

CRITICAL ECOSYSTEM PARTNERSHIP FUND – CARIBBEAN HOTSPOT PROJECT (P173464)

Labor Management Procedures

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1. Introduction

These Labor Management Procedures (LMP) have been prepared for the Critical Ecosystem Partnership Fund – Caribbean Hotspot Project, funded by the Policy and Human Resources Development Trust Fund at the World Bank and implemented by Conservation International (CI). The project has five components, which deal with, respectively: improving management of land and sea around priority Key Biodiversity Areas (KBAs); increasing the capacity of civil society organizations (CSOs) involved in conservation; increasing the capacity of the Regional Implementation Team (RIT) in leading and coordinating CSO conservation actions; strengthening CSO partnerships for conservation; and project management.

The project is an initiative of the Critical Ecosystem Partnership Fund (CEPF): a partnership of l'Agence Française de Développement, CI, the European Union, the Global Environment Facility, the Government of Japan, and the World Bank. The Project Implementation Unit will be the CEPF Secretariat, which is hosted by CI on behalf of the partnership. The CEPF Secretariat will be supported by a RIT, hosted at the Caribbean Natural Resources Institute (CANARI), with responsibility for providing strategic leadership within the Caribbean Islands Hotspot and for coordination, capacity building and supervision of participating CSOs. The CEPF Secretariat will also be supported by a Collaborative Social Accountability Team (CSAT), hosted at the Instituto Tecnológico de Santo Domingo (INTEC), with responsibility for building partnerships for collaborative conservation action in and around priority KBAs. These LMP apply to project workers employed or engaged by CI. Separate LMP will be prepared by CSAT and INTEC prior to award of the RIT and CSAT grants. Separate LMP will also be prepared by the CSOs receiving sub-grants under the project prior to the award of these sub-grants.

The LMP seek to ensure that measures are in place to manage risks associated with employment under the project and help to determine the resources necessary for effective planning and management. They set out the approach to complying with national labor legislation, as well as the objectives of the World Banks's Environmental and Social Framework (ESF), in particular Environmental and Social Standard 2 (ESS2) on Labour and Working Conditions. It is important to note the LMP are a living document and can be updated to meet the demands of the project.

2. Overview of Labor Use on the Project

Number of Project Workers

Position	Place of work	Jurisdiction
Executive Director	CI Headquarters, Arlington, VA	United States of America
Executive Assistant	CI Headquarters, Arlington, VA	United States of America
Managing Director	Remote worker, Cambridge	United Kingdom
Grant Director 1	CI Headquarters, Arlington, VA	United States of America
Grant Director 2	CI Headquarters, Arlington, VA	United States of America
Grants Coordinator	CI Headquarters, Arlington, VA	United States of America
Vice President, External Grants	CI Headquarters, Arlington, VA	United States of America
and Contracts		

Fourteen workers will be employed on the project. They will all be CI employees, and therefore qualify as direct workers. The 14 positions and their places of work are listed in the following table.

Position	Place of work	Jurisdiction
Grants Manager	CI Headquarters, Arlington, VA	United States of America
Senior Director, Monitoring,	Remote worker, Heath, MA	United States of America
Evaluation and Outreach		
Communications Director	CI Headquarters, Arlington, VA	United States of America
Communications Manager	CI Headquarters, Arlington, VA	United States of America
Senior Director, Finance and	CI Headquarters, Arlington, VA	United States of America
Operations		
Finance Manager	CI Office, Seattle, WA	United States of America
Finance Coordinator	CI Headquarters, Arlington, VA	United States of America

Characteristics of Project Workers

CI is an equal opportunity employer that values diversity in all forms and is committed to an inclusive, respectful environment for all. It is our policy to ensure that all individuals are treated equally without regard to race, color, national origin or ancestry, religion or creed, sex (including pregnancy, childbirth, and related medical conditions), disability (physical or mental), citizenship status, marital status, genetic information, age, sexual orientation, gender identity or expression, medical condition, military service and/or veteran status, or any other characteristic protected by applicable law. The 14 direct workers currently comprise five men and nine women, although the sex ratio may change over time due to turnover. None of the direct workers is aged under 18, and, given the qualification requirements for the positions, no one under this age will be employed or engaged to work on the project, either as a direct worker or a contracted worker.

Timing of Labor Requirements

The 14 direct workers are all existing, full-time employees of CI, who will be assigned to work part time on the project; no new positions will be created or staff recruited, unless to fill vacant positions due to staff turnover. All direct workers will begin work on the project at inception and continue until closure. Labor requirements are anticipated to be fairly constant over the duration of the project.

Contracted Workers

It is anticipated that a small number of consultants will be contracted over the course of the project, to undertake short-term assignments, such as independent evaluations, translation of documents, or design of communication materials. On average, one consultant per year will be contracted, for around 20 days. CI's procurement policy requires all consulting services with a value of \$5,000 or more to follow a competitive procurement process. The nationalities and places of work of the consultants are not known at this stage.

Community Workers

No community workers will be engaged directly by CI. It is anticipated that some of the sub-grantees will engage community workers in the context of the sub-grants they receive under the project. Dedicated LMP will be developed by each sub-grantee.

Migrant Workers

No migrant workers are expected to work on the project.

3. Assessment of Key Potential Labor Risks

Project activities

The project aims to improve the capacity of CSOs to reduce threats to globally important biodiversity in the Caribbean Islands Biodiversity Hotspot. To this end, the project has five components.

Component 1: Increased Share of Land and Sea in and around Priority Key Biodiversity Areas under Improved Management. This component will support a grant mechanism that focuses on building the capacity of CSOs to reduce threats to globally important biodiversity. At the site scale, grant-making will support conservation actions in and around 32 priority KBAs: sites that contribute significantly to the conservation of global biodiversity. These grants will support sub-projects implemented by CSOs in the Caribbean Islands, which aim to support capacity building of them, and to reduce threats to globally important biodiversity in and around 32 priority KBAs in seven Caribbean Island countries. Each subgrantee will be required to prepare sub-project specific LMP prior to award of the grant. The role of the CEPF Secretariat will be to select, award and oversee implementation of grants larger than \$50,000, and to ensure compliance with grant terms, including those related to the World Bank ESSs.

