



WORKERS, CONTRACTORS AND MANAGERS CODE OF CONDUCT

DARES INTERCONNECTED MINI-GRID PROJECT

Prepared for submission to the Rural Electrification Agency (REA)
under the Distributed Access through Renewable Energy Scale-Up (DARES) Project

Project Developer / Contractor

PROMASS ENGINEERING SERVICES LTD

Project Location: _____
Mini-grid Capacity: _____ | Distribution Licensee/DisCo: _____
REA/DARES Reference: _____

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This document becomes effective only after approval and completion of all project-specific contact details.

DOCUMENT CONTROL AND APPROVAL

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Approval

Prepared / Reviewed by	Name: _____ Title: Environmental & Social Safeguards Lead
Signature / Date	Signature: _____ Date: _____
Approved by	Dr. Sani Mohammed Bida Managing Director / CEO
Signature / Date	Signature: _____ Date: _____

Distribution

- REA/DARES Project Coordination Unit and assigned safeguards personnel.
- Project Developer, EPC contractor, subcontractors, consultants and labour providers.
- Project managers, supervisors, security personnel and all project workers.
- Community liaison personnel, grievance committees and relevant project partners.

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Key Acronyms

ACRONYM	MEANING
AP/PAP	Affected Person / Project-Affected Person
CoC	Code of Conduct
DARES	Distributed Access through Renewable Energy Scale-Up
E&S	Environmental and Social
ESMP	Environmental and Social Management Plan
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
HSE	Health, Safety and Environment
IMG	Interconnected Mini-grid
LMP	Labour Management Procedures
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
REA	Rural Electrification Agency
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
VAC	Violence Against Children

1. PURPOSE AND OBJECTIVES

This Code of Conduct (the “Code”) sets the minimum standards of behaviour required from every person engaged on, visiting, supervising or acting on behalf of the DARES Interconnected Mini-grid Project. It is intended to prevent harm, protect workers and communities, and ensure that the project is implemented lawfully, safely, respectfully and ethically.

- Prevent Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), Gender-Based Violence (GBV), Violence Against Children (VAC), discrimination, intimidation, abuse of power and retaliation.
- Protect occupational health and safety, including construction, electrical, traffic and operational risks associated with an interconnected mini-grid.
- Protect community health, safety, security, livelihoods, property, privacy, natural resources and cultural heritage.
- Define clear reporting duties, confidential channels, survivor-centred response principles and consequences for violations.
- Support compliance with the project ESMP, LMP, Stakeholder Engagement Plan, GRM, contracts, permits and applicable laws.

2. SCOPE AND APPLICATION

This Code applies throughout the project lifecycle - mobilisation, surveys, design, procurement, civil works, line construction, interconnection, testing, commissioning, operation, maintenance and demobilisation - and applies on and off site whenever conduct is connected to the project.

- PROMASS Engineering Services Ltd employees, directors and representatives.
- EPC contractors, subcontractors, labour suppliers, consultants, vendors, transporters, security providers and their personnel.
- Temporary, casual, migrant and local workers; apprentices, interns and volunteers.
- Managers, supervisors and anyone with authority over workers or access to communities.
- Visitors and other persons granted access to project facilities, camps, offices, substations, distribution lines or work fronts.

CONDITION OF ENGAGEMENT

Signing this Code, attending induction and completing required refresher training are conditions for site access and continued engagement. Contractors remain accountable for the conduct of their workers and subcontractors.

3. POLICY AND STANDARDS FRAMEWORK

This Code shall be read together with the project contract and approved environmental and social instruments. Where standards differ, the requirement that provides stronger protection to people and the environment shall apply, subject to Nigerian law and the contract.

- The DARES Project environmental and social requirements, including applicable Environmental and Social Commitment Plan provisions and project safeguards procedures.
- Applicable World Bank Environmental and Social Standards, particularly ESS1, ESS2, ESS4 and ESS10, as reflected in project instruments.
- The approved project ESMP, LMP, Stakeholder Engagement Plan, security arrangements, traffic plan, emergency plans and GRM.
- Applicable Nigerian laws and regulations on labour, occupational safety, child protection, violence prevention, trafficking, environment, data protection, electricity and mini-grid development, as amended.
- Applicable NERC requirements, interconnection conditions, Distribution Licensee/DisCo requirements, permits and technical safety rules.

