

Labor Management Procedures

for

ROGUN HYDROPOWER PROJECT



**Project Management Group under the President of the
Republic of Tajikistan**

September 2026

Contents

1. INTRODUCTION.....	5
1.1 Project Introduction	5
1.1.1 Previous World Bank Studies	5
1.1.2 World Bank's Technical Assistance.....	5
1.1.3 World Bank's Investment Project Financing (IPF) for Rogun HPP.....	6
1.2 Introduction to the Labor Management Procedures and its Update	6
1.3 Scope and Structure of the LMP	7
1.4 Project Key Characteristics	8
1.5 Project Elements.....	9
1.6 Ongoing Works	10
2. NUMBER OF PROJECT WORKERS.....	12
3. TIMING AND NATURE OF LABOR REQUIREMENTS	17
3.1 Timing.....	17
3.2 Type of Workers.....	17
3.3 Workforce Characteristics	18
4. ASSESSMENT OF EXISTING LABOR RISKS.....	18
4.1 Occupational Health and Safety	18
4.2 Terms and Conditions of Employment	18
4.3 Forced and Child Labor.....	19
4.4 Gender-Based Violence /SEA/SH	19
4.5 Labor Influx	20
4.6 Worker Grievance Redress Mechanisms	20
4.7 Worker Accommodation Facilities	24
4.9 Transportation.....	26
5. OVERVIEW OF RELEVANT LABOR LEGISLATION	26
5.1 Forced and Child Labor.....	27
5.2 Wages and Deductions	27
5.3 Working Hours	27
5.4 Leave	28
5.5 Overtime Work.....	28
5.6 Labor Disputes.....	29
5.7 Women	30
5.8 Non - Discrimination.....	30
5.9 Shift Work	30
5.11 Occupational Accidents, Compensation, and Disability Determination: Employer's Material Liability	31

5.11 World Bank Environmental and Social Standard 2 (ESS 2) on Labor and Working Conditions
32

6. RESPONSIBLE STAFF	33
7. POLICIES AND PROCEDURES	35
8. GRIEVANCE REDRESS MECHANISM	42
8.1 Worker GRM Structure.....	43
8.2 Sensitive Grievances	44
8.3 Grievance Logs.....	45
8.4 Monitoring and Reporting Grievances	45
9. CONTRACTOR MANAGEMENT	47
10. PRIMARY SUPPLIERS	48
ANNEX 01 Example Format for Report on Compliance with Conditions of Work with ESS2 for Third Parties Engaging Contracted Workers.....	49
ANNEX 02 Sample Training and Awareness Plan.....	52
ANNEX 03 Worker Grievance Form	53
ANNEX 04 Example Worker Grievance Poster.....	55
ANNEX 05 Example Code of Conduct.....	56
ANNEX 06 Sensitive Grievance Procedure	60
ANNEX 07 Example Worker Accommodation Audit Form	61
ANNEX 08 Primary Suppliers: Screening and Monitoring Plan (December 2025)	73
ANNEX 09: Indicative OHS Risk Assessment Register (to be tailored in contractors' contracts)	75

List of Abbreviations and Acronyms

Acronym	Term
BV	Bureau Veritas
CoC	Code of Conduct
DFZ	State Enterprise of Directorate for Flooding Zone of Rogun HPP
EHS	Environmental, Health and Safety
EPC	Engineering Procurement and Construction
E&S	Environmental and Social
ESF	World Bank Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESHS	Environmental, Social, and Health and Safety (aka HSE, E&S)
ESMP	Environmental and Social Management Plan
ESS	World Bank Environmental and Social Standards
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
GWh	Gigawatt hours
HPP	Hydropower Project
HR	Human Resources
H&S	Health and Safety
HSE	Health, Safety, and Environment (aka ESHS, E&S)
IDA	International Development Association
IFIs	International Financial Institutions
ILO	International Labor Organization
JSC/OJSC	(Open) Joint Stock Company
KWh	Kilowatt hours
LMP	Labor Management Procedures
LRP	Livelihood Restoration Plan
masl	Meters Above Sea Level
MW	Megawatts
OHS	Occupational Health and Safety
PD	Procurement Department
PMF	Probable Maximum Flood
PMC	Project Management Consultant
PMG	Project Management Group for Energy Facilities Construction Under the President of Tajikistan
RAP	Resettlement Action Plan
Rogun JSC	Open Joint Stock Company Rogun Hydropower Plant
TA	Technical Assistance
UN	United Nations

1. INTRODUCTION

1.1 Project Introduction

Tajikistan has established the Open Joint Stock Company Rogun Hydropower Plant (Rogun JSC) for the construction of the Rogun Hydropower Plant (HPP) (the Project). The Project is being constructed on the Vakhsh River, approximately 110km east of Dushanbe and 70km upstream of the Nurek HPP. The dam will be 330m high and will become the largest HPP in Central Asia, with a generation capacity of 3,780 megawatts (MW) and average annual generation of over 17,000 gigawatt hours (GWh). The Project is expected to produce electricity for 100 years or more and, by intercepting sediment, will extend the life of Nurek HPP.

Once completed, the Rogun HPP will be critical in helping Tajikistan to meet its domestic energy demands and to support neighboring countries through the export of surplus renewable electricity. Rogun JSC is reporting to the Project Management Group for Energy Facilities Construction under the President of the Republic of Tajikistan (PMG).

On November 19, 2018, the first of six planned turbines was commissioned, with a generation capacity of 120MW. On 9 September 2019, a second unit with the same 120MW capacity was commissioned. As of April 2021, both units were operational and generating approximately 1.6 billion KWh of electricity annually. The generation capacity of these units is being increased and additional units are being installed beginning in late 2026 or early 2027.

Operation of the Rogun HPP will be consistent with existing agreements for water allocation in the Vakhsh River. The agreements allocate shares of water flows to each country, as a result of which Nurek HPP, and in future Rogun HPP, stores high flows in spring for release in summer to support downstream irrigation and in winter for electricity generation. The dam will be completed in about 2032 but to accommodate downstream users, the Rogun reservoir will not be filled immediately but rather through about 2036. .

1.1.1 Previous World Bank Studies

The World Bank previously provided funding to the Government of Tajikistan to conduct the Technical and Economic Assessment Study and Environmental and Social Impact Assessment (ESIA) (published in 2014) for Rogun HPP. The Techno-Economic Assessment Study concluded the site, where construction had begun in 1980, was suitable for the Project. The ESIA, Resettlement Action Plan (RAP), and Livelihood Restoration Plan (LRP) identified measures that Rogun HPP should take in order to avoid, reduce, or otherwise mitigate potential environmental and social impacts in order to be considered good international industry practice (GIIP). Construction therefore started again in 2014-2015 and has continued since.

In 2021, the World Bank reviewed the ongoing construction to evaluate the adequacy of the mitigation measures in the 2014 Environmental and Social Management Plan (ESMP) to achieve compliance with the 2018 World Bank Environmental and Social Framework, and also to evaluate the extent to which Rogun JSC and its contractors were implementing the requirements of the ESMP.

1.1.2 World Bank's Technical Assistance

On 12 January 2023, The World Bank's Board of Executive Directors approved \$15 million in grant financing from the International Development Association for the Technical Assistance for Financing Framework for Rogun Hydropower Project in Tajikistan (TA). This TA aims to support the Government of Tajikistan in improving the financial and commercial frameworks of the Rogun Hydropower Plant (HPP) Project and enhancing its technical, environmental and social sustainability.

The International Development Association (IDA) grant financed the hiring of experts on dam safety and E&S frameworks to help with necessary improvements that will bring the Project in line with current hydropower industry requirements and align with the World Bank's Environmental and Social Framework. The TA Project is also instrumental in increasing Rogun HPP Project benefits to a larger number of people by financing development of a benefit-sharing mechanism whereby a portion of the Project's revenues will be channeled to various socio-economic programs and initiatives.

The TA Project improved the readiness of the Rogun HPP Project to increase the financing required for its completion. In particular, it helps to update the financing plan to ensure that annual spending on the project does not create macro-fiscal risks for the country and that the HPP has a reliable commercial framework for sale of electricity to domestic consumers and for exports.

1.1.3 World Bank's Investment Project Financing (IPF) for Rogun HPP

Phase 1 Project (P181029) was approved by the Board on December 17 2024 (restructured on December 19 2025) and declared effective on December 22 2025. Phase 1 has established the foundations for the program. Construction is advancing across all lots: as of May 2026, the main dam (Lot 2) was approximately 59 percent complete; Left Bank early works (Lot 4) were approximately 61 percent complete; Right Bank structures (Lot 3) were approximately 25 percent; and electro-mechanical equipment (Lot 1) 9.5 percent. The reservoir reached 1,100 masl in September 2025, with impoundment to 1,140 masl to be complete by October 2026. Co-financing of approximately US\$786 million has been secured from AIIB, CDP (Italy), IsDB, OPEC Fund, Kuwait Fund, and Saudi Fund. US\$58.5 million (17 percent) of the Phase 1 grant has been disbursed, with disbursements expected to accelerate to 50-60 percent in 2026 once outstanding conditions are met.

Subsequent phases of the Project will support: (i) continued construction works on critical dam and plant structures and associated facilities; (ii) enhanced project management and supervision (including the Employer's Representative/PMC and dispute avoidance/adjudication mechanisms); (iii) implementation of RAPs and LRPs; and (iv) hydrometeorological capacity and data sharing for reservoir operations and regional coordination.

1.2 Introduction to the Labor Management Procedures and its Update

As part of the financing agreement, the Project is required to comply with the World Bank's Environmental and Social Framework (2018) (ESF) comprising, *inter alia*, the Environmental and Social Standards (ESSs)¹. This Labor Management Procedures (LMP) document has been developed, laying out the Project's approach to meeting the objectives of World Bank ESS 2: Labor and Working Conditions (ESS2). It sets out the terms and conditions for employment or engagement of workers on the Project, specifies the requirements and standards to be met and the policies and procedures to be followed, assesses risks and proposes the implementation of compliance measures and promotes fair treatment, non-discrimination and equal opportunity of Project workers.

The LMP is developed to help avoid, mitigate and manage risks and impacts in relation to Project workers and sets out the way in which Project workers will be managed, in accordance with the requirements of national law and the ESS2. The procedures address the way in which both standards will apply to different categories of Project workers, including direct workers, and the way in which third parties will manage their workers to comply with applicable requirements.

¹ In August 2016, the World Bank's Board of Executive Directors approved the Environmental and Social Framework (ESF), which came into effect in August 2018

The LMP applies to Project workers as defined by ESS2². The focus of this document is on direct workers recruited by PMG, Rogun JSC and Directorate for the Flooding Zone (DFZ, previously referred to as the Resettlement Unit) as well as contracted workers who are employed by a contractor or other third party. There will not be community workers (see Section 3.2) because members of the local community are hired to be part of the contractors' labor force. In addition, the LMP will apply to workers employed by primary suppliers of the construction program, with requirements focused on procedures to identify, assess and manage potential risks of child labor, forced labor and serious safety issues which may arise in relation to primary suppliers, and outlines the roles and responsibilities of the Rogun JSC Procurement Department (PD) to monitor primary suppliers and cascade requirements to those suppliers.

Tajikistan is signatory to most of the International Labor Organization (ILO) and United Nations (UN) Conventions informing the ESS2.³ Partly as a result, the legal framework of Tajikistan regarding labor and working conditions is, with a few exceptions, relatively compliant with ESS2. The main gaps of Tajikistan labor legislation with respect to the World Bank's ESS2 include the ESS2 requirements for a workplace grievance mechanism, explicit prohibition of sexual harassment in the workplace and employment, provision of a grievance mechanism for sexual exploitation and abuse (SEA) and sexual harassment (SH), prohibition of employing women in hazardous jobs, and specific requirements for separate facilities for men and women. All of these gaps are addressed by measures stipulated in this LMP and other management plans that have been developed for the Project (e.g., Gender Action Plan, Occupational Health and Safety Plan and Community Health and Safety Plan).

The LMP is a live document that will be reviewed periodically, no less than annually, throughout construction of Rogun HPP. It will be updated as necessary to reflect new or changed activities and conditions. All revisions will be subject to approval by the World Bank.

The original LMP was finalized and disclosed in February 2024. This update of the LMP has taken into account the latest project developments, implementation progress and stakeholder feedback. PMG's and Rogun JSC's capacity to manage labor, OHS, as well as other E&S issues for the Rogun HPP Project has been strengthened through more staffing, resources, and technical support.

1.3 Scope and Structure of the LMP

This LMP is an integral part of the Project's environmental and social assessment and Project implementation. The document is organized as follows:

- Section 2 estimates the number of workers who will be involved in the Project;
- Section 3 gives an overview of the timing and nature of labor use on the Project;
- Section 4 describes Project activities and potential labor rights and working condition risks to workers;

² The term "Project worker" refers to: (a) people employed or engaged directly by the Borrower (including the Project proponent and the Project implementing agencies) to work specifically in relation to the Project (direct workers); people employed or engaged through third parties to perform work related to core functions of the Project, regardless of location (contracted workers); (c) people employed or engaged by the Borrower's primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labor (community workers). ESS2 applies to Project workers including fulltime, part-time, temporary, seasonal and migrant workers.

³ These include: ILO Convention 87 on Freedom of Association and Protection of the Right to Organize, ILO Convention 98 on the Right to Organize and Collective Bargaining, ILO Convention 29 on Forced Labor, ILO Convention 155 on Occupational Safety and Health, ILO Convention 105 on the Abolition of Forced Labor, ILO Convention 138 on Minimum Age (of Employment), ILO Convention 182 on the Worst Forms of Child Labor, ILO Convention 100 on Equal Remuneration and ILO Convention 111 on Discrimination (Employment and Occupation).

- Section 5 provides an overview of key provisions in relevant national labor legislation and international standards;
- Section 6 describes the responsibilities of PMG, Rogun JSC, DFZ, and supporting companies;
- Section 7 identifies policies and procedures governing employment and labor relations, and addresses key identified risks;
- Section 8 summarizes the worker grievance redress mechanism;
- Section 9 covers contractor management; and
- Section 10 describes how the Rogun JSC Procurement Department will manage their primary suppliers.

Note that this document covers all workers, contractors and subcontractors engaged by PMG, Rogun JSC, and DFZ to support the design, construction, and operation of the Project. The Rogun HPP workforce also comprises private security staff hired by contracted security firms, local police, and national Army personnel. However, their recruitment and employment is addressed in the **Security Management Plan**. At a minimum, private security personnel will be subject to the Code of Conduct (CoC) (**Annex 06**), and the Project will work with the military to establish clear rules of behavior. All this is or will be detailed in the Security Management Plan⁴.

1.4 Project Key Characteristics

The key characteristics of Rogun HPP Project are the following:

Table 1-1 Rogun HPP Characteristics

Characteristic	Description
Location	Vakhsh River, first project in the cascade, 70km upstream of the 3,000 MW Nurek HPP
Dam	Rock-filled dam with a central impervious core
Dam crest	1,300 meters above sea level (masl)
Full supply level	1,290 masl
Foundation level	~ 965 masl
Dam height	335 m
Installed capacity	3,780 MW (6 x 630 MW) ⁵
Expected annual average generation (at fully supply level)	14,400 GWh
Total spillway capacity (surface spillway and high-level outlets)	7,800 m ³ /sec Probable Maximum Flood (PMF)
Maximum operating head	320 m
Total reservoir capacity	13.3 km ³
Reservoir active storage	10.3 km ³
Reservoir area (maximum)	110 km ²
Reservoir operating lifespan	115 years (based on the estimated sediment inflow)

⁴ The Security Management Plan will provide details on standards, protocols, and codes of conduct for the selection and assignment of the Tajikistan army to the Project, including screening to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force.

⁵ A staged construction as planned in order to generate energy during the construction phase. A smaller dam embedded in the main one allows raising the reservoir level before dam completion. This allows for the early generation of benefits during the lengthy implementation stage of the Project.

Characteristic	Description
Projection completion cost (updated estimate)	US\$6.6 billion
Project start	1976; stopped during early 1990s, resumed most recently in 2016
Project owner and implementing entity	Rogun JSC
Ownership structure of Rogun JSC	97% Republic of Tajikistan; 3% various domestic legal entities and individuals

1.5 Project Elements

The Project includes or will include the following elements:

- The dam, with construction to be in four stages:
 - Pre-cofferdam: made of large blocks and fill, this began the river diversion and allowed construction to proceed in part of the riverbed. As estimated at the time of the Techno-Economic Assessment Study, this was completed in about 28 months.
 - Cofferdam: this intermediate structure has a bituminous core and a crest elevation of 1,050 meters above sea level. It took about 36 months to complete, inclusive of the eight months for the pre-cofferdam.
 - Stage 1 dam: an intermediate stage of the full dam allows early electricity generation. It is designed to be 1,110masl. This dam was completed in 2018 and extends 660 meters from end to end.
 - Full-height dam: rockfill dam with an impervious clay core, with a reservoir at 1,290masl and dam crest at 1,300. Estimated to be completed in about 2032.
- Diversion tunnels to carry water around the dam site while works are completed. There are currently four tunnels, designated as DT-1, DT-2, DT-3, DT-4. Downstream parts will be used as for the tailrace.
- Surface spillway, two mid-level, and three high-level tunnels to protect the dam and allow safe passage of floodwaters up to the PMF.
- Six headrace tunnels and penstocks to guide water from the intakes to the powerhouse.
- Several access tunnels to allow access to the powerhouse, gate chambers, etc.
- Underground powerhouse and transformer room in excavated caverns on the left bank. The powerhouse will contain six 660MW turbines. Two turbines are current operating, but at reduced capacity until late 2026 or early 2027.
- Six 500kV transmission lines, two complete and four to be constructed, to evacuate power to the national grid and to neighboring countries. These are considered associated facilities within the meaning of World Bank ESS1.
- Approximately 80km of underground transport routes, of which over 70km will be converted to water tunnels or plugged as the reservoir rises and about 6km will remain in use after construction is complete and the reservoir reaches full supply level.
- Approximately 26km of surface roads, of which only about 5-6km will remain after construction, with the rest flooded by the rising reservoir.
- A reservoir that will extend from the dam for 70km upstream. The reservoir will flood an area of 170km² at full supply level and 51km² at minimum operating level. Maximum storage capacity will be 1,030,000m³. The terrain is mountainous so the reservoir will flood several

side valleys. The reservoir will not be allowed to fill to its Full Supply Level immediately upon dam completion but rather over several years, until about 2036A total of 69 villages are within the future footprint of the reservoir and Project sites, and this will require about 46,000 people to be resettled. Since construction and reservoir filling were to take 16 years, resettlement is taking place in phases in line with the inundation levels of the reservoir. Resettlement began in the 1980s but then slowed or stopped when construction was interrupted. Phase 1 activities were complete by 2017 and involved resettlement of eight villages that lay within the construction footprint or would be flooded during early reservoir filling; Phase 1 included less than five percent of the total to be resettled. Phase 2 resettlement began in 2017 and is ongoing, covering an estimated 1,421 households. The remaining households will be resettled under future phases.

