



PROMASS ENGINEERING SERVICES LIMITED

LABOUR MANAGEMENT PLAN

For the Proposed 1 MW Solar Hybrid Interconnected Mini-grid Project under the Distributed Access through Renewable Energy Scale-up (DARES) Programme

Submission purpose: Project-level framework for fair recruitment, decent work, labour and working conditions, occupational health and safety, contractor labour compliance, worker grievance management and prevention of child labour, forced labour, SEA/SH and GBV throughout development, construction, interconnection, operation, maintenance and decommissioning.

Document Control	Details
Document number	PESL-DARES-IMG-LMP-001
Version / issue	Version 1.0 / Issue 01
Issue date	29 July 2026
Document status	Submission Version
Project location	To be completed before submission
Distribution Company (DisCo)	To be completed before submission
REA / DARES reference	To be completed before submission
Prepared by	Promass Engineering Services Limited
Approved by	Dr Sani Mohammed Bida, MD/CEO

This is a controlled document. Uncontrolled copies shall be checked against the current approved version before use.

DOCUMENT APPROVAL AND CONTROL

This Labour Management Plan (LMP) is issued by Promass Engineering Services Limited for application to the proposed DARES Interconnected Mini-grid Project. It shall be read together with the project ESMS, ESHS Standards, Stakeholder Engagement Plan, Code of Conduct, site-specific ESMP/C-ESMP, emergency procedures and contractual requirements.

Role	Name / Position	Signature	Date
Prepared by	E&S / Human Resources Team		29 July 2026
Reviewed by	Project Manager / E&S Manager		
Approved by	Dr Sani Mohammed Bida, MD/CEO		

Revision history

Version	Date	Description of change	Approval
1.0 / Issue 01	29 July 2026	Original five-page labour policies and procedures expanded and adapted into a project-level LMP for a 1 MW solar hybrid interconnected mini-grid under the DARES Programme.	MD/CEO

Distribution and document custody

Controlled holder	Copy format	Responsibility
MD/CEO and Project Director	Master electronic copy	Approval and management oversight.
Project Manager	Controlled electronic copy	Project implementation and contractor enforcement.
E&S / HSE Manager	Controlled working copy	Monitoring, reporting, training and corrective actions.
HR / Administration	Controlled working copy	Recruitment, contracts, worker files and worker GRM.
EPC / O&M Contractor	Contract-controlled copy	Cascading requirements to subcontractors and workers.
REA / DARES and relevant DisCo	Submission / disclosure copy	Programme and interface review, as applicable.

Required completion before submission: Insert the project location, relevant DisCo, point of common coupling, workforce estimate, approved grievance contacts, emergency contacts, contractor details and budget. Any project-specific requirement communicated by REA or the DisCo shall be incorporated through controlled revision.

CONTENTS

EXECUTIVE SUMMARY	4
1. INTRODUCTION AND PURPOSE	5
2. PROJECT DESCRIPTION AND LABOUR USE	6
3. LEGAL, POLICY AND INSTITUTIONAL FRAMEWORK	8
4. LABOUR RISK ASSESSMENT	8
5. LABOUR POLICIES AND EMPLOYMENT PROCEDURES	11
6. OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT	13
7. CONTRACTOR AND PRIMARY SUPPLIER MANAGEMENT	15
8. LABOUR INFLUX, LOCAL EMPLOYMENT AND WORKER ACCOMMODATION	15
9. WORKER GRIEVANCE MECHANISM	17
10. SEA/SH, GBV, HARASSMENT AND CHILD SAFEGUARDING	18
11. ROLES AND RESPONSIBILITIES	20
12. TRAINING AND CAPACITY BUILDING	20
13. MONITORING, REPORTING AND CORRECTIVE ACTION	21
14. IMPLEMENTATION BUDGET	23
15. REVIEW, DISCLOSURE AND MANAGEMENT COMMITMENT	23
ANNEX A - PROJECT AND WORKFORCE INFORMATION SHEET	24
ANNEX B - RECRUITMENT AND AGE VERIFICATION CHECKLIST	26
ANNEX C - MINIMUM WORKER CONTRACT REQUIREMENTS	27
ANNEX D - WORKER INDUCTION AND CODE OF CONDUCT REGISTER	28
ANNEX E - JOB HAZARD ANALYSIS / SAFE WORK METHOD FORM	29
ANNEX F - ELECTRICAL PERMIT-TO-WORK AND LOTO CHECKLIST	30
ANNEX G - WORKER GRIEVANCE FORM AND REGISTER	31
ANNEX H - INCIDENT NOTIFICATION AND INVESTIGATION FORM	32
ANNEX I - WORKER ACCOMMODATION / CAMP CHECKLIST	33
ANNEX J - CONTRACTOR LABOUR COMPLIANCE CHECKLIST	34
ANNEX K - MONTHLY LABOUR AND OHS MONITORING REPORT	35
ANNEX L - TRAINING MATRIX AND ATTENDANCE RECORD	37
ANNEX M - MANAGEMENT ADOPTION AND WORKER ACKNOWLEDGEMENT	38

EXECUTIVE SUMMARY

Promass Engineering Services Limited has prepared this Labour Management Plan for the proposed 1 MW solar hybrid interconnected mini-grid project under the Distributed Access through Renewable Energy Scale-up (DARES) Programme. The Plan expands the company's existing labour policies and procedures into a project-specific management instrument suitable for application during development, construction, interconnection, commissioning, operation, maintenance and decommissioning.

The project will engage direct workers, contracted workers, specialist consultants, primary supply workers and, where required, formally engaged community workers. Personnel of REA, the relevant Distribution Company and public authorities may also enter the worksite for inspection, switching, testing or oversight. Their employment remains with their parent organisations, but site access is subject to the project's safety, security and conduct rules.

Core commitment: No work is so urgent that it cannot be performed safely, lawfully, fairly and with respect for workers and host communities. Promass will not tolerate child labour, forced labour, discrimination, retaliation, SEA/SH, GBV, violence against children, wage abuse or unsafe work.

Summary of mandatory controls

- Written and understandable terms of employment for every project worker, including job, wages, hours, overtime, benefits, discipline, grievance and termination provisions.
- Minimum employment age of 18 years for all project work, supported by documented age and identity verification.
- Fair recruitment, non-discrimination, equal opportunity, reasonable accommodation and protection of pregnant workers and persons with disabilities.
- Worker grievance mechanism separate from the community GRM, with confidential and anonymous channels and protection from retaliation.
- Mandatory Code of Conduct and induction addressing community interaction, SEA/SH, GBV, child safeguarding, alcohol and drugs, theft, violence and respectful behaviour.
- Risk-based OHS controls including task risk assessment, competent supervision, PPE, permit-to-work, lock-out/tag-out, test-before-touch, working-at-height controls, lifting plans, traffic management, first aid and emergency response.
- Formal coordination with the relevant DisCo for isolation, protection, switching, energisation and work at the point of common coupling; no person may energise or access electrical apparatus without written authority.
- Contract clauses, prequalification, monitoring and corrective action for contractors, subcontractors and primary suppliers.
- Prompt notification, investigation and closure of labour, OHS and social incidents, including serious incident reporting to REA/DARES and other authorities as required.

Implementation status

This is a framework submission version. Project-specific workforce numbers, the named DisCo, location, contractor details, worker grievance contacts, referral services, emergency numbers, welfare arrangements, project schedule and approved budget shall be entered before mobilisation. Contractors shall prepare labour and OHS implementation arrangements consistent with this LMP and the project C-ESMP; no contractor procedure may reduce the standards in this Plan.

1. INTRODUCTION AND PURPOSE

1.1 Background

The proposed project comprises a solar photovoltaic generation facility, battery energy storage and associated balance-of-system equipment connected to a local distribution network through an agreed point of common coupling. It may include a powerhouse, inverter and battery rooms or containers, transformers, switchgear, protection and metering, distribution lines, poles, service connections, access routes and temporary work areas. As an interconnected system, work may interface with existing energised infrastructure and the relevant Distribution Company.

The original Promass labour document established key policies on non-discrimination, written contracts, age verification, fair working conditions, OHS, forced labour, labour influx, worker grievance arrangements and prevention of SEA/SH and GBV. This revised Plan retains those commitments and establishes responsibilities, procedures, records and monitoring tools for the DARES Interconnected Mini-grid Project.

1.2 Purpose

The purpose of this LMP is to identify likely labour requirements and risks and to define how project workers will be recruited, managed, protected, consulted and separated from employment in a fair and transparent manner. It converts policy commitments into auditable requirements for Promass, consultants, contractors, subcontractors, security providers, labour brokers and primary suppliers.