4. DEFINITIONS

Abuse of power: Improper use of authority, influence, access, resources or a position of trust to obtain a personal, sexual, financial or other benefit, or to disadvantage another person.

Child: Any person below 18 years of age. A mistaken belief about age is not a defence.

Community member: Any person living, working, studying, trading or travelling in communities affected by or near the project, including landowners, customers and vulnerable persons.

Consent: Informed, voluntary, specific and freely given agreement. Consent can be withdrawn at any time. Consent is absent where there is coercion, manipulation, intoxication, incapacity, threat, deception, a child is involved, or a project-related power imbalance is abused.

Gender-Based Violence (GBV): A harmful act directed at a person because of gender, sex or perceived gender, including physical, sexual, psychological and economic harm, harmful practices, trafficking, SEA and SH.

Sexual Exploitation: Actual or attempted abuse of vulnerability, differential power or trust for sexual purposes, including profiting socially, politically or financially from another person's sexual exploitation.

Sexual Abuse: Actual or threatened physical intrusion of a sexual nature, by force or under unequal, coercive or exploitative conditions.

Sexual Harassment: Unwelcome sexual advance, request for sexual favour, verbal, non-verbal, digital or physical conduct of a sexual nature that affects employment, participation or dignity, or creates an intimidating, hostile, humiliating or offensive environment.

Survivor-centred approach: A response that prioritises safety, confidentiality, respect, non-discrimination, informed choice and access to appropriate services, while avoiding blame or unnecessary disclosure.

Violence Against Children (VAC): Physical, sexual or emotional violence, injury, abuse, neglect, exploitation, trafficking, harmful work or other maltreatment of a child.

Worker: Any person engaged directly or indirectly on the project, regardless of employment status, payment arrangement or duration.

5. CORE PRINCIPLES AND MANDATORY PROHIBITIONS

- **Respect and dignity:** Treat every person fairly and respectfully, without discrimination or humiliation.
- **Do no harm:** Avoid conduct that could foreseeably harm workers, communities, children, customers, property or the environment.
- **Zero tolerance for SEA and VAC:** SEA, sexual activity with a child, child grooming, child labour and all forms of VAC are prohibited.
- **No sexual harassment or GBV:** SH and GBV are prohibited at work, in camps, during travel, online, at community engagements and in any project-related setting.
- **No transactional sex:** Never exchange or promise money, employment, electricity connections, compensation, goods, services, influence or project benefits for sex or sexual favours.
- **No abuse of project power:** Do not use access to jobs, connections, customer registration, compensation, procurement, permits, information or grievance decisions to exploit or pressure another person.
- **Safety first:** Stop work and report any activity that presents an imminent risk to life, health, electrical safety, the public or the environment.
- **Accountability:** Report suspected breaches in good faith, cooperate with authorised investigations and accept proportionate disciplinary action for violations.
- **No retaliation:** Do not threaten, dismiss, disadvantage, expose or harass any complainant, witness, survivor or person who refuses improper conduct.

6. GENERAL STANDARDS OF CONDUCT

- Obey lawful instructions, approved method statements, permits-to-work, security arrangements, traffic controls and site rules.
- Behave professionally and avoid abusive, threatening, provocative, discriminatory, indecent or culturally disrespectful language or gestures.
- Do not fight, bully, haze, stalk, intimidate or deliberately humiliate any person.
- Do not possess weapons except authorised security personnel acting under approved procedures and applicable law.
- Do not possess, distribute or use illegal drugs. Do not report for duty under the influence of alcohol, drugs or any substance that impairs safe performance.
- Do not steal, damage, misuse or remove project, worker, community or public property.
- Remain within authorised work areas and working hours unless permission is obtained.
- Dress appropriately for the task and community context. Clothing shall be safe, non-discriminatory, non-provocative and free from offensive or partisan slogans while on duty.
- Do not make unauthorised public statements, political representations or commitments in the name of the project, REA, DARES, a DisCo or PROMASS.
- Use social media responsibly; do not post confidential project information, identifiable survivor information, restricted infrastructure details or images of community members without valid consent and authorisation.