Component 2: Increased Capacity of CSOs in Conservation. This component will further strengthen the capacity of local, national and regional civil society in the conservation and sustainable use of biodiversity through targeted capacity development activities (such as classroom-based trainings in proposal design, project cycle management, gender mainstream, and managing environmental and social risks, hands-on mentoring, and development of online training materials) and dedicated knowledge exchanges. This component will be executed through a combination of grants to CSOs, to build local, national and regional institutional capacity and foster stakeholder collaboration, and direct training and mentoring of CSOs by the RIT. Again, each sub-grantee will be required to prepare sub-project-specific LMP prior to grant award.

Component 3: Increased Capacity of RIT in Leadership and Coordination of CSO Conservation Actions. This component will strengthen the role and widen the responsibilities of the RITs in the active hotspots vis-à-vis the CEPF Secretariat. The RIT is central to the delivery of Components 1, 2 and 4, because it provides strategic leadership and local knowledge to build a broad constituency of CSOs working across institutional and political boundaries toward achieving the conservation goals described in the ecosystem profile. The RIT's major functions and specific activities will be based on approved terms of reference. The RIT will be hosted at CANARI, which will be required to develop LMP specific to the RIT. The CEPF Secretariat will provide capacity building and oversight for the RIT.

Component 4: Strengthened CSO Partnerships for Conservation. This component will adopt a collaborative social accountability approach to facilitate partnerships of CSOs and other stakeholders to co-create analyses of and solutions to conservation challenges in and around priority KBAs. In the Dominican Republic, Antigua and Barbuda, Jamaica and Saint Lucia, this component will be led by the CSAT, hosted at INTEC, which will be required to develop LMP specific to the CSAT. In The Bahamas, Haiti and Saint Vincent and the Grenadines, this component will be led by the RIT, learning from the experience of INTEC. The CEPF Secretariat will play a supervisory and coordinating role.

Component 5: Project Management, including M&E. This component will cover all activities related to administration and supervision of the project, communication, procurement and financial management as well as monitoring and reporting. The CEPF Secretariat will function as the Project Implementation Unit, working in partnership with the RIT, and in close collaboration with the CSAT.

Key Labor Risks

The key labor risks that may be associated with the project are outlined below:

Project Component	Key Labor Risks	Mitigation Measures
Component 1: Increased	 Accidents (e.g., road traffic 	 Require all project workers to
Share of Land and Sea in and	accidents), health emergencies	comply with Cl's Code of Ethics
around Priority Key	(e.g., acute illness) or security	and Anti-harassment Policy
Biodiversity Areas under	issues (e.g., violent crime)	(Annexes 1 and 2).
Improved Management	during international travel to	 Implement the Health and
	the project countries	Safety Plan for the CEPF
	• Workplace injuries at CI offices	Secretariat (Annex 3).
	or remote work locations	 Ensure all project workers have
	 Discrimination and/or 	access to CI's Ethics Hotline.
	harassment in the workplace	 Defer non-essential travel and
	• Transmission of COVID-19	comply with all applicable
		restrictions related to COVID-19.
Component 2: Increased	 Accidents (e.g., road traffic 	 Implement the Health and
Capacity of CSOs in	accidents), health emergencies	Safety Plan for the CEPF
Conservation	(e.g., acute illness) or security	Secretariat.
	issues (e.g., violent crime)	 Require all project workers to
	during international travel to	comply with Cl's Code of Ethics
	the project countries	and Anti-harassment Policy.
	• Workplace injuries at CI offices	 Ensure all project workers have
	or remote work locations	access to Cl's Ethics Hotline.
	 Discrimination and/or 	 Defer non-essential travel and
	harassment in the workplace	comply with all applicable
	 Transmission of COVID-19 	restrictions related to COVID-19.
Component 3: Increased	 Accidents (e.g., road traffic 	 Implement the Health and
Capacity of RIT in Leadership	accidents), health emergencies	Safety Plan for the CEPF
and Coordination of CSO	(e.g., acute illness) or security	Secretariat.
Conservation Actions	issues (e.g., violent crime)	 Require all project workers to
	during international travel to	comply with Cl's Code of Ethics
	the project countries	and Anti-harassment Policy.
	• Workplace injuries at CI offices	 Ensure all project workers have
	or remote work locations	access to Cl's Ethics Hotline.
	 Discrimination and/or 	 Defer non-essential travel and
	harassment in the workplace	comply with all applicable
	 Transmission of COVID-19 	restrictions related to COVID-19.

Project Component	Key Labor Risks	Mitigation Measures
Component 4: Strengthened	 Accidents (e.g., road traffic 	 Implement the Health and
CSO Partnerships for	accidents), health emergencies	Safety Plan for the CEPF
Conservation	(e.g., acute illness) or security	Secretariat.
	issues (e.g., violent crime)	 Require all project workers to
	during international travel to	comply with Cl's Code of Ethics
	the project countries	and Anti-harassment Policy.
	• Workplace injuries at CI offices	 Ensure all project workers have
	or remote work locations	access to Cl's Ethics Hotline.
	 Discrimination and/or 	 Defer non-essential travel and
	harassment in the workplace	comply with all applicable
	 Transmission of COVID-19 	restrictions related to COVID-19.
Component 5: Project	• Workplace injuries at CI offices	 Implement the Health and
Management, including M&E	or remote work locations	Safety Plan for the CEPF
	 Discrimination and/or 	Secretariat.
	harassment in the workplace	 Require all project workers to
	• Transmission of COVID-19	comply with Cl's Code of Ethics
		and Anti-harassment Policy.
		 Ensure all project workers have
		access to Cl's Ethics Hotline.
		 Defer non-essential travel and
		comply with all applicable
		restrictions related to COVID-19.