1.6 Ongoing Works

Works are being undertaken and completed in four lots, including the main supplier (Lot 1) and three works contracts (Lots 2, 3, and 4), all of which are engineering procurement and construction (EPC) contracts. The contracts are described in Table 1-2 below:

Table 1-2. Construction Contracts

Lot	Scope	Contractor	Scope	Status
Lot 1	Electro-mechanical equipment (4 generating units)	Voith Hydro (Austria)	Installation of four new generating units, delivery of two runners for two early generating units. Installation of the balance of plant and control equipment.	Under implementation (~14 percent complete)
Lot 1A	Additional electro-mechanical equipment – replacement of Runners of turbines for Unit 5 and Unit 6.	TajikSGEM (Tajikistan)	Replacement of the turbine runners of Units No. 5 and 6	Under implementation
Lot 1B	Additional electro-mechanical equipment	TBD	TBD	Not yet in place
Lot 2	Main dam	WeBuild (Italy) - approx.	Design, procurement and construction of: • Modernization/reconstruction / completion (if necessary) of Diversion tunnels. • Construction of cofferdam and river diversion. • Construction of transition sections DT-1 and DT-2. • Treatment of the entire base (salt layer, grout curtain, drainage curtain). • Installation of dam monitoring devices and reservoir monitoring. • Main Dam to elev. 1,300 masl	Under implementation (~59 percent complete)
Lot 3	Limited right bank structures	TGEM (Tajikistan)	Additional tunnels and spillways to provide adequate flood discharge capacity as the height of	Under implementation (~31 percent complete)

Lot 3A	Full scope right bank structures	Prequalification stage	the Main Dam increases and lower tunnels can no longer be safely used due to the increasing head.	Procurement underway
Lot 4	Left bank structures.	TBD	Multi-level water intake, six inlet pressure tunnels and shafts to hydraulic units and the corresponding outlet tunnels. "Early works" under Lot 4 are currently being undertaken by non-EPC Contractors. After international tendering, an EPC Contractor will be appointed and these early works contracts will be terminated, all within six months after financing is received.	Procurement underway
Lot 4 "early works"	Left bank structures early works	Ariana (Iran) and EMZ (Tajikistan)	Early works" are taking place under Lot 4, including tunnelling for the water intake of the powerhouse, ventilation shafts, etc. These are not being undertaken as part of the EPC contract but by other contractors.	Under implementation (~87 percent complete)

The following organizations have responsibilities for Project design, oversight, and supervision of the Project:

- **Project Management Group for Energy Facilities Construction Under the President of Tajikistan (PMG):** PMG oversees OJSC Rogun's construction of Rogun HPP and DFZ's implementation of the resettlement program. PMG reports directly to the President of the Republic of Tajikistan and provides monthly reports on Project progress.
- **Employer/Owner:** OJSC Rogun HPP (Rogun JSC) is responsible for overall construction and operation of Rogun HPP, including supervision of the ER and HSE Supervisor.
- **Employer's Representative:** A consortium of Tractebel/ELC (ElectroConsult) is responsible for supervising the construction activities of all contractors. The responsibilities of Tractebel will continue until 31 December 2026, after which a Project Management Consultant (PMC) will assume the relevant responsibilities. As of 1 July 2026, Bureau Veritas (BV) assumed the ER's responsibility for supervising health, safety, and environmental (HSE) performance of all Contractors and others on the construction site. (BV now acts as the ER for the supervision of HSE performance)
- **Project Management Consultant (PMC).** The Employer's Representative (Tractebel) will be replaced by a PMC before December 31, 2026, The PMC will be responsible for supervising all contractor works and performance on behalf of OJSC Rogun, except environmental and social performance, which will continue to be supervised by the HSE Supervisor, Bureau Veritas.

- **State Enterprise ‘Directorate for Flooding Zone of Rogun HPP’ (DFZ):** Responsible design and implementation of the resettlement and livelihood restoration program, in coordination with other government ministries and agencies.
- **Non-EPC Contractors, Subcontractors and Suppliers.** Besides the EPC Contractors for major works, there are a number of other Contractors who undertake various construction activities. In addition, each of the EPC Contractors and the early works Contractors have appointed subcontractors for certain element of their works, and there are also a number of primary suppliers to OJSC Rogun and Contractors.

2. NUMBER OF PROJECT WORKERS

Employment at Rogun changes from month to month as different activities commence or are completed.

As of August, 2026, the Rogun HPP Project employs a total of 20,563 workers, including the Project Owner and contractors. Of these, 17,855 are shift workers (day-night shifts and 15-day on-off shifts), and 2,758 are office-based workers. The workforce comprises 19,305 male and 1,267 female workers, with 19,122 Tajik nationals and 1,407 expatriate workers. The workforce is distributed among a total of 50 entities, , with the largest workforces employed by TGEM LLC, EMZ Norak , WeBuild, Tunnel Sadi Oriyono (Lot 4A/Ariana), and OJSC "Rogun HPP".

Table 1-3: List of Contractors and Number of Workers Onsite

No.	Name of Contractor	Total Number of Workers	Type of Workers		Gender Split of Workers on Site		Nationality of Workers		Age of Workers			
			Shift Workers (1&2)	Office Workers	Male	Female	Tajik	Expat	18-30 years old	31-50 years old	51-63 years old	> 63 years old
1	Rogun" JSC	1126	615	511	979	147	1144	0	252	532	302	40
2	"Sokhtmoni Asosi"	231	181	50	216	15	231	0	17	103	99	12
3	"Khokrud"	371	337	34	7	364	320	51	162	179	25	5
4	"Jom-ko" Ltd	69	55	14	65	4	69	0	24	29	14	2
5	"Gidromantazhi Osiyi Markazi" Ltd	277	255	22	263	14	277	0	125	102	47	3
6	"Samand Sokhtmon" Ltd	123	111	12	117	6	123	0	38	63	19	3
7	"Nursoz" Ltd	279	266	13	263	16	279	0	38	63	19	3
8	"Nurafzo 2010" Ltd	145	126	19	137	8	145	0	54	40	51	0
9	"Vakhsh Sokhtmon" Ltd	750	679	71	732	18	703	47	234	469	47	0
10	"Farkhunda-2014" Ltd	45	35	10	43	2	45	0	14	25	5	1
11	"Nur-81" Ltd	53	43	10	48	5	53	0	21	24	5	3
12	"Inventor" Ltd	128	110	18	118	10	128	0	43	63	18	4
13	"Tojikgidromantazh" LLC	441	421	20	417	24	441	0	97	219	108	17
14	"TojikSGEM" LLC	789	753	36	768	21	789	0	305	411	68	5

15	"Yokubjon-2016" Ltd	250	238	12	238	12	250	0	65	133	42	10
16	"Voight Hydro"(Lot 1)	10			10	0	6	4	1	7	1	0
17	"We Build"	1526	1108	418	1403	125	1375	151	237	968	271	0
18	"TGEM" LLC	8761	8255	506	8542	219	8079	682	3139	4416	1078	128
19	"Tunnel Sadi Oriyono" Ltd (Lot 4A) aka Ariana	1412	1025	387	1388	24	1141	271	304	769	301	38
20	"ZTM Norak" Ltd aka EMZ	1564	1454	110	1505	59	1517	47	265	889	316	94
21	"Bunyodi Noor" Ltd	17	13	4	14	3	17	0	25	5	10	2
22	"Bunyodi Asri 21" Ltd	36	12	24	32	4	36	0	8	27	1	0
23	"TREVI" Company	179	139	40	172	7	120	59	58	61	57	3
24	"TadES"	40	33	7	37	3	40	0	25	14	1	0
25	"Elitstroy "Ltd	60	57	3	59	1	60	0	9	22	29	0
26	Project designing Company "Afry"	7		7	7	0	3	4	0	6	1	0
27	"Binokor" Ltd	21	17	4	21	0	21	0	8	9	10	0

28	"Mirshoh Sokhtmon"	27	22	5	26	1	27	0	4	7	11	0
29	"Inventor " Ltd	147	127	20	131	16	140	7	32	87	19	9
30	"Hokrud" Ltd	371	337	34	364	7	320	51	162	179	25	5
31	"Hydromontage Osiyoi Miyona" Ltd;	277	255	22	263	14	277	0	125	102	47	3
32	"Rushdi Manotiqi Kuhiston" LTD	51	37	14	48	3	51	0	10	23	18	0
34	"Expert sanoat" Ltd	11	9	3	9	2	11	0	4	6	1	0
35	"Bunyodi Rogun" Ltd	10		10	10	0	10	0	8	2	0	0
36	"Gidrospecproekt" Ltd	32	28	4	31	1	32	0	4	17	11	0
37	"Shukihi Istiqlol" Ltd	102	94	8	98	4	102	0	39	42	19	0
38	"Nuri Vakhsh" Ltd	62	53	9	60	2	62	0	19	26	17	0
39	"Rogun Sokhtmon" Ltd	13	11	2	13	0	13	0	3	8	2	0
40	"Sarband-2" Ltd	76	66	10	73	3	76	0	25	45	4	2
41	"SCIF" Ltd	18	15	3	15	3	18	0	6	7	4	1
42	"Sinohydro BUREAU 16 CO" Ltd	201	101	100	191	10	201	0	39	78	84	0
43	"Umron Morun" Ltd	22	17	5	22	0	22	0	0	10	12	0
44	"TSEUITTVS" Ltd	228	191	37	228	0	228	0	64	134	26	4

45	"GidroProyekt Institute" Ltd	22		22	21	1	22	0	0	11	11	0
46	"VestTrasSrtroyi" Ltd	6	4	2	5	1	4	2	2	2	1	1
47	"Somoniyon" Ltd	6	4	2	5	1	6	0	2	2	2	0
48	"Tojik kon" Ltd	4	0	4	4	0	4	0	0	3	1	0
49	"Bars Plus" Ltd	84	80	4	80	4	84	0	14	45	25	0
	"Farob" Ltd	81	66	74	7	81	0	31	32	12	6	
50	"Tono Energy"	2	0	2	0	2	0	0	2	0	0	0
Total		20,563	17,855	2,758	19,305	1,267	19,122	1,407	6,164	10,496	3,291	398

DFZ also employs a number of contractors for clearing land, moving residents to resettlement locations, and for construction works at resettlement villages. As of mid-2026, employs 47 direct workers and its Contractors about 80 Tajik citizens, of which 89 percent are male and 11 percent female, with no expatriates. and all Tajik.

3. TIMING AND NATURE OF LABOR REQUIREMENTS

3.1 Timing

As noted, construction of the dam is predicted to be completed in about 2032. PMG, Rogun JSC, and DFZ direct workers are employed under standard Government of Tajikistan civil servant employment contracts. Labor requirements, including time schedules and deliverables, are stipulated in their respective contracts. Contracted workers employed by Contractors are eligible to work for a contract period fixed by the Client, which may be Rogun JSC, PMG, or DFZ.

3.2 Type of Workers

It is expected that the following categories of workers will be engaged under the Project, as defined by ESS2:

Direct workers: Direct workers include PMG, Rogun JSC, and DFZ employees and staff and certain consultants. These workers were hired under individual contracts, on a full-time and/or part-time basis, with specific definitions of assigned tasks and responsibilities. There are approximately 1,200 direct workers, mostly employed by OJSC Rogun.

Direct workers include employees and staff of PMG, OJSC "Rogun", and DFZ, as well as certain consultants engaged directly by these entities. These workers are employed under individual contracts on a full-time and/or part-time basis, with defined tasks and responsibilities. As of 1 June 2026, approximately **1,240 direct workers** are engaged by PMG, OJSC "Rogun", and DFZ, with the majority employed by OJSC "Rogun". The number of direct workers may vary during Project implementation depending on staffing requirements and changes in Project activities

Contracted Workers: As described previously, many Contractors and subcontractors are involved in construction activities for the Project. Contracted are hired on the basis of a written labor agreement, indicating the specific terms and conditions of employment in line with the Tajikistan Labor Code. The Contractors may engage one or multiple subcontractors, subject to Rogun JSC and/or PMG approval (with generally through the Employer's Representative and, from 2027, the PMC. Subcontractors' workers are also contracted workers. As of mid-2026, there were about 17,000 contracted workers

Primary supply⁶ workers: Under ESS2, the concern for primary suppliers is related to child labor, forced labor, and worker safety. OJSC Rogun has two regular suppliers who could be considered primary suppliers; both are Tajik firms and they supply cement and steel, respectively. Other suppliers, of which there are about 100 (fuel, lubricants, fuels, food, etc.) would not be considered primary, or would provide limited opportunity for PMG or Rogun JSC to exert control or influence⁷ Due to the strict laws regarding child and forced labor, these are not considered to be a significant risk, but there could be risks to worker safety at the two primary suppliers. Each of these suppliers have provided certification they do not employ child labor or forced labor and maintain safe workplaces.

The various Contractors also have primary suppliers who provide steel and other materials on an ongoing basis. Suppliers include companies that are Tajik, Chinese, Russian, Iranian, Swiss, Italian,

⁶ The World Bank's ESF defines "primary supplier" as "those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project. Core functions of a project constitute those production and/or service processes essential for a specific project activity without which the project cannot continue."

⁷ This is an issue since the World Bank ESF states (ESS2, paragraph 42) that "[t]he ability of the Borrower to address these risks will depend upon the Borrower's level of control or influence over its primary suppliers."

or other nationalities. All have certified they comply with national law and that they do not employ child labor or forced labor and that workplaces are safe.

The primary suppliers will be required to provide certifications on an annual basis. **Community workers:** Community workers will not be employed on the Project.

3.3 Workforce Characteristics

The Project workforce is mostly unskilled and semiskilled construction labor, as well as some skilled labor and professionals. A common trend that can be observed across all the different Project contractors, Rogun JSC workers and DFZ employees is that women are present in a limited number and primarily for domestic types of work, such as cleaning, preparing food for workers and washing dishes. In addition to domestic types of work, there is also a small number of women working as nurses, engineers and in administrative roles within HR Departments or other administrative within Rogun JSC, DFZ, and the different Contractor organizations. Women currently represent about 6.2% of the total workforce. As highlighted in Table 2-1 above, the majority of Project workers are from Tajikistan, with expatriates comprising only around 6.8% of the workforce. Expatriates predominantly originate from South Asia (including India and Pakistan), Russia, Iran, Kazakhstan and Uzbekistan. All workers are over the age of 18.

4. ASSESSMENT OF EXISTING LABOR RISKS

The following section provides an overview of the existing key labor risks associated with the Rogun HPP and the corresponding LMP requirements that serve to mitigate the identified risks. Further details of the specific policies and procedures to be followed to manage the identified risks are presented in section 7.

4.1 Occupational Health and Safety

Construction is widely recognized as one of the most hazardous occupations in the world. As a result, many different Project activities pose risks to workers. , Particularly high-risk activities include: drilling, driving and operating vehicles and heavy equipment, use of explosives for tunnelling; working at height (in the tunnels, at the dam, and on steep slopes); working in confined spaces (in tunnels); hot work (welding), repetitive working, extreme temperatures, hard manual labor; working around heavy equipment and machinery, working with pressurized equipment, trip and fall hazards, exposure to noise and dust and other air pollutants, exposure to electrical hazards, carrying heavy loads, exposure to chemicals (e.g., paints, fuels, fresh concrete); and many others. and working in both hot and cold conditions due to the climate extremes. Contractors each have **Occupational Health and Safety (OHS) Plans** that meet requirements established in the OHS Management Plan Framework prepared by PMG. Plans have approved by the ER or the HSE Supervisor and are reviewed and updated at least annually.

4.2 Terms and Conditions of Employment

Over the course of the Project, there have been instances where employment contract used by Contractors are not complete with regard to the wages, working hours, break and rest periods. There have also been instances of excessive overtime and delayed payments of wages.

Requirements are now in place for all Project workers to be provided with labor contracts which contain information that is accurate, clear and understandable regarding their terms and conditions of employment, including wages, working hours, adequate periods of rest per week, annual holiday and sick leave, as required by national law. Employees must also be able to read and understood and their contracts in their own language (primarily Tajik). Documentation regarding employment is

required to be provided during the onboarding process and when any material changes occur. An overtime policy is in place that prohibits overtime for shift workers (that is, for 12-hour shift workers), and this is required to be stated within all labor contracts. All employers are required to pay their employees in full, regularly and on time. Where exceptional circumstances necessitate a change in the regular payday, employees must be given adequate notice. Further details relating to the terms and conditions of employment are presented in Section 9.

4.3 Forced and Child Labor

Risks associated with child and forced labor are governed by national laws and regulations. And there have been no known instances of violations of the law. Article 208 under the Labor Code of the Republic of Tajikistan prohibits employees under the age of 18 years in heavy, underground and harmful and hazardous works, and Article 8 prohibits the use of forced labor. Tajikistan is also a signatory to ILO Conventions C182 (Worst Form of Child Labor Convention, signed June 8, 2005) and C138 (Minimum Age Convention, signed June 26, 1993, specifying minimum age at 16). In accordance with the national legislation, no one under the age of 18 is or will be engaged in the construction works of the Project. The risk of child labor is currently and will continue to be mitigated through the verification of workers' age during the onboarding process by using legally recognized documents to prove their right to work, such as a copy of passports, birth certificates etc. As noted previously, primary suppliers have certified and will continue to do so. As and if needed, Rogun JSC and Contractors will work with noncompliant suppliers to bring them into compliance with the law and this LMP or identify alternative suppliers whose policies and practices are in compliance.

4.4 Gender-Based Violence /SEA/SH

Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) risks may arise in connection with the Project due to the large, predominantly male construction workforce, interaction between workers and surrounding communities, and prevailing gender norms. Other gender-related risks include limited transportation arrangements for women workers as well as inadequate accommodation and amenities, where applicable.

To prevent and address SEA/SH risks, the Project has integrated an Individual Code of Conduct (CoC) into its labour management arrangements. The CoC applies to Project personnel and establishes standards of behaviour related to ESHS, OHS, labour and working conditions, including explicit prohibitions on sexual exploitation, sexual abuse, and sexual harassment. It also prohibits inappropriate, harassing, abusive, sexually provocative, demeaning, or culturally inappropriate behaviour towards women, children, and men.

The CoC requires workers to comply with its provisions, report suspected or actual GBV and breaches of the CoC through their manager or the grievance mechanism, and complete relevant training on GBV, SEA and SH where such training is provided under the Project. The CoC provides for confidential and anonymous reporting and prohibits retaliation against persons who raise concerns in good faith.

Violations of the CoC constitute misconduct and may result in disciplinary action, including a formal warning, formal reprimand, or termination of employment. Where warranted and with informed consent, cases may also be referred to the police.

The Code of Conduct for individuals is provided as an annex to this LMP.

A separate grievance procedure, with confidential and anonymous reporting systems, is also implemented to handle sensitive grievances, such as for those relating to SEA/SH. A designated female focal point, with experience in dealing with SEA/SH issues and specialized training in safeguarding policies, has been appointed by PMG to support the management of SEA/SH allegations(of which there have been none to date)s. This individual monitors and reports on the

presence or absence of violation cases. Further details of the sensitive grievance mechanism are presented in section 10.2.

A stand-alone Gender Assessment and a Gender Action Plan have also been adopted by the Project with defined actions to address gender insecurity, SEA/SH and promote employment opportunities for women. The Gender Action Plan includes development of the SEA/SH sensitive grievance mechanism and GBV referral mechanism for survivors.

As of mid-2026, there have been no known instances of gender-based violence or of sexual exploitation, abuse, or harassment.