7. LABOUR, EQUALITY AND WORKPLACE BEHAVIOUR

- No forced labour, bonded labour, trafficking, recruitment fees charged to workers, retention of identity documents or restriction of lawful movement.
- No child labour. Age verification shall be completed before engagement. Persons under 18 shall not perform hazardous work, electrical work, night work or any work that interferes with education or development.
- Recruitment, pay, training, promotion and discipline shall be based on legitimate job requirements, without discrimination based on sex, age, disability, ethnicity, religion, marital status, pregnancy, political opinion or other protected status.
- Respect freedom of association and workers' lawful rights to raise concerns collectively or individually.
- Pay wages and benefits accurately and on time, provide understandable employment terms, and keep lawful working hours and rest periods.
- Provide reasonable accommodation for persons with disabilities and protect pregnant and nursing workers from unsafe assignments.
- Do not demand money, gifts, sexual favours or personal services in return for recruitment, assignment, overtime, leave, training, promotion or continued employment.
- Use the Worker Grievance Mechanism for employment-related concerns. Workers may also use other lawful channels without retaliation.

8. SEA/SH, GBV AND VIOLENCE AGAINST CHILDREN

8.1 Prohibited Conduct

- Any sexual activity with a child, including grooming, sexualised communication, exposure to sexual material, photography, online contact or arranging access to a child.
- Rape, attempted rape, sexual assault, unwanted touching, sexualised jokes, comments, staring, gestures, display of sexual material, repeated invitations, stalking or cyber-harassment.
- Offering or withholding jobs, payment, connections, compensation, goods, contracts, services, grades, transport, protection or any project benefit in exchange for sex or a sexual relationship.
- Sexual relationships with subordinates, job applicants, complainants, beneficiaries or community members where project authority, dependency or vulnerability undermines free consent.
- Physical assault, coercive control, threats, forced marriage, female genital mutilation, economic abuse, trafficking or any other GBV-related act.
- Inviting unaccompanied children into private accommodation or sleeping near unsupervised children except in a genuine emergency, with supervisor approval and another responsible adult present where practicable.
- Physical punishment or degrading discipline of children, or employing a child for domestic or project work that is hazardous, exploitative or unsuitable for age and development.

8.2 Required Behaviour

- Maintain professional boundaries with community members, customers, job applicants, complainants, students and children.
- Immediately report suspected SEA, SH, GBV or VAC through an approved confidential channel. Do not investigate personally, confront the alleged perpetrator or circulate details.
- Protect the privacy and dignity of survivors. Share information only on a strict need-to-know basis with authorised personnel.
- Respect a survivor's informed choices about services and reporting, subject to mandatory legal duties and immediate child-safeguarding requirements.
- Do not mediate, negotiate informal settlements, demand proof, blame the survivor or condition assistance on participation in an investigation.

IMPORTANT

Sexual activity with anyone under 18 is prohibited, regardless of local customs, apparent consent, mistaken belief of age or whether payment was involved. "I did not know the person was under 18" is not a defence.

9. OCCUPATIONAL HEALTH, SAFETY AND ELECTRICAL SAFETY

9.1 General OHS Duties

- Attend induction, daily briefings/toolbox talks and all task-specific training. Do not perform work for which you are not trained, medically fit or authorised.
- Wear the prescribed PPE correctly and maintain it in serviceable condition. Never bypass guards, interlocks, barriers, permits or safety devices.

- Conduct task risk assessments and use approved method statements for excavation, lifting, work at height, hot work, confined spaces, line work and energisation.
- Report hazards, near misses, incidents, injuries, occupational illness and unsafe acts immediately. Preserve the scene where safe, except to rescue life or prevent escalation.
- Exercise stop-work authority where there is imminent danger. No worker shall be punished for a good-faith safety stop.
- Maintain good housekeeping, safe access, lighting, sanitation, drinking water, first aid and emergency arrangements.

