

ESS2 - Labour and Working Conditions



CANARI serves as CEPF's regional implementation team for the Caribbean Islands Biodiversity Hotspot.

Labour Management Procedures Template

March 2024

CEPF Grant 115614

International Iguana Foundation

Plan and implement critical conservation actions for the Jamaican Iguana

Jamaica

Grant Summary
1. Grantee organization: International Iguana Foundation
2. Sub project title: <i>Plan and implement critical conservation actions for the Jamaican Iguana</i>
3. Grant number: 115614
4. Grant amount (USD\$): 49,914
5. Proposed dates of grant: 1 Jan 2025 – 31 Dec 2026
6. Countries where activities will be undertaken: Jamaica
7. Date of preparation of this document: 26 March 2024

8. Overview of the Caribbean Hotspot Project

This section should include a general description of the Parent project, including its components. This description can be standard across all of the sub-project ESS Instruments.

The Critical Ecosystem Partnership Fund (CEPF) Caribbean Islands Biodiversity Hotspot Small Grants Mechanism is being implemented in the Caribbean Islands by the Caribbean Natural Resources Institute (CANARI) acting as the Regional Implementation Team (RIT). After a successful first investment in the Caribbean Islands Biodiversity Hotspot between 2011 and 2016, the CEPF has returned to the region for a second phase of investment from August 2021 – July 2026, which totals US\$11.8 million.

The goal of the CEPF is to conserve biodiversity. Its approach is to build local conservation leadership and nurture sustainable development by developing locally driven conservation strategies and providing grants to civil society to implement those strategies. In the Caribbean, the CEPF aims to strengthen the protection and management of globally important biodiversity within 32 priority Key Biodiversity Areas (KBAs) and seven conservation corridors in Antigua and Barbuda; The Bahamas; Dominican Republic; Haiti; Jamaica; Saint Lucia; Saint Vincent and the Grenadines.

9. Overview of labour use on the sub-project

This section should briefly describe the main types of workers who will be employed or engaged on the sub-project as follows:

Number of Project Workers

The total number of workers to be employed on the sub-project, and the different types of workers: direct workers; contracted workers; and community workers. Where numbers are not yet firm, an estimate should be provided.

The project will employ 11 direct workers i.e one worker from the Fort Worth Zoo, ~6 workers from NEPA, one retired volunteer and three students researchers that will be engaged in the project. There will be two student researchers volunteering (See Table 8.1).

Table 9.1: Project worker positions and status

Staff Position	Type (direct / contracted / community)	Gender	Place of work (remote / office / field)	Status	
				(full time / part- time)	(current staff / to be hired)
Conservation Biologist	Contracted	Female	All	Full time	Current staff
Field technician	Contracted	Male	field	Full time	Current staff
Field technician	Contracted	Male	field	Full time	Current staff
Field technician	Contracted	Male	field	Full time	Current staff

Staff Position	Type (direct / contracted / community)	Gender	Place of work (remote / office / field)	Status	
				(full time / part- time)	(current staff / to be hired)
Field technician	Contracted	Male	field	Full time	Current staff
Field supervisor	Contracted	Male	field	Full time	Current staff
Interviewer	Contracted	TBD	field	Full time	Current staff
Expert/moderator	volunteer	Female	Healthscreen, action planning workshop	N/A	Current Volunteer
Student researcher	volunteer	TBD	field	N/A	TBD
Student workshop coordinator	contracted	Female	Student workshop	Full Time	Current staff
Student workshop coordinator	contracted	Female	Student workshop	Full Time	Current staff

Characteristics of Project Workers

To the extent possible, a broad description and an indication of the likely characteristics of the project workers e.g., local workers, national or international migrants, female workers, workers between the minimum age and 18, etc.

Conservation Biologist: International, female, age 43

Field technicians: Local, male, ages 22-37

Field Supervisor: Local, male, age 55

Expert/moderator: International, female, age 58

Student researchers: International, gender TBD, age range 20-30

Student workshop coordinators: Local, females, age range-30-40

Timing of Labour Requirements

The timing and sequencing of labour requirements

Table 9.2 below outlines the anticipated timing of the labour requirements under this sub-project.

Table 9.2: Timing of labour requirements

Category of workers	2025				2026			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
1. Direct workers								
1.1 Staff	x	x	x	x	x	x	x	x
1.2 Consultants								
1.3 Volunteers and interns	x	x	x		x	x	x	
2. Contracted workers								
3 Community workers								

Direct Workers

The Fort Worth Zoo employs the Conservation Biologist who will be the PI on this project. NEPA employs the remaining project workers who will be engaged on this project. Student researchers and other volunteers will be supervised by both the conservation biologist (FWZ) and the field supervisor (NEPA). The student workshop coordinators will be supervised by the conservation biologist (FWZ).