4.5 Labor Influx

As shown in Table 2-1, 95% of the workforce is male, many of whom live in worker accommodation provided by their employers on site or within accommodation in Rogun city. Most of the workers are from the local area and from elsewhere in Tajikistan. The significant influx of labor into the local community could lead to an increase in the spread of communicable diseases and create tensions between the workforce and local community members. However, this risk is somewhat mitigated by the fact that the Project is the major employer in Rogun city and the region, and indeed Rogun city was established in order to support the Project. Rogun JSC, DFZ and all contractors each conduct induction training for all their employees and the employees of all their sub-contractors. The induction training includes coverage of the rules and regulations on community relationship and on the provisions of the Code of Conduct. Workers are trained on refraining from unacceptable conduct toward local community members, specifically women, and informed of the sanctions for non-compliance. Additionally, guidance on the detrimental effects of the abuse of alcohol and drugs and other potentially harmful substances and the risk and concerns relating to HIV/AIDS, COVID-19 and of other health risk-related activities is provided to workers.

The risks associated with labor influx are addressed by Rogun JSC and Contractors by measures specified in the Gender Action Plan, Code of Conduct, and other elements of the Environmental and Social Management Plan.

As of mid-2026, there had been no reports of issues arising from labor influx.

4.6 Worker Grievance Redress Mechanisms

A Grievance Redress Mechanism (GRM) has been established by Rogun JSC and is available to all Rogun HPP workers to lodge complaints and raise concerns related to their employment, working conditions, health and safety, accommodation, workplace relations and other labour-related matters. Individual employers, including Contractors and subcontractors, have primary responsibility for receiving, recording, addressing and resolving worker grievances. Bureau Veritas (BV), as the HSE Supervisor, is responsible for monitoring the implementation and functionality of the Worker GRM by Contractors and subcontractors, including compiling grievances across the site, following up on unresolved grievances, and escalating unresolved, repeated or systemic issues to Rogun JSC and PMG, as appropriate.

In response to project monitoring, PMG and Rogun JSC are addressing certain identified weaknesses in the functionality of the Worker GRM. At present, workers often rely on informal “open door” arrangements, whereby grievances are raised through individual site managers/supervisors, Contractor Human Resources (HR) staff or the Contractor’s Trade Union. In the past, such grievances have not always been systematically recorded, tracked and reported. Directly overseen by the HSE Supervisor, the strengthened Worker GRM will ensure that grievances received through both formal and informal channels are appropriately recorded, followed up and reflected in the central Project GRM system, subject to the confidentiality requirements applicable to sensitive grievances.

To strengthen accessibility, transparency and systematic management of worker grievances, the Project's *eFeedback* platform provides an additional digital channel through which workers can submit grievances and other feedback. The platform enables grievances to be securely recorded, tracked, assigned to responsible persons, followed up and monitored through the established GRM process. Workers may submit grievances directly through the *eFeedback* platform or through assisted access points where digital access or literacy may be a barrier.

The central GRM established by PMG and Rogun JSC will provide overall coordination and oversight of worker grievance management. Bureau Veritas, as the HSE Supervisor, will monitor the implementation and effectiveness of the Worker GRMs operated by contractors and subcontractors and will verify that grievances are appropriately recorded, addressed and resolved. Unresolved, serious, repeated or systemic grievances will be escalated through the established reporting arrangements to Rogun JSC and PMG.

The Worker GRM is designed to address concerns promptly through an understandable, transparent and accessible process that provides timely feedback to workers in a language they understand and without retaliation, intimidation or discrimination. Workers will be able to use the reporting channel with which they feel most comfortable.

Multiple communication channels are available to workers, including:

- Face-to-face reporting to designated contractor/subcontractor GRM and Gender Focal Points, site managers or other designated personnel;
- Grievance and suggestion boxes;
- Telephone/hotline;
- WhatsApp/SMS and other appropriate communication channels;
- Email;
- The *eFeedback* platform; and
- An anonymous reporting channel that allows workers to submit complaints without identifying themselves.

The available channels are accessible to both women and men workers, including local and foreign workers and both direct and contracted workers. Contractors and subcontractors are required to ensure their workers are informed of the available channels and are able to raise concerns without having to report through a person who may be directly involved in the issue complained about. The Project will provide access to both female and male GRM/Gender Focal Points to facilitate gender-sensitive access to the mechanism. The Worker GRM is implemented in a gender-sensitive manner and provides appropriate arrangements for workers to raise concerns relating to discrimination, harassment, unequal treatment, workplace conditions, privacy, accommodation, safety and other gender-related issues. SEA/SH-related complaints are handled through the designated confidential SEA/SH reporting and referral pathway and not managed through the ordinary grievance process in a manner that could compromise the confidentiality, safety, or dignity of the survivor. Information on sensitive cases shall be handled in accordance with the applicable SEA/SH procedure, and identifying information shall not be included in routine GRM reporting.

Information on the Worker GRM, including the available reporting channels and information on how to access the *eFeedback* platform, is displayed on notice boards in worker accommodation camps, some workplaces, and other appropriate locations on site. Where necessary, information is also provided through worker meetings, toolbox talks and other awareness-raising activities.

Details of the grievance procedure and available reporting channels is provided to all workers during worker induction training and reinforced through periodic awareness-raising activities.

Roles and Responsibilities

Contractors and subcontractors have primary responsibility for managing their workers' grievances at the site level. Their designated GRM and Gender Focal Points:

- receive and register grievances
- provide information to workers on the GRM and available reporting channels
- ensure that grievances are acknowledged, investigated and addressed within the established timeframe
- provide feedback to complainants on the status and outcome of their grievances
- maintain appropriate grievance records
- identify and escalate serious, sensitive, unresolved or systemic grievances
- support gender-sensitive access to the GRM
- support awareness-raising on gender equality, non-discrimination, respectful workplace behaviour and SEA/SH prevention
- ensure that SEA/SH concerns are referred through the designated confidential pathway and
- provide relevant grievance information and statistics to the HSE Supervisor through the established reporting arrangements.

Responsibilities of Bureau Veritas, as the HSE Supervisor, include:

- monitor the implementation and functionality of contractor and subcontractor Worker GRMs;
- verify that contractor/subcontractor grievance records are complete and up to date;
- monitor the status and timely resolution of worker grievances;
- follow up on unresolved or overdue grievances;
- monitor the accessibility of the GRM to women and men workers and other potentially vulnerable workers;
- monitor the effectiveness of available grievance channels, including the *eFeedback* platform;
- review grievance trends and identify recurring or systemic labour, OHS, accommodation, gender or other workplace issues;
- monitor corrective actions arising from worker grievances;
- conduct worker consultations, where appropriate, to assess workers' awareness and confidence in the GRM;
- include relevant non-confidential information on Worker GRM performance in its periodic HSE/ESHS reporting; and

- escalate unresolved, serious, repeated or systemic grievances to Rogun JSC and PMG, as appropriate.
- Rogun JSC, through its designated GRM Social Specialist, who is also responsible for addressing gender-related issues, will maintain central oversight of the Project GRM, including receiving and reviewing grievance information escalated by contractors, subcontractors and Bureau Veritas;
- maintaining and managing the central Project GRM database;
- ensuring that grievances received through different channels, including the eFeedback platform, are appropriately consolidated and tracked;
- monitoring unresolved grievances and coordinating their resolution with the responsible parties;
- analysing grievance data to identify recurring or systemic issues;
- coordinating with Bureau Veritas on workers' grievances and corrective actions;
- ensuring appropriate management of sensitive grievances through the designated confidential mechanisms; and
- providing relevant GRM information to PMG for Project reporting.

PMG will provide overall Project-level oversight of the GRM, monitor its implementation and functionality, coordinate with Rogun JSC and Bureau Veritas on significant or systemic issues, and report on the GRM to the World Bank in accordance with the Project's reporting requirements.

eFeedback Platform

The *eFeedback* platform is part of the Project's Worker GRM and provides a secure digital channel for submitting, recording and tracking grievances. Grievances received through the platform are assigned to the appropriate responsible party for review and resolution in accordance with the established GRM procedures.

The platform supports:

- electronic submission of grievances and feedback by workers;
- registration and categorisation of grievances;
- assignment of grievances to responsible personnel;
- tracking of grievance status and resolution;
- monitoring of overdue and unresolved grievances;
- generation of GRM statistics and reports; and
- improved central oversight of grievance trends and recurring issues.

The eFeedback platform will complement rather than replace other Worker GRM channels. Workers will continue to have the option of using face-to-face reporting, grievance boxes, telephone/hotline, WhatsApp/SMS, email and anonymous reporting channels.

Bureau Veritas monitors the functionality and accessibility of the Worker GRM, including the effective operation and use of the *eFeedback* channel for construction-site workers. PMG and Rogun JSC use information generated through the platform, together with information from other GRM channels, for central GRM monitoring, analysis and reporting.

Further details on the GRM, including the grievance process, responsibilities, timelines, escalation arrangements and management of sensitive grievances, are presented in Section 10.

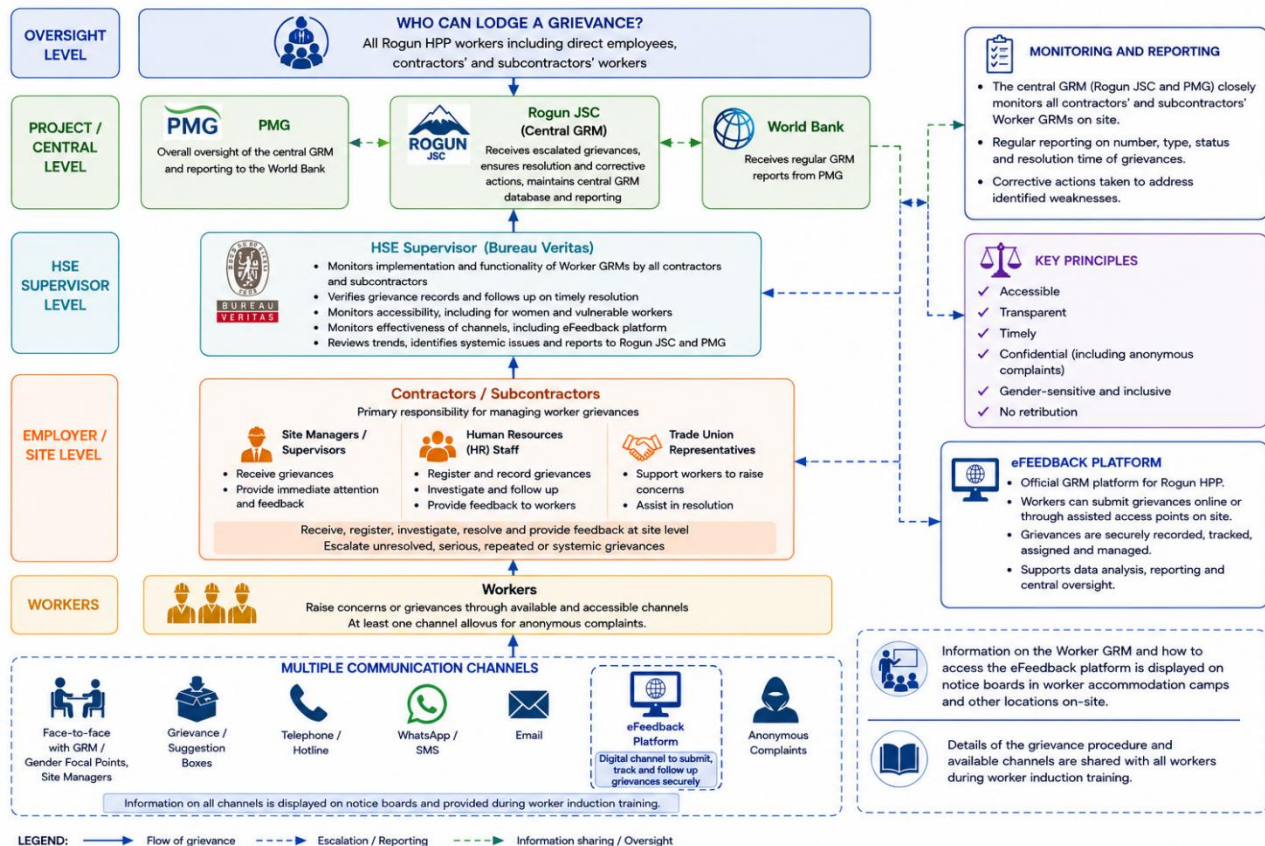


Figure 1. Rogun HPP Worker Grievance Redress Mechanism (GRM)

4.7 Worker Accommodation Facilities

Poor working conditions and unsafe working environments pose significant risks to employees H&S and well-being. Among the risks are the limited provision of potable water, no soap or disinfectant in washrooms, insufficient and poorly maintained toilet facilities, inadequate firefighting supplies, inadequate living space and sleeping areas, inadequate kitchens, and inadequate first aid and medical facilities. In the past, some Contractors did not provide their employees with suitable living conditions, and some substandard conditions still prevail.

The Project has now adopted an Accommodations Management Plan Framework that requires each Contractor that provides accommodations to its workers to develop and implement an Accommodations Management Plan (it is noted that "accommodations" includes not only dormitories but also medical, recreational, ablution, and sanitation facilities, as well as kitchens and dining facilities). These Plans require that worker accommodation facilities be designed, operated,

maintained, and decommissioned in accordance with national legislation and the IFC–EBRD *Workers' Accommodation: Processes and Standards* guidance⁸. o

Accommodation facilities are required to have adequate indoor space, natural and artificial lighting, ventilation, seasonal heating and cooling, weather protection, and conditions appropriate to the climatic context of the Project area. Sleeping rooms and dormitories must comply with minimum habitability standards, including a minimum ceiling height of 2.10 metres, adequate spacing between beds, and occupancy arrangements that prevent overcrowding. Unless stricter national requirements apply, sleeping areas shall provide at least 4 to 5.5 square metres of floor space per occupant.

Each worker has to be provided with an individual bed of adequate size, a clean mattress and bedding, and secure storage facilities for personal belongings. The practice of shift sleeping, whereby workers on day and night shifts use the same bed, is strictly prohibited (workers on alternative 15-day shifts maybe assigned the same quarters and beds, however). Sleeping areas have to be maintained in a clean and orderly condition and protected from dampness, pest infestation, and other conditions that may adversely affect health and well-being. Accommodation arrangements must be sufficient to preserve personal dignity, privacy, and security, including the provision of sex-segregated accommodation, except in approved family housing arrangements.

Accommodation arrangements must be gender-responsive and sufficient to preserve the personal dignity, privacy, safety and security of all workers. Accommodation, sleeping areas, toilets, showers, changing areas and other relevant facilities have to be appropriately segregated by sex, except in approved family housing arrangements. Where women workers are accommodated, adequate privacy and security must be ensured, including secure access to sleeping and sanitary facilities and appropriate lighting along pathways, entrances and other areas used at night. Facilities shall also provide appropriate arrangements for menstrual hygiene, including access to clean water, private washing facilities and appropriate disposal facilities. Female and male workers are required to have equal and safe access to common, recreational, dining, medical and other welfare facilities. Contractors and subcontractors operating labour camps have to ensure that workers have continuous access to potable water that complies with applicable national standards, together with adequate toilet, shower, and handwashing facilities maintained in a clean and hygienic condition. Sanitary facilities are required to be segregated by sex where appropriate, and to be conveniently accessible to residents. Sanitary and washing facilities for women must provide adequate privacy and appropriate arrangements for menstrual hygiene.

All accommodations camps are required to be equipped with fire detection and fire safety systems, clearly marked emergency exits, and adequate first-aid facilities. Security arrangements implemented within worker accommodation facilities must be proportionate, lawful, and respectful of workers' rights. Security arrangements and accommodation layouts must also consider gender-specific safety risks and may shall not restrict women workers' privacy, dignity or freedom of movement.

Security arrangements and accommodation layouts will also consider gender-specific safety risks and not restrict women workers' privacy, dignity or freedom of movement.

Bureau Veritas, as the HSE Supervisor, is responsible for monitoring worker accommodation facilities through periodic inspections to verify compliance with the applicable Project requirements, approved Accommodation Management Plans, ESS2 and GIIP.

As of mid-2026, Contractors who operated substandard or otherwise inadequate accommodations are in the process of upgrading their facilities and practices. Additional buildings are being

⁸ <https://www.ifc.org/content/dam/ifc/doc/mgrt/workers-accomodation.pdf>

constructed as old accommodations are demolished to make way for the reservoir, and remaining accommodations are being upgraded as necessary to meet the requirements of the respective Accommodations Management Plans.

Most of the original worker accommodation facilities were located in Construction Camp 1. As Project implementation has progressed, accommodation arrangements have evolved to reflect changing workforce requirements and the phased development of the Project. As of mid-2026, camps have been or are being upgraded, replaced, or supplemented by additional accommodation facilities, including Construction Camp 2 and accommodation areas located downstream of the dam. Through the HSE Supervisor, monitors accommodations through periodic inspections to ensure that accommodation standards are maintained throughout the Project lifecycle.

4.9 Transportation

Site traffic presents a significant risk to workers, both pedestrians and passengers. As noted previously, there are many kilometers of underground and surface roads and over 2,000 vehicles and mobile equipment in operation on project roads on a daily basis. Increased attention is being paid to the safety of vehicles, with daily checklists having to be completed before the vehicle is cleared for use.

Workers who are directly involved in construction work 12-hour day-night shifts on 15-day rotations. Other workers work 8- or 12-hour day shifts on weekly basis. Workers require daily transportation from their accommodations or the main gate (for those who live in Rogun city or nearby villages) to and from their workplaces at the beginning and end of their daily shifts. At the shift change every 15 days, even more workers require transportation between accommodations or workplaces to the main gate and to their homes in other parts of Tajikistan.

There is no centralized internal worker transport system. Some transportation is usually provided by Contractors for their workers at the start and end of their shifts, but workers often walk or flag down passing vehicles to get a lift to accommodations, to their workplace, or to the main gate. This is generally true at the end of 15-day rotations. Although employers generally provide transport for workers who reside within 30 kilometers of the site, this is not always provided. Additionally, transport back to more distant home districts after 15-day worker shifts is often promised, but again not always provided.

In the future, the transport system will need to be updated to facilitate worker accessibility and connectivity. The On-Site Traffic Management Plan and individual Contractor Plans, and smaller-scale action plans to address specific issues, have begun to improve traffic safety and reduce risks to workers and property.

Charging fees for the services provided to workers such as food and for transport on site is not be allowed. All employee contracts are required to identify the benefits and/or provisions, such as off-site transport, that are provided by their employer. Any charges for additional benefits may not be allowed to lead to a worker becoming indebted to an employer.

5. OVERVIEW OF RELEVANT LABOR LEGISLATION

All workers who work or provide services for the Project in Tajikistan must follow the Labor Code of Tajikistan (2016), which is a legislative act implemented to regulate labor issues within the Republic of Tajikistan. The following section provides an overview of the key facets of this Labor Code that governs labor relations, and other applicable regulatory requirements and standards relevant to this LMP.

5.1 Forced and Child Labor

Article 8 of the 2016 Labor Code prohibits forced labor. The Code also sets the minimum age at which a child can be employed as well as the conditions under which children can work (Articles 21, 74, and Chapter 15). The minimum employment age is 15, but in certain cases of vocational training, mild work may be allowed for 14-year-olds (Article 21). In addition, there are some restrictions on what type of work can be done by workers under the age of 18, and what hours of work are permissible. Examples of labor restrictions include that those between 14 and 15 cannot work more than 24 hours per week while those under 18 cannot be engaged in “heavy work, underground work, and work with harmful and dangerous working conditions, as well as work which may be detrimental to their health and moral development” and there are restrictions on lifting (Article 208). Those under 18 also may not work more than 35 hours per week; during the academic year, the maximum number of hours is half of this, 12 and 17.5 hours, respectively.