9.2 Electrical and Interconnection Safety

- Only competent and authorised persons may work on electrical installations, distribution lines, transformers, switchgear, metering systems, protection systems or interconnection equipment.
- Apply isolation, lock-out/tag-out, test-for-dead, earthing/grounding and permit-to-work procedures before work on equipment that may become energised.
- Treat all conductors and equipment as live until proven otherwise. Maintain safe approach distances and use insulated tools and arc-rated PPE where required.
- Do not energise, back-feed, synchronise or connect the mini-grid to a DisCo network without approved procedures, protection settings, authorisation and communication with the relevant control authority.
- Secure substations, battery rooms, solar arrays, control rooms and distribution assets against unauthorised public access. Maintain warning signs, barriers and emergency contact information.
- Observe battery safety requirements, including ventilation, fire protection, spill response, isolation and manufacturer guidance for lithium-ion or other storage systems.

9.3 Driving, Lifting and Work at Height

- Use licensed, fit and authorised drivers; wear seat belts; obey project speed limits; do not use handheld phones while driving; and never drive when fatigued or impaired.
- Use approved lifting plans, certified equipment and competent operators/riggers. Never stand under suspended loads.
- Use inspected ladders, scaffolds, fall-prevention systems and full-body harnesses where required. Do not work at height in unsafe weather or without rescue arrangements.

10. COMMUNITY HEALTH, SAFETY AND SECURITY

- Plan work to minimise risks to pedestrians, road users, schools, markets, homes, farms, livestock and existing utilities.
- Barricade and illuminate excavations, cable trenches, pole foundations and work zones; provide safe crossings and restore access promptly.
- Implement traffic management, flagging, signage, speed control and safe delivery routes, especially near schools, markets and densely populated areas.
- Control dust, noise, vibration, glare, waste, vector breeding and water contamination. Notify communities in advance of disruptive work or planned outages.
- Do not enter private land, buildings or farms without authorised access and prior communication, except in a lawful emergency.
- Do not obstruct livelihoods, damage crops, take water, harvest resources or use community facilities without approval and agreed arrangements.
- Security personnel shall be screened, trained and supervised; use of force must be lawful, necessary, proportionate and documented. Firearms are not permitted unless specifically lawful and authorised.
- Report any community injury, property damage, conflict, protest, security threat or serious complaint immediately to the Project Manager and safeguards focal point.

11. ENVIRONMENTAL AND CULTURAL HERITAGE CONDUCT

- Follow the ESMP and site-specific environmental procedures. Obtain approval before vegetation clearing, borrow-pit use, waste disposal, discharge or work near watercourses and sensitive receptors.
- Prevent spills and leaks. Store fuel, oil, chemicals and hazardous waste in labelled, secure, bunded areas with spill kits and trained responders.
- Segregate waste; reuse or recycle where practicable; use authorised transporters and disposal facilities; and keep waste-transfer records.
- Do not burn waste, dump into drains or watercourses, hunt wildlife, collect firewood, disturb nests or remove plants, soil, artefacts or community resources without authorisation.
- Use water, energy and materials efficiently and prevent conflict over shared water points or other limited natural resources.

- Immediately stop work and protect the area if archaeological, historical, sacred or cultural material is discovered. Notify the supervisor and implement the project chance-finds procedure.
- Restore disturbed areas, remove temporary works and leave sites safe, clean and stable at demobilisation.

12. COMMUNITY RELATIONS AND GRIEVANCE MANAGEMENT

- Treat community members, customers and PAPs with courtesy, patience and impartiality, including during surveys, connection registration, compensation discussions and complaint handling.
- Provide only accurate, authorised information. Do not promise jobs, compensation, tariffs, connections, land payments or project benefits outside approved processes.
- Use local liaison arrangements and interpreters where needed. Respect cultural practices that do not conflict with human rights, safety or this Code.
- Channel community complaints to the project GRM. Do not obstruct access to the GRM, demand payment, alter records or retaliate against complainants.
- Give priority to accessible channels for women, persons with disabilities, elderly persons, low-literacy groups and other vulnerable persons.
- Do not publicly disclose names or details of SEA/SH, GBV, VAC or sensitive grievances. Such cases shall use dedicated confidential referral pathways.