1.3 Objectives

- Promote safe and healthy working conditions and prevent occupational injuries, ill-health and fatalities.
- Promote fair treatment, non-discrimination and equal opportunity for project workers.
- Protect workers, including vulnerable workers, migrant workers, women, persons with disabilities and young adults.
- Prevent child labour, forced labour, trafficking, harassment, SEA/SH, GBV and retaliation.
- Support freedom of association and worker-management consultation consistent with applicable law.
- Provide accessible worker grievance channels and timely resolution.
- Manage labour influx and worker-community interaction to avoid conflict and pressure on local services.
- Ensure contractors and primary suppliers meet the project's labour and OHS standards.
- Establish records, indicators, reporting lines, incident response and continuous improvement.

1.4 Scope and applicability

This LMP applies to all persons employed or engaged in connection with the project, regardless of location or contractual tier, including personnel working at project offices, warehouses, fabrication areas, transport routes, generation and battery sites, distribution corridors, the point of common coupling, worker accommodation and community engagement activities. It applies from recruitment and procurement through demobilisation and final settlement of worker entitlements.

1.5 Relationship with other project instruments

Instrument	Relationship to this LMP
Environmental and Social Management System (ESMS)	Provides the governance, screening, risk management, monitoring, audit and corrective-action framework.
Environmental and Social Management Plan / C-ESMP	Translates site-specific impacts and mitigation into construction and operational actions.
ESHS Standards	Defines mandatory environmental, social, health and safety performance requirements.
Stakeholder Engagement Plan	Manages community and institutional engagement; the worker GRM under this LMP remains separate from the community GRM.
Code of Conduct	Sets individual and management behaviour requirements, including SEA/SH, GBV, child safeguarding, community interaction and disciplinary consequences.
Emergency Preparedness and Response Plan	Defines emergency organisation, communication, evacuation, medical response and DisCo coordination.

Instrument	Relationship to this LMP
Interconnection Agreement / Operating Protocol	Governs switching, isolation, protection settings, outage coordination and controlled energisation at the grid interface.
Contractor contracts and purchase orders	Make LMP and ESHS compliance legally binding and establish reporting and remedy provisions.

2. PROJECT DESCRIPTION AND LABOUR USE

2.1 Anticipated project phases

Phase	Typical activities	Labour implications
Development and design	Surveys, land and route confirmation, load assessment, environmental and social studies, engineering, permitting and DisCo studies.	Small multidisciplinary team; travel and community interaction; survey and electrical interface risks.
Procurement and logistics	Equipment sourcing, inspection, shipping, haulage, storage and local transport.	Primary supply workers, drivers, warehouse personnel and lifting crews; supply-chain, traffic and handling risks.
Construction	Site preparation, fencing, foundations, structures, PV installation, battery and inverter installation, transformer and switchgear works, poles, conductors, cabling and customer connections.	Peak workforce; multiple contractors; local labour; work at height, lifting, excavation, electrical and community-interface risks.
Interconnection and commissioning	Protection testing, cable tests, switching plans, isolation, synchronisation where applicable, anti-islanding verification, metering and energisation.	Specialist electrical workers and DisCo personnel; high-consequence electrical risks and strict authority controls.
Operation and maintenance	Monitoring, preventive and corrective maintenance, vegetation control, battery inspection, customer service and fault response.	Smaller permanent workforce; lone working, electrical access, driving, battery and emergency risks.
Decommissioning / repowering	Isolation, dismantling, transport, recycling/disposal, land restoration and worker demobilisation.	Temporary labour increase; electrical isolation, lifting, waste, final payment and retrenchment risks.

2.2 Categories of project workers

Worker category	Examples	Management approach
Direct workers	Promass project management, engineers, E&S/HSE, HR, finance, community liaison, technicians and administrative staff.	Managed directly under Promass employment policies, contracts, this LMP and the Code of Conduct.
Contracted workers	EPC and civil/electrical contractors, installers, security, drivers, waste handlers, cleaners, O&M providers and subcontractors.	Contractor is the employer; Promass enforces contractual LMP/ESHS requirements and conducts oversight.
Primary supply workers	Workers producing or supplying PV modules, batteries, inverters, transformers, switchgear, cables, poles and other essential equipment.	Risk-based supplier due diligence, contractual prohibitions on child and forced labour, and corrective action.
Community workers, if used	Formally engaged local workers for suitable non-hazardous tasks.	Voluntary, paid, documented and supervised engagement; no unpaid community labour for commercial work; no hazardous work without competence.
Consultants and specialists	Designers, surveyors, environmental and social consultants, testing engineers, auditors and trainers.	Professional contracts, site induction, competence verification and compliance with site rules.

Worker category	Examples	Management approach
Government / REA / DisCo personnel	Inspectors, reviewers, switching and protection personnel.	Remain subject to parent-employer terms but comply with site access, coordination, electrical authority and emergency rules.

2.3 Workforce profile and estimates

The final workforce estimate will be established after appointment of the EPC contractor and confirmation of the construction programme. Annex A shall be completed before mobilisation and updated monthly. Workforce data shall be disaggregated, as practicable, by employer, sex, local/migrant status, job category, age band, disability status where voluntarily disclosed, and contract type.

Workforce item	Development	Construction peak	Operation / O&M
Promass direct workers	TBC	TBC	TBC
Contracted workers	TBC	TBC	TBC
Community/local workers	TBC	TBC	TBC
Migrant/non-local workers	TBC	TBC	TBC
Female workers	TBC	TBC	TBC
Workers requiring accommodation	TBC	TBC	TBC

2.4 Workforce sourcing and timing

Promass will encourage transparent local recruitment for suitable positions while preserving merit, competence and equal opportunity. Specialist positions may require non-local workers. Recruitment campaigns shall be announced early enough for interested persons to apply and shall not be controlled by a single individual, political group, traditional authority or labour intermediary. Community leaders may verify residence but may not determine final selection or collect fees from applicants.

2.5 Prohibited labour arrangements

- Employment of any person below 18 years on the project.
- Forced, bonded, indentured, trafficked, prison or compulsory labour not freely offered.
- Recruitment fees, deposits, confiscation of identity documents, restriction of movement or withholding of wages to compel work.
- Unpaid trial work, disguised volunteering or compulsory community labour for commercial project activities.
- Payment below lawful or contractually agreed rates, unauthorised deductions or delayed final settlement.
- Engagement through unapproved labour brokers or informal subcontractors.
- Work without required competence, medical fitness where relevant, induction, PPE, supervision or safe system of work.

3. LEGAL, POLICY AND INSTITUTIONAL FRAMEWORK

3.1 Applicable requirements

Promass and every project employer shall comply with applicable Nigerian labour, employment, occupational safety, compensation, immigration, anti-trafficking, data protection, public health and social protection requirements at federal, state and local levels. The attachment identified the World Bank Environmental and Social Standard 2 (ESS2), International Labour Organisation principles, ISO 45001 and the Nigerian Labour Act as core references. These remain the principal framework for this LMP, together with REA/DARES requirements and project contracts.

Requirement / standard	Application to the project
World Bank ESS2 - Labour and Working Conditions	Terms of employment, non-discrimination, worker organisations, child and forced labour, worker GRM, OHS, contracted and primary supply workers.
Relevant World Bank Environmental and Social Standards	ESS1 risk management; ESS4 community health and safety; ESS10 engagement; other standards where labour activities interact with land, biodiversity or cultural heritage.
Applicable Nigerian labour and employment law	Contracts, wages, hours, leave, termination, worker representation, statutory records and lawful deductions.
Applicable OHS, factories, compensation and public health requirements	Workplace safety, welfare, incident notification, compensation, medical care and statutory inspections.
Applicable anti-trafficking, child protection and criminal law	Prohibition and response to trafficking, forced labour, child labour, violence, exploitation and abuse.
REA / DARES E&S instruments and approvals	Programme-specific labour, OHS, reporting, incident response, Code of Conduct and contractor requirements.
NERC / DisCo technical and safety requirements	Competence, switching, isolation, protection, energisation and public electrical safety at the interconnected interface.
ILO conventions and good international industry practice	Freedom from forced and child labour, equality, decent work, occupational safety and fundamental principles and rights at work.
ISO 45001 principles	Systematic leadership, worker participation, hazard control, competence, monitoring, audit and continual improvement.

3.2 Order of precedence

Where requirements differ, the project shall apply the provision that affords the greater protection to workers, provided it does not conflict with mandatory Nigerian law. Contract terms may improve but shall not reduce statutory rights or this LMP. Any uncertainty shall be referred to the Project Manager, HR Manager and E&S/HSE Manager before action is taken.