5.2 Wages and Deductions

Contracts and collective agreements establish the form and amount of compensation for work performed. The Government establishes a minimum wage, and this can be adjusted by an index as appropriate. Work in desert, other arid areas, and mountainous areas is subject to additional compensation, and work in areas with unfavorable climatic and living conditions may be adjusted based on regional coefficients.

Employers are obligated to pay workers at least once per fortnight (Article 158). If payment is not paid as specified in the contract and this is the fault of the employer, the employer must then pay interest on the late amount for each day of delay (Article 158). Employers also must pay for work-related damage to health or property (Articles 186 and 187), and families are compensated in case of death (Article 343). Deductions are allowed for specific reasons but may not exceed 50 percent of the amount owed to the employee, and payment after deductions may not be less than the minimum rate determined by the government (Article 163).

5.3 Working Hours

Working time arrangements at the Rogun HPP Project are governed by the Labour Code of the Republic of Tajikistan and applicable collective and employment agreements, which must comply with the Code. Under Articles 74 and 75 of the Code, normal working time is limited to 40 hours per week, or 35 hours per week for hazardous, harmful, heavy, underground, or otherwise dangerous work. The duration and distribution of working hours are established through employment contracts, internal labour regulations, and approved work schedules.

Workers are entitled to rest and meal breaks and other legally required rest periods. Additional arrangements apply where working conditions require protection from extreme heat or cold and for breastfeeding, in accordance with national legislation. Working schedules, breaks, weekly rest periods, and leave arrangements are communicated to workers through their employment arrangements and applicable workplace procedures.

Most workers at Rogun are work on shifts and their work schedules are governed by Articles 243 and 245 of the Labour Code. Shift work is a special form of work performed away from the employee's permanent place of residence where daily return home is not possible, and an individual shift rotation may not exceed 15 calendar days. Employers are responsible for providing shift workers with appropriate accommodation, meals, transportation to and from their place of residence, and suitable working and rest conditions. The Labour Code also establishes restrictions on the engagement of persons under 18, pregnant women, and certain persons with disabilities in shift work.

At Rogun HPP, shift-based work is used for a significant proportion of the construction workforce, particularly for workers engaged in construction activities and other site-based operations. Shift schedules are established by the relevant employers and communicated to workers in accordance with applicable requirements. Contractors are responsible for organizing shift arrangements, working and rest periods, and accommodation in compliance with the Labour Code and Project requirements and as supervised by the HSE Supervisor.

The Project recognizes that the 15-day shift rotation currently used by some contractors, including schedules involving extended daily working hours, requires review against the statutory weekly working-time limits and the specific requirements applicable to hazardous work. During the Project implementation period, PMG, together with OJSC "Rogun" and relevant contractors, will review existing shift arrangements, including working and rest periods and fatigue-management measures, and consider whether alternative shift systems would provide improved compliance, worker safety, and welfare. This review may include consideration of alternative shift patterns, including shorter daily shifts where appropriate.

Under Article 82, work performed beyond the applicable normal working-time limits constitutes overtime. Overtime is subject to the conditions and limits established by the Labour Code, including the limit of four hours over two consecutive days or 120 hours per year. Article 83 provides for compensation of overtime in accordance with applicable legislation and employment or collective agreements. Contractors are responsible for recording working hours and overtime and ensuring that working-time arrangements comply with these requirement

5.4 Leave

Workers in Tajikistan are entitled to several kinds of leave, including paid holidays, annual basic minimum leave, maternity leave, childcare, and others (Article 90). In addition to nine national holidays, employees have to receive at least 24 days of paid leave per year (Article 19), with workers under 18 years of age receiving at least 30 days and disabled employees receiving 30 days. In addition, those who work in hazardous and difficult conditions must receive at least an additional seven days or at least eight days if they work under adverse climatic conditions (Articles 95-98). Worker may also be granted additional leave based on their length of service (Articles 100, 102).

Leave without pay may also be taken by certain groups of people and may also be covered in contracts (Articles 116, 117). At termination of employment, employees are paid for unused leave, or they may use the leave as their last days of employment (Article 118).

Women are provided maternity leave for up to 70 calendar days, or 86 days in case of complicated labors, and then are provided 70 days leave after giving birth (110 if twins or more, or in case of complications) (Article 222). Maternity leave is calculated in total and is paid in a lump sum, regardless of the actual number of days off before giving birth. After giving birth, a mother may take additional leave until the child is 18 months old, and unpaid leave until the child is three years old (Article 224). Comparable leave is provided for adoption of newborn babies (Article 226).

5.5 Overtime Work

It is prohibited to work overtime if employees work 12-hour shifts and/or within difficult and harmful working conditions. For non-shift workers, overtime can be required for up to two hours per day for two days hazardous and difficult working conditions and four hours per day in other jobs. Overtime may not exceed 120 hours per year. (Article 79). Overtime for most workers is paid at double the normal wages or can be paid with additional time off (Article 154). Conditions and wages for overtime work are determined in the contract. Night work is paid at a rate of at least 1.5 times the normal rate, as specified in contracts and agreements (Article 156).

5.6 Labor Disputes

Under the Labor Code of the Republic of Tajikistan, worker grievances are addressed within the framework of individual labor disputes. Articles 1 and 198 define such disputes as unresolved disagreements between an employer and an employee concerning the application of the Labor Code and other normative legal acts of the Republic of Tajikistan, working conditions provided by the employment contract, and agreements or collective agreements. Within this framework, the Ministry of Labor, Migration and Employment of the Population (MoLMEP) has a supervisory and enforcement role through labor oversight, inspection (subject, where applicable, to the 2025 national moratorium on inspections of business entities⁹, compliance monitoring, and action in response to worker complaints or identified violations.

The Labor Code places individual labor disputes within a formal dispute-resolution framework. As a general rule, such disputes are considered by labor dispute commissions composed of an equal number of employer and employee representatives, with employee representatives elected by the employees (Article 199). The commission must consider the dispute within seven days (Article 203), and if it fails to do so, either party may appeal to the court (Article 205). The public prosecutor may also challenge a decision that is contrary to law or other normative acts (Article 192). Within this framework, the MoLMEP, acting through its competent supervision service and in accordance with the regulatory framework governing its powers, may become involved where a complaint raises issues of labor-law compliance, working conditions, occupational safety and health, or other matters falling within state labor supervision and control.

This framework operates in the context of workers' rights under Article 18 and employers' obligations under Article 19, including obligations relating to lawful working conditions and occupational safety and health. Appeals must be brought within the time limits established by Article 201, including a three-month period for filing a claim with a labor dispute commission, while appeals to the court are subject to the periods provided by the Labor Code. Individual disputes should be distinguished from collective labor disputes, which are separately defined in Article 1 and governed by specific provisions on mediation (Article 320), labor arbitration (Article 321), judicial review (Article 322), and collective action, including strikes, where permitted by law (Article 323).

By contrast, Article 1 defines collective labor disputes as unresolved disagreements between employers or employers' associations and the collective of workers or their representatives concerning the establishment or modification of working conditions, the conclusion or implementation of agreements and collective agreements, or the application of the Labor Code and other normative legal acts of the Republic of Tajikistan. Under Article 320, mediators are selected by agreement of the parties and must issue a decision within 10 days. That decision is binding unless one of the parties objects within 10 days. If no decision is reached within that period, or if disagreement remains, the parties establish labor arbitration with the participation of the relevant local public authority, and the arbitration must issue a decision within 10 days (Article 321). Collective disputes are also subject to judicial review at the request of either party (Article 322). If the dispute remains unresolved, it may be referred to the labor collective or trade union, which may pursue lawful means of resolution, including strikes, in accordance with Article 323.

Project workers are not restricted to the GRM for seeking redress of grievances. They retain the right to seek remedies through the Ministry of Labour, Migration and Employment of the Population

⁹ See Law of the Republic of Tajikistan No. 2142 of 11 February 2025, on the moratorium on inspections of the activities of business entities, together with Presidential Decree No. 915 of 10 January 2025 implementing that moratorium. Accordingly, the exercise of inspection powers, including labor inspections, may be limited or suspended to the extent provided by that legal regime and subject to any applicable statutory exceptions.

(MLMEP), including the State Labour Inspectorate, in accordance with the Labour Code of the Republic of Tajikistan. The Project worker grievance mechanism is intended to complement, and not replace or restrict, workers' access to administrative and judicial remedies available under national legislation.

5.7 Women

Article 216 prohibits the employment of women in heavy, underground and hazardous works. Article 217 prohibits overtime, weekend work, and business trips for women who are pregnant or who have children under three years of age. For women with children between 3 and 14 years of age, overtime and business trips are allowed, but only if the woman agrees. There is no formal legislation in Tajikistan that protects women from sexual harassment in the workplace, or any criminal or civil penalties for sexual harassment in employment. Other gender-specific provisions are described in relevant subsections.

5.8 Non - Discrimination

Article 7 of the Code prohibits discrimination and guarantees all citizens equal rights to work. It is prohibited to separate, prevent, prioritize or reject employment in any form based on ethnicity, race, language, religious belief, political views, social status, education and property that impedes equal opportunity to labor. The article states that individuals who are subjected to discrimination in the workplace can apply to court.

5.9 Shift Work

Article 243 of the Labour Code of the Republic of Tajikistan provides for shift work as a special form of labour organization carried out outside the employee's permanent place of residence, where daily return to the permanent place of residence cannot be ensured. Under Article 243, employers are required to provide employees engaged in shift work, during their stay at the work site, with accommodation, meals, transportation to and from the place of work, and appropriate conditions for work and rest.

Article 245 provides that the duration of a shift generally should not exceed 15 calendar days, subject to the exceptions provided by law

Shift work is prohibited for anyone under the age of 18, pregnant women or persons with disability of I¹⁰ and II¹¹ category to be engaged in shift work.

For purposes of Project monitoring, contractors applying a shift-work arrangement have to demonstrate (to the HSE Supervisor) that the requirements of Articles 243 and 245 are implemented in practice. Compliance with these requirements must be verified and monitored through the review of contractors' employment agreements, internal procedures/policies, shift-work arrangements, and related records^{5.10} Occupational Health and Safety

¹⁰ Disabled Group I: Total inability or severe restriction of the ability to live without assistance or work, due to physical, mental or sensory impairment. This would include individuals who are unable to do the following without assistance or supervision: Basic self-care and personal hygiene; Movement outside the home; Awareness and understanding of surroundings, self-control, and emotional regulation; Communication with others.

¹¹ Disabled Group II: Severe life limitation, including; Assistance with self-care required 3-7 times per week, but no more than once per day; Inability to move far from place of residence or use transport without assistance from devices or others; Sensory limitations impairing the ability to work, study or carry out life tasks; Significant loss of self-control, including on a short-term or periodic basis; Difficulties in communicating with those outside the close family. This applies to persons who may be able to participate in some education or training but only in specialized institutions or with the use of specialized assistance.

Occupational health and safety are also governed by the Labor Code. The law specifically includes construction and operation of facilities in the types of occupations that are subject to labor protection laws (Articles 349, 352).

Among other requirements, the law requires employers to:

- Be responsible for ensuring safe working conditions and safety of work at every workplace (Article 331) and for informing workers of workplace conditions and the results of labor inspections (Article 332);
- Apply the means to protect workers individually and collectively (including protective clothing and equipment) (Article 335);
- Provide appropriate work and rest regimes;
- Training workers in their jobs and safe methods of work (Article 350);
- Provide instructions on labor protection (Article 336);
- Test and verify the knowledge of workers in working safely;
- Provide certifications of workplaces at least every five years;
- Investigate accidents (Article 342);
- Provide sanitation and medical services;
- Provide access to premises by state officials; and
- Providing social insurance for accidents and diseases.

Employees, on the other hand, are required to pass initial and periodic medical examinations and to pass training and periodic checks of their knowledge of their jobs and safety requirements, and to carry out medical and health measures that are prescribed by medical institution if paid by employer.

Not only state officials have the right to inspect premises to verify safety conditions. In addition, trade unions and other employee representatives also may conduct inspections of working conditions and practices and to participate in accident investigations. In general, they have the right to “freely check” compliance with labor protection requirements and propose measures to eliminate violations, which must be considered by the Employer (Article 357).

The law gives workers the right to refuse to undertake work that violates labor protection requirements (Articles 335, 337, 345). In addition, workers engaged in hazardous working conditions are entitled to free medical and preventative care (Article 333), additional paid leave and other benefits and compensation. In case of disability or death, employers must provide compensation in multiples of average annual earnings as well as other amounts required by law (Article 343).

5.11 Occupational Accidents, Compensation, and Disability Determination: Employer’s Material Liability

Under the Labor Code of the Republic of Tajikistan, employers are required to compensate employees for work-related harm to life or health, provide mandatory social insurance, investigate and document occupational accidents, and, subject to limited defenses, cover lost earnings, related expenses, moral damage, and specified lump-sum payments in cases of disability or death. The applicable implementing resolution establishes the procedure for such compensation, while disability status and eligibility for related social protection are formally determined through a medico-social examination under Government Order No. 177 of 26 April 2022 and the Law “On Social Protection of Disabled People,” including classification into Group I, II, or III disability:

- Compensation for work-related harm. Article 187: Where harm to life or health is suffered in connection with the performance of work duties, the employer must compensate for that harm in accordance with the civil legislation of the Republic of Tajikistan. If no insurance payment

is made, compensation is payable in full. Where insurance applies, the employer must pay the difference between the insurance amount and the actual harm.

- Limits on employee liability. Article 188: An employee is liable only for direct actual damage. Liability is excluded in cases of force majeure, extreme necessity, or the employer's failure to provide proper safeguarding conditions, and it may not be imposed for normal production or economic risk.
- Mandatory social insurance. Article 341: All employees are subject to mandatory social insurance, to be provided by the employer, against occupational accidents, occupational diseases, and other work-related harm.
- Accident investigation and reporting. Article 342: The employer must promptly investigate and record occupational accidents, prepare the prescribed report, and, upon request, provide the injured person with a certified copy within three days. A refusal to prepare the report, or any disagreement with its contents, may be appealed to employee representatives or to the court.
- Employer liability and compensation scope. Article 343: The employer must compensate harm caused by a source of increased danger unless it proves force majeure or the intentional act of the victim. For harm caused under normal conditions, the employer may avoid liability only by proving the absence of fault. Compensation includes lost earnings, injury-related expenses, and moral damage. In addition, an employee who becomes disabled as a result of an occupational accident is entitled to a one-time allowance of at least twelve months' average earnings, while the dependents of a deceased employee are entitled to at least sixty months' average earnings. A survivor's pension is not deducted from compensation.

Compensation Procedure for Work-Related Injury, Deterioration in Health, or Death. Government of the Republic of Tajikistan Resolution No. 661 of 21 October 2014, "On the Procedure for Compensation of Damage by the Employer in Connection with Deterioration in Health or the Death of Workers" (as amended by Resolution No. 112 of 3 March 2018), sets out the procedure governing employer compensation for harm caused to workers through deterioration of health or death in connection with the performance of labor duties.

Medico-social examination and disability status: Government Order No. 177 of 26 April 2022 provides that disability, including its cause, duration, time of origin, degree, and the need for social protection, shall be determined through a medico-social examination conducted by the Public Service of Medico-Social Examination. Article 1 of the Law of the Republic of Tajikistan "On Social Protection of Disabled People" No. 675 of 29 December 2010 defines a person with disability, a child with disability, disability, and medico-social examination, and confirms that such examination constitutes the formal basis for determining eligibility for social protection and rehabilitation. In practice, adult disability status is commonly described by reference to Group I, Group II, or Group III disability. Group I generally refers to total disability, incapacity for any work, and the need for constant care; Group II generally refers to disability involving significantly reduced work capacity and a possible periodic need for care; and Group III generally refers to disability involving reduced work capacity but a lesser degree of functional limitation.

5.11 World Bank Environmental and Social Standard 2 (ESS 2) on Labor and Working Conditions

World Bank ESS 2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

Objectives of this Standard are as follows:

- To promote safety and health at work.

- To promote the fair treatment, non-discrimination and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labor and child labor.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- To provide project workers with accessible means to raise workplace concerns.

Application of ESS 2 promotes the implementation of a systematic approach to improving the management of risks and impacts related to labor and working conditions in projects.

6. RESPONSIBLE STAFF

In the past, labor management has been primarily under the purview of each organization's own HR programs, with monitoring and enforcement under the responsibility of state authorities. With the adoption of these Labor Management Procedure, PMG and JSC Rogun (and DFZ) became responsible for monitoring Contactor compliance with the requirements herein, and for requiring Contractors to better monitor their own compliance (Note this does not mean that Rogun JSC and contractors will be responsible for enforcing the law, but rather for enforcing requirements of contracts and subcontracts, which have been modified to include requirements to comply with these Procedures.).)

Rogun JSC, through the HSE Supervisor, and DFZ are now overseeing implementation of this LMP and monitoring compliance with contractual labour requirements. Contractors are responsible for implementation of labor requirements within their organizations and by their subcontractors. Enforcement of national labor legislation remains the responsibility of competent state authorities, including MLMEP and the State Labour Inspectorate.

Error! Reference source not found. shows the organizations responsibility for monitoring labor requirements. As shown in the figure and as described below, a Third-Party Labor Monitor will conduct one or more audits of labor management practices against requirements of this LMP, and report findings to PMG, which will work with JSC Rogun and DFZ as needed to improve performance.