The table above provides a brief description of the project component and their associated labor-related risks. Most of the occupational health and safety risks relate to international travel that CEPF Secretariat staff and short-term consultants will make to supervise, support and evaluate project activities in the project countries, including during RIT and CSAT supervision missions and site visits to CSO sub-projects. A health and safety plan has been prepared and will be followed. The specific risk mitigation measures for each trip will be informed by the travel advice of International SOS, as well as any travel advisories issued by the US State Department (and UK Foreign and Commonwealth Office, in the case of the CEPF Managing Director). CI employees benefit from comprehensive medical insurance and travel accident insurance.

Project workers may also be exposed to workplace injuries at CI offices or remote work locations (two project workers work from a home office). This risk is addressed by CI's USA Safety and Security Plan, which covers the headquarters office in Arlington, VA, and the satellite office in Seattle, WA. A particular issue is the risk of transmission of COVID-19. Mitigation measures currently in place include an indefinite ban on international travel other than travel deemed "mission critical", which requires prior approval subject to strict criteria. When the risk presented by COVID-19 eventually diminishes, the safety of project workers, communities and partners will be the main consideration in deciding when international travel can resume. The overriding principle will be to 'do-no-harm' when considering activities until a proven vaccine or cure becomes widely available. Until such time, non-essential travel to high- and medium-risk locations will be deferred.

Although unlikely, there may be some risk of discrimination and/or harassment, including sexual harassment, in the workplace, on the grounds of gender or other protected characteristic. This risk will be mitigated by ensuring that all project workers are trained in and comply with CEPF's Gender Policy (Annex 4) and CI's Anti-harassment Policy, as well as its Code of Ethics, which provides for an Ethics Hotline, where complaints can be raised confidentially, without fear of reprisal.

4. Brief Overview of Labor Legislation: Terms and Conditions

The following table sets out the key aspects of national labor legislation with regard to terms and conditions of work. (Please note that, in the sub-project LMPs, this section will reflect the Labor Legislation [Terms and Conditions] for the respective country in which the sub-project is being implemented).

Jurisdiction	Relevant national legislation	
United Kingdom The Employment Rights Act (1996) covers a variety of topics, such as		
	employment contracts, unfair dismissal, family-friendly leave, and redundancy.	
	The National Minimum Wage Act (1998) establishes a national minimum wage	
	for employees and workers.	
	The Employment Relations Act (1999) establishes rights at work for union	
	recognition, derecognition, and industrial action.	
	The Maternity and Parental Leave Regulations (1999) sets out the rights of	
	employees to time off for maternity or paternity leave.	
	The Equality Act (2010) is a comprehensive piece of legislation that protects	
	individuals from unfair treatment inside and outside of the workplace, and	
	promotes a fair and more equal society.	
United States of	The Fair Labor Standards Act (1938) establishes minimum wage, overtime pay,	
America recordkeeping, and youth employment standards affecting employed		
	private sector. Among other provisions, the act requires employers to pay non-	
	exempt employees at least the federal minimum wage, restricts the hours that	
	children under the age of 16 can work and forbids the employment of children	
	under the age of 18 in certain dangerous jobs.	
	The Family and Medical Leave Act (1993) requires employers of 50 or more	
	employees to give up to 12 weeks of unpaid, job-protected leave to eligible	
	employees for the birth or adoption of a child or for the serious illness of the	
	employee or a spouse, child or parent.	
	The Labor-Management Reporting and Disclosure Act (1959) deals with the	
	relationship between a union and its members.	
	Title VII of the Civil Rights Act (1964) prohibits harassment and discrimination in	
	the workplace based on race, color, religion, sex and national origin.	

5. Brief Overview of Labor Legislation: Occupational Health and Safety

The following table sets out the key aspects of national labor legislation with regard to occupational health and safety. All direct workers will be employed in the USA, apart from one who will be employed in the UK. All contracted workers will be contracted under a service agreement governed by and interpreted in accordance with US law. (**Please note that in the sub-project LMPs, this section will reflect the Labor** Legislation [Occupational Health and Safety] for the respective country in which the sub-project is being implemented).

Jurisdiction	Relevant national legislation	
United Kingdom	The Health and Safety at Work Act (1974) is the primary piece of legislation	
	covering occupational health and safety. The act confers on all workers a right to	
	work in places where risks to their health and safety are properly controlled. It	
	sets out the general duties that: employers have towards employees and	
	members of the public; employees have to themselves and to each other; and	
	certain self-employed have towards themselves and others.	
United States of	The Occupational Safety and Health Act (1970) mandates that all non-	
America	government employers provide employees with an environment free from	
	recognized hazards, such as exposure to toxic chemicals, excessive noise levels,	
	mechanical dangers, heat or cold stress, or unsanitary conditions. Section 11(c)	
	of the Act prohibits any employer from discharging, retaliating or discriminating	
	against any employee because the worker has exercised rights under the act.	
	These rights include complaining to the Occupational Safety and Health	
	Administration (OSHA), seeking an OSHA inspection, participating in an OSHA	
	inspection, and participating or testifying in any proceeding related to an OSHA	
	inspection.	

6. Responsible Staff

The Project Implementation Unit will be the CEPF Secretariat, administered by CI. As well as employing the CEPF Secretariat staff, CI also provides all necessary support functions to the CEPF Secretariat, including Human Resources and legal services. This section identifies the functions and/or individuals responsible for different aspects of labor management under the project. In each case, "line manager" could refer to any of the following positions: Executive Director; Managing Director; Vice President, External Grants and Contracts; Senior Director, Monitoring, Evaluation and Outreach; Communications Director; or Senior Director, Finance and Operations.

Recruitment of project workers

Line Manager responsibilities:

- Prepare job description and advertisement.
- Schedule and lead interviews.
- Determine candidacy of all applicants.
- Conduct reference checks.
- Select final candidate.
- Complete hiring forms.
- Send rejection letters to applicants.

HR Business Partner responsibilities:

- Conduct background checks.
- Provide technical support and guidance throughout the recruitment process.
- Approve any exceptions to the internal posting requirements.

Executive Director responsibilities:

- Approve the recruitment of an open position.
- Approve the offer of employment to the selected candidate.

Management of direct workers

Line Manager responsibilities:

- Provide day-to-day guidance and oversight.
- Approve timesheets and leave requests.
- Approve annual goals.
- Undertake annual performance appraisal.
- Propose annual performance ratings.