3.3 Legal and permit register

The E&S/HSE Manager will maintain a legal and other-requirements register. HR will maintain current employment templates and statutory records. Contractors shall identify applicable requirements in their mobilisation plans and provide evidence of compliance. Changes shall be reviewed during management meetings and incorporated through controlled revision or instruction.

4. LABOUR RISK ASSESSMENT

4.1 Risk assessment methodology

Labour and OHS risks shall be assessed using the project risk matrix and mitigation hierarchy: eliminate, substitute, apply engineering controls, apply administrative controls and use PPE as the final layer. Risk assessments shall consider normal, abnormal and emergency conditions; vulnerable workers; community interface; cumulative fatigue; weather; concurrent operations; and the consequences of work on an energised distribution network.

4.2 Principal labour and working-condition risks

Risk area	Potential impacts	Initial risk	Key controls
Recruitment and employment terms	Informal hiring, unclear duties, recruitment fees, wage disputes, unauthorised deductions, excessive overtime or delayed final payment.	Moderate	Transparent recruitment; written contracts; payroll controls; timesheets; worker briefing; audits and worker GRM.
Discrimination and exclusion	Bias based on sex, ethnicity, religion, disability, pregnancy, origin, age or other status; harassment and unequal access to training or promotion.	Moderate	Equal-opportunity policy; objective criteria; reasonable accommodation; confidential reporting; disciplinary response.
Child labour and age fraud	Under-age persons engaged through informal labour channels or subcontractors.	High	Minimum age 18; identity and age verification; contractor audits; immediate safe removal and referral.
Forced labour and trafficking	Withholding documents or wages, coercion, debt bondage, threats, restricted movement or recruitment deception.	High	No worker-paid recruitment fees; freedom to leave; confidential interviews; supplier due diligence; corrective action and reporting.
Electrical work and interconnection	Electric shock, arc flash, back-feed, unexpected energisation, inadequate isolation, induced voltage or switching error.	High	Authorised persons; DisCo-approved switching; PTW; LOTO; test-before-touch; earthing; approach distances; arc-rated PPE; controlled energisation.
PV DC and battery systems	Persistent DC voltage, short circuit, thermal runaway, fire, toxic vapour, electrolyte exposure and heavy loads.	High	Isolation design; insulated tools; BMS monitoring; ventilation; fire detection; exclusion zones; battery handling plan; emergency response.
Work at height	Falls from roofs, structures, poles, ladders or elevated platforms; falling objects.	High	Avoid height where possible; certified access; fall prevention/arrest; rescue plan; dropped-object control; competent supervision.
Excavation and civil works	Collapse, buried services, falls, plant interaction, dust, noise and manual handling.	High	Permit, service detection, shoring/sloping, barricades, access/egress, spotters, dust/noise controls and inspections.
Lifting and transport	Dropped loads, crane overturn, vehicle collision, fatigue and public road incidents.	High	Lift plans, certified equipment/operators, exclusion zones, journey management, speed control, vehicle checks and driver fitness.
Labour influx and community conflict	Pressure on housing, water, health services and prices; disputes, crime, communicable disease, SEA/SH and GBV.	Moderate to High	Local hiring; worker accommodation controls; Code of Conduct; community liaison; health awareness; security and grievance mechanisms.
SEA/SH, GBV and harassment	Abuse of power, sexual favours, hostile workplace, exploitation of community members or retaliation.	High	Signed CoC; training; confidential channels; survivor-centred referrals; sanctions; restricted data access.
Worker accommodation and welfare	Overcrowding, poor sanitation, unsafe cooking, fire, disease, unequal facilities or conflict with communities.	Moderate	Accommodation standards; gender-sensitive facilities; water/sanitation; inspections; camp rules; medical and fire arrangements.
Heat, weather and fatigue	Heat stress, dehydration, lightning, reduced concentration, long hours and night work.	Moderate to High	Work-rest regime; water/shade; weather monitoring; lightning stop-work; fatigue controls; shift limits.
Security and violence	Theft, conflict, intimidation, excessive force or interaction with armed personnel.	Moderate to High	Security risk assessment; vetted personnel; human-rights-based rules; incident escalation; no weapons except lawfully authorised.
Primary supply chain	Child or forced labour, unsafe factories, hazardous battery production or poor waste practices.	Moderate to High	Supplier screening; declarations; audit rights; traceability; corrective action; replacement of non-compliant supplier.
Retrenchment and demobilisation	Abrupt termination, unpaid benefits, discrimination, conflict or loss of accommodation.	Moderate	Advance planning, clear criteria, consultation, lawful notice, final settlement, records and access to worker GRM.

4.3 Dynamic risk assessment

Supervisors shall pause work and reassess whenever conditions, personnel, equipment, weather, isolation status, sequence or interfaces change. Workers have the right and duty to stop work where they reasonably believe there is an imminent and serious danger. No worker shall suffer retaliation for a good-faith stop-work decision or safety report.

5. LABOUR POLICIES AND EMPLOYMENT PROCEDURES

5.1 Management policy statement

Promass labour policy: All project workers shall be treated with dignity and fairness, provided with clear and lawful employment conditions, protected from discrimination, exploitation and abuse, and enabled to perform their work safely. Compliance is a condition of employment, contract award, site access and continued engagement.

5.2 Recruitment and selection

1. Prepare an approved job description stating qualifications, competence, duties, reporting line, location, duration and material hazards.
2. Advertise or communicate the opportunity through transparent and non-discriminatory channels; no applicant shall pay a recruitment or placement fee.
3. Use objective selection criteria and document the decision. Community residence may be verified without transferring hiring authority to community leaders.
4. Verify identity, minimum age, competence, licences and references as relevant. Retain only the information necessary and protect personal data.
5. Issue a written offer and employment contract before work begins. Explain the terms orally and in a language understood by the worker where necessary.
6. Complete medical fitness assessment only where job-related and lawful, without using health information for unjustified discrimination.
7. Complete induction, Code of Conduct signature, emergency registration and PPE issue before site access.

5.3 Minimum age and child labour

Promass will engage only persons who are at least 18 years old. The rule applies to all workers and all tasks, including apprentices, casual labour, family members of suppliers, security, cleaning, transport and community work. Acceptable evidence may include a national identity document, passport, birth certificate, school or medical record, or another reliable record. Where documents are unavailable, HR shall apply a documented and conservative verification process; uncertainty shall be resolved before engagement.

If a person below 18 is found working, work shall stop immediately and the person shall be removed from hazardous exposure in a manner that protects the child from further harm. The matter shall be reported to project management, investigated, addressed with the employer or supplier, and referred to appropriate services or authorities where required. The response shall consider the best interests of the child and shall not expose the child or family to retaliation.

5.4 Forced labour and trafficking

No work or service may be exacted under threat, penalty, coercion, abduction, fraud or deception. Workers must freely consent to employment and may leave after reasonable notice. Employers and recruiters shall not retain original identity documents, charge recruitment fees, restrict lawful movement, impose debt, withhold wages to compel work or threaten immigration, police or community action. Suspected trafficking or forced labour shall trigger immediate protective action and escalation to Promass and REA as appropriate.

5.5 Non-discrimination, equal opportunity and inclusion

- Recruitment, pay, training, promotion, discipline and termination will be based on objective job-related criteria.
- Harassment, bullying, victimisation, hate speech and discrimination are prohibited.
- Reasonable accommodation will be considered for workers with disabilities, including accessible routes, suitable tools and alternative communication formats.
- Pregnant and nursing workers will be protected from unsafe exposure, prejudice and unfair dismissal and will receive applicable maternity entitlements.
- Facilities, PPE and welfare arrangements will be appropriate for women and men; PPE shall be available in suitable sizes.
- Worker data on disability, health, religion or other sensitive matters will be collected only where necessary, voluntary or legally required and will be protected.

5.6 Terms and conditions of employment

Every worker shall receive clear written terms before work begins. At minimum, the contract or engagement letter shall state the employer, worker identity, job title, supervisor, work location, start date, duration, probation where applicable, hours, rest days, wage rate, payment frequency, overtime, allowances, benefits, leave, accommodation or transport arrangements, Code of Conduct, OHS duties, disciplinary procedure, worker GRM, notice, termination and final settlement. Material changes require written notice and worker acknowledgement.

5.7 Wages, hours, overtime and deductions

- Wages shall be paid regularly, directly and with an itemised record or payslip.
- Deductions shall be lawful, explained and recorded. No deduction may be used as punishment for reporting a grievance or safety concern.
- Hours and overtime shall comply with applicable law and contract terms. Overtime shall be voluntary except for genuine emergencies and shall be compensated as agreed.
- Work schedules shall include adequate rest and shall control fatigue, travel time, night work, heat exposure and high-risk electrical tasks.
- Timesheets and payroll records shall be reconciled. Final wages, benefits and return of worker property shall be settled promptly at demobilisation.