Community Workers

The anticipated or known services expected from community workers including from local partner stakeholders. The salaries of community workers are paid with non-project funds.

N/A

10. Risk mitigation measures

This section will describe the measures that will be taken to mitigate all risks rated as moderate or above. Mitigation measures will be presented following the mitigation hierarchy, which requires that risks are anticipated and avoided where possible. Where avoidance is not possible, risks should be minimized to acceptable levels. Any risks that remain following avoidance and minimization should be mitigated.

Table 10.1: Potential Labour Risks and Mitigation Measures

Key labour risks	Risk probability <i>(low / medium / high)</i>	Level of Risk <i>(low / medium / high)</i>	Description	Mitigation Measures
Accidents (e.g., roadtraffic accidents), health emergencies (e.g., acute illness)	low	low	Movement by vehicle will be necessary to reach the field site.	NEPA oversees all vehicular movement of the field team and travel is done in a government vehicle with a government driver, following all government safety procedures. If health emergencies arise the field team communicates with the field supervisor and conservation biologist to determine the best line of action to ensure everyone’s safety.
Hydrometeorological events (hurricanes, tropical storms) and other natural disasters, including earthquakes and volcanic eruptions	Medium	Low	Over the life of the project, it is possible that the country could be severely impacted by a hydrometeorological event or other natural disasters. The Caribbean region is up to seven times more likely to experience a natural disaster than larger	The field supervisor, conservation biologist, and boat transport organization (CCAM) all monitor the weather very carefully. If there is a threat of a hurricane those in the field are evacuated and do not return until the threat has passed. From our experience there are not surprise hurricanes and thus people have always been

			states, and when one occurs, it incurs as much as six times more damage.	able to evacuate well in advance of a threatening situation.
Discrimination and/or harassment in the workplace	low	low	Men and women work together on this project.	A grievance mechanism has been developed to address these issues and will be shared with all members of the project prior to the start of the project. All complaints will be taken seriously and resolved as quickly as possible.
Use of child labour	low	low	No children are ever involved in the work on this project.	No children will ever be involved in the work on this project.
Contraction/transmission of COVID-19	low	low	Project staff may travel to participate in the field work, as well as surveys.	We will follow the guidelines of the Jamaican government on Covid-19 at the time of the fieldwork and community engagement.

11. Brief overview of legislation: terms and conditions

This section should present a brief overview of the key aspects of national labour and employment law relevant to terms and conditions of employment (e.g., wages, deductions, benefits, etc.).

Table 11.1: National labour legislation relevant to ESS2 in Jamaica and the United States

Law	Relevance to ESS2
Jamaica	
Disabilities Act (2014)	Provides for employment of and non-discrimination against persons with disabilities.
Trade Unions Act (1919; amended)	Provides legal recognition for trade unions and establishes the right of collective bargaining.
Labour Relations and Industrial Disputes Act (1975; amended)	Regulates relations between employers and workers, including procedures for settlement of industrial disputes.
Minimum Wage Act (1938; amended)	Provides for the protection of workers in relation to the payment of wages.
Employment (Termination and Redundancy Payment) Act (1974)	Provides for a separation payment whenever an employee is made redundant or their employment is terminated.
Holiday with Pay Act (1974)	Establishes the right to paid annual vacation.
Jamaica (Constitution) Order in Council Act (1962; amended)	Confers protection from discrimination on the grounds of race, etc.
Employment (Equal Pay for Men and Women) Act (1975)	Prohibits discrimination on grounds of sex in respect of remuneration and other terms and conditions of employment.
Maternity Leave Act (1979)	Prevents some forms of discrimination against pregnant women and entitles pregnant women to 12 weeks of maternity leave.

Child Care and Protection Act, (2004)	Prohibits the employment of children under the age of 13, restricts employment of children under the age of 15 to light work, and prohibits the employment of young people under the age of 18 in hazardous work.
Factories Act (1943; amended)	Provides for regulation of occupational health and safety in certain settings, including building operations and engineering construction.
United States of America	
The Fair Labour Standards Act (1938)	Establishes minimum wage, overtime pay, recordkeeping, and youth employment standards affecting employees in the 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 Labour-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

12. Brief overview of legislation: occupational health and safety

This section should present a brief overview of the key aspects of national labour and employment law relevant to occupational health and safety.