HR Business Partner responsibilities:

- Provide guidance on annual performance appraisal and goal setting.
- Approve annual performance ratings.

Executive Director responsibilities:

• Approve annual performance ratings.

Engagement and management of contracted workers

Line Manager responsibilities:

- Prepare scope of work and request for proposals.
- Identify technical reviewers and circulate proposals for review.
- Facilitate proposal review meeting and document outcome.
- Provide orientation for consultant.
- Provide day-to-day guidance and oversight.
- Approve deliverables.

Grants Manager responsibilities:

- Conduct security screening.
- Prepare service agreement.
- Review payment requests and request payments.

General Counsel's Officer responsibilities:

- Review potential conflicts of interest.
- Review the hiring of former employees as consultants.
- Approve standard agreement templates.
- Review non-standard agreements.

Executive Director responsibilities:

- Approve the engagement of a consultant.
- Sign the service agreement.

Compliance with occupational health and safety

Senior Director, Administration and Human Resources responsibilities:

- Ensure safety and security plan for US offices is completed and updated as required.
- Act as local security focal point, responsible for day-to-day security management.

Senior Director of Safety and Security responsibilities:

- Maintain commensurate expertise within the safety and security function to ensure that CI has the required skills and knowledge.
- Provide safety and security advice.
- Assist with the management of critical incidents.
- Provide training and support on safety and security topics.

Direct worker responsibilities:

• Contribute to personal security by practicing basic security and situational awareness and, in highrisk locations, by adhering to location-specific personal security guidelines issued by CI.

Training of workers

Line Manager responsibilities:

- Ensure that direct reports have the necessary training in key business processes.
- Approve professional development goals of direct reports.

HR Business Partner responsibilities:

- Provide orientation for new hires.
- Communicate career development opportunities, including Cl's internal mentoring program, emerging leaders program, and online resources, such as CI-People Learning, in-Learning and eCornell.

Addressing worker grievances that involve discrimination, harassment, or other illegal or unethical behavior

Direct worker responsibilities:

- Immediately report any discrimination, harassment, or other illegal or unethical conduct that he or she experiences, observes or becomes aware of using the Reporting Procedure for Violation of CI's Anti-Discrimination and Equal Opportunity Employment Policy, Harassment Policy, or for Other Illegal or Unethical Behavior.
- Immediately report any retaliatory conduct that he or she experiences, observes or becomes aware of following the Reporting Procedure described above.

Human Resources and General Counsel's Office teams

- Contract a third-party provider to maintain a confidential Ethics Hotline.
- Promptly and thoroughly investigate all complaints of discrimination, harassment, and other illegal or unethical behavior, whether receive directly or via the Ethics Hotline.
- Take appropriate action to correct any violation confirmed to occur and prevent its recurrence.
- Put in place reasonable interim measures during an investigation.

Addressing worker grievances that do not involve discrimination, harassment, or other illegal or unethical behavior

Direct worker responsibilities:

- Discuss employment concerns or questions with immediate supervisor.
- If the supervisor has not satisfactorily resolved the problem, approach either a higher-level supervisor within the "chain of command" or their HR Business Partner.

Line Manager responsibilities:

- Establish effective two-way communication with direct reports.
- Discuss employment concerns or questions with direct report.
- Seek advice from Human Resources as needed.

HR Business Partner responsibilities:

- Guide employees to resolve issues on their own prior to filing a formal complaint, by providing advice and tools on effective communication or serving as a mediator.
- Review formal complaints and arrange a meeting with the employee to determine appropriate next steps.

7. Policies and Procedures

CI has comprehensive legal and human resources policies and procedures, which all employees are responsible for understanding and following.

The following legal policies and procedures of CI are particularly relevant to labor management:

- Compliance with Laws
- CI's Code of Ethics
- Privacy Policy
- Use of CI Property (Tangible and Intangible)
- Conflict of Interest and Personal Relationships
- Anti-Fraud Policy and Guidelines for Investigation
- Whistleblower Policy
- Child Protection and Safeguarding

The following human resources policies and procedures are particularly relevant to labor management:

- Equal Opportunity and Anti-Discrimination Employment
- Anti-Harassment
- Drug-Free Workplace
- Workplace Conduct
- Conflict Resolution and Formal Complaints
- Life-threatening Illnesses
- Compensation
- Benefits and Leave
- Relocation
- Attendance
- Time Recording
- Staffing, Hiring, and Job Description Policy
- Immigration Policy
- Background Check Policy

- Separation
- Personnel Records
- Performance Management
- Professional Development Policy

All these policies and procedures will be made available to direct workers through Cl's intranet. Relevant provisions will be incorporated in the service agreements that are signed with contracted workers.

8. Age of Employment

The minimum age for employment on the project is 18 years. The age of direct workers and contracted workers will be verified as part of the required authorization checks conducted by each office to ensure legal ability to work within the relevant jurisdiction (e.g., I-9 verification process for all US employees).

9. Terms and Conditions

Salary and working hours

Direct workers will be employed either on a salary or hourly basis. Positions will be classified as either salary or hourly, based upon the job description and local labor laws. Salary positions are excluded from overtime provisions. Hourly positions are covered by overtime provisions and must be compensated for all time worked.

The standard work week is 35 hours. Time worked includes all time that an employee is required to be physically at work or performs work for CI and must be reflected in quarter hour increments. Time worked is used to determine overtime pay required for hourly employees. Time worked does not include rest breaks or meal breaks. Work performed at a different location counts as work time.

Straight time is paid for hours in excess of 35 hours per standard workweek up to and including 40 hours per standard workweek. Overtime is paid for hours in excess of 40 hours per standard workweek. Overtime pay is equivalent to one and a half times the employee's regular rate of pay. The Fair Labor Standards Act (FLSA) exempts some employees from its overtime pay and minimum wage provisions, and it also exempts certain employees from the overtime pay provisions alone. FLSA assumes all positions are non-exempt. It is Cl's responsibility to demonstrate that a job is exempt from overtime provisions and Human Resources determines the FLSA status of all positions. Cl's obligation to pay overtime to non-exempt employees under the FLSA cannot be waived or excused for any reason (such as insufficient funds in the budget). Time off for illness, holidays, vacation or other reasons are not considered hours worked, and are therefore not included when computing overtime hours. Compensatory time cannot be substituted for overtime pay, even if the employee requests this arrangement.

