor or forced labor is identified, the remedy must be directed at the affected individuals - including removal from the work, referral to education or support services, and, in the case of forced labor, repayment of any fees or withheld wages - and not merely at the supplier's paperwork. Simply ceasing to buy from the supplier is not, by itself, an acceptable remedy where it would leave the affected workers worse off.

9.3.5. **Supplier replacement clause:** Every supply contract must contain, and every contractor must be prepared to exercise, a right to suspend and to terminate the supply relationship for environmental and social non-performance. Where a supplier fails to close corrective actions by the agreed deadline, or where non-compliance recurs after remediation, or where the supplier denies access for audit, the contractor must suspend purchasing and, if the failure persists beyond a further 30 days, replace the supplier. Where child labor, forced labor or a serious safety failure causing death or permanent injury is confirmed and the supplier does not immediately and verifiably remedy it, the supplier is replaced without a further remediation period. Contractors must identify alternative sources for each high-risk primary material in advance, so that the obligation to replace a supplier is not defeated by the argument that no alternative exists. Replacement of a supplier, and the reason for it, is reported to the PIU within 10 working days and to the World Bank in the next semi-annual monitoring report.

Note: Primary supply chain risk screening will be completed within 3 months of contract award for each major civil works package. Identified high-risk suppliers will be flagged to the World Bank. Audit results to be integrated in the Annual LMP Monitoring Reports.

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10. INTEGRATION WITH SITE-SPECIFIC LMPs

10.1 Component 1: Site-specific LMP for Integrated Solid Waste Management

Under Component 1, site-specific LMP will be prepared as part of the ESIA package and will provide detailed labor management procedures specific to the construction and operation of the Absheron Regional Landfill, the five WTSs (Gala, Sumgait, Khizi Sitalchay, Khizi Findigan, Shamakhi Goylerdag), and the associated sorting facility. The Component 1 site-specific LMP will include:

- Site-specific workforce plan and estimated labor numbers per facility;
- Detailed OHS management requirements for WTS/landfill/MRF construction and operation, including specific WBG EHS Guidelines for Waste Management Facilities;
- Site-specific emergency response plan (particularly for landfill gas management);
- Contractor management procedures; and
- OHS monitoring indicators and targets for the site.

Note: The under the Component 1, site-specific LMPs to be appended as Annex A to this Project-level LMP, upon finalization of site-specific ESF instruments.

10.2 Component 2: Site-specific LMP for Remediation of Polluted Lakes and Oil-Contaminated Sites

Under Component 2, site-specific LMP will be prepared as part of the ESIA package and will provide detailed labor management procedures for remediation of Zigh, Khojasan, and Boyukshor Lakes and the oil-contaminated sites.

The Component 2 site-specific LMP will include:

- Site-specific HRAs for workers based on the ESIA contaminant characterization results;
- Detailed chemical exposure management protocols for each lake site, based on site-specific contaminant profiles;
- Biological monitoring program for workers with regular contaminated sediment or soil exposure;
- Confined space and dredging-specific OHS management procedures;
- Emergency response procedures for H2S release and other acute contamination exposure events;
- Contractor qualification requirements specific to hazardous material remediation; and
- OHS monitoring indicators and targets for the site.

Note: The under Component 2, site-specific LMPs to be appended as Annex B to this Project-level LMP, upon finalization of site-specific ESF instruments.

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11. MONITORING, REPORTING, AND REVIEW

11.1 Project-level LMP Monitoring Indicators

Table 6: Project-level LMP Monitoring Indicators and Targets

Indicator	Target / Benchmark	Means of Verification	Frequency
% workers with written signed employment contracts	100%	Contract register audit	Quarterly
% workers paid at or above minimum wage	100%	Payroll audit	Quarterly
Total Recordable Incident Rate (TRIR) per 200,000 work hours	*[Target: <3.0 – to be confirmed with WB]*	Incident register; site reports	Monthly
Lost Time Injury Frequency Rate (LTIFR)	*[Target: <1.0 – to be confirmed]*	Incident register	Monthly
No. of fatalities	Zero	Incident register; PIU reports	Monthly
% workers who completed OHS induction before starting work	100%	Training attendance register	Quarterly
% CoC signed by all workers	100%	CoC register	Quarterly
No. of worker grievances received / resolved / pending	100% acknowledged within 3 days; 85% resolved within 21 days	WGM register	Monthly
No. of SEA/SH-related worker complaints (referrals to support services)	100% referred within 24h	Confidential WGM sub-register	Monthly
% women in overall project workforce	Reported and justified; no Project-wide numeric target imposed on contractors	Contractor recruitment register; PIU audit	Semi-annual
No. of child labor incidents identified	Zero	Age verification register; site audits	Monthly