Figure 2 - Labor Management Procedures Organogram

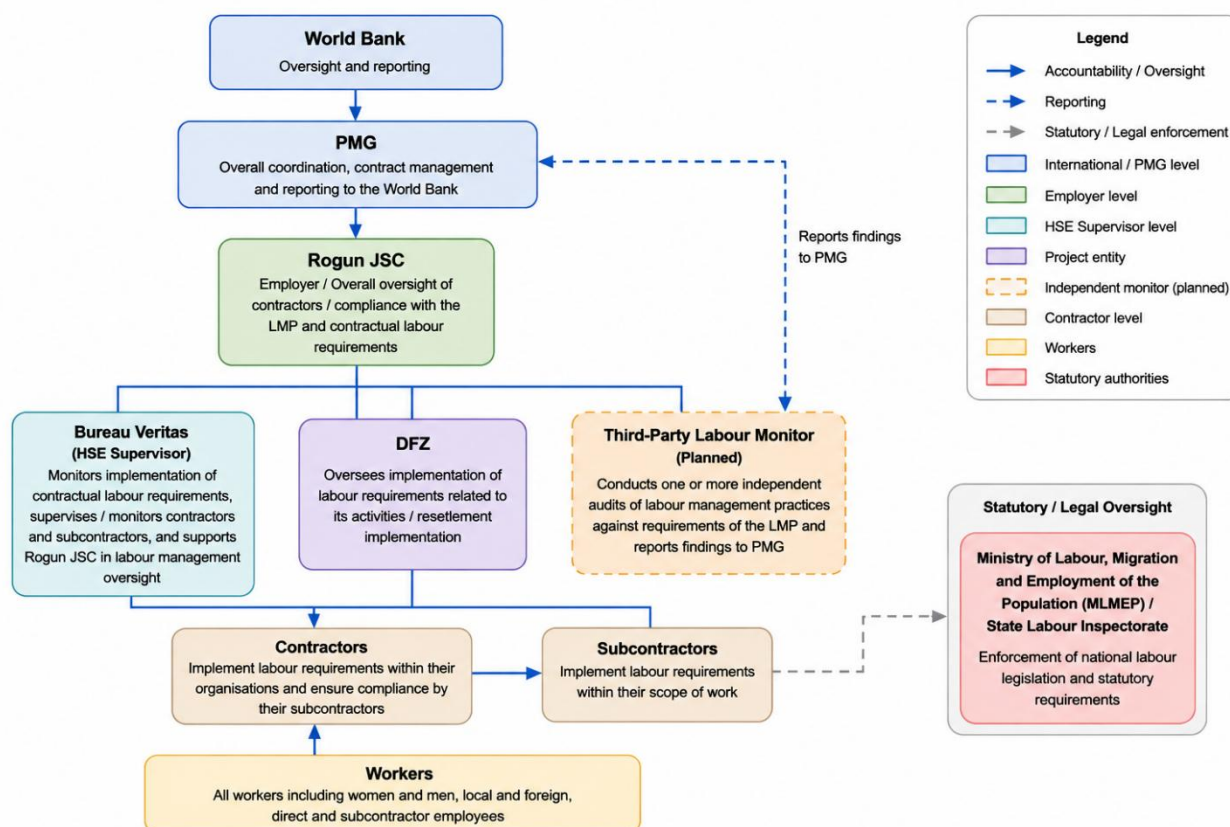


Figure 1. Parties and Labor-Related Responsibilities

Figure 1 illustrates the institutional responsibilities for implementation, monitoring and oversight of this LMPPMG. PMG provides overall coordination, contract management, and reporting to the World Bank, while Rogun JSC, as the Employer, has overall responsibility for overseeing contractors' compliance with the LMP and contractual labour requirements. On behalf of Rogun JSC, Bureau Veritas, as the HSE Supervisor, monitors implementation of contractual labour requirements and supervises/monitors contractors and subcontractors. DFZ oversees labour requirements related to its activities. Contractors are responsible for implementing labour requirements within their organisations and ensuring compliance by their subcontractors. The planned Third-Party Labour Monitor will independently audit labour management practices against the LMP and report its findings to PMG. Enforcement of national labour legislation remains the responsibility of the competent state authorities, including the Ministry of Labour, Migration and Employment of the Population (MLMEP) and the State Labour Inspectorate.

Rogun JSC and DFZ, are responsible for:

- Implementing this labor management procedure for its own employees;
- Ensuring that contracts include labor management requirements that comply with these labor management procedures, including occupational health and safety requirements,
- Through the HSE Supervisor, monitoring and enforcing labor requirements, including implementation of the Worker GRM, of its Contractors and consultants

- Providing monthly summary reports to PMG, again through the HSE Supervisor, based on its own operations and reports submitted by Contractors on labor and working conditions aspects contained in this LMP.

Rogun JSC and DFZ respective Procurement Departments are responsible for:

- Ensuring their own primary suppliers certify compliance with Tajikistan law regarding child labor, forced labor, and occupational health and safety.
- Working with Contractors to identify if firms qualify as primary suppliers
- Ensuring that Contractors require The primary suppliers certify before contract award and thereafter on an annual basis that they comply with the Tajikistan Labor Code provisions regarding child labor, forced labor, and occupational health and safety. If a supplier cannot so certify, Rogun JSC and/or DFZ will work with the supplier to bring them into compliance or will identify alternative suppliers
- Providing updates as needed for reporting requirements.

The Contractors are responsible for the following:

- Employing or appointing HR and OHS managers and specialists as required by the Environmental and Social Management Plan, including this LMP and OHS Plans, and for monitoring and enforcing compliance with labor and OHS requirements of their own organizations and their subcontractors.
- Submit a weekly report to the JSE Supervisor that summarizes labor management and OHS issues that arose during the week and the way in which they were addressed and resolved.
- Submit a monthly report to the HSE Supervisor that includes labor management and OHS information as required by the Environmental and Social Management Plan.
- Notifying the HSE Supervisor about all incidents with employees (injuries, illnesses and incidents) for contracted and sub-contracted workers;
- Having a system for regular review and reporting on labor, and occupational safety and health performance
- Implementing labor management procedures and occupational health and safety plans for their employees , subcontractors, and primary suppliers
- Developing and implementing emergency preparedness and response plans
- Maintaining records of recruitment and employment of contracted workers;
- Defining in employment contracts and clearly communicating job descriptions and employment conditions to contracted workers. Supporting the implementation of the workers' grievance mechanism and address the grievance received from the contracted and sub-contracted workers;
- Managing and maintaining their workers' accommodation facilities (food safety, fire safety, hygiene standards, sanitary provisions, drinking water, first aid etc.) and ensuring compliance with international standards;
- Delivering induction (including on the CoC principles and SEA/SH prevention), refresher and periodic OHS training to employees, and maintaining records of training.

7. POLICIES AND PROCEDURES

This section outlines main policies and procedures to be followed during the construction phase of the project to prevent and manage the risks identified in section 4. The policies adopted for the Project will contribute to the achievement of ESS2 objectives and are in line with the legislation of the Republic of Tajikistan.

Labor Influx and SEA/SH

All Project workers are entitled to fair treatment and protection from harassment, sexual harassment and abuse at work. All employers will install mechanisms to protect Project workers from incidences of mistreatment. Contractors will also manage labor relations with local communities and SEA/SH risks through a CoC (**Annex 06**). The CoC commits all persons engaged by contractors, including those employed by sub-contractors, to acceptable standards of behavior. The CoC includes disciplinary measures (up to and including termination and/or referral to law enforcement) for non-compliance with its terms, including non-compliance with specific policies related to SEA/SH, sexual exploitation and sexual harassment. The CoC will be available in Tajik, Russian and English and will be signed by each worker to indicate that they have:

- Received a copy of the CoC as part of their contract;
- Been trained on the CoC as part of induction process and had the CoC explained to them;
- Acknowledged that adherence to this CoC is a mandatory condition of employment; and
- Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

Copies of signed CoC documents will be retained by the respective employers. The CoC form will also be displayed on notice boards at worker accommodation facilities, on site and within PMG, Rogun JSC and DFZ offices and in contractors' site offices.

Employers will specifically address the risks of SEA/SH through:

- Mandatory induction and periodic refresher training on CoC principles, SEA/SH topics/policies and the grievance procedure for reporting SEA/SH issues;
- Implementing a separate grievance procedure, with confidential and anonymous reporting systems, to handle sensitive/ SEA/SH grievances (refer to section 10.2); and
- Integrating gender-responsive measures across the Project site, including adequate lighting around the roads and worker camps, well-lit lockable wash and toilet facilities, safe commuting transportation to and from work shifts, and menstrual hygiene management facilities.

As noted above, Rogun JSC will appoint a designated trained female officer to manage SEA/SH allegations/grievances, raise awareness and conduct training on SEA/SH to the workforce and monitor and report on the presence or absence of violations. A SEA/SH referral mechanism will be developed as part of the overall SEA/SH grievance mechanism. The referral mechanism will serve to refer SEA/SH survivors to appropriate services (medical, psychological, judicial, safety, etc.), as required. Details of the SEA/SH mechanism are presented in the **Gender Action Plan**.

Occupational, Health and Safety

All employers of direct or contracted workers are responsible for ensuring the health and safety of their workers. Rogun JSC, DFZ and all contractors will comply with the requirements of the laws of the Republic of Tajikistan on health and safety and contracts must include specifications and conditions based on international standards. This includes assessment of OHS risks and hazards, informing and training of Project workers on OHS issues, and on measures that must be taken to mitigate or diminish risks. All contractors on site have developed their own Occupational Health and Safety Plans that meet the requirements of the wide Occupational Health and Safety Management Plan Framework. These have been approved by the ER and/or HSE Supervisor and are now being implemented by the Contractors.

The OHS Management Plan Framework Contractor OHS Management Plans include, but are not limited to, the following requirements:

- Provide and record participation of mandatory OHS induction training for all employees through a reviewed and agreed induction presentation, followed by periodic H&S training, including daily briefings.
- Ensure all workers have a medical exam performed by a qualified medical professional prior to commencing work and thereafter on an annual basis, and upon termination, including voluntary resignations;
- Maintain and regularly review an Incident and Accident Register to record near misses, injuries, incidents and fatalities throughout the duration of the Project and to conduct analyses of incidents and accidents in order to prevent recurrence;
- Report and share OHS statistics with the Project Management Consultant in the monthly progress report -basis, and report serious incidents (including fatalities, disabling injuries, injuries to non-workers, and major spills) immediately;
- Conduct and record daily H&S inspections and monitoring of workplaces to ensure compliance with the OHS Plans;
- Provide all employees with sufficient quantities of portable drinking water, which is to be brought to site at the start of every shift and available at their point of work;
- Ensure all workers have access to clean, well-maintained sanitary facilities that have hot and cold running water and soap at all times;
- Provide all Project workers with health and life insurance as required by national law;
- Provide all new workers with new and free-of-charge PPE prior to commencing work, including eye protection, helmet, respiratory protection, safety shoes/boots, gloves, weather protection, as appropriate. Periodic checks on PPE will be conducted to check for any defaults or wear and tear. Any worn-out, faulty or broken PPE will be replaced immediately at the expense of the employer;
- Conduct a daily equipment review checklist to ensure that vehicles and machines are safe to operate prior to use, with unsafe ones taken out of service until repaired;
- Provide adequate lighting at workplaces, particularly in construction areas where workers have to navigate steep terrain and in underground locations;
- Ensure machine guards and shields are provided and used as needed to protect the workers and others;
- Have an emergency preparedness and response plan in place, including spill response procedures;
- Ensure availability of spill response kits; and
- Keep well-stocked first aid boxes on site and within worker accommodation facilities.

As described in previous sections, the HSE Supervisor will supervise OHS performance of all contractors on behalf of Rogun JSC.

Worker's Organization

In compliance with national legislation, no Project worker will be prevented from joining a trade union or any other worker organization. The principle of free association and collective bargaining will be strictly respected. Employers must not condition the participation of a Project worker in the Project, his/her status, remuneration or entitlements on the Project worker's membership or activity in any organization. Rights established in the collective bargaining agreements should be clearly represented on information boards on site, as well as the schedule for upcoming trade union members meetings.

Child and Forced Labor

Under no circumstances will PMG, Rogun JSC, DFZ, the Project Management Consultant, Contractors, subcontractors, or suppliers engage forced labor or children under the age of 18. Forced

labor includes bonded labor (working against an impossible debt), excessive limitations of freedom of movement, excessive notice periods, retaining the worker's identity or other government-issued documents, imposition of recruitment or employment fees payable at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from Project workers, or other restrictions that compel a Project worker to work on a non-voluntary basis.

No other restrictions regarding the age of employment will be imposed. The age of workers will not be used as a criterion in deciding on hiring and promoting Project workers or terminating their contracts. The contractors are required to verify the identity and age of all workers during the onboarding process by reviewing and retaining a copy (but not the original) of Government-issued documentation that provides the age. I

To mitigate risks associated with forced labor, Contractors that provide worker loan agreements should develop a formal company policy in relation to worker loan agreements. This policy should be communicated to all employees during induction and refresher training to ensure that workers understand their rights.

Terms and Conditions of Employment

Labor relations with Project workers are drawn up by contracts in accordance with the provisions of the Labor Code of the Republic of Tajikistan and the requirements of ESS2. Adherence to law and good practice and a high level of integrity is expected from all participants in the Project. PMG and DFZ and Rogun JSC will make it clear in tender documentation that non-compliance with national legislation, including the legislation regarding terms and conditions of employment, labor rights and occupational health and safety, may constitute grounds for termination of the contract with a contracted party and exclusion of that party from the Project.

All contractors will prepare labor management procedures in line with this labor management procedure and the national Labor Code. Among the measures that will be implemented by contractors, monitored by the Project Management Consultant, and audited by the Third-Party Labor Monitoring Consultant to ensure fair treatment of all employees will be the following:

- As per Labor Code requirements, recruitment procedures will be transparent, public and non-discriminatory with respect to ethnicity, religion, sexual orientation, disability, gender, and other grounds specified in the Labor Code;
- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post;
- All employers will maintain accurate and up-to-date payroll and working hours records;
- All on-the-job and technical training will be provided free of charge by or on behalf of each employer;
- All workers will have written contracts describing terms and conditions of work and will have the contents explained to them. Workers will sign the employment contract. General terms and conditions of employment will be available at work sites;
- Unskilled labor will be preferentially recruited from affected communities, settlements and municipalities, especially from resettled households and communities;
- Employees will be informed at least two months before their expected release date if their contract will not be renewed or will be terminated early;

- If the threshold for redundancies is met at any point during construction, as stated in the Retrenchment Policy to be developed by Rogun JSC, the employer (including Rogun JSC for its employees) will develop a retrenchment plan that meets the requirements of the Policy, and will implement the plan following approval by the Project Management Consultant;
- Neither direct nor contracted workers will be required to pay any hiring fees. If any hiring fees are to be incurred, these will be paid by the respective employers of the persons being hired;
- Labor contracts will be provided in a language understandable by both parties;
- In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulties with understanding the documentation;
- Employees will be provided with the necessary equipment, tools, instruments, materials to do the jobs for which they are hired;
- All workers will be told about wage deductions and Overtime Policy in their induction training;
- Employers will promptly notify employees of hiring and dismissal and of changes in the terms of the employment agreement;
- Construction contracts will require compliance with the Labor Code and with relevant requirements of ESS2; and
- Stipulate in contracts that all contractor (and subcontractor) personnel must be of the age of 18 years or more.

As noted above, the HSE Supervisor will supervise employment and labor management, including OHS performance. This will include spot checks, records reviews, worker interviews, routine observation, and formal inspections and audits. Instances of noncompliance will result in remedies in accordance with the contract, which may progress from verbal warnings to written notices, to formal Notices to Correct, to termination. In addition, the Project Management Consultant may recommend nonpayment of interim completion certificates for specific works until a contractor comes into compliance with labor management and OHS requirements (as well as other environmental and social contractor requirements).

A Project worker may be employed or engaged for work on the Project only after agreeing, signing, and receiving a copy of an employment contract or engagement agreement which contains information required by the provisions of the Labor Code. All Project workers will perform work or provide services under conditions set in their labor/employment contract or agreement in return for remuneration. Their status must be clearly defined in line with the national law. Any form of disguised employment will not be acceptable. For short-term and part-time workers, the agreement on work will specify all rights that will be provided to or that may be available to the worker, such as refund of travel expenses, leaves, etc.

PMG, Rogun JSC, DFZ and contractors will ensure that all Project workers are provided with employment contracts which contain clear information in their own language on the terms and conditions of employment, including working hours, wages, breaks and holidays, discipline and termination procedures in a language they understand. During the onboarding procedure, all workers will be notified on how to access the confidential process for raising complaints and provided with a signed copy of their employment contract.

While some contractors/subcontractors have been engaging a substantial number of migrant workers as shift workers under the Project, PMG, Rogun JSC, DFZ and contractors will ensure that the labor and working conditions of migrant workers be protected and that the fair treatment, non-discrimination and equal opportunity be promoted for such workers, as per ESS2.

The terms and conditions of employment of Project workers must meet the following standards:

Shift workers:

- Shifts will not exceed 15 consecutive calendar days.
- Working hours for day and night shift workers will not exceed a total of 12 hours per day, and workers will not be allowed or required to work overtime. The 12-hour shifts will include a one-hour meal break and additional mandatory breaks, including at least one 15-minute break after every two hours of work. Workers will be notified about the start of the break and will not be allowed to forgo the break in return for time payment.

Office / normal workers:

- Normal working hours will not exceed 40 hours per week. For workers working a 5-day week, the duration of works will not exceed 8 hours a day.
- Like day and night shift workers, office workers must have a meal break and at least two rest breaks during their working hours.
- Any work longer than 8 hours will be considered overtime work and Project workers will receive extra payment for the hours of overtime work in accordance with national law. In any case, Project workers may not be required or allowed to work more than 12 hours a day.

Applicable to ALL workers:

- All workers must understand the job he/she is going to do and the wage/salary he/she is going to receive, and this will be specified in the labor agreement/contract.
- Project workers must receive a daily rest of at least 12 hours between work shifts.
- Project workers will be paid in full on a regular basis, at least once a month, in accordance with the Labor Code, including additional benefits stipulated within the employment contract and national legislation (e.g., additional payment for working on national holidays, maternity leave etc.). Where exceptional circumstances necessitate a change in the regular payday, employees will be given adequate notice.
- Details of wage deductions will be in the labor contract and must comply with national law (deductions cannot exceed 50% of the amount owed to the employee, and payment after deductions may not be less than the minimum rate determined by the government).
- All employee contracts will clearly state what additional benefits and/or provisions are provided by the company to ensure that workers are aware of their rights.
- Project workers are entitled to annual, sick, maternity and family leave, as required by the national legislation. Where the national legislation does not stipulate entitlement to leaves on any ground (e.g., temporary or seasonal work), the contracted party will provide the project worker, at his/her request, with a reasonable opportunity to take leave taking into consideration all the circumstances.
- An employment contract or engagement agreement, except in case of permanent employment, ends on the date of its expiry, unless both parties have agreed otherwise. In case of an early termination, a written notice will be submitted at least 15 days in advance unless the termination is for cause and is allowed under national law. The termination of an employment contract and payment of any remaining entitlements will be done in compliance with the national legislation.

- Employers will assess the risk related to specific jobs. Contractors will be responsible for taking preventive and protective measures to ensure a safe and healthy work environment and informing Project workers on all the relevant issues and conditions that may affect his/her health and safety at work. Workers will respect regulations and instructions relating to health and safety at work and not put in danger their lives or risk the life/health of others.
- Project workers have the right to form or join union or other organizations of their choosing and to bargain collectively, in accordance with the national legislation. The employer will not interfere with the worker's right to choose the organization or opt for an alternative mechanism to protect their rights regarding working conditions and terms of employment.
- Project workers will be able to raise grievances using the grievance mechanism defined in Section 8.

Worker Accommodation Facilities

As noted previously, most contractor accommodations are in Construction Camp 1, which is in the future reservoir's footprint. These accommodations will be demolished before that occurs, which should be in 2026. New accommodation is under construction, and they will meet standards from their commissioning. Prior to being demolished, existing accommodations that are still in use six months after financing becomes available will be required to achieve these requirements.