CI's compensation program uses a merit-based approach that utilizes job descriptions, pay structures, and external salary data to help ensure that pay levels are competitive with external market practices. CI uses a Compensation Standard Operating Procedure to help managers maintain consistency and objectivity when making pay decisions and to reward and recognize individual achievement.

Benefits

A full set of benefits is available to full-time, regular employees scheduled to work 21 hours or more per week and whose employment is for 3 months or more. Short-term employees may be eligible for medical insurance and retirement plan only but must first meet the eligibility requirement of working more than 21 hours per week, for a period of at least 3 months.

Benefits include medical insurance (health, dental and vision), a retirement plan, life and disability insurance, flexible spending and transit benefits, discounted gym membership, and workers compensation. CI provides vacation leave, sick leave and personal leave in accordance with the hours worked and number of years employed. CI provides parental leave for the birth or adoption of a child after 1 full year of employment. Parental leave runs concurrently with Family and Medical Leave (FMLA). FMLA is a federal law that provides eligible employees up to 12 work weeks of unpaid, job-protected leave within a 12 month period for the birth or adoption of a child, the serious illness of a parent, dependent child or spouse, or the employee's own serious medical condition. Eligible employees are US employees who have at least one year of continuous service and have worked at least 1,250 hours in the 12 months before the leave is to begin. Paid leave may be substituted for unpaid leave if the employee has earned or accrued the leave. CI also provides employees with two days per year to provide acts of community service. In addition, CI provides up to 3 days for bereavement leave in the event of a death in the employee's family. The employee may use up to 2 additional days (5 total) for bereavement leave if there is a need to travel an extended distance or if it is an immediate family member.

10. Grievance Mechanism

The Grievance Redress Mechanism for project workers, which is based upon Cl's existing Conflict Resolution and Formal Complaints policy, is consistent with the World Bank's ESF requirements. If any gaps are detected between Cl policy and ESS2, the higher standard will prevail.

Every project worker has the right to work in a safe, positive environment free of discrimination, harassment, and other illegal or unethical behavior. With this right comes the responsibility to act in accordance with Cl's employment policies, core values, and Code of Ethics.

All project workers are encouraged to communicate with each other openly and resolve differences professionally, with the support of their supervisor and Human Resources staff if needed. Project workers who are CI employees also have the option of speak to one of six Respectful Workplace Advisors, who provide another avenue to share concerns and express challenges throughout the organization.

Reporting procedure for other employment concerns or questions not involving discrimination, harassment, or other illegal or unethical behavior

For employment concerns or questions that do not involve discrimination, harassment, or other illegal or unethical behavior described above, CI provides the following complaint procedure:

 Resolve a conflict within the "chain of command": CI urges all employees to discuss their employment concerns or questions with their immediate supervisor. Supervisors are expected to establish effective two-way communication with their employees. If the supervisor has not resolved a problem to the satisfaction of the employee, the employee can approach either a higher-level supervisor within the "chain of command" or Human Resources.

- 2. Seek advice from Human Resources: Human Resource's goal is to guide employees to resolve issues on their own prior to filing a formal complaint. Human Resources may assist by providing advice and tools on effective communication or may serve as a mediator to help a supervisor and an employee, or two colleagues, come to a mutual decision.
- 3. File a formal complaint with Human Resource: In the event that an employee has tried to resolve a conflict with his/her supervisor or colleague and continues to be unsatisfied, then s/he can file a formal complaint directly to Human Resources, preferably in the form of a written statement. Examples of situations include an employee who believes that his/her supervisor is assigning an unreasonable amount of work without proper compensation, a supervisor who is not applying policies, procedures or guidelines in a fair and equitable way, or an employee who disagrees with their supervisor's assessment of their progress. Human Resources will review the complaint and arrange a meeting with the employee to determine appropriate next steps.

Reporting procedure for violation of Cl's Anti-Discrimination and Equal Opportunity Employment Policy or Harassment Policy, or for other illegal or unethical behavior

When a project worker (direct or contracted) experiences, observes, or becomes aware of any conduct that may violate CI's policies, core values, or the Code of Ethics (e.g. as opposed to a routine disagreement as may take place from time to time in any office), he or she must report this conduct using the Reporting Procedure described here.

A project worker who experiences, observes, or becomes aware of discrimination, harassment, or other illegal or unethical conduct described above must immediately report the possible violation to the Human Resources or Risk Management teams.

A project worker who does not feel comfortable reporting to either of the above individuals may report the possible violation anonymously through the Ethics Hotline (see below).

CI will promptly and thoroughly investigate all complaints of discrimination, harassment, and other illegal or unethical behavior. CI will keep the investigation confidential to the extent possible and will disclose information relating to the investigation only on a need-to-know basis. If the investigation confirms that a violation has occurred, CI will take appropriate action to correct and prevent its recurrence. CI may put reasonable interim measures in place during an investigation, if CI determines that such measures would be in the project worker's and/or CI's best interest. These measures may include, but are not limited to, a leave of absence, suspension, or transfer of the project worker who reportedly violated the applicable policy or ethical standard.

Cl's Ethics Hotline

All project workers employed or engaged by CI will have access to the Ethics Hotline. They will be informed about the existence of the mechanism, explained how to use it and provided with the link to the hotline web portal.

The CI Ethics Hotline consists of a toll-free telephone line (+1-866-294-8674) and a secure web portal (<u>https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html</u>) that allows grievances to be made anonymously. A project worker may submit a grievance through the website or by telephone in his/her local language at any time. Project workers are given the option of reporting grievances anonymously and confidentially.

