

LABOR MANAGEMENT PROCEDURES

1. OVERVIEW OF LABOR USE ON THE PROJECT

Number of Project Workers:

Total estimated number of workers to be employed on the project: 39.

Organization	Number of Individuals
CLASP -- <i>employees</i>	16
Humboldt State University (HSU) -- <i>contracted</i>	10
Intertek Hong Kong – <i>contracted</i>	4
University of Nairobi (UoN) -- <i>contracted</i>	4
Individual Consultants -- <i>contracted</i>	5
Total	39

Characteristics of Project Workers:

All workers will be professional office workers. There will be a mix of male and female workers all of whom are at least 18 years old.

Timing and Location of Labor Requirements:

Most project personnel will be based in the United States or Kenya. A few individual consultants will be based elsewhere. Some project activities will take place in the following countries: Hong Kong (China), Haiti, Kenya, Nigeria, Madagascar, Rwanda, and Uganda. The majority of project personnel will be engaged throughout the duration of the project.

This document will be updated periodically throughout the project with detail on the location of individual consultants.

During the first half of 2020, CLASP hired two local consultants, one based in Cote D'Ivoire, engaging with stakeholders in West Africa and Madagascar, and another based in Kenya, engaging with stakeholders in East Africa. The local consultant in Cote D'Ivoire is a woman.

During the second half of 2020, CLASP hired two local consultants, one based in Niger, engaging with stakeholders in West Africa, Madagascar, and Haiti, and another based in Nigeria, engaging with stakeholders in that country. Neither of these consultants is a woman. They were hired to replace the local consultant based in Cote D'Ivoire, who resigned her position in June.

Contracted Workers:

Contracted workers will largely be the employees of our contractors (Humboldt State University, Intertek Hong Kong, and University of Nairobi). CLASP plans to also contract directly with individual consultants.

Migrant Workers:

N/A

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The project will include no physical works, and anticipated risks and impacts related to working conditions (including health and safety) are expected to be negligible. The current scope of engagement planned under the project includes CLASP focusing on adopting the international standards of off-grid solar products and engaging with manufacturers on market surveillance and compliance. The stakeholder engagement will also cover consumers (on a limited scale) for estimating the relative size of quality-verified and non-quality-verified product markets.

3. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

All employees of CLASP, HSU, Intertek Hong Kong, and UoN are based in the United States, China, or Kenya and are protected by the relevant labor legislation of those jurisdictions. CLASP will use the standard World Bank consultant agreement template for its contracts with independent consultants.

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

All employees of CLASP, HSU, Intertek Hong Kong, and UoN are based in the United States, China, or Kenya and are protected by the relevant labor legislation of those jurisdictions. CLASP will use the standard World Bank consultant agreement template for its contracts with independent consultants. CLASP will request a certificate from HSU, Intertek Hong Kong, and UoN providing evidence of their compliance with applicable laws, e.g., Department of Occupational Safety & Health (DOS&H) certificate.

5. RESPONSIBLE STAFF

The table below shows which individual within each organization will be responsible for the following:

- engagement and management of project workers
- engagement and management of contractors/subcontractors
- occupational health and safety (OHS)
- training of workers
- addressing worker grievances

Organization	Responsible Individual
CLASP	Ari Reeves
Humboldt State University (HSU)	Arne Jacobson
Intertek Hong Kong	Angela Yu
University of Nairobi (UoN)	Michael Gatari
Individual Consultants	Andrea Testa

6. POLICIES AND PROCEDURES

CLASP will ensure that all applicable local, national, and international occupational health and safety standards are followed throughout this project.

7. AGE OF EMPLOYMENT

All personnel will be adults above 18 years old. Copies of individuals' government-issued identification is available upon request.

8. TERMS AND CONDITIONS

Not applicable.

9. GRIEVANCE MECHANISM

CLASP has engaged Lighthouse Services to provide an anonymous ethics and compliance hotline for all employees, team members, and partners. Reports may cover, but are not limited to the following topics: Ethical violations Wrongful Discharge, Unsafe Working Conditions Internal Controls, Quality of Service Vandalism and Sabotage, Sexual Harassment Theft, Discrimination Conduct Violations, Alcohol and Substance Abuse Threats, Fraud Bribery and Kickbacks, Conflict of Interest Improper Conduct, Theft and Embezzlement Violation of Company Policy, Violation of the Law Misuse of Company Property, Falsification of Contract, Reports or Records. Lighthouse submits all anonymous complaints it receives to appropriate CLASP representatives, which vary depending on the issue that was reported. Information provided may be the basis of an internal and/or external investigation. While a reporting person using Lighthouse Services will not have to disclose his/her identity when filing a complaint via the anonymous hotline, his/her identity may become known during the course of the investigation due to information provided and decision to decline to provide an identity may hinder CLASP's ability to investigate the matter. Any person accused or implicated in the report will not be included among the report recipients at CLASP for that specific report from Lighthouse. Lighthouse Services are available 24 hours a day, 7 days a week and can be reached via the following avenues: Website: www.lighthouse-services.com/clasp

Telephone:

o English speaking USA and Canada: 833-480-0010

o Spanish speaking USA and Canada: 800-216-1288

o French speaking Canada: 855-725-0002

o Spanish speaking Mexico: 01-800-681-5340

o All other countries: 800-603-2869 (must dial country access code first, click here for codes and dialing instructions)

Fax: (215) 689-3885 (must include company name with report)

Project personnel who engage with stakeholders will be instructed to identify themselves as CLASP staff or consultants and make clear that any concerns can be raised directly with CLASP.

GRM shall provide an opportunity of hearing to all the concerned parties and examine the relevant record before making the final decision. Every effort will be made to ensure that grievances/ appeals are considered and disposed of preferably within three (3) weeks of the date of receipt of the complaint. The complete records of all activities shall be kept and filed into the grievance database maintained by CLASP. CLASP will produce a report every six month.

The cases shall be considered as disposed of and closed when:

- The decision has been made and the Complainant has indicated acceptance of the response;
- Where the complainant has not responded within one month of being intimated the final decision of the grievance officer on his grievance/complaint;
- Where the Complainant fails to attend the meetings related to the complaint; and
- Where the Complainant withdraws his/her complaint.

10. CONTRACTOR MANAGEMENT

CLASP maintains procurement guidelines that are based on United States and international standards and are consistent with the World Bank's procurement guidelines. CLASP will follow these guidelines in selecting contractors for this project and will use the standard World Bank consultant agreement template for its contracts with independent consultants. CLASP will closely monitor the performance of its consultants throughout the project.