Annex M

Worker Management Plan
Worker Management Plan

Version 1.0

November 2014

Yara Dallol Potash Project, Danakil Depression, Ethiopia

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<td>AfDB</td>
<td>African Development Bank</td>
</tr>
<tr>
<td>CHSSP</td>
<td>Community Health, Safety and Security Plan</td>
</tr>
<tr>
<td>EBRD</td>
<td>European Bank for Reconstruction and Development</td>
</tr>
<tr>
<td>ESMP</td>
<td>Environmental and Social Management Plan</td>
</tr>
<tr>
<td>HIV / AIDS</td>
<td>Human Immuno-deficiency Virus / Acquired Immune Deficiency Syndrome</td>
</tr>
<tr>
<td>OHS</td>
<td>Occupational Health and Safety</td>
</tr>
<tr>
<td>QHSE</td>
<td>Quality Health, Safety, Security and Environmental</td>
</tr>
<tr>
<td>HR</td>
<td>Human Resources</td>
</tr>
<tr>
<td>IMCP</td>
<td>Integrated Mine Closure Plan</td>
</tr>
<tr>
<td>IFC</td>
<td>International Finance Corporation</td>
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<tr>
<td>ILO</td>
<td>International Labour Organization</td>
</tr>
<tr>
<td>MOLSA</td>
<td>Ministry of Labour and Social Affairs</td>
</tr>
<tr>
<td>MoM</td>
<td>Ministry of Mines</td>
</tr>
<tr>
<td>OHS</td>
<td>Occupational Health and Safety</td>
</tr>
<tr>
<td>PPE</td>
<td>Personal Protective Equipment</td>
</tr>
<tr>
<td>SPRP</td>
<td>Sourcing, Procurement and Recruitment Plan</td>
</tr>
<tr>
<td>WkMP</td>
<td>Worker Management Plan</td>
</tr>
</tbody>
</table>
DEFINITIONS

The following definitions are of relevance within this report:

- **Decommissioning** – this is the process by which options for the final status of project structures at the end of their working life are assessed for their dismantling, physical removal, disposal or modification (if beneficial usage of existing Project infrastructure is a component of the closure scheme).

- **Employer** – the organisation Yara Dallol BV, which utilises the services of someone for remuneration or compensation in return.

- **Employee** – any person, excluding an independent contractor, who works for another person and who receives, or is entitled to receive, remuneration and refers to any other person who in any manner assists in carrying out or conducting the business of an employer and the term “employer” has a corresponding meaning.

- **Post-Closure** – this is the phase after decommissioning and closure where activities are reduced to monitoring and maintaining specific areas until a positive and predictable trend is established.

- **Recruitment** – the process of advertising, selecting and appointing a suitable candidate for a vacant position.

- **Contractors** – persons working for external companies (or employed by an employment agency) that are under contract to carry out for the unit, but not being part of the unit’s workforce.
INTRODUCTION

Yara International is a leading global fertilizer company with sales of fertilizer to about 150 countries globally. As part of Yara International’s overall upstream strategy, the company is exploring for suitable raw sources that can be developed and used as a source to Yara International’s global fertilizer production and directly as finished product in its product portfolio. To complement these upstream processes, Yara International has recently started a subsidiary company, Yara Dallol BV, which is involved in the exploration and mining development of potash concessions in Ethiopia. These concessions are located in the Danakil Depression, Afar National Regional State (ANRS), Ethiopia. Yara International, through its Ethiopian subsidiary, proposes to develop a potash mine – the Yara Dallol Potash Project (hereafter referred to as the Project) within three concession areas.

As part of the environmental approval process for the Project a suite of environmental and social management plans is needed to address the issues identified in the Environmental and Social Impact Assessment (ESIA). Several management plans have been developed to address impacts identified in the ESIA and are implemented as part of an environmental management system for the Yara Dallol Potash Project.

Several activities associated with the Project may impact upon the health safety and security of the local community. This Worker Management Plan (WkMP) has been compiled to address the specific impacts that are anticipated to occur as a result of planned mining developments as identified in the ESIA. This plan sets out a formal system by which Yara Dallol BV can manage and implement mitigation measures that will avoid or reduce the significance of impacts related to community health, safety and security.