Any grievances received will be investigated by a team from CI's Human Resources department and General Counsel's Office. The review process typically includes:

- Receipt of the report is typically acknowledged within 2-3 business days. This confirmation and further communications will take place within the Ethics Hotline online portal or via phone. Additional time may be required for any translation needed to respond to the reporter in the submitted language.
- Determination if the grievance is an ethics or policy violation. A request for more information may be made to the reporter.
- If the grievance raised is not an ethics or policy violation, the reporter is informed of the most appropriate way to resolve the grievance, in line with the established procedure outlined above.
- If the issue raised is an ethics or policy violation, an investigation may be conducted by trained staff from the Human Resources and/or General Counsel's Office teams or external investigators or attorneys. A lead or leads from one of those groups will be responsible to move the case forward.
- Evidence is reviewed.
- Interviews are conducted with parties involved and witnesses, possibly in an off-site and confidential space or during off-hours, as needed.
- The lead will look for opportunities for acquiring more evidence and will also seek names of other potential witnesses or affected individuals.
- Report reviewed by CI's Chief People Officer and General Counsel and routed to the CEO of CI.
- Decision is made on next steps. If the investigation confirms that a violation has occurred, CI will take action, up to and including termination, as appropriate.
- The lead investigator communicates to reporting party that the investigation has concluded.
- The Audit Committee of CI's Board of Directors is notified of all grievances.

Non-retaliation

CI strictly prohibits and will not tolerate any adverse action against an individual for:

- reporting conduct that they reasonably believe may violate Cl's policies or Code of Ethics;
- filing a complaint of alleged discrimination or harassment with a government agency or court;
- assisting another individual in reporting conduct that may allegedly violate Cl's policies;
- assisting another individual in filing a complaint of alleged discrimination or harassment with a governmental agency or court;
- cooperating in an investigation of any kind; or
- opposing alleged unlawful discrimination or harassment.

Any project worker who experiences, observes, or becomes aware of any conduct he or she believes may be retaliatory must immediately follow the reporting procedure described above. Project workers also have the right to access national courts to resolve their grievances.

in addition to the project's main GRM channel, the affected person can also approach the Bank directly, especially if the alleged perpetrator ends of up being someone directly implicated with managing the GRM. The affected person can approach the Task Team Leader (TTL), the World Bank Caribbean country director, or any other Bank staff within the task team that he/she feels comfortable sharing with.

The complainant has the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. It must be noted that this GRS should ideally only be accessed once the project's grievance mechanism has first been utilized without an acceptable resolution. World Bank Procedures requires the complainant to express their grievances in writing to World Bank office in Washington DC by completing the bank's <u>GRS complaint form</u> which can be found at the following URL link: <u>http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5</u>. Completed forms will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices.

Email: grievances@worldbank.org Fax:+1-202-614-7313 By letter:The World BankGrievance Redress Service (GRS) MSN MC 10-1018 NW,

Addressing Gender-Based Violence

The GRM will specify an individual who will be responsible for dealing with any gender-based violence (GBV) issues, should they arise. A list of GBV service providers will be kept available by the project. The GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

If a GBV related incident occurs, it will be reported through the GRM, as appropriate, and keeping the survivor information confidential. Specifically, the GRM will only record the following information related to the GBV complaint:

- Age and sex of survivor
- Type of alleged incident as reported. The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of their knowledge, the perpetrator was associated with the project;
- If possible, the age and sex of the survivor; and
- Whether the survivor was referred to the GBV Services Provider.

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

- Refer complainants to the GBV Services Provider; and
- Record the resolution of the complaint

The GRM will also immediately notify both CI and the World Bank of any GBV complaints **WITH THE CONSENT OF THE SURVIVOR**.

In addition to the project's main GRM channel, the GBV survivor can also approach the World Bank directly, especially if the alleged perpetrator ends up being someone directly responsible for managing the GRM. The affected person can approach the Task Team Leader (TTL), the World Bank Caribbean country director, or any other World Bank staff within the task team with whom he/she feels comfortable sharing.

11. Contractor Management

As discussed above, it is anticipated that a small number of contracted workers (consultants) will be engaged over the course of the project, to undertake short-term assignments. All consulting services valued at \$5,000 or above will be procured following a competitive process. Each consultant will be selected from among at least three bids generated through a request for proposals disclosed publicly via CEPF's website and other appropriate means. Selection will be done by a panel of at least three persons, according to criteria published with the request for proposals.

Contracted workers will be engaged under a service agreement governed by and interpreted in accordance with the laws of the District of Columbia and relevant US federal law. The service agreements will flow down relevant requirements of ESS2 in relation to management of labor issues, including occupational health and safety. Contracted workers will be required to acknowledge receipt of Cl's Code of Ethics and certify their agreement and compliance therewith. Contracted workers will be informed about the existence of the Ethics Hotline, which they can use to raise grievances. Any grievances raised will be addressed through the process described in Section 10.

12. Community Workers

At the sub-grantee level, community workers could be involved, and for which individual LMP will be prepared and in line with guidance provided in the ESMF. If such is the case, the project will: (i) Ascertain whether such labor is or will be provided on a voluntary basis as an outcome of individual or community agreement. These measures and how to ascertain them will be documented in the sub grantee level LMPs- This will include a) clearly identifying the terms and conditions on which community labor will be engaged (if applicable, the amount and method of payment), (ii) set out the times of work, and (iii) specify the way in which community workers can raise grievances in relation to the project.; (ii) Assess working conditions and Occupational Health and Safety in relation to community labor. This assessment will be applied, proportionate to: a) the nature and scope of the project; (b) the specific project activities in which the community workers are engaged; and (c) the nature of the potential risks and impacts. If indicated as necessary by the assessment, at a minimum, apply the relevant requirements of the WBG general and specific EHS Guidelines as detailed in the ESMF. Considerations for protecting the project workers, particularly those deployed to remote rural areas, from contracting COVID-19 will be included, following World Bank interim guidance notes as referenced above; (iii) Assess whether there is a risk of child labor or forced labor. If cases of child labor or forced labor are identified, CI will take appropriate steps to remedy them -child labor will not be allowed under the project. If relevant, the sub-grantees level LMP will set out roles and responsibilities for monitoring community workers; and (iv) Provide adequate training to community workers tailored to their needs and the potential risks and impacts of the project

13. Primary Supply Workers

No primary supply workers will be engaged by CI in relation to the project.