13. INFORMATION, ASSETS, ANTI-FRAUD AND CONFLICTS OF INTEREST

- Protect personal data, customer records, engineering drawings, network information, commercial information, passwords and confidential grievances.
- Collect photographs, coordinates, identity data or household information only for authorised purposes, with appropriate notice, consent or other lawful basis, and secure storage.
- Do not falsify timesheets, test results, inspection records, invoices, delivery notes, connection data, environmental records, incident reports or grievance logs.
- Do not offer, request, accept or facilitate bribes, kickbacks, secret commissions, improper gifts or favours.
- Declare actual, potential or perceived conflicts of interest, including family relationships, financial interests, gifts, outside employment or involvement in supplier selection.
- Use project vehicles, tools, materials, internet, fuel, electricity and funds only for authorised purposes.
- Report suspected fraud, theft, diversion, meter tampering, illegal connections or corruption through approved channels; do not take personal enforcement action.

14. WORKER ACCOMMODATION AND LABOUR-INFLUX CONTROLS

- Where accommodation is provided, maintain adequate space, sanitation, water, ventilation, lighting, privacy, fire safety, first aid and waste management.
- Keep camps secure without unlawfully restricting workers' movement. Display camp rules and grievance contacts in languages workers understand.
- No weapons, illegal drugs, violence, exploitation, gambling-related coercion, prostitution-related exploitation or unauthorised visitors in worker accommodation.
- Respect local customs and community resources. Avoid nuisance, excessive noise, harassment, public intoxication and conflict with residents.
- Recruit local labour transparently where feasible, especially for unskilled work, without excluding qualified persons or charging recruitment fees.
- Manage communicable-disease risks through awareness, hygiene, voluntary and confidential referral to health services, and non-discrimination. HIV status shall not be used to deny employment.

15. REPORTING, RESPONSE AND NON-RETALIATION

15.1 Duty to Report

Every worker must promptly report any actual, attempted, suspected or threatened breach that may involve SEA/SH, GBV, VAC, serious safety risk, violence, fraud, corruption, serious environmental harm or retaliation. Reports made in good faith are protected even if not substantiated.

15.2 Approved Channels

- Immediate supervisor or Project Manager, except where they may be implicated.
- Environmental and Social / SEA-SH Focal Point using the project-specific contacts in Annex A.
- Worker Grievance Mechanism for employment issues.
- Community GRM for community concerns, with confidential handling for sensitive cases.
- Confidential hotline, email, complaint box or other channel approved by the project.

- Emergency services or lawful authorities where urgent protection or mandatory reporting is required.

15.3 Response Principles

- Ensure immediate safety and urgent medical care where needed.
- For SEA/SH, GBV and VAC, use survivor-centred and child-sensitive referral pathways; obtain informed consent before sharing information except where law or imminent risk requires otherwise.
- Record only necessary information, restrict access, avoid repeated interviewing and never ask a survivor to confront the alleged perpetrator.
- Separate alleged perpetrators from survivors or vulnerable persons where necessary, without prejudging the outcome and without disadvantaging the survivor.
- Retaliation, intimidation, malicious disclosure or interference with a complaint or investigation is a separate serious violation.

16. INVESTIGATION, DISCIPLINE AND REFERRAL

Allegations will be assessed promptly, impartially and confidentially by authorised personnel. The project will protect due process while prioritising safety and preserving evidence. The Code does not replace criminal, civil, professional or regulatory processes.

- Possible measures include coaching, retraining, written warning, removal from a task, suspension of site access, reassignment, termination of employment or contract, recovery of loss, supplier sanctions and referral to competent authorities.
- SEA, sexual activity with a child, VAC, serious violence, trafficking, serious retaliation, deliberate life-threatening safety violations, major fraud or theft may constitute gross misconduct and may lead to immediate removal and termination, subject to applicable procedure.
- Managers may be disciplined for failing to prevent foreseeable harm, suppressing reports, retaliating, failing to act on known violations or allowing workers to remain on site without signed Codes and training.
- Nothing in this Code prevents a survivor, complainant or worker from using lawful external remedies.