Table 12.1 sets out the key aspects of national legislation relevant to occupational health and safety in the Jamaica and the United States of America and their relevance to ESS2. A community health and safety plan has also been developed for the project and will be implemented.

Table 12.1: National legislation relevant to occupational health and safety in in Jamaica and the United States

Law	Relevance to ESS2
Jamaica	
Public Health Act (2003)	Provides a list of communicable diseases that must be notified to the competent authorities.
Occupational Safety and Health Legislation—the Occupational Safety and Health (OSH) Bill (2017) is still in draft form.	The legislation requires employers operating workplaces to observe certain regulations regarding the safety and health of their workers. Its objectives are: (a) the prevention of injury and illness caused by conditions at the workplace, (b) the protection of workers from risks to their safety, health and welfare arising out of or in connection with activities in their workplaces and (c) the promotion of safe and healthy workplaces. Until it is approved, other legislation that applies to Occupational Health and Safety in Jamaica include the Factories Act (1943), the Labour Officers (Power) Act

	(1943), the Building Operations and Works of Engineering Construction (Safety, Health and Welfare) Regulations, the Docks (Safety, Health and Welfare) Regulations and the Women (Employment of) Act (1942).
Disaster Preparedness and Emergency Management Act (1993)	Provides for disaster preparedness and emergency management measures.
United States of America	
The Occupational Safety and Health Act (1970)	Mandates that all non-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.

13. Responsible staff

This section identifies the functions and/or individuals within the sub-project responsible for (as relevant):

- *Engagement and management of project workers.*
- *Engagement and management of contractors/subcontractors.*
- *Occupational health and safety.*
- *Training of workers.*
- *Addressing worker grievances.*

Responsible staff for management and supervision of activities related to the LMP are listed in Table 13.1.

Table 13.1: Responsible staff and workers for the implementation of the LMP

Position	Activities	Estimated time (%)
Conservation Biologist	Engagement and management of project workers, training of workers, addressing worker grievances	15%
Field Supervisor	Engagement and management of project workers, addressing worker grievances	10%

14. Implementation cost estimates:

The below table outlines those items or activities associated with the LMP. For staff with the responsibility of implementing safeguard policies, a percentage of their budgeted costs has been used. The table represents the costs associated with implementing the LMP over the course of the entire sub-project. Travel insurance for workers is covered by another project.

Table 14.1: Implementation schedule and cost estimates for the lifetime of the sub-project.

Item	Cost Estimate (USD)

15. Policies and procedures

This section should describe policies and procedures for managing each category of sub-project staff, in accordance with national labour and employment law and ESS2, as well as any organizational policies and procedures. Found: www.canai.org

We will follow the policies and procedures of the Fort Worth Zoo, where the conservation biologist is employed. See attachment.

16. Contracted workers

This section will describe how the requirements of national labour and employment law and ESS2 will be incorporated into grant agreements and/or service contracts with third parties who will employ or engage contracted workers.

We will follow the policies and procedures of the Fort Worth Zoo, where the conservation biologist is employed. See attachment.

17. Community workers

This section will describe how the requirements of ESS2 will be complied with in regard to community workers employed or engaged to work on the sub-project.

N/A

18. Grievance mechanism

This section will describe how a mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. The mechanism must: be made easily accessible to such workers; address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution; and operate in an independent and objective manner. Please describe how you will put in place a grievance mechanism that meets these requirements.

The following is the GM for the project to address concerns of The International Iguana Foundation’s project workers. The GM will be made available to workers once the project starts. Grievances that relate to external stakeholders will be handled by a separate mechanism which is included as part of the project’s Stakeholder Engagement Plan.

This GM is streamlined, considering the limited scope of project activities at the community level and the low risk of adverse social impacts. The key measures will be to explain the purpose of any visit to stakeholders, explain the existence of the GM and make available contact information of The International Iguana Foundation’s and the CEPF RIT. This will be done through a printed handout or other locally appropriate means.

Objectives of the GM

The objectives of the GM are as follows:

1. Ensure that the World Bank ESSs are adhered to in all project activities.
2. Address any negative environmental and social impacts of all project activities.
3. Resolve all grievances emanating from project activities in a timely manner.
4. Establish relationships of trust between project staff and stakeholders.
5. Create transparency among stakeholders, including affected persons, through an established communication system.
6. Bolster the relationship of trust among the project staff and the affected parties.