Annex 1: Cl's Code of Ethics

Introduction and Purpose

Conservation International's (CI's) reputation derives from our commitment to our core values: Integrity, Respect, Courage, Optimism, and Passion and Teamwork. CI's Code of Ethics (the "Code") provides guidance to CI employees, consultants, experts, interns, and volunteers in living CI's core values, and outlines minimum standards for ethical conduct which all staff must adhere to.

CI relies on the personal integrity, good judgment and common sense of the individuals acting on behalf of the organization to deal with issues not expressly addressed by the Code. Failure of a staff member to adhere to the Code may result in disciplinary action up to and, including discharge from employment and filing of criminal charges.

CI employees, consultants, experts, interns and volunteers shall:

Integrity:

- Act in good faith, responsibly, with due care, competence and diligence and maintain the highest professional standards at all times.
- Comply with CI policies as well as all applicable laws, rules and regulations, domestic and international, in every country where CI works.
- Reflect actual expenses or work performed in expense reports, timesheets, and other records. Never engage in any of the following acts: falsification of business documents, theft, embezzlement, diversion of funds, bribery, or fraud.

Transparency:

- Perform duties, exercise authority and use CI resources and assets in the interest of the organization and never for personal benefit.
- Avoid conflicts of interest and not allow independent judgment to be compromised.
- Not accept gifts or favors in excess of \$150 from vendors, consultants or grantees.

Accountability:

- Disclose to a supervisor and the General Counsel's Office, at the earliest opportunity, any information they have or become aware of, that may result in a real or perceived conflict of interest or impropriety.
- Exercise responsible stewardship over Cl's assets and resources; spend funds wisely, in the best interests of Cl and in furtherance of its mission. Adhere to and respect the wishes of its donors.
- Manage programs, activities, staff and operations in a professionally sound manner, with knowledge and wisdom, and with a goal of increasing overall organizational performance.

Confidentiality:

- Not disclose confidential information obtained during the course of their work at Cl.
- Protect confidential relationships between CI and its grantees, donors, and vendors.
- Mutual Respect and Collaboration:

- Assist its partners in building the necessary capacity to carry out conservation programs efficiently and effectively and to manage funds in a fiscally and operationally prudent manner.
- Create constructive relationships with grant-seekers and other partners based on mutual respect and shared goals by communicating clearly and timely, and respecting our partners' expertise in their field of knowledge.

Engage with indigenous peoples and local communities in which CI works in a positive and constructive manner that respects the culture, laws, and practices of those communities, with due regard for the right of free, prior and informed consent.

Annex 2: Cl's Anti-harassment Policy

All employees have the right to work in an environment free from harassment and be treated with dignity and professional courtesy. CI will not tolerate any form of harassment based on a person's protected characteristic(s) that has the effect or purpose of interfering with an individual's work performance or is so pervasive that it creates an intimidating, hostile, or offensive work environment. Slurs, insults, epithets, disparaging remarks, jokes, or other types of harassment are expressly prohibited in the workplace. This includes conduct which may be intended as harmless, benign or playful, but is not perceived as such by the recipient or an onlooker. Conduct that makes any employee feel degraded, or intimidated is forbidden.

Harassment on the basis of sex will not be tolerated. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when: the conduct has the effect or purpose of interfering with any employee's work performance or is so pervasive that it creates an intimidating, hostile, or offensive working environment regardless of whether that individual is the target of the harassment.

Unwelcome behavior of a sexual nature or based on sex includes, but is not limited to: sexually-suggestive statements, questions, insults, or jokes; comments of a sexual nature about a person's physical attributes; sexual innuendoes, offensive touching, obscene gestures or suggestive sounds, display of sexually suggestive pictures, materials or objects; and sexual bribery. Even if an employee voluntarily participates in activities or discussions of a sexual nature, the actions still constitute sexual harassment if the employee indicated that the conduct was unwelcome. Moreover, even consensual sexual relations can constitute sexual harassment if they are so pervasive in the office as to interfere with the work environment or the work performance of others not part of these consensual relationships.

Any employee who experiences, observes, or becomes aware of conduct that violates CI's policies prohibiting discrimination and harassment, must immediately report the possible violation using the Reporting Procedure for Violation of CI's Anti-Discrimination and Equal Opportunity Employment Policy, Harassment Policy, or for Other Illegal or Unethical Behavior set forth in the Conflict Resolution and Formal Complaints Policy.

Annex 3: Health and Safety Plan for CEPF Secretariat

CI administers CEPF on behalf of the global donor partnership. As such, the CEPF Secretariat staff are employees of CI and subject to its policies on health and safety. CI regards its personnel as its most valuable asset. Ensuring the safety and security, as well as the preparedness of those working for CI is one of the primary concerns of the organization. The General Counsel's Office, led by the General Counsel and supported by the Senior Director of Safety and Security, is responsible for managing risks to the organization's people, assets, operations and reputation. To this end, CI has developed a safety and security plan for each country where it has offices.

CI employees are responsible for contributing to their own personal security by practicing basic security and situational awareness and, in high-risk locations, by adhering to location-specific personal security guidelines issued by CI. The Senior Director of Safety and Security is available to provide safety and security advice to project staff travelling to Caribbean countries, to assist with the management of critical incidents, and to provide training and support on safety and security topics.

Country	Travel Medical Risk	Travel Security Risk
Antigua and Barbuda	High	Low
The Bahamas	Medium	Low
Dominican Republic	Medium	Medium
Haiti	Extreme	High
Jamaica	Medium	Medium (High for West
		Kingston, Spanish Town)
Saint Lucia	High	Low
Saint Vincent and the Grenadines	High	Low
Trinidad and Tobago	Medium	Medium (High for Laventille,
-		Beetham)
United States of America	Low	Low

The country risk ratings for the countries where project activities will be implemented, according to the assessments by International SOS, are as follows:

CEPF Secretariat staff traveling to any of these countries will be required to follow the travel advice prepared by International SOS. This travel advice covers COVID-19-related restrictions and is updated frequently.