5.8 Working conditions and welfare

Workplaces shall provide safe drinking water, hygienic toilets, handwashing, rest areas, suitable eating arrangements, first aid, lighting, ventilation, housekeeping, fire protection and weather protection proportionate to the work. Separate and secure sanitation and changing facilities shall be provided for women and men where needed. Workers shall not be required to purchase mandatory PPE or essential safety equipment.

5.9 Freedom of association and worker consultation

Workers may form or join lawful worker organisations and select representatives without intimidation or retaliation. Where formal representation is not available, Promass and contractors shall provide alternative worker committees and regular consultation. Safety representatives, including female representation where practicable, shall participate in risk reviews, inspections, incident learning and welfare discussions.

5.10 Discipline, termination and retrenchment

Disciplinary procedures shall be clear, proportionate, documented and based on a fair opportunity to respond. Summary dismissal may be applied only for serious misconduct and in accordance with contract and law. Termination shall state the reason, notice or payment in lieu, final entitlements and grievance route. Retrenchment or major demobilisation shall use objective criteria, consultation, timely notice and documented settlement; discrimination and retaliation are prohibited.

5.11 Privacy and worker records

HR shall maintain secure personnel files, contracts, age verification, training, medical fitness where relevant, payroll, disciplinary and grievance records. Access shall be limited to authorised persons. SEA/SH records shall be separated and coded without unnecessary identifying information. Records shall be retained for the period required by law, contract and REA/DARES requirements, then securely disposed.

6. OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT

6.1 OHS management system

Promass and contractors will implement an OHS management system consistent with the project ESHS Standards, ESS2, applicable Nigerian requirements and ISO 45001 principles. Each employer is responsible for the safety of its workers; Promass retains oversight and the right to stop unsafe work, require corrective action, remove personnel or suspend a contractor.

6.2 OHS planning and controls

Control element	Minimum requirement
Leadership and responsibilities	Named accountable manager, competent HSE personnel, supervisors and authorised electrical persons; adequate resources and visible management participation.
Hazard identification	Baseline risk assessment, task JHA/SWMS, daily pre-task review and reassessment after change, incident or abnormal condition.
Competence	Verification of trade skills, licences, equipment authorisation, first aid and rescue competence before assignment.
Safe systems of work	Approved procedures, method statements, permits, exclusion zones, barriers, signage, supervision and communication.
PPE	Risk-based PPE issued at no cost, correctly fitted, inspected, maintained and replaced. PPE does not substitute for higher-order controls.
Worker participation	Toolbox talks, safety committees, inspections, stop-work authority, consultation and feedback on corrective actions.
Emergency readiness	Site emergency plan, alarm, contacts, first aid, fire response, rescue equipment, drills and coordination with communities and DisCo.
Monitoring and learning	Inspections, leading indicators, incident/near-miss reporting, root-cause analysis, action tracking and management review.

6.3 Site induction and daily coordination

No person may start work without site induction. Induction shall cover hazards, welfare, emergency arrangements, worker GRM, Code of Conduct, SEA/SH and GBV, child safeguarding, community interaction, security, environmental controls, stop-work authority and incident reporting. Supervisors shall conduct daily toolbox talks and coordinate simultaneous operations. Visitors shall receive an appropriate briefing and remain escorted where required.

6.4 Permit-to-work and lock-out/tag-out

A documented permit-to-work system shall control electrical work, work at height, confined space, hot work, excavation, lifting, line work and other designated high-risk tasks. Electrical isolation shall use lock-out/tag-out, verification of isolation, discharge of stored energy, test-before-touch and protective earthing where applicable. Each person exposed shall apply or be protected by a personal lock or formally controlled group lock. A permit may be closed only after personnel, tools and temporary earths are accounted for and the apparatus is safe for return to service.

6.5 Interconnection and electrical safety

- Only competent and formally authorised persons may operate, test, isolate, earth or access electrical apparatus.
- All work at the point of common coupling or on DisCo-controlled equipment shall follow the approved interconnection agreement, switching procedure and permit boundaries.
- Promass shall nominate an electrical interface lead. Switching instructions shall identify equipment, status, sequence, communication protocol, responsible persons and restoration steps.
- Back-feed, multiple sources, automatic reclosing, generator and battery sources, PV DC and induced voltages shall be considered in every isolation plan.
- Live work is prohibited unless unavoidable, legally permitted, risk assessed, authorised by senior management and the asset controller, and performed under a specific live-work procedure by competent specialists.

- Protection settings, anti-islanding, synchronisation where applicable, metering and emergency trip functions shall be tested and documented before energisation.
- No energisation may occur until the pre-energisation checklist is signed by Promass and the relevant DisCo authority and all affected workers and communities have been notified.

6.6 Work at height and lifting

Work at height shall be avoided where possible. Where required, use certified scaffolds, platforms, ladders or elevating equipment; edge protection; inspected fall-arrest systems; competent users; a rescue plan; dropped-object controls and weather limits. Lifting shall use certified equipment and operators, a lift plan proportionate to risk, verified ground conditions, tag lines, exclusion zones and a competent banksman. No person may stand under a suspended load.

6.7 Excavation, civil works and buried services

Excavation requires permit, service detection, utility consultation, safe slope or shoring, access and egress, barricading, spoil setback, water control, daily inspection and traffic separation. Unknown cables or pipes shall be treated as live until identified. Trenches shall not be left open without secure protection and community warning.

6.8 Battery energy storage and hazardous materials

Battery work shall follow manufacturer requirements and a project battery safety procedure. Controls shall address heavy modules, electrical short circuit, thermal runaway, fire and explosion, toxic or flammable gases, electrolyte, damaged cells, ventilation, temperature, fire detection, emergency isolation and restricted access. Safety data sheets, spill kits, insulated tools and suitable fire-response equipment shall be available. Damaged or end-of-life batteries shall be quarantined, documented and transferred only to approved handlers.

6.9 Traffic, driving and logistics

Vehicles shall be roadworthy, insured and driven by licensed, fit and authorised drivers. Journey plans shall consider road condition, weather, fatigue, night driving, community routes, school and market periods, load restraint and emergency contacts. Speed limits, reversing controls, spotters and pedestrian segregation shall be enforced at sites and storage areas.

6.10 Occupational health and welfare

- Heat-stress prevention through acclimatisation, hydration, shade, work-rest cycles and supervision.
- Control of dust, noise, vibration, welding fumes, chemicals, ergonomic strain and manual handling.
- Fitness-for-work and health surveillance where justified by exposure and law, with confidentiality protected.
- Access to first aid, referral medical services and emergency transport.
- Communicable-disease awareness and voluntary, non-discriminatory health information; HIV status shall not be a condition of employment.
- Psychosocial risk controls, respectful supervision, reasonable working hours and access to grievance and support channels.

6.11 Incident reporting, investigation and learning

All injuries, illnesses, near misses, dangerous occurrences, fires, electrical trips, social incidents and unsafe conditions shall be reported promptly. Fatalities, life-threatening injuries, major electrical incidents, serious SEA/SH or violence allegations and other severe events shall be notified immediately to Promass senior management and to REA/DARES as required, normally within 24 hours of awareness. A preliminary notification shall be followed by investigation, root-cause analysis and a corrective-action report, ordinarily within 15 days or another agreed period. Relevant authorities and the DisCo shall be informed where applicable.

Incident investigations shall focus on system causes and prevention, not blame. Corrective actions shall have owners and due dates and shall be verified before closure. Workers who report incidents or participate in investigations are protected from retaliation. SEA/SH allegations shall not be investigated through ordinary OHS processes; the survivor-centred protocol in Section 10 applies.

6.12 Emergency preparedness

Site emergency plans shall address electric shock, arc flash, fire, battery thermal runaway, chemical spill, structural collapse, fall rescue, traffic incident, severe weather, security event and medical emergency. Plans shall define command, alarm, isolation authority, evacuation, muster, first aid, external contacts, community communication, media control, evidence preservation and recovery. Drills shall be conducted before high-risk work and periodically during the project.

7. CONTRACTOR AND PRIMARY SUPPLIER MANAGEMENT

7.1 Contractor prequalification

Procurement shall evaluate labour and OHS competence before award. Bidders shall provide policies, responsible staff, workforce plan, incident history, training arrangements, worker GRM, Code of Conduct approach, accommodation plan where applicable, age-verification method, evidence of wage compliance, subcontractor controls and ability to meet electrical safety requirements.