First Level of Redress

1. *Receive Grievance:* At the project level, all complaints should be received by Richard Hudson. Complaints can be made in person, in writing, verbally over the phone, by email or any other suitable medium. Complaints can be filed anonymously. The point of receipt of complaints is listed below:

Contact	
Position	Executive Director
Telephone	817 759 7177
Email address	SAPasachnik@iguanafoundation.org
Physical address	1989 Colonial Parkway, Fort Worth, Texas, USA, 76110

At the local and national level, all complaints should be addressed to:

Contact	
Telephone	(876) 754-7540
Email address	dreid@nepa.gov.jm
Physical address	10 Caledonia Ave, Kingston, 5, Jamaica

All grievances received by The International Iguana Foundation should be forwarded to the Richard Hudson within 24 hours of receipt.

2. *Acknowledgement:* All grievances will be acknowledged by telephone or in writing by the Richard Hudson within 48 hours of receipt and the complainant will be informed of the approximate timeline for addressing the complaint, if it can't be addressed immediately. Richard Hudson will seek to ensure the speedy resolution of the grievance. If the grievance cannot be resolved at this level, it is taken to the next level.
3. *Record:* The grievance will be registered in the International Iguana Foundation's grievance file, including relevant documents.
4. *Notification:* Communication of the grievance as follows:
 - a. If it is concerning the project, communication to the Manager International Iguana Foundation
 - b. Notification will also be made to the CEPF Grant Director and Regional Implementation Team Manager within 15 days.
 - c. If it is concerning general International Iguana Foundation

operations/activity, communication to Richard Hudson.

5. *Assessment:* A decision is made on the nature of the investigation that will take place.
6. *Investigation:* Appropriate investigation of the grievance by an internal team assigned to this task (for example, this may include staff directly involved as well as the Manager International Iguana Foundation. The investigation may include meetings with the complainant and other stakeholders and a review of relevant documents. An impartial party shall be involved in meetings with the complainant. Community representatives or representatives of the complainant will be allowed to sit in on these meetings. Minutes of meetings and documents will be added to the grievance file.
7. *Resolution:* Depending on the findings of the investigation:
 - a. A resolution is decided immediately
 - i. The complaint is rejected
 - ii. A response is agreed
 - iii. The complaint is referred to as appropriate
 - d. A resolution cannot be achieved, and the case is presented to the CEPF Grant Director or International Iguana Foundation's Grievance Committee for further input
8. *Communication:* Once a resolution has been reached, the decision is communicated to the complainant in writing. Documents are added to the grievance file.
 - e. *Satisfaction:* If the complainant is not satisfied with International Iguana Foundation's response, it can be taken to the second level of redress. At all stages, documents are added to the grievance file.

NB: The complainant may request that the issue be transferred to the second level of redress if he/she does not feel that the grievance is being adequately addressed by the Grant Director for the Caribbean Islands Biodiversity Hotspot.

Second Level of Redress

If claimants are not satisfied with the way in which their grievance has been handled at level one, they will be given the opportunity to raise it directly with the CEPF Grant Director for the Caribbean Islands Biodiversity Hotspot, who can be contacted as follows:

Contact	
Title	Grant Director for the Caribbean Islands Biodiversity Hotspot
Telephone	+1-703-341-2400
Email address	cepf@cepf.net
Physical address	Critical Ecosystem Partnership Fund, 2011 Crystal Drive, Suite 600, Arlington, VA 22202

Third Level of Redress

If claimants are not satisfied with the way in which their grievance has been handled at level two, they can contact the CEPF Executive Director via the CI Ethics Hotline (telephone: +1-866-294-8674 / web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>).

If the complainant does not accept the solution offered by the CEPF Executive Director, then the complaint is passed on to the fourth level. Alternatively, the complainant can access the fourth level at any point. It is expected that the complaint will be resolved at this level within 35 working days of receipt of the original complaint. However, if both parties agree that meaningful progress towards resolution is being made, the matter may be retained at this level for a maximum of 60 working days.

19. Addressing Gender Based Violence

You will also need to make special provisions for grievances related to gender-based violence (GBV), due to the need for complaints to be handled by persons with specialist training and adopting a survivor-centered approach. You will be provided with the contact details of a GBV service provider in the sub-project country and will be required to include them in your grievance mechanisms. Survivors of GBV will have the option of contacting the GBV service provider directly, who will, in-turn, inform the CEPF Secretariat, with the express consent of the survivor.