CI also conducts its own risk assessments for countries where it has offices, which, in the context of the project, is the USA. The overall risk level for the USA is rated low, with the highest-rated risks being "terrorism – regional" and "terrorism – direct vicinity". Even though country-level security risks are assessed as low, the alert level may increase due to changes in the threat environment. There are three possible alert levels:

- **Normal:** This alert level describes a normal state of operations in the country in question; there are no specific events that have occurred or are predicted to occur that would signal a change in the threat environment.
- **Heightened:** An event has occurred or is predicted to occur that necessitates a higher state of alert and consequentially a change in Cl's normal operations.

• **Emergency**: An event or series of events has occurred or is predicted to occur that severely disrupts or directly affects Cl's operations in that country.

The following table outlines a set of specific triggers that would necessitate a change in the alert level for the USA. These triggers have been developed to reflect recent events that would necessitate a change in CI's operations to mitigate security risk. The decision to escalate the alert level can only be made by the Chief People Officer. All international travel will be suspended when the Chief People Officer has escalated the alert level in a country to "heightened" or "emergency".

Alert level	Summary activities	Scenarios or triggers
NORMAL	 Monitor the political and security situation Prepare to implement heightened security measures at short notice Evaluate threat information reports prepared by local sources and the Senior Director of Safety and Security 	 The political and security environment is unchanged, and there have been no significant events that could be considered "abnormal". Effective government and/or rule of law in place. National infrastructure, including transport and commercial airlines operating normally Freedom of movement throughout country Acceptable levels of crime Business continues uninterrupted No immediate threats in Cl's offices
HEIGHTENED	Commence the incident	 and activities Country-wide large-scale sustained
	 management process Contact staff via SMS and email and inform them of the situation Report the situation to the General Counsel and Senior Director of Safety and Security Brief staff of the situation and what is being done about it Identify any specific security measures that should be implemented Prepare to call the global crisis 	 protests and/or strike action called by political parties/religious groups/or any other organization have a sizeable base, leading to random incidents of violence, arson and damage to public transport Occasional riots and violence in the vicinity of Cl's offices Significant police of National Guard deployment required to maintain rule of law Embassies/Control Risks/ International SOS issue advisories for essential travel only Low-scale terrorist actions involving low intensity blasts in major cities A natural calamity has occured
	management team into session if the situation escalates	A flatural calamity has occured affecting the specific part of the country in which we have an office

All CEPF Secretariat staff are provided with comprehensive health insurance, providing access to health care in the USA and internationally.

Staff working from or visiting Cl's head office in Arlington, Virginia are advised that:

- For emergency medical issues call 911.
- For non-emergency health issues, contact International SOS (+1 215 942 8226) who will refer you
 to an appropriate medical provider and manage the direct billing agreement with the insurers. In
 addition, please contact Global Administration (<u>ost@conservation.org</u>) / Senior Director of Safety
 and Security (<u>phorne@conservation.org</u>).
- The nearest medical facility to the office is the Virginia Hospital Center, located at 1701 N George Mason Drive Arlington, VA 22205.
- Should you need to procure basic medicines or personal care products, the nearest pharmacy within walking distance from the CI office and local hotels is the CVS Pharmacy located at 2400 Jefferson Davis Highway, Arlington, VA 22202.

Annex 4: CEPF's Gender Policy

CEPF's mission is to engage civil society to protect biodiversity hotspots, the world's most biologically diverse yet threatened ecosystems. The purpose of this policy is to ensure CEPF carries out its mission through a gender awareness lens. This means that staff of the CEPF Secretariat, Regional Implementation Teams and grantees will understand and take into account the different roles of men and women in CEPF-related activities at all scales (e.g., Regional Implementation Team training, proposal design, project implementation and reporting). Gender issues and considerations will be actively incorporated throughout the grant-making process and progress on gender-related outcomes will be monitored.

CEPF recognizes that:

- In all of our conservation work, gender plays an important role in achieving long-term goals and objectives.
- Gender equity is a critical component of our overall strategy to ensure empowered civil society, equitable participation and decision-making by stakeholders at all scales, and the sustainability of conservation impacts.
- Both men and women encounter constraints based on gender. If not addressed, these constraints can cause delays or impediments to achieving CEPF's conservation objectives.

CEPF staff will strive to:

- Provide and encourage training and professional development on gender among staff of the CEPF Secretariat, Regional Implementation Teams and grantees as part of CEPF's learning efforts.
- Work with grantees to ensure gender analysis and recommendations are included in the project design, implementation and monitoring processes.
- Develop indicators and report on gender equity as part of CEPF's Monitoring Framework.
- Promote best practices for incorporating gender in conservation strategies throughout the CEPF network.

DEFINITIONS

Gender refers to the economic, social, political, and cultural attributes and opportunities associated with being women and men. The social definitions of what it means to be a woman or a man vary among cultures and change over time. Gender is a sociocultural expression of particular characteristics and roles that are associated with certain groups of people with reference to their sex and sexuality.

Gender analysis is the process of collecting and interpreting information on the respective roles and responsibilities among men and women in six domains of activity, including: practices and participation; access to resources; knowledge and beliefs; laws, policies and regulatory institutions.

Gender aware refers to explicit recognition of local gender differences, norms, and relations and their importance to outcomes in program/policy design, implementation and evaluation. This recognition derives from analysis or assessment of gender differences, norms, and relations in order to address gender equity in outcomes.

Gender equity is the process of being fair to women and men. To ensure fairness, measures must be taken to compensate for historical and social disadvantages that prevent women and men from operating on a level playing field.

Gender equality is the state or condition that affords women and men equal enjoyment of human rights, socially valued goods, opportunities, and resources.

Gender integration refers to strategies applied in program assessment, design, implementation, and evaluation to take gender norms into account and to compensate for gender-based inequalities.

Gender mainstreaming is the process of incorporating a gender perspective into policies, strategies, programs, project activities, and administrative functions, as well as into the institutional culture of an organization.

Sex refers to the biological differences between males and females. Sex differences are concerned with males' and females' physiology.