7.2 Contract requirements

- Compliance with this LMP, ESMS, ESHS Standards, Code of Conduct, SEP, site ESMP/C-ESMP and approved method statements.
- Provision of written contracts, lawful wages, hours, overtime, leave, welfare, PPE, insurance/compensation and final settlement.
- No child labour, forced labour, trafficking, discrimination, harassment, SEA/SH or GBV.
- Maintenance of worker registers, age verification, payroll, timesheets, training, PPE, incidents, grievances and corrective actions.
- Prompt notification of serious incidents and unrestricted access for Promass and authorised audits.
- Flow-down of all requirements to subcontractors and labour brokers; prior approval of subcontracting.
- Right of Promass to stop work, withhold certification, require replacement of personnel, implement corrective action or terminate for serious or repeated non-compliance.

7.3 Mobilisation requirements

Before mobilisation, each contractor shall submit a labour and OHS implementation pack containing its organisation, named HR/HSE personnel, worker estimate, recruitment plan, worker GRM contacts, emergency plan, training matrix, accommodation details, welfare plan, risk assessments, high-risk procedures, permits, licences, equipment certificates and signed management commitment. Promass approval does not transfer employer responsibility.

7.4 Monitoring and performance management

Promass will conduct inspections, document reviews, worker interviews and payroll/time-record sampling. Findings shall be graded according to severity. Immediate-danger or serious-rights violations require stop-work and immediate action. Other findings require a corrective action plan with responsible person and deadline. Repeated or deliberate non-compliance will affect payment, performance evaluation and eligibility for future work.

7.5 Primary suppliers

Suppliers of solar modules, batteries, inverters, transformers, switchgear, cables and other essential equipment shall be screened for significant risks of child labour, forced labour and serious safety deficiencies. Procurement shall obtain declarations and traceability information, include contractual prohibitions and audit rights, and review credible allegations. Where a serious issue is identified, Promass shall require time-bound corrective action and, where remedy is not feasible, replace the supplier when practicable.

7.6 Labour brokers and recruiters

Use of labour brokers requires prior approval. Brokers shall be licensed where required, may not charge workers, retain documents or make unauthorised deductions, and shall provide transparent records of recruitment and employment. The contractor remains fully responsible for the workers and the broker's conduct.

8. LABOUR INFLUX, LOCAL EMPLOYMENT AND WORKER ACCOMMODATION

8.1 Labour influx management

The project may bring specialist or migrant workers into rural or small communities. Unmanaged influx can increase pressure on housing, water, health services and prices and can contribute to traffic, conflict, communicable disease, crime, SEA/SH and GBV. Promass and contractors shall minimise non-local labour where skills are locally available, sequence mobilisation, maintain community liaison and monitor impacts throughout construction.

8.2 Local employment

- Announce opportunities transparently and early, using accessible community channels.
- Use clear skill and selection criteria and retain records of applications and decisions.
- Prioritise qualified local candidates for suitable work without creating quotas that exclude other protected groups or compromise competence.
- Do not allow community leaders, political actors or labour intermediaries to sell jobs, collect fees or impose candidates.
- Provide equal pay for equal work and access to induction, PPE, welfare and grievance channels for local and non-local workers.
- Provide skills transfer and apprenticeship opportunities only for adults aged 18 or above and only under safe, supervised arrangements.

8.3 Worker-community interaction

All workers shall sign the Code of Conduct and receive training in local customs, respectful communication, SEA/SH, GBV, child safeguarding, alcohol and drugs, security, traffic and grievance channels. Exchange of money, jobs, goods or services for sex is prohibited. Workers shall not enter homes or restricted community areas without permission, damage crops or property, take local resources without authorisation, or engage children in project activities.

8.4 Worker accommodation and camps

Where accommodation is provided, the contractor shall submit an accommodation or camp management plan proportionate to scale. Housing shall be safe, weatherproof, ventilated, adequately spaced and maintained, with potable water, sanitation, bathing, waste management, cooking/eating areas, fire protection, lighting, security, medical access, recreation and transport. Women and men shall have separate secure facilities where appropriate. Movement shall not be unreasonably restricted, and workers shall not be charged undisclosed or excessive accommodation costs.

Camp rules shall address visitors, children, alcohol and drugs, noise, curfews only where justified, weapons, waste, water, food hygiene, communicable disease, grievance channels and relations with host communities. Camp demobilisation shall remove waste, restore the site and settle all local obligations.

8.5 Local resources and services

Contractors shall provide or purchase water, food, accommodation and other services without depriving communities or causing avoidable price shocks. Use of wildlife and illegal natural resources is prohibited. Any community-provided accommodation or service shall be documented and paid for fairly. The Community Liaison Officer shall monitor complaints and coordinate corrective action.

9. WORKER GRIEVANCE MECHANISM

9.1 Purpose and principles

A separate worker grievance mechanism will enable all direct and contracted workers to raise workplace concerns without fear. It does not replace access to courts, regulators, unions or lawful external remedies. The mechanism shall be accessible, confidential, impartial, timely, free of charge, culturally appropriate and protective against retaliation.

9.2 Matters covered

- Recruitment, contract terms, pay, overtime, deductions, leave, benefits, accommodation or final settlement.
- Discrimination, harassment, bullying, unfair discipline or termination.
- OHS hazards, lack of PPE, unsafe instructions, fatigue, welfare or medical concerns.
- Child or forced labour, recruitment fees, trafficking or retention of identity documents.
- SEA/SH, GBV, violence, intimidation or retaliation.
- Conduct of supervisors, contractors, security personnel, colleagues or labour brokers.
- Any other work-related concern or suggestion for improvement.

9.3 Access channels

Channel	Access arrangement
Supervisor / line manager	Verbal or written report, unless the supervisor is involved or the worker prefers another channel.
Contractor HR / worker representative	Direct submission through the employer or elected worker representative.
Promass Grievance Officer / HR Manager	In-person, phone, SMS/WhatsApp, email or sealed letter; details to be inserted before mobilisation.
Anonymous channel	Locked grievance box or anonymous phone/email report. Anonymous cases will be assessed to the extent information permits.
SEA/SH focal point	Confidential, survivor-centred channel with separate restricted records and referral options.
Union or external remedy	Workers retain the right to contact a lawful worker organisation, regulator, court or other authority.

9.4 Procedure and timelines

Step	Action	Target timeline
1. Receipt and safety screening	Record the grievance, check immediate safety and retaliation risks, and separate SEA/SH or child-protection cases.	Same day
2. Acknowledgement	Confirm receipt in a language and format understood by the worker; anonymous complaints may be acknowledged through notice or agreed channel.	Within 2 working days
3. Assessment and assignment	Classify, identify responsible reviewer, conflicts of interest and required interim measures.	Within 5 working days
4. Review and proposed resolution	Gather relevant information, hear the worker, review records and propose a fair remedy.	Normally within 15 working days
5. Complex case update	Explain the reason for delay and revised date.	Before day 15; resolution normally within 30 working days
6. Worker response / appeal	Worker accepts, rejects or appeals to a higher or independent level.	Appeal within 10 working days of decision
7. Closure and verification	Document agreed action, verify completion, obtain feedback where possible and close without waiving legal rights.	Promptly after action

9.5 Confidentiality and non-retaliation

Information shall be shared only with persons who need it to address the grievance. No worker may be dismissed, denied work, threatened, transferred, harassed or disadvantaged for using the mechanism or supporting another worker. Alleged retaliation shall be treated as a separate serious grievance and may require interim protective measures.

9.6 SEA/SH and child-protection grievances

SEA/SH reports shall be handled using a survivor-centred approach based on safety, confidentiality, respect, non-discrimination and informed consent. The ordinary grievance team shall not seek detailed testimony, confront the alleged perpetrator or promise outcomes. It shall record only minimum non-identifying information, offer referral to qualified medical, psychosocial, legal and protection services, and report to management and REA in a manner that protects identity. Cases involving a child shall prioritise the best interests and safety of the child and comply with mandatory reporting requirements.

9.7 Records and reporting

The Grievance Officer shall maintain a secure register showing case number, category, date, employer, status, action and closure date without unnecessary sensitive details. Monthly reports will show aggregate trends, resolution times, overdue cases and corrective actions. SEA/SH cases will be reported only in anonymised aggregate form.

10. SEA/SH, GBV, HARASSMENT AND CHILD SAFEGUARDING

10.1 Zero-tolerance standard

Promass applies zero tolerance to sexual exploitation and abuse, sexual harassment, gender-based violence and violence against children. Zero tolerance means every credible report is received safely, assessed and acted upon; it does not mean automatic punishment without fair process. Confirmed misconduct may result in removal from site, disciplinary action, contract termination and referral to authorities as appropriate.