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

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

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

Sexual Abuse (SEA) is an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions

Sexual Exploitation (SE) refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual harassment (SH) is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) service provider is an organization offering specific services for SEA/SH survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

SEA/SH grievances can be received through any of the available channels and will be considered as "High-profile grievances - that if not resolved promptly may represent significant risks to the environment or community". A list of SEA/SH service providers is available at the RIT's page: <https://canari.org/wp-content/uploads/2022/06/CEPF-II-GBV-Service-Providers-Jamaica2.pdf>.

Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centered approach.¹ Any cases of SEA/SH brought through the Grantee will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The CEPF will be notified as soon as the designated persons from the Grantee organization learn about the complaint.

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

ACTION 1: COMPLAINT INTAKE AND REFERRAL

If the survivor gives consent, the designated person responsible from the Grantee fills in a complaints form, excluding any information that can identify the survivor:

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

If the survivor does not want to provide written consent, her consent can be verbally received. If needed or desired by the survivor, the designated person responsible for the Grantee refers her/him to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and according to preestablished and confidential referral procedures. The survivor's consent must be documented even if it is received verbally. The service providers will be able to direct survivors to other service providers in case the survivor wishes to access other services. The designated person

¹ The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

responsible for the Grantee will keep the survivor informed about any actions taken by the perpetrator's employer. If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the designated person responsible from the Grantee can close the case.

ACTION 2: INCIDENT REPORTING

The designated person responsible for the Grantee needs to report the anonymized SEA/SH incident as soon as it becomes known, to the Executive Director who will in turn inform the CEPF.

Complaint Forms and other detailed information should be filed in a safe location by the designated person responsible for the Grantee. Neither the designated person responsible for the Grantee nor the Executive Director should seek additional information from the survivor.

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

As long as the SEA/SH remains open the designated person responsible from the Grantee and/or Executive Director should update the CEPF on the measures taken to close the incident.

ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION

Each SEA/SH incident should be verified to determine if it was related to the CEPF-funded project. The designated person responsible for the Grantee should form a SEA/SH verification committee comprised by her/him, one member of the Grantee organization, one member of a local service provider and a representative of the contractor (if relevant). The designated person responsible from the Grantee should notify the SEA/SH Committee of the incident within 24 hours of its creation. The SEA/SH verification committee will consider the SEA/SH allegation to determine the likelihood that the grievance is related to the project.

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to a project², the verification committee discusses appropriate actions to be recommended to the appropriate party—i.e., the employer of the perpetrator, which could be the designated person responsible from the Grantee or a contractor. The designated person responsible from the Grantee will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labour legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

For SEA/SH incidents where the survivor did not consent to an investigation, the appropriate steps should be taken to ensure the survivor is referred to/made aware of available services and that the

² Project actors are: (a) people employed or engaged directly by the Grantee to work specifically in relation to the project (direct workers); (b) people employed or engaged through third parties (Project staff, subcontractors, brokers, agents or intermediaries) to perform work related to core functions of the project, regardless of location (contracted workers); (c) people employed or engaged by the Grantee's primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labour such as voluntary services or participation in project activities and processes (community workers).

project mitigation measures are reviewed to determine if they remain adequate and appropriate or if they require strengthening.

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

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

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

The Grantee will also immediately notify both the CEPF and the World Bank of any SEA/SH complaints **WITH THE CONSENT OF THE SURVIVOR**.

20. Disclosure

EPF requires that all direct and contracted workers be informed of the existence of the grievance mechanism and the measures put in place to protect them against any reprisal for its use, either at the time of recruitment or at the start of the sub-project, whichever is later. CEPF also requires that all direct, contracted and community workers be provided with Conservation International's (CI's) Code of Ethics, and be informed that any violations of the Code of Ethics should be reported to CI via its Ethics Hotline at www.ci.ethicspoint.com.

CEPF also requires that all direct, contracted and community and community workers be provided with Conservation International's (CI) Code of Ethics and be informed that any violations of the Code of Ethics should be reported to CI via its Ethics Hotline at www.ci.ethicspoint.com

The code of ethics will be consistent with the code of conduct of the WB:

Stesha Pasachnik has signed a contract with the sub-grantee for 2025-2026. This contract requires you to implement measures to address environmental and social risks related to the sub-project, including the risks of sexual exploitation, sexual abuse, and sexual harassment.

Herewith, all persons are referred to as “**Sub-grantee's Personnel**” and are subject to this Code of Conduct.

This Code of Conduct identifies the behaviour that is required from all Sub-grantee Personnel.