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% of unskilled and semi-skilled workers recruited from the affected communities/districts	Reported and justified by site; no Project-wide numeric target imposed on contractors	Contractor recruitment register; PIU audit	Monthly
No. of censused waste pickers offered, entering and retained in Project employment (at 6 and 12 months)	Meets or exceeds the contractual reserved quota at each facility	Recruitment register cross-referenced to the verified census list	Semi-annual
No. of censused waste pickers completing a baseline occupational health examination	100% before starting work	Confidential health surveillance records (aggregate)	Semi-annual
% of workers in hazardous roles with up-to-date periodic health surveillance	100%	Aggregate anonymised health surveillance report	Semi-annual
Worker accommodation inspections completed and compliant	100% inspected before occupation; all non-conformities closed within 14 days	PIU inspection reports against IFC/EBRD workers' accommodation standard	Quarterly
No. of community grievances relating to worker conduct or labor influx	Declining trend; all substantiated cases actioned under the sanctions ladder	Project GRM register (SEP)	Monthly
No. of CoC breaches recorded and sanctions applied, by stage	All breaches recorded and a sanction applied and closed	PIU non-compliance and sanctions register	Monthly
Corrective actions: opened, closed, overdue, and average days to closure	Zero actions overdue by more than 30 days	Consolidated PIU corrective action tracker	Monthly
% of primary suppliers screened; no. of random and trigger-based supplier audits completed	100% screened before engagement; at least 20% of active suppliers audited annually	Supplier register; audit reports	Semi-annual

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No. of subcontractors registered with the PIU before mobilization	100% of subcontractors at all tiers	PIU subcontractor register reconciled against site access logs	Monthly
Retrenchment: no. retrenched, redeployed, retrained and re-employed, disaggregated by sex and age band	Retrenchment Plan prepared and cleared before any retrenchment takes effect	Retrenchment Plan monitoring report	Semi-annual

11.2 Reporting

Monthly and semi-annual reporting requirements are described in Section 7.3 (Table 5). The PIU will include a dedicated LMP section in all semi-annual E&S monitoring reports submitted to the World Bank, covering: workforce data disaggregated by category, gender, and nationality; OHS incident data; WGM data; CoC compliance; and any material supply chain findings.

11.2.1 Corrective Action Planning and Tracking

Every monthly contractor report and every semi-annual E&S monitoring report must include a corrective action plan covering all outstanding labor, OHS and SEA/SH findings, in the following form:

- Each finding is stated together with its source - site inspection, audit, incident investigation, grievance, health surveillance or self-reporting - the date it was identified, and the category assigned under the sanctions ladder in Section 7.2.
- Each finding has a stated root cause. Corrective actions addressed only to the immediate symptom, without addressing why the failure occurred, will be returned by the PIU as incomplete.
- Each corrective action names a single accountable individual by role, states a completion deadline, and states the evidence that will demonstrate closure.
- Actions carried forward from previous periods are listed separately, with the original deadline, the reason for non-closure and the revised deadline. The number and age of overdue actions is reported explicitly, because a lengthening tail of overdue actions is the clearest early indicator of a deteriorating labor and OHS management system.
- Closure is verified by the PIU, not self-certified by the contractor. The PIU maintains a single consolidated corrective action tracker across all sites and contractors, and reports its status - opened, closed, overdue, and average time to closure - in each semi-annual report to the World Bank, together with an explanation of any systemic pattern.
- Corrective actions arising from a substantiated SEA/SH case are tracked in a confidential sub-tracker held by the PIU Social Specialist and are reported in anonymized aggregate form only.

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11.3 Annual Review

The Project-level LMP and site-specific LMPs will be reviewed and updated at least once a year throughout project implementation. Beyond the annual cycle, an unscheduled update is required when any of the following occurs:

a) a material changes in project scope, site footprint or construction methodology;

b) mobilization of international workers or a significant increase in total workforce;

c) a new labor risk pattern emerging from grievance data or site audits;

d) fatality or serious permanent injury;

e) a substantiated SEA/SH case;

f) identification of child or forced labor at any tier of the supply chain; or

g) a change in Azerbaijani labor legislation or applicable World Bank standards.

All material updates will be submitted to the World Bank for review and no-objection before taking effect.