10.2 Mandatory prevention measures

- All personnel sign the project Code of Conduct before mobilisation and receive induction and periodic refresher training.
- Contractors appoint trained focal persons and display safe reporting channels in accessible locations and languages.
- Workers are prohibited from sexual activity with any person under 18; mistaken belief about age or alleged consent is not a defence.
- Exchange of money, employment, goods, services, influence or project benefits for sex or sexual favours is prohibited.
- Supervisors and personnel shall not exploit actual or perceived power over workers, job applicants, customers or community members.
- Facilities and work arrangements shall reduce risk, including adequate lighting, secure transport where needed, separate sanitation and safe accommodation.
- Security personnel shall receive human-rights, conduct and SEA/SH training and shall not use their role to intimidate or exploit.
- Community and worker information shall explain prohibited conduct, confidential channels and available support without disclosing survivor identities.

10.3 Response principles

Principle	Required conduct
Safety	Assess immediate danger and support a safety plan for the survivor and others at risk.
Confidentiality	Share only what is necessary and authorised; use restricted files and coded reports.
Informed consent	Explain options and obtain consent before referral or information sharing, except where law requires action.
Respect and dignity	Listen without blame, pressure or judgement; allow the survivor to choose available services.

Principle	Required conduct
Non-discrimination	Provide equal support regardless of sex, age, disability, status, ethnicity, religion or other characteristic.
Best interests of the child	Use child-sensitive procedures, appropriate guardianship and mandatory protection actions.
Do no harm	Avoid actions that increase stigma, retaliation, family conflict, legal risk or exposure of identity.

10.4 Referral pathway

Before mobilisation, the E&S Manager shall map qualified local medical, psychosocial, legal, security and child-protection services and confirm confidential referral arrangements. Annex A shall list the approved focal point and referral contacts. Emergency medical care shall not be delayed for administrative approval. Any programme reporting shall use anonymised information and follow REA/DARES protocols.

11. ROLES AND RESPONSIBILITIES

Role	Responsibilities
MD/CEO / Project Director	Approve the LMP; provide resources; review serious incidents and performance; enforce accountability.
Project Manager	Integrate LMP into programme, contracts and site decisions; coordinate contractors and DisCo; stop unsafe or non-compliant work.
E&S Manager	Maintain LMP alignment with ESMS/SEP; monitor social risks, labour influx, contractor compliance, reporting and corrective actions.
HSE Manager	Lead OHS system, risk assessments, permits, inspections, incident investigation, emergency planning and training.
HR / Administration Manager	Manage recruitment, contracts, age verification, payroll, welfare, records, discipline, termination and worker GRM support.
Worker Grievance Officer	Receive, log, assess and track grievances; protect confidentiality; report trends and overdue actions.
SEA/SH Focal Point	Maintain safe confidential channels and referral pathway; provide survivor-centred first-line response and anonymised reporting.
Community Liaison Officer	Coordinate local recruitment communication, worker-community relations, community complaints and vulnerable-group concerns.
Electrical Authorised Person / DisCo Interface Lead	Control electrical authority, switching, isolation, PTW/LOTO, protection testing and energisation coordination.
Procurement / Contract Manager	Include LMP clauses, screen contractors and suppliers, monitor deliverables and apply contractual remedies.
Contractor management	Act as employer; implement this LMP; appoint competent HR/HSE staff; manage subcontractors; submit records and reports.
Supervisors	Plan safe work, brief workers, enforce conduct, monitor hours and welfare, receive concerns and stop unsafe work.
Workers	Follow contracts, Code of Conduct and safe systems; use PPE; report hazards and incidents; respect colleagues and communities.
Worker representatives / safety committee	Represent workers, participate in consultation and inspections, raise concerns and monitor agreed actions.
REA / DARES and relevant DisCo	Programme/technical oversight and incident/interface coordination within their respective mandates.

11.2 Accountability and delegation

Delegation does not remove accountability. Every appointed person shall have a written role, authority, competence and access to resources. Acting appointments shall be documented. Conflicts of interest in grievance, discipline, procurement or incident review shall be declared and managed.

12. TRAINING AND CAPACITY BUILDING

12.1 Training principles

Training shall be role-specific, practical, understandable and documented. Workers who cannot read shall receive oral, visual or demonstration-based instruction. Competence shall be verified through questions, observation, practical assessment or certification. Refresher training shall follow incidents, changes, poor performance or expiry of competence.

Audience	Minimum training	Timing / frequency
All workers before site access	Site induction; Code of Conduct; worker GRM; SEA/SH/GBV; child safeguarding; emergency actions; environmental and community rules; stop-work authority.	Before mobilisation; refresher at least every 6 months and after major change.
Supervisors	Leadership, fair treatment, hours/fatigue, JHA, toolbox talks, incident response, grievance escalation and non-retaliation.	Before appointment; quarterly refreshers.
Electrical workers	Electrical safety, PTW/LOTO, test-before-touch, arc flash, PV DC, batteries, switching and DisCo interface.	Before authorisation; annual/competence-based refresher.
Work-at-height / rescue teams	Access equipment, fall protection, inspection, rescue and dropped-object prevention.	Before task; periodic drills.
Drivers and plant operators	Journey management, fatigue, defensive driving, inspection, reversing and community traffic.	Before authorisation; periodic review.
HR / Grievance personnel	Fair recruitment, age verification, records, worker GRM, confidentiality, retaliation and data protection.	Before mobilisation; annual refresher.
SEA/SH focal persons	Survivor-centred first-line response, consent, referral, confidentiality, child safeguarding and safe reporting.	Specialist training before role; periodic supervision/refresher.
First aid / fire / emergency teams	First aid, CPR/AED where applicable, electric shock, fire, spill, battery incident, rescue, communication and drills.	Certification and drill schedule.
Contractor and supplier management	Contract obligations, monitoring, labour records, corrective actions and serious incident reporting.	At award/mobilisation and review meetings.

12.2 Training records

Training records shall show topic, date, duration, trainer, language, materials, participants, signatures or other attendance proof, assessment result and refresher due date. Contractor records shall be available for audit. Attendance without demonstrated understanding is not sufficient for high-risk work authorisation.

13. MONITORING, REPORTING AND CORRECTIVE ACTION

13.1 Monitoring programme

Indicator area	Examples	Frequency
Workforce profile	Total workers by employer/category; local/non-local; female/male; accommodation; new hires and demobilised workers.	Monthly
Contracts and payroll	Percentage with signed contracts; payroll timeliness; overtime; deductions; final settlement; wage complaints.	Monthly sampling
Age and forced labour	Age-verification completion; recruitment fees; document retention; worker interview findings.	At recruitment and quarterly audit
OHS leading indicators	Induction, toolbox talks, JHAs, permits, inspections, corrective actions, PPE, drills and worker safety observations.	Daily/weekly; monthly summary
OHS incidents	Fatalities, lost-time injuries, medical treatment, first aid, near misses, electrical events, vehicle incidents and root-cause actions.	Immediate and monthly
Grievances	Received, category, anonymous, resolved, overdue, appeal, retaliation and average closure time.	Monthly

Indicator area	Examples	Frequency
SEA/SH and GBV	Training and CoC coverage; referral pathway readiness; anonymised aggregate cases only.	Monthly/quarterly, restricted
Local employment and influx	Local hiring, camp occupancy, community complaints, service pressure and worker-community incidents.	Monthly
Contractor/supplier compliance	Inspections, audits, worker interviews, non-conformities, action closure and sanctions.	Monthly/quarterly
Training and competence	Planned vs completed training, expired authorisations and assessment results.	Monthly

13.2 Reporting

Contractors shall submit monthly labour and OHS reports using Annex K and immediately report severe incidents or rights violations. Promass will consolidate performance for management and REA/DARES reporting as required. Reports shall distinguish direct and contracted workers, identify overdue actions and explain material changes. Personal and survivor-identifying data shall not be included in routine reports.

13.3 Inspections and audits

Supervisors shall inspect work daily; HSE/E&S personnel shall conduct formal weekly and monthly inspections; contractor labour records will be audited periodically; and management reviews will occur at least quarterly during construction. High-risk suppliers may be subject to remote or on-site due diligence. Worker interviews shall be confidential and selected without employer coaching.