17. TRAINING, MONITORING AND REVIEW

- All personnel shall receive induction before mobilisation or site access, including SEA/SH, GBV, VAC, OHS, electrical safety, community conduct, GRM and reporting channels.
- Toolbox talks and refresher training shall be provided at intervals proportionate to risk, and after incidents, audit findings, scope changes or mobilisation of new crews.
- Training shall be understandable, culturally appropriate and accessible to low-literacy workers and persons with disabilities. Attendance and comprehension shall be documented.
- Supervisors shall conduct observations, inspections, spot checks and worker interviews. Contractors shall submit records of signed Codes, training, grievances, incidents and disciplinary actions as required.
- This Code shall be reviewed at least annually and before major construction or operational changes. Revisions shall be approved, communicated and re-signed where material obligations change.

18. COMPANY / CONTRACTOR CODE OF CONDUCT

PROMASS Engineering Services Ltd and every contractor or subcontractor engaged on the project commits to create and maintain a workplace and project environment that prevents harm and enforces this Code.

18.1 Organisational Commitments

- Appoint competent E&S, HSE and SEA/SH focal personnel with clear authority, resources and confidential reporting arrangements.
- Integrate this Code into procurement, contracts, mobilisation, subcontractor management, site rules, induction and performance evaluation.
- Verify worker age, qualifications and fitness; prohibit recruitment fees, forced labour, child labour and trafficking.
- Ensure every worker and manager receives the Code in a language and format they understand, signs it before site access and receives refresher training.
- Provide PPE, welfare facilities, first aid, emergency arrangements, safe equipment, competent supervision and adequate budgets for OHS and environmental controls.
- Maintain separate but coordinated worker and community grievance channels, including confidential SEA/SH and VAC pathways and service referrals.
- Investigate or refer allegations promptly using qualified and impartial personnel; protect confidentiality and prohibit retaliation.
- Notify PROMASS/REA/DARES and other parties of incidents within contractual reporting timelines, while protecting survivor identity and sensitive information.
- Monitor subcontractors and labour providers; require corrective action and remove or sanction entities that fail to comply.
- Promote transparent local employment where feasible, fair access to opportunities and equitable use of community resources.
- Maintain records sufficient to demonstrate compliance while applying data minimisation and confidentiality.
- Cooperate with audits, inspections, authorised monitoring and corrective-action plans.

18.2 Company / Contractor Declaration

On behalf of the company/contractor, I acknowledge that I have read and understood this Code, accept responsibility for its implementation, and understand that failure to comply may result in suspension, termination, financial remedies, exclusion from project activities and/or referral to competent authorities.

Company / Contractor	PROMASS ENGINEERING SERVICES LTD / _____
Authorised Representative	Name: _____ Title: _____
Signature / Company Stamp	Signature: _____ Stamp: _____
Date	_____

19. MANAGER AND SUPERVISOR CODE OF CONDUCT

Managers and supervisors carry enhanced responsibility because their decisions, conduct and response to concerns directly affect worker and community safety. In addition to the general Code, each manager/supervisor shall:

- Lead by example and never request, authorise or ignore conduct that breaches this Code.
- Confirm that all personnel under their control are age-verified, trained, competent, medically fit where required, properly equipped and have signed the Individual Code.
- Plan work with appropriate risk assessments, permits, method statements, community notifications and environmental controls.
- Enforce PPE, electrical isolation, traffic management, work-at-height, excavation and other critical controls consistently.
- Create a respectful workplace, distribute opportunities fairly and prevent harassment, discrimination, retaliation and abuse of authority.
- Immediately act on observed or reported SEA/SH, GBV, VAC, serious safety risk or other serious misconduct. Do not investigate sensitive allegations personally unless formally authorised and trained.
- Protect confidentiality, preserve evidence and refer survivors or affected persons to approved support and reporting pathways.
- Never pressure a complainant to withdraw, accept an informal settlement, confront an alleged perpetrator or disclose details publicly.
- Remove persons from hazardous or sensitive duties where necessary to protect safety, without prejudging findings or penalising the complainant.
- Report incidents through the required chain and within contractual timelines; verify that corrective actions are completed.
- Monitor camp conduct, community interaction, driving, substance use, working hours and subcontractor compliance.
- Document induction, toolbox talks, inspections, warnings, stop-work actions, grievances and corrective measures accurately.
- Cooperate with audits and accept accountability for deliberate inaction, concealment, retaliation or systemic non-compliance.