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ANNEXES

Annex A: site-specific LMPs under the Component 1 (to be added upon finalization of site-specific ESF instruments)

Annex B: site-specific LMPs under the Component 2 (to be added upon finalization of site-specific ESF instruments)

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Annex 1: Code of Conduct Template

The Code of Conduct below applies to all project workers (direct and contracted). Contractors are required to adapt this template for their specific sites and workforce, have all workers sign it before commencing work, and enforce it throughout the project.

PROJECT WORKER CODE OF CONDUCT – LIVABLE BAKU PROJECT

I, [Name], employed by [Company] as [Position] on the Livable Baku Project, understand and commit to the following:

1. I will comply with all applicable national laws, the Project's Labor Management Procedures, and my employment contract.

2. I will treat all colleagues, community members, and project-affected persons with respect and dignity, without discrimination on any basis.

3. I will not engage in, encourage, or condone any form of sexual exploitation, sexual abuse, or sexual harassment (SEA/SH). I understand that SEA/SH includes unwanted sexual contact; demands for sexual favors; sexually offensive verbal or written communications; and any sexual conduct toward persons under 18.

4. I will not engage in, encourage, or condone violence, physical intimidation, or threats toward any person on the project or in the surrounding community.

5. I will not consume alcohol or illegal substances during working hours or on project premises.

6. I will follow all OHS instructions, use required PPE correctly and report any unsafe conditions to my supervisor or through the Grievance Mechanism.

7. I will not employ, direct, or engage persons under 18 years of age for any project work.

8. I will not engage in or facilitate forced labor or human trafficking.

9. I will not enter private land or community areas without authorization.

10. I understand that violations of this Code of Conduct may result in disciplinary action, dismissal, and referral to national authorities.

I also understand that I may raise concerns about any violation of this Code of Conduct at any time, confidentially and without fear of retaliation, through: my company's Grievance Officer; the PIU GRM hotline; or the dedicated SEA/SH channel.

Name:	
Signature:	
Date:	
Employer/Company:	
Site:	
Witnessed by:	

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Annex 2: Worker Grievance Form Template

Any worker on the Project, including workers employed by contractors, subcontractors and suppliers may use this form to raise a concern. Using the mechanism is free. No worker will be dismissed, disciplined, or treated unfavorably for raising a concern in good faith. You may submit this form anonymously. Using this mechanism does not prevent you from using the courts, the State Labor Inspectorate, or any other legal remedy.

How to submit: place the completed form in the grievance box at the site, or hand it to the PIU Grievance Focal Person or send it to the PIU Office/MoE at the:

Address: Government House, Gate #5, 6th Floor, 84 Uzeyir Hajibeyov, Baku 1000,

or

Email: livablebaku.grm@economy.gov.az

Part 1 — About you (optional)

You do not have to give your name. If you do not give contact details, we cannot inform you of the outcome.

Name	
Position / job title	
Employer (contractor / subcontractor)	
Site or work location	
Contact (phone or e-mail)	
☐ I wish to submit this grievance anonymously. **☐ I ask that my identity be kept confidential.**	

Part 2 — Your concern

Date the issue happened	
Where it happened	

What is your concern about? (tick one or more)

☐ Health and safety ☐ Wages, hours or contract terms ☐ Accommodation or facilities
☐ Discrimination or unfair treatment ☐ Harassment or bullying
☐ Sexual exploitation, sexual abuse or sexual harassment (SEA/SH)
☐ Child labor or forced labor ☐ Breach of the Code of Conduct ☐ Other

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Describe what happened

What outcome would you like?

Signature (optional): _____ Date: ____ / ____ / _____

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Annex 3: Worker Grievance Registration Form

Reference Number:	*[Auto-assigned]*
Date Received:	*[DD/MM/YYYY]*
Channel:	*[Site box / Grievance Officer / PIU direct / Email / Other]*
Worker Name:	*[Optional – confidential]*
Anonymous?	*[Yes / No]*
Employer/Contractor:	
Site:	
Category:	*[OHS / Wages & Terms / Discrimination / SEA/SH / Child/Forced Labor / CoC Violation / Other]*
Description:	*[Full description of the concern]*
Action Taken:	*[Investigation summary and resolution]*
Resolution Date:	*[DD/MM/YYYY]*
Worker Satisfied?	*[Yes / No / No response]*
Status:	*[Open / Resolved / Escalated / Closed]*

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Annex 4: Monthly OHS Incident Register Template

Date	Site	Incident Type	Worker / Category	Description	Severity	Corrective Actions

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Annex 5: Contractor OHS Inspection and Pre-Mobilization Checklist Template

This checklist is used by the PIU Environmental Specialist for pre-mobilization clearance and for the monthly site OHS inspection required by Section 6.2, and by contractors for self-inspection.