Contractors will ensure that worker accommodation facilities are kept in good condition, have appropriate facilities/amenities and are maintained to a high hygiene standard. A monitoring and inspection system will be implemented by contractors and by the Project Management Consultant to ensure that worker facilities align with standards set out in IFC/EBRD guidance note, "Standards and processes for Workers' accommodation: processes and standards". Monthly progress reports of contractors and of the Project Management Consultant will describe monitoring activities and major findings regarding accommodations, which would include not only dormitories or apartments but also food safety, fire regulations, hygiene and sanitation. A full worker accommodation checklist, which specifies the minimum required standards, is presented in **Annex 8**. The Third-Party Labor Monitoring Consultant will also audit worker accommodation facilities after one year, and possibly thereafter if improvements are needed. Each contractor will designate an accommodation manager who will be responsible for managing the worker accommodation and conducting regular monitoring and compliance checks. All camp facilities at a minimum will provide:

- Supply of fresh and clean drinking water in such quantities as to provide for all personal and household uses. All tanks used for the storage of drinking water must be constructed and covered to prevent the stored water from becoming polluted or contaminated;
- Separate cooking and eating areas that will be cleaned daily;
- Food that contains an appropriate level of nutritional value and takes into account religious and cultural backgrounds;
- Mandatory training sessions for all kitchen staff to ensure that food handlers receive the appropriate supervision and training in food hygiene;
- Separate sanitary, accommodation, and recreational facilities provided for men and women;
- First aid kits and/or medical facilities;
- Laundry facilities or services;
- Basic collective social/recreational space for workers to use in their free time;

- A clean and separate bed for each worker, with the practice of “hot bedding”¹² prohibited;
- Clean toilet and shower facilities with hot and cold running water, soap, sanitary provisions in female toilets and sufficient privacy provided at all times, including ceiling to floor partitions and lockable doors. Toilet/shower facilities must have a checklist on the inside of the door providing details of when it was last inspected/cleaned. This should happen at least on a daily basis;
- Bedrooms that will be cleaned daily and preferably not shared by more than 6 workers. The dimensions of the accommodation will comply with IFC/EBRD guidance for Worker Accommodation, including having 4-5.5m² per resident for floor space;
- Lockers and/or storage facilities for workers to store personal belongings;
- Good illumination, with natural and artificial lighting available;
- Ventilation/cooling in the summer and heating provisions in the winter;
- Adequate sewage and waste disposal systems;
- Safe electrical installation; and
- Fire protection measures, including fire alarms, smoke detectors, fire extinguishers and fire bucket stands. A specific fire safety risk assessment and corresponding plan will be prepared, including training of fire wardens, periodic testing and monitoring of fire safety equipment and periodic drills.

Transportation

As for the risks relating to transportation and traffic, an adequate transport system should be adopted for the whole Project site to improve road safety and facilitate worker accessibility and connectivity. Charging fees for the services provided to workers such as food or transport should be avoided. All employee contracts should stipulate what additional benefits and/or provisions are provided by the company to ensure that workers are aware of their rights. This includes specifying whether transport is provided by the company both to and from worker accommodation camps and work sites as well as to home districts after completing their 15-day shifts. Any such charges should still leave workers with sufficient income and should never lead to a worker becoming indebted to an employer.

Site speed limits and traffic control signs should be obeyed by all drivers. Induction training and refresher training should be provided to material suppliers and relevant workers on safe driving practices, the risks of dangerous driving and disciplinary sanctions for non-compliance. A standalone Transport Management Plan to mitigate transport related risks will be implemented by Rogun JSC.

8. GRIEVANCE REDRESS MECHANISM

The Worker Grievance Redress Mechanism (GRM), with the exception of Sensitive Grievances including SEA/SH claims, is managed by PMG and Rogun JSC. It enables all Project workers, regardless of their employer, to raise workplace complaints, suggestions and requests. The GRM will address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution.

¹² “Hot bedding” refers to having a bed assigned to more than one person, such as having the same bed assigned to a workers on night shift and a worker on day shift. It will be permissible, however, for workers on different 15-day shifts to be assigned the same when the shift changes.

8.1 Worker GRM Structure

Multiple communication channels are available to workers, including options for anonymous complaints. These may include verbal reporting to managers or worker representatives, written complaints, suggestion/complaint boxes, telephone or other electronic channels, and the Project's eGRM system, as applicable. Workers may also seek assistance from their trade union or other worker representative in relation to a grievance or disciplinary matter.

The workers' GRM operates through the following levels:

Contractor and Subcontractor Level,	The worker GRM is available to all contractor and subcontractor workers to raise workplace concerns in accordance with this LMP. Each contractor and subcontractor designates a Social/Gender Focal Point (Social/GFP) responsible for receiving, registering, and facilitating the resolution of worker grievances. Workers are informed of the available grievance channels and may raise concerns directly with the designated Social/GFP without having to report through a person who may be directly involved in the matter complained about. Contractors and subcontractors are responsible for maintaining records of grievances and actions taken and for reporting grievance information in accordance with Project requirements. Where a grievance cannot be resolved at the contractor/subcontractor level, it is escalated to the central Rogun JSC level. PMG provides oversight and monitoring of the implementation of the worker GRM in accordance with its contractual responsibilities.
Bureau Veritas (BV) – HSE Supervisor	Bureau Veritas (BV), as the HSE Supervisor, monitors and supports the functioning of the workers' GRM at the Rogun site. BV monitors the implementation of contractor and subcontractor GRMs, verifies grievance records and resolution, follows up on unresolved grievances, identifies recurring or systemic issues, and escalates serious, repeated, systemic, or unresolved grievances to Rogun JSC and PMG, as appropriate
Central Rogun JSC Level	Rogun JSC maintains central oversight of the Project worker GRM through its designated Social/GRM Specialist, who is also responsible for addressing gender-related issues. The Social/GRM Specialist receives and reviews grievances escalated from contractors and subcontractors, as well as grievances submitted directly to the central level, and coordinates their assessment, resolution, and follow-up. The Specialist maintains the central grievance register and monitors the implementation of corrective actions. Direct workers employed by Rogun JSC may also raise grievances through the central-level mechanism.
PMG Level	PMG provides overall Project-level oversight of the implementation and effectiveness of the workers' GRM. PMG receives relevant information on serious, systemic, or unresolved grievances and supports coordination with Rogun JSC and other relevant Project parties. PMG also leads implementation of the Project Gender Action Plan, including the Project's SEA/SH-related commitments
External Labour Dispute Resolution	Where a grievance cannot be resolved through the contractor/subcontractor or central Rogun JSC level, the worker may request further review through the Project's grievance escalation procedure. Workers may be accompanied or supported by a colleague or trade union representative, as appropriate. The Project GRM does not prevent workers from accessing judicial or administrative remedies available under national legislation.
Ministry of Labour, Migration and Employment of the Population (MLMEP)	MLMEP provides an external avenue for labour-related grievances and labour disputes in accordance with its statutory mandate and applicable national legislation. Workers retain the right to approach the competent labour authorities where a labour matter cannot be resolved through the Project's internal grievance mechanism or where they choose to pursue a statutory remedy

The complete GRM procedure, applicable to both contracted and direct workers, is presented in **Annex 03**. Grievances can be submitted anonymously, and confidentiality will be ensured in all cases, including when the person making the complaint is known. For anonymous grievances, the resolution will be posted publicly so the grievant can know how it was handled and resolved.

Details of the grievance procedure will be disseminated widely. The Project workers will be informed on the grievance mechanism upon their employment or engagement. The information will be made available along with the prohibition of harassment and on the protection of whistle blowers. The workers' grievance mechanism will be described in staff induction trainings. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances, and any grievances will be treated confidentially.
- Anonymous grievances will be treated equally as other grievances whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response.

Information about the existence of the grievance mechanism will be readily available to all Project workers (direct and contracted) through notice boards on site (**Annex 05**) and within worker accommodation facilities, the presence of "suggestion/complaint boxes", and other means as needed. Grievance forms will also be available within worker accommodation facilities, Rogun JSC offices and by the complaint boxes for workers to fill out and submit if required (**Annex 04**).

Project workers are entitled to give suggestions, remarks and information regarding health and safety at work. He/she may refuse to work if his/her life or safety is endangered or if appropriate measures for provision of health and safety at work have not been put in place. Project workers may express their concerns or raise grievances to their supervisors or managers, to the appointed HSE/OHS officer, through workers' representatives or via the Rogun Trade Union.

The Project workers' grievance mechanism will not prevent workers from using judicial or administrative channels (e.g., employment tribunal, labor court or labor inspectorate, law enforcement, etc.).

8.2 Sensitive Grievances

A separate central grievance procedure has been established to handle sensitive grievances, such as for those relating to SEA/SH. This relevant for workers engaged by Rogun JSC, as well as PMG and DFZ. Sensitive grievances need to be dealt with in a confidential, sensitive and timely manner. Survivors of sexual harassment may feel too intimidated to lodge a grievance in person, so measures must be in place to allow allegations relating to SEA/SH to be submitted through anonymous and confidential submission.

Rogun JSC should appoint a third party to support the management of SEA/SH allegations. This "Sensitive Grievances Manager" must have experience dealing with SEA/SH issues and specialized training in safeguarding policies and procedures. This individual will also monitor and report on the presence or absence of violation cases. To provide support to the Sensitive GRM Manager, Rogun JSC, in consultation with PMG, will appoint at least two female focal points from the Rogun HPP

workforce to ensure that women workers have a contact that they feel comfortable raising grievances with. DFZ also has a focal point for sensitive grievances by workers.

Sensitive grievances, such as those relating to SEA/SH, will be recorded in a separate grievance logbook that will only be accessible to the Sensitive Grievances Manager through restrictive access measures such as password protection.

Project workers will be informed about the sensitive grievance procedure for SEA/SH issues upon their employment or engagement and as well as in staff induction trainings and refresher trainings. The sensitive GRM procedure is presented in **Annex 07**.

8.3 Grievance Logs

The contractors' GRM focal points and the designated PMG and Rogun JSC GRM contacts will each maintain a worker grievance log to ensure that each grievance is individually referenced and properly tracked, and actions recorded are followed. The logs will contain the following information, only accessible to the GRM focal points and designated Rogun JSC GRM Manager:

- The grievance reference number
- Date of complaint submission
- The person's name, his / her location and preferred contact details (unless it is an anonymous complaint);
- Details of his / her complaint;
- Details of the proposed corrective action;
- The person(s) responsible for implementing the corrective action;
- The date when the proposed resolution action was sent to the applicant (if applicable);
- Date the complaint was closed; and
- Date the response was sent to the applicant.

Confidential grievances or grievances submitted anonymously will be accessed only by authorized personnel. Anonymous grievances will include the selected option of communication method (whether the complainant would want the response via phone, to a different email, or to a different postal address) or, if none is provided, the resolution will be posted publicly.

8.4 Monitoring and Reporting Grievances

Bureau Veritas (BV), as the HSE Supervisor, monitors the implementation and functionality of workers' GRMs established by contractors and subcontractors and supports the overall monitoring of the Project workers' GRM. BV verifies that contractor and subcontractor Social/GFPs maintain appropriate grievance records, that workers are informed of available grievance channels, and that grievances are appropriately acknowledged, investigated, responded to, and closed.

BV monitors the status of unresolved grievances and the implementation of corrective actions and identifies recurring or systemic issues relating to labour and working conditions, OHS, accommodation, wages and working hours, discrimination, harassment, and other workplace concerns. Serious, repeated, systemic, or unresolved grievances are escalated to Rogun JSC and PMG, as appropriate.

Contractors and subcontractors provide information on grievances received, resolved, and outstanding through their established reporting arrangements. BV consolidates relevant non-confidential information for inclusion in its periodic HSE/ESHS reporting.

The Rogun JSC GRM Social Specialist maintains the central grievance record and consolidates relevant information received from contractors, subcontractors, and BV for Project-level monitoring

and reporting. The Specialist analyses grievance trends, monitors unresolved cases and corrective actions, and provides relevant information to PMG.

PMG reviews Project-level grievance information and trends as part of its overall oversight of labour management and the workers' GRM. Confidential and sensitive grievance information is handled in accordance with the separate sensitive grievance procedure and is not included in general reporting in a manner that could identify the complainant or survivor.

Third-Party SEA/SH GRM Specialist

- Managing and implementing the sensitive GRM in coordination with the Rogun JSC GRM Social and Gender Focal Point
- Providing support and ensuring the safety and confidentiality of survivors and witnesses, with support from SEA/SH service providers
- Ensuring that SEA/SH cases are appropriately and securely logged and that confidential records are maintained separately from the general GRM database
- Developing and delivering SEA/SH training and awareness-raising materials to Project workers in coordination with Rogun JSC and Bureau Veritas, as appropriate
- Monitoring and reporting on SEA/SH risks, including identification of possible patterns in SEA/SH grievances
- Providing anonymized information on SEA/SH GRM functionality and trends to Rogun JSC for inclusion in Project reporting and
- Monitoring the support and safety needs of survivors, witnesses and/or whistleblowers.

Bureau Veritas will monitor the availability and functionality of appropriate SEA/SH reporting mechanisms as part of its construction-site E&S supervision. Confidential case management and survivor support will remain under the responsibility of the designated SEA/SH GRM arrangements.

PMG Reporting to the World Bank

PMG will submit quarterly reports to the World Bank, which will include a GRM-related section providing information on:

- GRM implementation status, including procedures, training, staffing and resources
- The number and type of grievances received during the reporting period
- The number of grievances resolved during the reporting period
- The number of grievances unresolved at the end of the reporting period, including grievances outstanding for 15 days and 30 days, together with the reasons for delayed resolution
- Separate anonymized information on sensitive grievances, including SEA/SH-related grievances
- Key trends and recurring issues identified through analysis of grievance data
- Actions taken to address systemic or recurring grievances

- The overall level of grievant satisfaction with the resolution and mitigation measures, where such information is available and
- Other relevant issues and developments relating to the GRM and SEA/SH GRM.

Contractor GRM Focal Points

Below is a list of the current The main contractors have appointed the GRM focal point listed in . Each focal point can be contacted directly by workers who wish to raise a grievance.

The contractor and subcontractor GRM focal points are required to record and report grievances in accordance with the established GRM procedures and reporting arrangements. Bureau Veritas will monitor the functioning of these contractor-level mechanisms, verify the recording and resolution of worker grievances, follow up on unresolved cases, and escalate unresolved or systemic grievances to PMG and Rogun JSC, as appropriate.

Workers may also submit grievances directly through the Project-level GRM channels where they prefer not to use the contractor-level mechanism.

#	Contractors	Name of Appointed Social/Gender Focal Points	Contact details	Email
OJSC Rogun (Key Implementer)				
1	OJSC Rogun	Saihona Rajabova	907807667	saihona.rajabova89@mail.ru
	Project HSE Supervisor	Iuliia Planina	+992 98 999 624	iuliia.planina.ext@bureauveritas.com
Key Contractors				
1	Ariana	Rahimova Shahlo Karimovna	93 799 46 46	shakhinyarakhimova@gmail.com
2	Voith	Madina Sattorova	551050135	madina.sattorova@voith.com
3	EMZ	Mirzoeva Lutfiya	939994858	general@emz.tj
4	TGEM	Davlyatova Shahriniso	919 35 20 75	shakhriniso.davlyatova@yahoo.com
5	WeBuild			

9. CONTRACTOR MANAGEMENT

All existing construction and other contracts include, and new contracts will include, provisions related to labor and occupational health and safety based on Tajik law and will include requirements to comply with the specifications of the Project's **Environmental and Social Management Plan**, of which this LMP is one component. Construction contracts are based on the World Bank's Standard Procurement Document for civil works, which in turn is based on FIDIC Silver and Red Books. As noted above, labor and working conditions are monitored by Contractors and compliance with standards is supervised by the HSE Supervisor.

10. PRIMARY SUPPLIERS

The Rogun JSC Procurement Department (PD) is responsible for coordinating the identification, screening, and monitoring of primary suppliers in accordance with the Primary Supplier Screening and Monitoring Plan (December 2025), which is summarized in Annex 09. The Plan describes applicable screening, monitoring, reporting, and follow-up arrangements for primary suppliers.

Primary suppliers are suppliers that, on an ongoing basis, provide goods or materials essential to the core functions of the Project. Screening of primary suppliers focuses on the key labour and occupational health and safety risks identified under ESS2, including child labour, forced labour, and significant occupational health and safety risks.

Primary suppliers are subject to screening and monitoring in accordance with the December 2025 Plan. The screening process considers the supplier's labour and OHS practices, compliance with applicable national legislation, and measures in place to prevent and manage child labour, forced labour, and OHS risks. Where risks are identified, appropriate corrective and monitoring measures are applied in accordance with the Plan.

Contractors are responsible for identifying and managing risks associated with their own primary suppliers in accordance with their contractual obligations and the Project's requirements. Information on identified primary suppliers and the results of screening and monitoring are reported through the established Project reporting arrangements.

Where a primary supplier is found to have significant deficiencies relating to child labour, forced labour, or occupational health and safety, the responsible Project party will require appropriate corrective action and monitor its implementation. Where the identified risks cannot be adequately addressed, alternative suppliers may be considered in accordance with applicable procurement and contractual requirements.

ANNEX 01 Example Format for Report on Compliance with Conditions of Work with ESS2 for Third Parties Engaging Contracted Workers¹³

Assignment name:
Contract ref. No:
Contract period: Start date (M/D/Y): End date (M/D/Y):
Contractor/Service Supplier:
Reported period:
Date of report:
Signature of authorized person:

LABOR AND WORKING CONDITIONS COMPLIANCE REPORT

Company Employees¹⁴ Statistics

Total number of employee's gender disaggregated¹⁵: M _____ F _____

Number of employees with an employment contract out of total number of employees:

Number of employees without an employment contract out of total number of employees:

Number of employees with access to social security, pension and health insurance out of total number of employees:

Number of employees who receives wages/salaries at least once a month out of total number of employees:

Number of employees who left the company in the reported period out of total number of employees:

Number of employees hired in the reported period:

Number of hours worked per employee (monthly average):

Total overtime (monthly average per employee):

Health and Safety

Number of injuries at work (in reporting period and cumulative since contract start) out of total nr. of employees:

Number of fatalities at work (in reporting period and cumulative) out of total nr. of employees:

Number of reported violence out of total nr. of employees:

Number of reported harassment/ abuses out of total nr. of employees:

Grievance Mechanism

Availability of an accessible and functioning employee grievance mechanism (GM) (Y/N):

Number of grievances raised with the GM (in reporting period and cumulative since contract start):

¹³ This is an example of the way in which information could be presented in a monthly report.

¹⁴ The employee is any natural person employed or engaged to work or perform service for the employer

¹⁵ The number of employees refers to the actual number/headcount on the date of the report.