19.1 Manager / Supervisor Declaration

I understand my duty to prevent, identify, report and respond to breaches of this Code. I will exercise authority fairly and will not tolerate SEA/SH, GBV, VAC, unsafe work, retaliation, fraud or abuse of project power.

Name	_____
Position / Employer	_____
Project / Work Location	_____
Signature	_____
Date	_____

20. INDIVIDUAL WORKER CODE OF CONDUCT

I acknowledge that misconduct - including SEA, SH, GBV, VAC, unsafe work, theft, fraud, violence, retaliation and serious environmental harm - is unacceptable at the worksite, in surrounding communities, in worker accommodation, during travel and in all project-related communications. I agree that while engaged on this project, I will:

1. Complete required identity, age, qualification, medical and security checks lawfully required for my role.
2. Treat women, men, children, persons with disabilities, community members, customers and colleagues with respect, regardless of status or background.
3. Not use language, images, gestures or behaviour that is harassing, abusive, sexually provocative, demeaning, discriminatory, threatening or culturally inappropriate.
4. Not engage in any sexual activity with a child, including grooming or digital contact. Mistaken belief about age or apparent consent is not a defence.
5. Not exchange or promise money, jobs, electricity connections, compensation, contracts, goods, services, transport, protection or any project benefit for sex or sexual favours.
6. Not use my position, authority or access to pressure, exploit or pursue sexual relationships with subordinates, applicants, complainants, beneficiaries or community members.
7. Not commit, threaten, encourage or conceal SEA/SH, GBV, VAC, trafficking, assault, bullying, stalking or intimidation.
8. Report suspected or actual serious misconduct promptly and in good faith through an approved channel, and keep sensitive information confidential.
9. Not retaliate against a complainant, survivor, witness or person who refuses an improper request or exercises stop-work authority.
10. Attend induction, toolbox talks and required training on OHS, SEA/SH, GBV, VAC, environmental protection, community conduct and the GRM.
11. Wear required PPE, follow permits and procedures, use stop-work authority for imminent danger and never bypass safety devices.
12. Perform only work I am trained and authorised to do, especially electrical work, energisation, lifting, work at height, excavation and driving.
13. Not possess or use illegal drugs, report for duty impaired, fight, carry unauthorised weapons or misuse alcohol in project-related settings.
14. Obey traffic rules, wear seat belts, avoid handheld phone use while driving and never operate a vehicle or equipment while fatigued or impaired.
15. Protect communities by using barriers, signs, safe access, traffic controls and respectful communication; I will not enter private property without authorisation.
16. Not steal, damage or misuse project, public, worker or community assets, nor falsify records or participate in fraud, bribery or illegal connections.
17. Protect confidential, personal and project information and obtain authorisation before taking or publishing photographs, videos or location data.
18. Prevent pollution, dispose of waste correctly, protect water and natural resources, respond to spills and follow chance-finds procedures.
19. Respect worker accommodation and community rules and avoid nuisance, harassment, exploitation or conflict with local residents.
20. Use the worker or community grievance mechanism as appropriate and cooperate truthfully with authorised investigations and corrective actions.

20.1 ACKNOWLEDGEMENT AND ACCEPTANCE

I confirm that this Code has been explained to me in a language and manner I understand. I know how to report a concern and understand that a breach may lead to removal from site, disciplinary action, termination of employment or contract, recovery of losses and/or referral to competent authorities. I understand that I remain personally responsible for my conduct.