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

Sub-grantee's Personnel shall:

1. carry out his/her duties competently and diligently.

2. acknowledge that adherence to this Code of Conduct is a condition of employment.
3. comply with this Code of Conduct and all applicable laws, regulations, and other requirements, including requirements to protect the health, safety and well-being of other Sub-grantee's Personnel and any other person.
4. maintain a safe working environment including by:
 - a. ensuring that workplace equipment and processes under each person's control are safe and without risk to health.
 - b. wearing required personal protective equipment when visiting construction sites and following sub-project COVID-19-related protection guidelines, as described in the Stakeholder Engagement Plan (SEP), Labour Management Procedure (LMP), Environmental and Social Management Framework (ESMF) and plans (ESMPs), or other relevant instruments.
 - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d. following applicable emergency operating procedures.
5. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation that he/she reasonably believes presents an imminent and serious danger to his/her life or health.
6. avoid any conflicts of interest (such that benefits, contracts, employment, or any sort of preferential treatment or favours, are not provided to any person with whom there is a financial, family, or personal connection).
7. respect reasonable work instructions (including regarding environmental and social norms).
8. protect and properly use property (for example, to prohibit theft, carelessness, or waste).
9. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers, or children.
10. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature with Sub-grantees or other Personnel.
11. not engage in Sexual Exploitation, which means any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
12. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
13. protect children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behaviour towards children, limiting interactions with children, and ensuring their safety in project areas).
14. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage.
15. shall have access to a referral system for victims of Gender Based Violence/Sexual Exploitation and Abuse of employees and any individual that may be associated with the sub-project. Where such an incident would have occurred, it should immediately be reported to the Employer or his/her designate who would ensure that the victim is referred to a service provider trained to handle GBV cases.
16. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH).
17. shall have access to a Grievance Redress Mechanism, which will afford effective remedies.
18. report violations of this Code of Conduct to the Employer under this project.
19. not retaliate against any person who reports violations of this Code of Conduct, whether to the Employer or the Project's Grievance Redress Mechanism; and,
20. the Grantee staff will follow the relevant requirements set out in LMP.

RAISING CONCERNS

If you observe any behaviour that is believed may represent a violation of this Code of Conduct, or that otherwise concerns you, you should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter the name of the Employer's Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Employer to handle these matters*] in writing at this address [] or by telephone at [] or in person at []; or
2. Call [] to reach the Employer's hotline (*if any*) and leave a message

The person's identity will be kept confidential unless reporting of allegations is mandated by the laws XXXX. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Sub-grantee Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

FOR GRANTEE PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of the Employer's contact person(s) with relevant experience*] requesting an explanation.

Name of Sub-grantee Personnel: [insert name]

Signature: _____

Date: (day month year): _____

Countersignature of an authorized representative of the Employer:

Signature: _____

Date: (day month year): _____

ATTACHMENT 1: Behaviours constituting Sexual Exploitation and Abuse (SEA) and behaviours constituting Sexual Harassment (SH)

ATTACHMENT 1 TO THE CODE OF CONDUCT FORM

BEHAVIORS CONSTITUTING SEXUAL EXPLOITATION AND ABUSE (SEA) AND BEHAVIORS CONSTITUTING SEXUAL HARASSMENT (SH)

The following non-exhaustive list is intended to illustrate types of prohibited behaviours:

(1) **Examples of sexual exploitation and abuse** include, but are not limited to:

- A Sub-grantee Personnel tells a member of the community that he/she can get them jobs related to the work site (e.g., cooking and cleaning) in exchange for sex.
- A Sub-grantee Personnel that is connecting electricity input to households says that he can connect women-headed households to the grid in exchange for sex.
- A Sub-grantee Personnel rapes, or otherwise sexually assaults a member of the community.
- A Sub-grantee Personnel denies a person access to any project Site unless he/she performs a sexual favour.
- A Sub-grantee Personnel tells a person applying for employment under the Project that he/she will only hire him/her if he/she has sex with him/her.

(2) **Examples of sexual harassment in a work context**

- Sub-grantee Personnel comment on the appearance of another Sub-grantee Personnel (either positive or negative) and sexual desirability.
- When a Sub-grantee Personnel complains about comments made by another Sub-grantee Personnel on his/her appearance, the other Sub-grantee Personnel comment that he/she is “asking for it” because of how he/she dresses.
- Unwelcome touching of a Sub-grantee or Employer’s Personnel by another Grantee Personnel.
- A Grantee Personnel tells another Grantee Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.