13.4 Non-conformity and corrective action

Classification	Example	Required response
Critical	Imminent danger; child or forced labour; serious SEA/SH; unauthorised energisation; fatality; deliberate concealment.	Stop work/protect persons immediately; notify senior management and REA as required; investigate; apply contractual and legal remedies.
Major	Repeated wage delay; missing contracts; serious unsafe system; overdue serious corrective action; retaliation.	Time-bound corrective action, enhanced supervision, payment/contract remedy and verification before closure.
Minor	Isolated record gap, housekeeping issue or low-risk procedural deviation.	Correct promptly, record and verify during next inspection.
Observation / improvement	Opportunity to strengthen practice beyond minimum compliance.	Assign where beneficial and track through management review.

13.5 Management review

Senior management will review workforce trends, incidents, grievances, contractor performance, legal changes, audit results, community feedback and resource needs at least quarterly during active construction and annually during operation. Decisions, assigned actions and due dates shall be recorded. This LMP will be revised when project design, workforce profile, law, REA requirements or risk conditions materially change.

14. IMPLEMENTATION BUDGET

Promass will provide adequate financial and human resources to implement this LMP. The budget is part of the project E&S/ESHS budget and shall be updated after appointment of contractors and confirmation of the work programme. Contractor pricing shall include compliance costs and shall not treat mandatory worker protection as a variation unless the project scope changes.

Budget line	Coverage	Approved amount (NGN)
HR and labour administration	Recruitment, contract translation/explanation, payroll controls, age verification and worker records.	TBC
E&S/HSE staffing	Project E&S/HSE manager, site officers, supervisors and specialist support.	TBC
Training and induction	Induction, CoC, OHS, electrical authorisation, SEA/SH/GBV, first aid and drills.	TBC
PPE and welfare	PPE, drinking water, sanitation, rest areas, first aid, medical referral and suitable facilities.	TBC
Worker grievance mechanism	Hotline/phone, boxes, communication, case management, translation and independent review where needed.	TBC
SEA/SH referral and safeguarding	Focal-point training, service mapping, confidential referral support and awareness materials.	TBC
Monitoring and audit	Inspections, worker interviews, contractor and supplier audits, reporting and corrective-action verification.	TBC
Emergency preparedness	First aid, rescue equipment, fire and spill response, drills and emergency transport arrangements.	TBC
Contingency	Unplanned corrective actions, specialist investigation and urgent worker protection.	TBC

The approved budget shall state responsible cost centre, release schedule and contingency authority. Expenditure will be reviewed during management meetings and reported within project E&S performance reports.

15. REVIEW, DISCLOSURE AND MANAGEMENT COMMITMENT

15.1 Review and revision

The LMP will be reviewed before mobilisation, after appointment of the main contractor, before energisation, following a serious incident, when workforce or project design changes materially, when monitoring identifies systemic gaps, and at least annually during operation. Revisions require document control, approval and communication to affected employers and workers.

15.2 Communication and disclosure

The full controlled Plan will be available to project management, contractors, REA/DARES and relevant reviewers. Workers will receive the provisions that affect them in understandable language and format through contracts, induction, posters, toolbox talks, worker representatives and grievance information. Confidential procedures and personal information will not be publicly disclosed.

15.3 Management commitment

Management commitment: Promass Engineering Services Limited accepts responsibility for establishing the systems, resources, supervision and oversight necessary to implement this Labour Management Plan. Contractors and suppliers remain responsible for their workers and shall demonstrate compliance as a condition of continued engagement.

ANNEX A - PROJECT AND WORKFORCE INFORMATION SHEET

Field	Project-specific information
Project name	Proposed 1 MW Solar Hybrid Interconnected Mini-grid Project under DARES
Project location / host community	
State / LGA	
REA / DARES reference	
Relevant DisCo	
Point of common coupling	
Interconnection agreement reference	
Promass Project Manager	
E&S Manager	
HSE Manager	
HR Manager	
Worker Grievance Officer and contacts	
SEA/SH focal point and confidential contact	
Emergency numbers / referral hospital	
Main EPC contractor	
O&M contractor	
Construction start / duration	
Planned energisation date	

A.1 Workforce estimate

Employer / contractor	Worker category	Male	Female	Local	Non-local	Accommodation required
Promass						
Main contractor						
Electrical subcontractor						
Civil subcontractor						
Security / logistics / other						

A.2 Approved service and referral contacts

Service	Organisation / person	Contact	Availability / notes
Nearest hospital / ambulance			
First aid lead			
Fire and rescue			

Service	Organisation / person	Contact	Availability / notes
Police / security emergency			
DisCo control / switching contact			
GBV medical / psychosocial referral			
Child protection service			
Labour / regulatory contact, if required			

ANNEX B - RECRUITMENT AND AGE VERIFICATION CHECKLIST

Recruitment control	Yes / No / N/A	Evidence / comments
Approved job description and selection criteria available		
Vacancy communicated transparently; no recruitment fee		
Applicant identity verified		
Applicant confirmed at least 18 years old		
Age document type and number recorded securely		
Competence / licence / references verified as relevant		
Medical fitness requirement job-related and lawful		
Written offer and contract provided before work		
Terms explained in understandable language / oral format if needed		
Wage, hours, overtime, leave, deductions and benefits explained		
Worker GRM and non-retaliation explained		
Code of Conduct signed		
Site induction and PPE issue completed before access		
Emergency contact recorded with consent		
No original identity document retained by employer or broker		

Worker name: _____ Employer: _____ Job: _____

Verified by: _____ Position: _____ Date: _____

Personal information collected through this checklist shall be stored securely and accessed only for legitimate project and legal purposes.

ANNEX C - MINIMUM WORKER CONTRACT REQUIREMENTS

Each worker contract or engagement letter shall address the following, adapted to the worker category and applicable law:

No.	Required term	Contract reference / status
1	Legal identity of employer and worker; work location and contact details.	
2	Job title, duties, supervisor, required competence and material hazards.	
3	Start date, contract duration, probation and renewal conditions.	
4	Normal hours, shifts, rest days, overtime approval and compensation.	
5	Wage rate, allowances, benefits, payment method and frequency.	
6	Lawful deductions and process for correcting payroll errors.	
7	Leave, sickness, maternity/paternity and other applicable entitlements.	
8	Accommodation, transport, meals and any lawful worker contribution.	
9	PPE, tools, medical/fitness requirements and OHS responsibilities.	
10	Code of Conduct, SEA/SH/GBV and child-safeguarding obligations.	
11	Worker grievance mechanism and protection from retaliation.	
12	Disciplinary process, investigation and right to respond.	
13	Notice, termination, redundancy/retrenchment and final settlement.	
14	Confidentiality and protection of personal information.	
15	Freedom to leave employment after applicable notice and return of worker documents.	

Worker confirmation: I have received and understood my employment terms and know how to raise a grievance.

Worker signature/thumbprint: _____ Employer representative: _____ Date: _____

ANNEX D - WORKER INDUCTION AND CODE OF CONDUCT REGISTER

Induction topic	Covered / comments
Project and employer information	
Employment terms, hours, wages and worker rights	
Worker grievance channels and non-retaliation	
Site hazards, JHA, stop-work authority and incident reporting	
Emergency alarm, muster, first aid and contacts	
PPE issue, use, care and replacement	
Electrical safety, PTW/LOTO and restricted areas	
Working at height, lifting, excavation and traffic rules	
Environmental, waste and community protection	
Code of Conduct, respectful behaviour and community interaction	
SEA/SH, GBV, child safeguarding and confidential channels	
Alcohol, drugs, weapons, theft and violence prohibitions	
Security and access control	
Worker questions and assessment of understanding	

Attendance register

No.	Name	Employer	Job	Sex (optional)	Signature / thumbprint	Date

Trainer: _____ Language / method: _____ Assessment method: _____

ANNEX E - JOB HAZARD ANALYSIS / SAFE WORK METHOD FORM

Field	Details
Task / work package	
Location / equipment	
Date / shift	
Supervisor / permit holder	
Workers involved	
Related permit / drawing / procedure	
Weather / simultaneous operations	

Step	Hazard / potential consequence	Initial risk	Controls using hierarchy	Residual risk	Responsible person

Emergency / rescue arrangements:

Required PPE:

Worker briefing completed and questions answered: Yes / No

Prepared by: _____ Reviewed by HSE: _____ Approved by:

_____ Date: _____

Dynamic review: Stop and revise this form after any change in conditions, sequence, equipment, isolation, personnel or weather.