Worker Full Name	_____
Employer / Subcontractor	_____
Job Title / Trade	_____
National ID / Staff No. (where applicable)	_____
Project Location	_____
Worker Signature / Thumbprint	_____
Date	_____
Witness / Induction Facilitator	Name: _____ Signature: _____
Language Used for Explanation	_____

ANNEX A - PROJECT REPORTING CONTACTS

The following details must be completed, verified, displayed at work sites and worker accommodation, communicated during induction and updated whenever personnel change. Sensitive SEA/SH and VAC channels must preserve confidentiality.

CONTACT / CHANNEL	REQUIRED INFORMATION	PROJECT-SPECIFIC DETAILS
Project Manager	Name / Phone / Email	_____
PROMASS E&S Safeguards Lead	Name / Phone / Email	_____
SEA/SH / GBV Focal Point (confidential)	Name / dedicated phone / email	_____
Child Safeguarding Focal Point	Name / Phone / Email	_____
HSE Manager / Emergency Coordinator	Name / Phone / Email	_____
Worker Grievance Mechanism	Phone / email / complaint box / office	_____
Community GRM / Community Liaison Officer	Phone / email / office	_____
Nearest Health Facility / Referral Service	Name / address / phone	_____
Emergency / Fire / Ambulance / Police	Verified local contacts	_____
REA/DARES Safeguards Contact	Name / Phone / Email	_____

BEFORE ISSUE

Do not submit or display the final controlled copy with blank mandatory reporting contacts. Confirm that telephone numbers, email addresses, referral services and emergency contacts are active and accessible to women, men, vulnerable persons and low-literacy workers.

ANNEX B - INDUCTION AND CODE ACCEPTANCE REGISTER

Use this register in addition to individual signed acknowledgement pages. Attach additional sheets as required.

S/N	Worker Name	Employer	Trade / Role	Language	Signature / Thumbprint	Date
1						
2						
3						
4						
5						
6						
7						
8						
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Induction Facilitator Certification

Facilitator Name / Position	_____
Topics Covered	CoC; SEA/SH; GBV; VAC; OHS; electrical safety; environment; GRM; reporting contacts
Location / Date / Duration	_____
Facilitator Signature	_____

ANNEX C - MINIMUM DISCIPLINARY RESPONSE GUIDE

This guide supports consistency but does not replace investigation, due process, contractual rights or applicable law. The actual response shall consider severity, intent, harm, prior conduct, retaliation, concealment and legal obligations. Protective measures may be taken immediately without presuming guilt.

CATEGORY	ILLUSTRATIVE EXAMPLES	POSSIBLE RESPONSE
Minor / Correctable	First-time housekeeping lapse, low-risk procedural omission, minor dress or conduct issue without harm.	Coaching, retraining, verbal or written warning, corrective action and monitoring.
Serious	Repeated safety breach, harassment, bullying, intoxication at work, unauthorised disclosure, theft, falsification, significant environmental breach, obstruction of GRM.	Immediate removal from task where necessary; formal investigation; suspension; final warning; restitution; reassignment or termination.
Gross Misconduct	SEA, sexual activity with a child, VAC, rape or sexual assault, trafficking, serious violence, serious retaliation, deliberate life-threatening safety violation, major fraud or sabotage.	Immediate protective action and removal from site; preservation of evidence; investigation/referral; termination of employment or contract where substantiated; notification to competent authorities as required.
Managerial Failure	Suppression of reports, failure to act on known serious risk, retaliation, allowing untrained or unsigned workers on site, concealment or systemic non-compliance.	Formal investigation; removal of supervisory authority; suspension; termination; contractor sanctions and corrective-action plan.

FINAL IMPLEMENTATION CHECK

- ☐ Project-specific contacts in Annex A completed and verified.
- ☐ Code approved, version-controlled and issued to all contractors and subcontractors.
- ☐ All managers and workers signed the appropriate declaration before site access.
- ☐ Induction and refresher training records available.
- ☐ Worker GRM and community GRM operational and communicated.
- ☐ Confidential SEA/SH and VAC referral pathways operational.
- ☐ Code displayed in accessible locations and translated/explained where required.
- ☐ Monitoring, incident reporting and disciplinary records established.

END OF CONTROLLED DOCUMENT