Section A is completed before any mobilization and must be fully cleared; Sections B to D are completed at each inspection.

Every 'No' answer requires an entry in the final column naming the corrective action, the accountable person and the deadline, and is transferred to the corrective action tracker maintained under Section 11.2.

The checklist is signed and dated by the inspector and by the contractor's OHS Manager, and a copy is retained on site.

Ref	Item to be verified	Yes / No / N/A	Evidence sighted	Action required, owner and date
A. Pre-mobilization clearance (to be completed before any mobilization)				
A1	Site-specific OHS Management Plan submitted, reviewed by the PIU and, where required, cleared by the World Bank			
A2	Qualified OHS Manager appointed, present on site, competence evidenced			
A3	Job hazard analyses and safe work method statements completed for all high-risk activities in the first 90 days			
A4	Permit-to-work system established and permit issuers named			
A5	Emergency response plan in place; first aiders trained on each shift; evacuation route and receiving hospital agreed			
A6	Worker fitness-for-work checks completed for all engaged workers, including respiratory face-fit testing where RPE is required			
A7	PPE procured, issued, recorded and individually fitted where required			
A8	Worker accommodation inspected and confirmed compliant before occupation			
A9	Induction (minimum 8 hours) delivered and recorded for every worker before first site entry, including subcontracted workers			
B. Site conditions and physical controls				
B1	Site perimeter secure; access controlled; unauthorized entry prevented, including by children			
B2	Signage in place and legible in the languages used on site			

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Ref	Item to be verified	Yes / No / N/A	Evidence sighted	Action required, owner and date
B3	Excavations battered, benched or shored; edge protection in place; access and egress provided			
B4	Work at height: edge protection, fall arrest, ladders and scaffolds inspected and tagged			
B5	Traffic management plan implemented; pedestrian and vehicle segregation; reversing controls; speed limits enforced			
B6	Plant and lifting equipment certified, inspected and operated by license-holders			
B7	Electrical safety: isolation, lock-out/tag-out, RCD protection, no damaged leads			
B8	Fire prevention and detection; extinguishers accessible and in date; hot work permits in use			
B9	Housekeeping; materials stored safely; no uncontrolled sharps or waste			
B10	Welfare: potable water, sanitation with separate facilities for women, rest and eating areas, washing facilities			
C. Component-specific controls				
C1	Waste handling: cut and puncture protection, biological hazard controls, vaccination status confirmed, tipping floor pedestrian controls			
C2	Landfill: landfill gas monitoring, leachate handling controls, working face traffic management, fire watch			
C3	Contaminated sites: gas detection for H2S and VOCs calibrated and in use; exposure monitoring undertaken; decontamination facilities operating			
C4	Confined space entry: permit, atmospheric testing, attendant, rescue plan and equipment			
C5	Work over or on water: buoyancy aids, rescue craft or throw-lines, man-overboard procedure			
C6	Legacy oil wells and pipelines: certified specialist contractor, hot work controls, blowout and ignition prevention			
C7	Contaminated material transport: covered loads, wheel wash, agreed route, spill kit carried, manifest maintained			
D. Systems, records and performance				

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Ref	Item to be verified	Yes / No / N/A	Evidence sighted	Action required, owner and date
D1	Daily pre-start briefings held and attendance recorded			
D2	Hazard register current; new job hazard analyses submitted to the PIU within 5 working days			
D3	Incident register complete; all incidents including near misses reported to the PIU within 24 hours			
D4	Root cause analyses and corrective action plans submitted within 10 working days; overdue actions listed			
D5	Stop-work authority explained at induction; uses recorded; no adverse treatment of any worker who exercised it			
D6	Health surveillance current for all workers in hazardous roles; exit examinations completed for leavers			
D7	Monthly OHS inspection completed and report submitted to the PIU			
D8	Previous inspection findings closed and closure evidenced			

Inspector (name, role, signature, date): _____

Contractor OHS Manager (name, signature, date): _____

Site: _____

Inspection type: pre-mobilization / monthly / unannounced / follow-up

Number of 'No' findings: _____

Findings carried forward from the previous inspection: _____

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Annex 6: Labor Inspection Checklist

This checklist is used by the PIU Social Specialist for the quarterly labor compliance inspection and for the unannounced checks required by Sections 5.4 and 7.3 and applies equally to the main contractor and to every subcontractor tier. Verification is by document review and by confidential individual interview with a random sample of workers, conducted away from supervisors and, where necessary, through an independent interpreter; questions in Sections C and D in particular must be tested with workers directly and not answered from contractor records alone.