ANNEX F - ELECTRICAL PERMIT-TO-WORK AND LOTO CHECKLIST

Permit information	Details
Permit number	
Work location / apparatus	
Asset owner / controller	
Work description	
Isolation / switching schedule reference	
DisCo authority / control contact	
Permit issuer / authorised person	
Permit receiver / person in charge	
Issue date and time	
Expiry / cancellation date and time	

Isolation and safety checklist

No.	Control	Verified / initials
1	All energy sources identified, including DisCo supply, PV DC, batteries, generator, capacitors, induced or back-feed sources.	
2	Approved switching instruction completed and equipment identified positively.	
3	Automatic reclosing / remote control / automatic start disabled where applicable.	
4	Isolation points opened, secured and tagged; personal or group locks applied.	
5	Stored energy discharged and mechanical/pneumatic/hydraulic energy controlled.	
6	Absence of voltage proved using an approved tester checked before and after use.	
7	Protective earths / shorts applied where required and recorded.	
8	Work zone, approach distances, barriers and arc-flash requirements established.	
9	All workers briefed on permit boundary, hazards, emergency trip and communication.	
10	Tools, test equipment and PPE inspected and appropriate.	
11	DisCo / Promass interface and restoration authority confirmed.	
12	Return-to-service check includes personnel, tools, temporary earths, guards, settings and documentation.	

Permit issued by: _____ Signature: _____ Time: _____ Accepted by: _____
Signature: _____

Permit suspended / cancelled / closed: _____ Date/time: _____ Apparatus status: _____

ANNEX G - WORKER GRIEVANCE FORM AND REGISTER

G.1 Worker grievance form

Field	Information
Case number (office use)	
Date received	
Worker name (optional)	
Employer / contractor	
Preferred contact and language	
Anonymous submission?	Yes / No
Immediate safety or retaliation concern?	
Grievance category	Pay / contract / OHS / discrimination / harassment / SEA-SH / forced or child labour / discipline / other
Description of concern	
Requested outcome	
Consent to share information and limits	
Received by	

For SEA/SH or child-protection concerns, record only minimum information and contact the trained focal point. Do not seek detailed testimony in this form.

G.2 Worker grievance register

Case	Date	Category	Employer	Anonymous	Immediate action	Owner	Due date	Status / closure

ANNEX H - INCIDENT NOTIFICATION AND INVESTIGATION FORM

Initial notification field	Details
Incident number	
Date / time / location	
Employer and activity	
Incident type	Fatality / injury / electrical / vehicle / fire / environmental / social / security / SEA-SH (coded) / other
Persons affected	
Brief factual description	
Immediate response and medical care	
Current risk and site status	
Authorities / REA / DisCo notified and time	
Reporter and contact	

Investigation and corrective action

Item	Finding / action
Evidence collected and interviews	
Immediate causes	
Underlying / system causes	
Legal / procedural requirements	
Corrective and preventive actions	
Responsible persons and due dates	
Worker / representative participation	
Lessons communicated	
Verification and closure	

Lead investigator: _____ Management approval: _____ Report date: _____

SEA/SH investigations and records must follow the separate survivor-centred protocol and shall not be documented in ordinary incident forms.

ANNEX I - WORKER ACCOMMODATION / CAMP CHECKLIST

No.	Inspection item	Compliant	Action / owner / due date
1	Location approved and does not create avoidable conflict, displacement or environmental harm.		
2	Structures are safe, weatherproof, ventilated, adequately lit and not overcrowded.		
3	Potable water quantity and quality are adequate; supply does not deprive the community.		
4	Toilets, bathing and handwashing are hygienic, sufficient and gender appropriate.		
5	Sleeping rooms provide privacy, secure storage, beds and mosquito/vector controls as needed.		
6	Cooking/eating areas are safe and hygienic; food storage and waste controls are adequate.		
7	Fire detection/extinguishers, escape routes, muster and drills are in place.		
8	First aid, medical referral, emergency transport and communicable-disease controls are available.		
9	Wastewater and solid waste are managed lawfully; no uncontrolled burning or dumping.		
10	Security is proportionate and respects rights; movement is not unreasonably restricted.		
11	Women and vulnerable workers have safe access, lighting and secure facilities.		
12	Camp rules, visitor controls, alcohol/drug rules, grievance channels and Code of Conduct are displayed.		
13	Accommodation charges, if any, are transparent and lawful.		
14	Community complaints and camp corrective actions are tracked.		
15	Demobilisation and site restoration plan is approved.		

Camp / accommodation: _____ Inspector: _____ Date: _____ Next inspection: _____

ANNEX J - CONTRACTOR LABOUR COMPLIANCE CHECKLIST

No.	Compliance item	Yes / No / N/A	Evidence / finding	Action due
1	Approved contractor labour/OHS implementation plan and named responsible personnel.			
2	Complete worker register and workforce profile submitted.			
3	Every worker has a written contract and understandable terms.			
4	Age and identity verification complete; all workers at least 18.			
5	No recruitment fees, document retention, forced labour or trafficking indicators.			
6	Payroll, timesheets, overtime, deductions and final settlement compliant.			
7	Worker GRM operational, confidential and known to workers.			
8	Code of Conduct signed; SEA/SH/GBV and child-safeguarding training complete.			
9	Induction, competence, licences, PPE and medical fitness as relevant.			
10	Risk assessments, permits, LOTO, emergency and high-risk procedures implemented.			
11	Welfare and accommodation standards met.			
12	Incidents, near misses and grievances reported within required timelines.			
13	Subcontractors and labour brokers approved and monitored.			
14	Corrective actions closed and evidence verified.			
15	Primary supplier declarations / due diligence completed as applicable.			

Contractor: _____ Review type: Pre-mobilisation / Monthly / Audit / Close-out

Reviewer(s): _____ Date: _____ Contractor representative: _____

ANNEX K - MONTHLY LABOUR AND OHS MONITORING REPORT

Reporting information	Details
Project / contractor	
Reporting month	
Prepared / approved by	
Major activities and locations	
Key changes in workforce or risk	

K.1 Workforce and employment

Indicator	This month	Cumulative / current	Comments
Total workers			
Direct / contracted / primary supply workers			
Local workers			
Female workers			
New hires / demobilised			
Workers with signed contracts			
Age verification complete			
Payroll made on time			
Workers in project accommodation			

K.2 OHS and social performance

Indicator	Number / status	Comments and corrective action
Fatalities / lost-time injuries / medical treatment / first aid		
Near misses / electrical events / vehicle incidents / fires		
Inductions / toolbox talks / permits / inspections		
Open high-risk corrective actions		
Worker grievances received / resolved / overdue		
SEA/SH/GBV training and CoC coverage		
Local employment / labour influx issues		
Contractor non-conformities and sanctions		
Serious incidents notified to REA/DisCo/authorities		

K.3 Management summary

Key achievements:

Key risks / overdue actions:

Support or decision required:

ANNEX L - TRAINING MATRIX AND ATTENDANCE RECORD

L.1 Training matrix

Training	Target audience	Provider / competence	Frequency	Next due
General induction and Code of Conduct	All personnel		Before access / 6-month refresher	
Worker rights and GRM	All workers and supervisors		Before access / refresher	
SEA/SH, GBV and child safeguarding	All workers; specialist module for focal persons		Before access / periodic	
First aid and emergency response	Nominated responders		Certification / drills	
Electrical PTW/LOTO and authorisation	Electrical workers and supervisors		Before authorisation / annual	
Working at height and rescue	Relevant workers		Before task / drills	
Lifting and rigging	Operators, riggers, banksmen and supervisors		Before authorisation	
Excavation and buried services	Relevant workers and supervisors		Before task	
Defensive driving and journey management	Drivers and supervisors		Before authorisation / periodic	
Supervisor fair management and incident response	Supervisors and managers		Before appointment / quarterly	

L.2 Attendance record

Training topic / date	Name	Employer	Job	Assessment result	Signature

ANNEX M - MANAGEMENT ADOPTION AND WORKER ACKNOWLEDGEMENT

M.1 Management adoption

Promass Engineering Services Limited adopts this Labour Management Plan for the proposed DARES Interconnected Mini-grid Project and commits to provide the authority, resources, staffing, training, monitoring and corrective action required for implementation. All contractors, subcontractors, suppliers and workers shall comply with the applicable provisions.

Name	Position	Signature	Date
Dr Sani Mohammed Bida	MD/CEO		
	Project Manager		
	E&S Manager		
	HSE Manager		
	HR / Administration Manager		

M.2 Contractor undertaking

We confirm that we have reviewed this LMP and will implement it for our workers and subcontractors, submit required records, cooperate with monitoring and promptly remedy non-compliance.

Contractor	Authorised representative	Signature / stamp	Date

M.3 Individual worker acknowledgement

I acknowledge that my employment terms, worker grievance channels, Code of Conduct, safety duties, stop-work right and prohibited conduct have been explained to me in a language and manner I understand. I know that I may report concerns without retaliation.

Worker name	Employer / job	Signature / thumbprint	Date

END OF CONTROLLED DOCUMENT