Number of grievances resolved by GM (in reporting period and cumulative since contract start):

Number of open grievances past 30 days:

Legal Cases

Number of suits filed with regard to labor, employment and OHS issues:

Number of disputes brought to peaceful settlement/ voluntary arbitration procedure:

Monitoring

Number of visits by labor/ OHS inspection:

Working and Labor Conditions Screening Check List

	Terms and conditions	Yes / No	Notes
1	All Project workers have an employment contract or engagement agreement in writing	Yes ☐ No ☐	If "No" please specify and explain
2	All Project workers are paid at least once a month	Yes ☐ No ☐	If "No" please specify and explain
3	All non-shift Project workers worked 8 hours a day, 40 hours a week All shift Project workers worked 12 hours a day for 15 consecutive days, followed by 15 days off	Yes ☐ No ☐	If "No" please explain and specify the hours worked
4	All Project workers had a regular daily and weekly rest	Yes ☐ No ☐	If "No" please specify and explain
5	Number of Project workers who were terminated from employment in line with national labor law and ESS2	Yes ☐ No ☐	If "Yes" please specify number and explain conditions of termination
6	Number of Project workers that attended OHS related training program	Yes ☐ No ☐	If "Yes" please specify number and explain
7	Project workers were granted leave they are entitled to (e.g. annual leave, maternity leave etc.)	Yes ☐	If "Yes" please specify the type and number of leaves

	Terms and conditions	Yes / No	Notes
		No ☐	
8	Project workers were involved in accidents at work resulting in injuries or fatalities	Yes ☐ No ☐	If "Yes" please specify and explain
9	Project workers reported on cases of discrimination, harassment, sexual harassment or non-compliance with law	Yes ☐ No ☐	If "Yes" please specify and explain
10	Project workers raised grievances or started voluntary arbitration / legal proceedings to settle a dispute	Yes ☐ No ☐	If "Yes" please specify and explain
11	In the reported period there were some incidents of non-compliance with the LMP	Yes ☐ No ☐	If "Yes" please specify and explain

ANNEX 02 Sample Training and Awareness Plan

Training	Description	Required Participants	Frequency
Healthy, Safety and Environment (HSE) Induction Training	Train all workers on: - Provisions in the HSE Manual - Company's HSE Policy - Right use of PPE - Health and Safety Regulations - Fire and emergency procedures	All Project workers	Upon employment Annual refresher
First Aid	Train selected officers (Contractor HSE Officer, Site Manager, Female workers representative) on the right first aid administration for different scenarios including demonstrations.	Designated first aiders	Upon mobilization to site Refresher every 6 months
Workplace / CoC Induction	Train all workers on: - Sexual Exploitation and Abuse/ Sexual Harassment - Code of Conduct principles - Sensitization on STDs/STIs/communicable diseases - Detrimental effects of the abuse of alcohol and drugs - Grievance Redress Mechanism - Disciplinary procedures	All Project workers	Upon employment Refresher every 6 months
Worker Accommodation Induction	Train all workers on: - Rules and regulations - Code of conduct - Camp management system - Interaction with communities - Health, safety and security - Fire and emergency procedures	All camp residents	Upon mobilization to site Annual refresher Daily monitoring
Construction Worker Training	Train on the correct procedures for: manual handling, PPE use, electrical safety, emergency procedures, work at height, confined spaces, underground construction, cofferdams etc.	All Project construction workers	Upon mobilization to site Refresher every 2 months Daily HSE briefings on site
Driving	Train all Project drivers on safety and acceptable conduct.	All Project drivers	Upon employment Refresher every 4 months Daily monitoring
Food Hygiene	Training sessions to ensure that food handlers receive the appropriate supervision and training in food hygiene.	All Project kitchen staff	Upon employment

ANNEX 03 Worker Grievance Form

Reference No:			
Full Name		Date Received	
Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	☐ I wish to raise my grievance anonymously ☐ I request not to disclose my identity without my consent		
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	☐ By Post: Please provide mailing address: _____ _____ ☐ By _____ Telephone: _____ ☐ By E-mail: _____		
Language Please mark your preferred language for communication	☐ Tajik ☐ Other (please specify)		
Description of Incident or Grievance:		What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance			
Please tick one:	☐ One-time incident/grievance (date _____) ☐ Happened more than once (how many times? _____) ☐ On-going (currently experiencing problem)		
What would you like to see happen to resolve the problem?			
Grievance Submission and Acknowledgment of Receipt			
Submitted by	Name:		
	Signature:		

Received by	Name:
	Signature:
Grievance Close-out	
Please write what remedy was implemented to address the grievance	
Complainant	Name:
	Signature:
Close-out by	Name:
	Signature:

ROGUN HYDROPOWER PROJECT COMPLAINTS PROCEDURE

All workers have a right to express their concerns without restraint, interference and without fear of discrimination or reprisal. If you have a concern, complaint or suggestion about the workplace, working conditions or accommodation facilities, speak up and follow the steps below.



There is a complaint form available if you wish to use it.



Outline your complaint in as much detail as possible with dates, locations, persons involved etc.



You can choose to remain anonymous if you wish.



Rogun JSC will ensure the confidentiality of the complaint process.

HOW TO FILE A COMPLAINT?

1. Complaints Box



Put the sealed envelope, letter or complaint form in a complaints box, which are located in Rogun JSC offices, worker accommodation facilities and in construction site areas.

2. By Post to



[INSERT POSTAL ADDRESS]

Complaint letters should be marked 'Confidential'.

5. Scan QR Code Below:

[INSERT QR CODE]

3. By Phone

[INSERT PHONE NUMBER]



OR via email to

[INSERT EMAIL ADDRESS]

4. In Person



Speak to your company HR Manager, Site Manager, Rogun JSC Grievance Officer or your worker representative.

CODE OF CONDUCT

Individual Code of Conduct

Implementation of Environmental, Social, Health and Safety (ESHS), Occupational Health and Safety (OHS), Labour and Working Conditions Standards

Preventing Sexual Exploitation and Abuse and Sexual Harassment

I, _____, subscribe to the Environmental, Social, Health and Safety Standards (ESHS), the Occupational Health and Safety (OHS) Standards and Labour and Working Conditions Standards for the Project, including the prohibitions against sexual exploitation and abuse and sexual harassment (SEA/SH).

The non-compliance with ESHS, OHS and Labour and Working Conditions standards, or acts of SEA/SH, whether in the workplace and in the surroundings, constitutes an act of misconduct subject to the application of sanctions that may culminate in the termination of the contract and/or employment. With the consent of the victims, reports of those who commit SEA/SH acts can be referred to the police.

I agree that while I am involved with any Project activities:

1. I will 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 project personnel and any other person.
2. I will not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel.
3. I will not engage in Sexual Exploitation, which means any actual or attempted abuse of 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.
4. I will 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.
5. I will not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
6. I will not engage in sexual harassment of work personnel and staff—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature is prohibited. E.g. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts.

7. I will not engage in sexual favors, for instance, making promises of favorable treatment (e.g. promotion), threats of unfavorable treatment (e.g. loss of job) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
8. I will not use prostitution in any form at any time.
9. I will treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
10. I will not participate in sexual contact or activity with children under the age of 18—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
11. I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered “non-consensual” within the scope of this Code.
12. I will consider reporting through the GRM or to my manager any suspected or actual GBV by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.
13. I will complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, Gender based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH), HIV/AIDs.
14. I will refrain from any form of theft for assets and facilities including from surrounding communities.
15. I will remain in designated working area during working hours.
16. I will always wear mandatory PPE during work.
17. I will follow prescribed environmental and occupational health and safety standards.
18. I will not retaliate against anyone who reports violations of this Code of Conduct

With regard to children under 18 years of age:

19. I will bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.
20. Where possible, I will make sure that another adult is present while working in the vicinity of the children.
21. I will not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.

22. I will not use computers, mobile phones, video and digital cameras or any other means to exploit or harass children or access child pornography (see also "Use of Child Images for Work Purposes" below).
23. I will not inflict physical or disciplinary punishment on children.
24. I will refrain from engaging children under the age of 14 (or such other higher age as is referred to in national law) to perform domestic or other work, or any work that puts them at significant risk of injury.
25. I will comply with all relevant legal provisions, including labor laws regarding child labor, and the World Bank's safeguard policies on child labor and the minimum age.
26. I will take due care when photographing or filming children (See below for details).

Use of Children's Images for Work-Related Purposes

When photographing or filming a child for work-related purposes, I must:

27. Before photographing or filming a child, evaluate and strive to comply with local traditions or restrictions on the reproduction of personal images.
28. Before photographing or filming a child, obtain the informed consent of the child and a parent or guardian. As part of this, I must explain how the photograph or film will be used.
29. Ensure that photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive way. Children should be appropriately dressed and not be in poses that could be considered as sexually suggestive.
30. Make sure the images are honest representations of the context and facts.
31. Make sure that file labels do not reveal identifying information about a child when sending images electronically.

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done by telling a supervisor or manager or by submitting information via the grievance mechanism.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. 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 behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

- Formal warning
- Formal reprimand
- Termination of employment

Report to the Police if warranted and if informed consent has been obtained

I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to health, GBV/SEA/SH issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

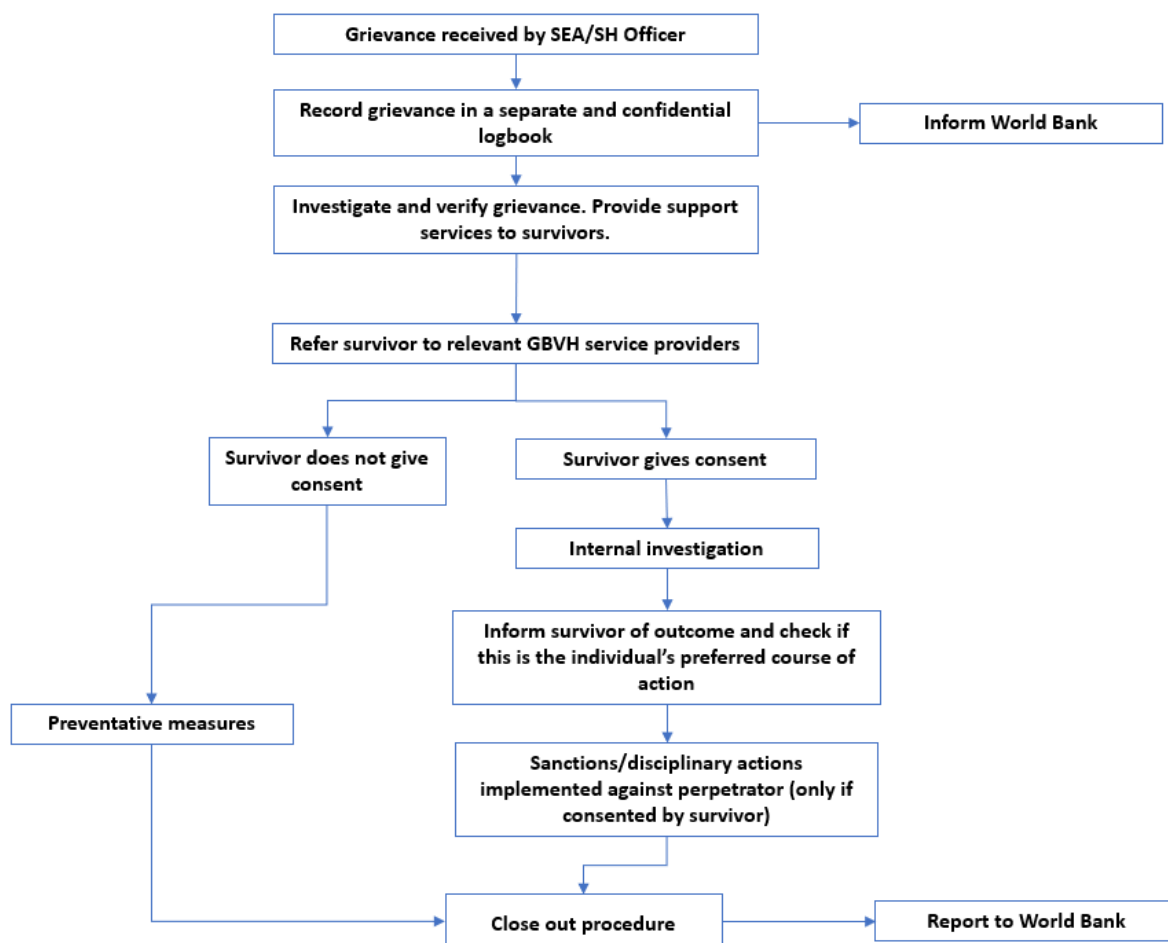
Signature: _____

Name: _____

Title: _____

Date: _____

ANNEX 06 Sensitive Grievance Procedure



ANNEX 07 Example Worker Accommodation Audit Form



ROGUN HYDROPOWER PROJECT WORKER ACCOMODATION AUDIT FORM (TAJIKISTAN)

Workers Accommodation Audit - Form				
	Date:		Inspection Team Members:	
	Contractor:			
	Location:			
	Number of Employees:			
(1) General Living Facilities		Yes	No	Remarks
1	Is the location of the facilities designed to avoid landslides, earthquakes, flooding or other natural hazard?			
2	Is transport provided to worksite safe and free?			
3	Are the living facilities built using adequate materials, kept in good repair and kept clean and free from rubbish and other refuse?			
Sub Total				
(2) Drainage		Yes	No	Remarks
1	Is the site adequately drained?			
Sub Total				
(3) Heating, air conditioning, ventilation and light		Yes	No	Remarks
1	Depending on climate are living facilities with adequate heating, ventilation, air conditioning and light systems including emergency lighting?			
2	Window represents not less than 5% to 10% of the floor area?			
Sub Total				

(4) Water		Yes	No	Remarks
1	Do workers have easy access to a supply of clean/potable water in adequate quantities?			
2	Does the quality of the water comply with national/local requirements or WHO standards?			
3	Are tanks used for the storage of drinking water constructed and covered to prevent water stored therein from becoming polluted or contaminated?			
4	Is the quality of the drinking water regularly monitored?			
Sub Total				
(5) Wastewater and Solid Waste		Yes	No	Remarks
1	Are wastewater, sewage, food and any other waste materials adequately discharged in compliance with local or World Bank standards and without causing any significant impacts on the Project residential(s), the environment or surrounding communities?			
2	Are specific containers for rubbish collection provided and emptied on a regular basis?			
3	Are pest extermination, vector control and disinfection undertaken throughout the living facilities?			
Sub Total				
(6) Rooms/dormitories/facilities		Yes	No	Remarks
1	Are the rooms/dormitories kept in good condition?			
2	Are the rooms/dormitories aired and cleaned at regular intervals?			
3	Are the rooms/dormitories built with easily cleanable flooring material?			
4	Are the rooms/dormitories and sanitary facilities located in the same buildings?			
5	Are residents provided with enough space? <i>(4.7 meters per person)</i>			
6	Is the ceiling height high enough? <i>(minimum of 2.1 meters)</i>			
7	Is the number of workers sharing the same room/dormitory minimized? <i>(Max of 6 workers)</i>			
8	Are the doors and windows lockable?			
9	Are mobile partitions or curtains provided?			
10	Is suitable furniture such as table, chair, mirror, bedside light provided for every worker?			
11	Are separate sleeping areas provided for men and women?			

Sub Total				
(7) Bed arrangements and storage facilities		Yes	No	Remarks
1	Is there a separate bed provided for every worker?			
2	Is the practice of "hot-bedding" prohibited?			
3	Is there a minimum space of 1 meter between beds?			
4	Is the use of double deck bunks minimized?			
5	When double deck bunks are in use, is there enough clear space between the lower and upper bunk of the bed?			
6	Are triple deck bunks prohibited?			
7	Are workers provided with comfortable mattresses, pillows and clean bed linens?			
8	Are the bed linen washed frequently and applied with adequate repellents and disinfectants (where conditions warrant)?			
9	Are adequate facilities for the storage of personal belongings provided? <i>(Standard 475 liters lockers and 1 meter of shelf unit)</i>			
10	Are there separate storages for work clothes and PPE and depending on condition, drying/airing areas?			
Sub Total				
(8) Sanitary and Toilet Facilities		Yes	No	Remarks
1	Are sanitary and toilet facilities constructed from materials that are easily cleanable?			
2	Are sanitary and toilet facilities cleaned frequently and kept in working condition?			
3	Are toilets, showers/bathrooms and other sanitary facilities designed to provide workers with adequate privacy including ceiling to floor partitions and lockable doors?			
4	Are separate sanitary and toilet facilities provided for men and women?			
5	Is there an adequate number of toilets and urinals? <i>(Standard: 1:6 to 1:15 ratio)</i>			
6	Are toilet facilities conveniently located and easily accessible?			
7	Is the shower flooring made of anti-slip hard washable materials?			
8	Is there an adequate number of hand wash basins and showers/bathrooms facilities provided? <i>(Standard: 1:6 to 1:15 ratio)</i>			
9	Are the sanitary facilities conveniently located?			

10	Is soap and/or anti-bacterial hand gel provided within all toilet facilities?			
11	Are shower facilities provided with an adequate supply of cold and hot running water?			
Sub Total				
(9) Laundry Facilities		Yes	No	Remarks
1	Are adequate facilities for washing and drying clothes provided?			
2	Sinks and tubs provided with hot and cold water?			
3	Cleaning soap provided?			
4	Drying lines provided for washing machines and dryers?			
5	Special laundry facilities for work clothes in contact with dangerous substance?			
Sub Total				
(10) Canteen and Cooking		Yes	No	Remarks
1	Are canteen and cooking facilities built with adequate and easy to clean materials?			
2	Are the canteen, cooking and laundry facilities kept in clean and sanitary condition?			
3	If workers cook their own meals, is kitchen space provided separately from the sleeping areas?			
4	Are workers provided with enough space in the canteen? (1 sq mtr to 1.5 sq mtr per person)			
5	Are canteens adequately furnished?			
6	Are kitchens provided with the facilities to maintain adequate personal hygiene?			
7	Are places for food preparation adequately ventilated and equipped?			
8	Are kitchen floor, ceiling and wall surfaces adjacent to or above food preparation and cooking areas built in non-absorbent, durable, non-toxic, easily cleanable materials?			
9	Are wall surfaces adjacent to cooking areas made of fire-resistant materials and food preparation tables equipped with a smooth, durable, non-corrosive, non-toxic, washable surface?			
10	Are adequate facilities for cleaning, disinfecting and storage of cooking utensils and equipment provided?			
11	Are there adequate sealable containers to deposit food waste and other refuse? Is refuse frequently removed from the kitchen to avoid accumulation?			
Sub Total				

(11) Standards for Nutrition and Food Safety		Yes	No	Remarks
1	Is there a special sanitary process such as the WHO "5 keys to safer food" implemented in relation to food safety?			
2	Does the food provided contain appropriate nutritional value?			
3	Does the food provided take into account workers' religious/cultural backgrounds?			
4	Hands wash before handling food and often during food preparation?			
5	Hands wash after going to the toilet?			
6	Wash and sanitize all surfaces and equipment used for food preparation			
7	Protect kitchen areas and food from insects, pests and other animals			
8	Separate raw and cooked			
9	Separate raw meat, poultry and seafood from other foods.			
10	Raw food, especially meat, poultry and seafood,			
11	Use separate equipment and utensils such as knives and cutting boards for handling raw foods.			
12	Store food in containers to avoid contact between raw and prepared foods			
13	Cook food thoroughly, especially meat, poultry, eggs and seafood			
14	Bring foods like soups and stews to boiling to make sure that they have reached 70°C.			
15	Keep food at safe temperatures			
16	Do not leave cooked food at room temperature for more than 2 hours.			
17	Refrigerate promptly all cooked and perishable food (preferably below 5°C).			
18	Use safe water or treat it to make it safe.			
19	Select fresh and wholesome foods.			
20	Wash fruits and vegetables, especially if eaten raw.			
21	Do not use food beyond its expiry date.			
Sub Total				
(12) Medical Facilities		Yes	No	Remarks
1	Are first aid kits provided in adequate numbers?			
2	Are first-aid kits adequately stocked?			
3	Is there an adequate number of staff/workers trained to provide first aid?			
4	Are there any other medical facilities/services provided on site? If not, why?			