Every 'No' answer requires a corrective action, an accountable person and a deadline, and is transferred to the corrective action tracker. No worker interviewed may be identified in this record.

Ref	Item to be verified	Yes / No / N/A	Evidence sighted	Action required, owner and date
A. Engagement, contracts and documentation				
A1	Every worker on site appears in the worker register, the site access log and the payroll (three-way reconciliation)			
A2	Written contract or engagement letter in place before work began, in a language the worker understands			
A3	Contract states role, wage, payment schedule, hours, overtime, leave, notice and grievance route			
A4	Age verified against a national identity document before engagement; copy on file; no worker under 18 on site			
A5	Code of Conduct signed by every worker, including subcontracted workers, before first site entry			
A6	No identity documents, passports, permits or bank cards retained by the employer or accommodation provider			
A7	Personnel files complete and retrievable within 24 hours			
B. Wages, hours and conditions				
B1	All workers paid at or above the statutory minimum wage; hazardous-role premia applied where due			

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Ref	Item to be verified	Yes / No / N/A	Evidence sighted	Action required, owner and date
B2	Wages paid in full, on time and at least monthly; payslips issued and comprehensible			
B3	No unauthorized deductions; no deduction for PPE, tools, transport, accommodation or recruitment			
B4	Working hours within limits; overtime voluntary, recorded and paid at premium rates; rest days provided			
B5	Annual leave, sick leave and maternity entitlements applied; hazardous-role leave entitlement of at least 25 days applied			
B6	Social insurance registration completed for all workers			
C. Recruitment, non-discrimination and equal opportunity				
C1	Vacancies publicly advertised in the affected district before recruitment; criteria published in advance			
C2	Recruitment register current and disaggregated by sex, age band and settlement of origin			
C3	No recruitment fee, deposit or commission charged to any worker or applicant, by the employer or any intermediary (tested by worker interview, not by records alone)			
C4	Reserved quota for censused waste pickers met; adjusted criteria applied so that entry is possible in practice			
C5	No discriminatory language or requirements in advertisements or person specifications; prohibited interview questions not used			
C6	Female workforce proportion recorded; facilities and PPE suitable for women provided			
D. Forced labor indicators (ILO screening)				

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Ref	Item to be verified	Yes / No / N/A	Evidence sighted	Action required, owner and date
D1	Workers free to terminate employment with reasonable notice and without penalty			
D2	Freedom of movement; workers not confined to site or accommodation; no restriction on outside contact			
D3	No debt bondage; no charges for transport, accommodation or tools recovered from wages			
D4	No intimidation, threats, or physical or sexual violence reported or observed			
D5	Living and working conditions at or above the legal minimum			
E. Labor influx (where applicable)				
E1	Separate, secure, and lit sanitation facilities for women			
E2	Labor Influx Management Plan being implemented; local recruitment proportion reported			
F. Grievances, SEA/SH and worker representation				
F1	Worker grievance mechanism explained at induction; contact details displayed in comprehensible languages			
F2	Complaint box present, sealed, tamper-evident and emptied on schedule; at least one channel bypasses the contractor			
F3	Grievance register current; acknowledgement within 3 days; resolution timeframes met; no case closed without a recorded outcome			
F4	No evidence of retaliation against any worker who raised a grievance or exercised stop-work authority			
F5	SEA/SH channel separate and confidential; keys held only by the PIU; contractor holds no identifying case information; no mediation attempted			

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Ref	Item to be verified	Yes / No / N/A	Evidence sighted	Action required, owner and date
F6	SEA/SH induction and refresher training completed and recorded for all workers			
F7	Referral pathway displayed and verified current			
F8	Workers free to form or join workers' organisations; no interference or detriment			
G. Subcontractors and supply chain				
G1	All subcontractors at all tiers notified to and registered with the PIU before mobilization			
G2	Subcontract documents incorporate this LMP, the Code of Conduct and the C-ESMP in full			
G3	Subcontracted workers receive identical induction, PPE, health surveillance and grievance access			
G4	Primary supplier register current; all suppliers screened before engagement			
G5	Random and trigger-based supplier audits completed as scheduled; findings and remediation recorded			

Inspector (name, role, signature, date): _____

Contractor representative (name, signature, date): _____

Site: _____

Employer inspected (main contractor / subcontractor, name and tier): _____

Workers on site on the day: _____

Workers interviewed (number, of whom women): _____

Number of 'No' findings: _____

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