Sub Total				
(13) Leisure, social and telecommunications facilities		Yes	No	Remarks
1	Are basic social collective spaces and adequate recreational areas provided to workers?			
2	Are workers provided with dedicated places for religious observance?			
3	Can workers access a telephone at an affordable/public price?			
4	Are workers provided with access to internet facilities?			
Sub Total				
(14) Management and staff		Yes	No	Remarks
1	Are there carefully designed worker camp management plans and policies especially in the field of health and safety (including emergency responses), security, workers' rights and relationships with the communities?			
2	Where contractors are used, have they clear contractual management responsibilities and duty to report?			
3	Does the person appointed to manage the accommodation have the required background, competency and experience to conduct his mission and is he/ she provided with the adequate responsibility and authority to do so?			
4	Is there enough staff to ensure the adequate implementation of housing standards (cleaning, cooking and security in particular)?			
5	Are staff members recruited from surrounding communities?			
6	Have the staff received basic health and safety training?			
7	Are the persons in charge of the kitchen particularly trained in nutrition and food handling and adequately supervised?			
Sub Total				
(15) Health and Safety On Site		Yes	No	Remarks
1	Have health and safety management plans including electrical, mechanical, structural and food safety been designed and implemented?			
2	Has the accommodation manager a duty to report to the health authority specific diseases, food poisoning or casualties?			
3	Is there an adequate number of staff/workers trained in providing first aid?			

4	Has a specific and adequate fire safety assessment and corresponding management plan been completed and implemented?			
5	Is guidance on alcohol, drug and HIV/AIDS and other health risk-related activities provided to workers?			
6	Are contraception measures (condoms in particular) provided?			
7	Do workers have an easy access to medical facilities and medical staff, including female doctors/nurses where appropriate?			
8	Have emergency plans on health and fire safety been prepared?			
9	Depending on circumstances, have specific emergency plans, (earthquakes, floods, tornadoes) been prepared?			
Sub Total				
(16) Security on Workers' Accommodation		Yes	No	Remarks
1	Has a security plan including clear measures to protect workers against theft and attack been designed and implemented?			
2	Has a security plan including clear provisions on the use of force been designed and implemented?			
3	Have the backgrounds of security staff been checked for previous crimes or abuses?			
4	Has the recruitment of security staff from both genders been considered?			
5	Have security staff received clear instruction about their duty and responsibility?			
6	Have security staff been adequately trained in dealing with domestic violence and the use of force?			
7	Are body searches only performed in exceptional circumstances by specifically trained security staff of both genders?			
8	Do security staff have a good understanding about the importance of respecting workers' rights and the rights of the surrounding communities and adopt appropriate conduct?			
9	Do workers and communities have specific means to raise concerns about security arrangements and staff?			
Sub Total				
(17) Workers' rights, rules and regulations on workers accommodation		Yes	No	Remarks
1	Are limitations on workers' freedom of movement limited and justified?			

2	Is an adequate transport system to the surrounding communities provided?			
3	Is the practice of withholding workers' ID papers prohibited?			
4	Is freedom of association expressly respected?			
5	Are workers' religious, cultural and social backgrounds respected?			
6	Are workers made aware of their rights and obligations and provided with a copy of the accommodations' internal rules, procedures and sanction mechanisms in a language or through a media they understand?			
7	Are house regulations nondiscriminatory, fair and reasonable?			
8	Are regulations on alcohol, tobacco and third parties' access to the camp clear and communicated to workers?			
9	Is a fair and non-discriminatory procedure to implement disciplinary procedures, including the right for workers to defend themselves, set up?			
Sub Total				
(18) Consultation and grievance mechanisms		Yes	No	Remarks
1	Have mechanisms for workers' consultation been designed and implemented?			
2	Are workers provided with processes and mechanisms to articulate their grievances in accordance with PS2/PR2?			
3	Have workers subjected to disciplinary proceedings arising from conduct in the accommodation had access to a fair and transparent hearing with the possibility to appeal the decision?			
4	Are there fair conflict resolution mechanisms in place?			
5	In cases where serious offences occur, are there mechanisms to ensure full cooperation with police authorities?			
Sub Total				
(19) Management of community relations		Yes	No	Remarks
1	Have community relation management plans addressing issues around community development, community needs, community health and safety and community social and cultural cohesion been designed and implemented?			

2	Do community relation management plans include the setting up of liaison mechanisms to allow a constant exchange of information and consultation of the surrounding communities?			
3	Is there a senior manager in charge of implementing the community relation management plan?			
4	Is there a senior manager in charge of liaising with the surrounding communities?			
5	Are the impacts generated by workers' accommodation periodically reviewed, mitigated or enhanced?			
6	Are community representatives provided with easy means to voice their opinions and lodge complaints?			
7	Is there a transparent and efficient process for dealing with community grievances, in accordance with ESS10?			
Sub Total				
(20) Fire Safety		Yes	No	Remarks
1	Fire safety plan available			
2	Evacuation map posted			
3	Emergency assembly point provided			
4	Fire alarm installed			
5	Fire detectors installed, tested and inspected - smoked detectors			
6	Fire extinguishers adequately provided			
7	Fire extinguishers conspicuously located/visible			
8	Firefighting equipment monthly inspected			
9	Fire team assigned/delegated			
10	Fire and emergency response contact/information posted			
11	Smoking area designated			
12	No smoking inside the building			
13	Emergency access are not obstructed			
Sub Total				
(21) Electrical		Yes	No	Remarks
1	Electrical fixtures are properly installed			

2	Monthly inspection program in place			
3	No loose and open connections			
4	Electrical circuit boards and panel boards adequately labelled (warning/danger)			
5	Temporary Power - generators have containment bunds, earthing rod, roof, fire extinguisher and exhaust is directed upwards to atmosphere (not into windows).			
Sub Total				
Item	Category	Yes	No	Total Items
1	General Living Facilities			3
2	Drainage			1
3	Heating, air conditioning, ventilation and light			2
4	Water			4
5	Wastewater and Solid Waste			3
6	Rooms/dormitories/facilities			11
7	Bed arrangements and storage facilities			10
8	Sanitary and Toilet Facilities			11
9	Laundry Facilities			5
10	Canteen and Cooking			11
11	Standards for Nutrition and Food Safety			21
12	Medical Facilities			4
13	Leisure, social and telecommunications facilities			4
14	Management and staff			7
15	Health and Safety on Site			9
16	Security on Workers' Accommodation			9
17	Workers' rights, rules and regulations on workers accommodation			9
18	Consultation and grievance mechanisms			5
19	Management of community relations			7
20	Fire Safety			13
21	Electrical			5

Overall Compliance Score			154
--------------------------	--	--	-----

Item	Category	Score (%)
1	General Living Facilities	
2	Drainage	
3	Heating, air conditioning, ventilation and light	
4	Water	
5	Wastewater and Solid Waste	
6	Rooms/dormitories/facilities	
7	Bed arrangements and storage facilities	
8	Sanitary and Toilet Facilities	
9	Laundry Facilities	
10	Canteen and Cooking	
11	Standards for Nutrition and Food Safety	
12	Medical Facilities	
13	Leisure, social and telecommunications facilities	
14	Management and staff	
15	Health and Safety on Site	
16	Security on Workers' Accommodation	
17	Workers' rights, rules and regulations on workers accommodation	

100%	Fully Compliant
75-99%	Partial Compliance
50-75%	Material Non-Compliance
0-50%	Non- Compliant

Item	Category	Score (%)
18	Consultation and grievance mechanisms	
19	Management of community relations	
20	Fire Safety	
21	Electrical	

ANNEX 08 Primary Suppliers: Screening and Monitoring Plan (December 2025)

This plan sets out the summary of the measures that are in place to identify, screen and monitor primary suppliers to the Rogun Hydropower project.

1. As part of the environmental and social assessment process, the Borrower has worked with the Contractors to review the list of suppliers to the project.
2. The primary suppliers are currently in good standing in terms of child labor, forced labor, and serious safety issues.
 - They are all licensed under Tajikistan law.
 - A number of primary suppliers are foreign companies, supplying rolled steel, rebar, cement, diesel/gasoline and equipment. These companies are providing supplies based on quality specifications under dedicated contracts with the project.
 - Each primary supplier has provided declarations to PMG that they do not engage or employ any forced or child labor.
3. Tajikistan law (Labor Code, 2016) prohibits child labor (below age 18) for hazardous, underground, morally harmful work, night work and overtime. The law also forbids forced labor. Companies operating in Tajikistan are subject to these requirements. Tajikistan has ratified ILO Convention 138 – Minimum Age, specifying 16 as the minimum age for admission to employment, and ILO Convention 182 – Worst Forms of Child Labor.
4. The State Inspectorate of the Ministry of Labor, Migration and Employment of the Population (MoLMEP) conducts inspections on a quarterly basis as well as on demand (in case they receive complaints or appeals), as required by the Labor Code. The State Service for Supervision of Industrial Safety and Mining Operations (SSSISMO) has permanent representatives on the construction site and carries out inspections each day. In case of incidents or accidents, senior officers of State Inspectorate and SSSSMO come to the Rogun dam site for investigations. MoLMEP also meets PMG and OJSC at least twice a year to discuss key issues. These meetings include representatives of the Contractors.
5. The primary suppliers also have contractual obligations regarding child labor, forced labor, and serious safety issues which are set out in their respective contracts. These include the following:

Forced Labor:

The Contractor shall take measures to require its primary suppliers (other than Subcontractors) not to employ or engage forced labor including trafficked persons. If forced labor/trafficking cases are identified, the Contractor shall take measures to require the primary suppliers to take appropriate steps to remedy them. Where the primary supplier does not remedy the situation, the Contractor shall within a reasonable period substitute the supplier with a primary supplier that is able to manage such risks.

Child Labor:

The Contractor shall take measures to require its primary suppliers (other than Subcontractors) not to employ or engage child labor. If child labor cases are identified, the Contractor shall take measures to require the primary suppliers to take appropriate steps to remedy them. Where the primary supplier does not remedy the situation, the Contractor shall within a reasonable period substitute the primary supplier with another primary supplier that is able to manage such risks.

Serious Safety Issues:

The Contractor, including its Subcontractors, shall comply with all applicable safety obligations. The Contractor shall also take measures to require its primary suppliers (other than Subcontractors) to adopt procedures and mitigation measures adequate to address safety issues related to their personnel. If serious safety issues are identified, the Contractor shall take measures to require the primary suppliers to take appropriate steps to remedy them. Where the primary supplier does not remedy the situation, the Contractor shall within a reasonable period substitute the primary supplier with another primary supplier that is able to manage such risks.

6. As required by the process set out in the Labor Management Procedures performed by Rogun PMG, all primary suppliers have stated that they do not hire child or forced labor through formal letters. If such statements are contradicted by credible facts, PMG will terminate their contracts immediately and seek new primary suppliers.
7. The main contractors will continue to monitor the performance of primary suppliers in terms of labor practice (child labor, forced labor, and serious safety issues), as specified by Lot 2, 3 and 4 contracts.
8. The main contractors are required by their respective contracts to report to the Borrower annually on child labor, forced labor, and serious safety issues of its primary suppliers.
9. In the event the Borrower becomes aware of allegations regarding child labor, forced labor, and serious safety issues with respect to the primary suppliers, based on information from the supervising engineer, or the main contractor, or through other credible sources. In these circumstances, the Borrower will request further information from relevant primary supplier regarding the allegations. As indicated above, if the Borrower discovers the primary suppliers are using child or forced labor, they will terminate the primary supplier and find a replacement.

ANNEX 09: Indicative OHS Risk Assessment Register (to be tailored in contractors' contracts)

This register presents indicative examples of principal OHS risks and indicative control measures for the Rogun Hydropower Project. It is not exhaustive and does not replace contractor- and activity-specific risk assessments; additional risks, consequences, and additional or alternative control measures may need to be identified through ongoing site-specific and task-specific assessments as design, construction methods, locations, interfaces, and working conditions evolve. Risk ratings are indicative only and shall be validated and updated by each contractor for the relevant work package, method statement, and work area.

Hazard / Activity	Potential Consequences	Initial Risk	Indicative Controls / Reference Measures
1. Underground excavation, tunneling, and confined work areas	Rock fall, entrapment, oxygen deficiency, poor visibility, collision, serious injury or fatality	Extreme	Geotechnical assessment, excavation sequencing, ground support design, scaling and inspection, ventilation, gas monitoring, controlled access, refuge arrangements, communications, permit-to-work, and emergency drills.
2. Geotechnical instability in tunnels, caverns, slopes, spoil areas, and foundations	Slope failure, collapse, burial, struck-by hazards, equipment loss, serious injury or fatality	Extreme	Geotechnical investigations, design review, slope and ground support systems, trigger action response plans, monitoring instrumentation, exclusion zones, controlled spoil placement, and competent inspection after blasting, rainfall, seismic events, or other changes in conditions.
3. Blasting and explosives handling	Premature detonation, fly rock, toxic fumes, hearing damage, fire, fatal injury	Extreme	Licensed blasting personnel, blast plans, exclusion zones, misfire procedures, secured storage, transport controls, pre-blast warnings, post-blast clearance, air quality checks, and vibration monitoring where relevant.
4. Explosives transport, storage magazines, and misfire recovery	Detonation, theft or loss, fire, unauthorized access, serious injury or fatality	Extreme	Licensed transport and storage, inventory reconciliation, secure magazines, controlled issue and return, vehicle routing and escort arrangements where required, ignition source control, documented misfire response, and restricted access to authorized personnel only.
5. Work at height on slopes, structures, galleries, shafts,	Falls of persons or materials, fractures, head injury, fatality	High	Engineered access platforms, edge protection, fall restraint or arrest systems, inspected scaffolds, ladder controls, dropped-object prevention,

Hazard / Activity	Potential Consequences	Initial Risk	Indicative Controls / Reference Measures
and temporary platforms			work-at-height permits, trained personnel, rescue arrangements, and weather restrictions.
6. Shafts, adits, openings, and unprotected edges	Falls into openings, falling objects, entrapment, serious injury or fatality	High	Physical barriers, secure covers, signage, exclusion zones, lighting, access control, inspection routines, and specific rescue planning for vertical and confined access points.
7. Heavy equipment, cranes, lifting appliances, and suspended loads	Struck-by incidents, crush injuries, load drops, equipment overturning	High	Lift plans, competent operators and riggers, inspection and certification, ground-bearing verification, exclusion zones, banksmen, signaling protocols, wind limits, and preventive maintenance.
8. Stored energy, pressurized systems, hydraulic lines, compressed air, and high-pressure water	Injection injuries, hose whip, rupture, uncontrolled release, serious injury or fatality	High	Isolation, depressurization, lockout-tagout, hose restraint systems, inspection and replacement criteria, guarding, competent maintenance, and permit-to-work for non-routine interventions.
9. Electrical installation, energized equipment, and temporary power systems	Electric shock, arc flash, burns, fire, fatality	High	Isolation and lockout-tagout, tested equipment, earthing, residual current protection, restricted access, qualified electricians, cable management, temporary power inspections, and permit-to-work for energized systems where unavoidable.
10. Traffic management, mobile plant, reversing, and haul roads in steep terrain	Vehicle collision, roll-over, pedestrian impact, loss of load, serious injury or fatality	High	A traffic management plan, segregated routes, speed limits, one-way systems where possible, reversing controls, vehicle inspections, competent drivers, fatigue controls, road maintenance, berms and barriers, and spotters at critical locations.
11. Work near water, dewatering systems, inundation pathways, and flooding hazards	Drowning, sudden inundation, slips, equipment loss, multiple casualties	High	Flood risk assessment, alarms, pumping redundancy, escape routes, life-saving equipment, water ingress monitoring, standby rescue capability, and weather and upstream condition surveillance.
12. Confined space entry, oxygen deficiency, toxic	Asphyxiation, poisoning, loss of	Extreme	Entry permits, atmospheric testing, continuous monitoring, forced ventilation, standby attendants,

Hazard / Activity	Potential Consequences	Initial Risk	Indicative Controls / Reference Measures
atmospheres, and poor ventilation	consciousness, entrapment, fatality		communication systems, rescue plans, intrinsically safe equipment where necessary, and strict control of simultaneous operations.
13. Dust, respirable crystalline silica, diesel exhaust, welding fumes, and poor air quality	Respiratory illness, irritation, chronic occupational disease, reduced alertness	High	Ventilation, wet suppression, enclosed cabins, engine emission control, exposure monitoring, respiratory protection, fit testing, health surveillance, and housekeeping.
14. Noise and vibration from drilling, blasting, breakers, and plant	Noise-induced hearing loss, fatigue, hand-arm vibration effects, communication failure	High	Noise mapping, equipment maintenance, hearing protection zones, exposure time limits, anti-vibration measures, health surveillance, and communication methods that remain effective in high-noise environments.
15. Hot work, welding, cutting, gas cylinders, fire, and explosion risk	Burns, smoke inhalation, cylinder rupture, fire spread, asset damage, fatalities	High	Hot work permits, gas testing, fire watch, cylinder securing and segregation, flashback arrestors, extinguishers, housekeeping, combustible control, and emergency response readiness.
16. Hazardous substances, fuels, oils, grouts, admixtures, explosives residues, and chemicals	Chemical burns, inhalation injury, fire, reactive incidents, environmental contamination affecting workers	High	Inventory and safety data sheet control, banded storage, labeling, spill response kits, trained handlers, segregation of incompatibles, decanting procedures, exposure controls, and emergency wash facilities.
17. Manual handling, repetitive tasks, awkward postures, and hand tools	Musculoskeletal disorders, strains, sprains, lacerations	Medium	Mechanical aids, team lifting, ergonomic planning, suitable tools, training, task rotation, and supervision.
18. Slips, trips, falls on the same level, poor housekeeping, and inadequate lighting	Sprains, fractures, dropped materials, vehicle or plant interaction, lost-time injuries	Medium	Housekeeping standards, designated walkways, drainage, cable and hose management, anti-slip surfaces, cleaning routines, adequate lighting, and supervisory inspections.
19. Temporary works, formwork, scaffolds, and falsework	Collapse, falls, struck-by hazards, concrete release, multiple injuries or fatalities	High	Engineered design, erection and dismantling procedures, inspection and tagging, load limits, competent persons, exclusion zones, and hold

Hazard / Activity	Potential Consequences	Initial Risk	Indicative Controls / Reference Measures
			points before loading or concrete pours.
20. Concrete works, grouting, pumping, and reinforcement activities	Cement burns, hose whip, collapse of pours, impalement, crush injuries	High	Pour plans, line restraint, exclusion zones, rebar cap protection, chemical-resistant PPE, wash facilities, competent supervision, and inspection of formwork and pump systems before use.
21. Fatigue, long shifts, inadequate rest, and night work	Human error, unsafe acts, delayed response, serious incidents, reduced alertness	High	Shift scheduling, legal working hour limits, rest periods, fit-for-duty checks, fatigue management plans, transport after long shifts where relevant, supervision, and monitoring of overtime and night work.
22. Contractor interfaces, simultaneous operations, and communication failures	Conflicting activities, unauthorized access, exposure to adjacent hazards, serious incidents	High	Interface management plans, shared permits, daily coordination meetings, area ownership, common rules, signage, communication protocols, toolbox talks, and stop-work authority where conflicts arise.
23. Extreme weather, heat, cold, ice, wind, altitude, and remote-site conditions	Heat stress, hypothermia, fatigue, reduced concentration, delayed rescue, weather-related incidents	High	Weather monitoring, work-rest regimes, hydration, seasonal PPE, shelter, acclimatization, stoppage criteria for adverse weather, journey management, and emergency medical arrangements.
24. Emergency preparedness, rescue limitations, and delayed medical response	Escalation of incidents, preventable fatalities, prolonged entrapment, uncontrolled consequences	High	Emergency response plans, rescue equipment, trained rescue teams, underground evacuation arrangements, communications redundancy, first-aid and clinic capacity, ambulance access, external coordination, and drills for credible worst-case scenarios.