1.1 POLICY STATEMENT AND OBJECTIVES

1.1.1 Policy Statement

This WkMP has been compiled within the context of the Project and it is being guided by the Yara Dallol BV Health, Environment, Safety, Quality and Product Stewardship Policy as set out in Box 1.1. This Policy is a high-level corporate statement of intent and establishes the principles to be followed in the management of environmental and Occupational Health and Safety (OHS) issues.
Box 1.1  Health, Environment, Safety, Quality and Product Stewardship Policy

Statement

1.1.2 Objectives

This Management Plan has been developed taking into account the requirements of Ethiopian labour law, International Finance Corporation (IFC) Performance Standard 2 and the International Labour Organisation’s (ILO) core conventions, and seeks to:

- Establish arrangements to appropriately manage and protect the OHS and welfare of Yara Dallol BV’s workforce including both employees and contractors and others who may be exposed to risks associated with Yara Dallol BV’s operations and activities.

- Ensure that employees understand their rights in relation to labour and working conditions.

- Allow employees to exercise their right to freedom of association and collective bargaining.

- Provide employees and contractors with a feedback mechanism for them to raise feedback, concerns, complaints and grievances and to receive information on the response and any associated corrective action.

- Prevent discrimination in hiring, remuneration, access to training, promotion, termination, and retirement on the grounds of race, national or social origin, caste, birth, religion, disability, gender, sexual orientation,
union membership, political opinions and age and promote equal opportunities. This applies equally to employees and non-employees.

- Manage disciplinary practices and retrenchment in a manner that treats those affected individuals with respect and dignity and without threat, abuse or ill-treatment.

- Design and manage accommodation provided for use by Yara Dallol BV’s workforce (including contractors) in a manner that prevents or minimises the risk of harm to health and safety.

- Ban the use or support of child, forced or compulsory labour in direct operations and in the supply chain.

- Ensure working hours do not exceed legal and industry standards and conditions of employment including remuneration are fair, equitable and are in line with industry norms.

1.2 **PURPOSE AND SCOPE**

The WkMP has been developed with the purpose of protecting the health, safety and wellbeing of Yara Dallol BV’s workforce, whilst also working to promote equal opportunity and non-discrimination in Yara Dallol BV and its contractor’s workforce management. This will be done within the context of meeting national requirements and standards, and the requirements of the IFC Performance Standards (IFC PS), as set out in Section 2.2.

The scope of this WkMP covers construction, operational and decommissioning/closure phases of the Project. It is further applicable across the entire workforce at all skills levels, and deals with all aspects relating to Yara Dallol BV’s employees including recruitment, labour and accommodation conditions, management of worker relationships and OHS. The WkMP also includes measures related to the management of workers engaged by third parties, and also the management of workforce-related risks within the supply chain.

1.3 **LINKAGE TO OTHER ENVIRONMENTAL AND SOCIAL PLANS**

The management measures identified in the WkMP relate to the Community Health, Safety and Security Plan (CHSSP), Sourcing, Procurement and Recruitment Plan (SPRP) and the Integrated Mine Closure Plan (IMCP), as shown in Table 1.1
Table 1.1  **Linkage to other Management Plans**

<table>
<thead>
<tr>
<th>Management Plan</th>
<th>Overlap of this Plan with Content of Other Plans</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SOCIAL MANAGEMENT PLANS</strong></td>
<td></td>
</tr>
<tr>
<td>Community Health, Safety and Security Plan (CHSSP)</td>
<td>The worker Code of Conduct addressed in the WkMP is of relevance for how workers will interact with neighbouring communities, and for the management of impacts where workers interact with non-Yara Dallol BV employees and neighbouring communities.</td>
</tr>
<tr>
<td>Sourcing, Procurement and Recruitment Plan (SPRP)</td>
<td>The measures recommended in the WkMP include the screening and auditing of suppliers and contractors to meet OHS and labour standards. Therefore measures identified in the SPRP should work to complement those in the WkMP, and ensure that suppliers and contractors comply with Project requirements.</td>
</tr>
<tr>
<td><strong>CLOSURE PLANS</strong></td>
<td></td>
</tr>
<tr>
<td>Integrated Mine Closure Plan (IMCP)</td>
<td>The IMCP will include measures that are relevant for the downscaling of the workforce and potential impacts related to worker redundancy.</td>
</tr>
</tbody>
</table>
A summary of the legal requirements and standards relevant to the WkMP are presented below.

2.1 NATIONAL LEGISLATION AND POLICY

The national legislation and policy relevant to the WkMP are discussed in the following sections below.

2.1.1 The Ethiopian Constitution

The Ethiopia Constitution covers the ‘Rights of Labour’, including the rights of workers “to form associations to improve their conditions of employment and economic well-being.

The general principles of labour rights in the Ethiopian Constitution include:

- The right of the security of the person (Article 16);
- The prohibition against inhuman treatment and forced and compulsory labour (Article 18);
- Freedom of association (Article 31);
- The right to express grievances (Article 42 (1) b);
- Equality of women in the labour force (Article 35); and
- Prevention of exploitative practices with regards to child labour, and prohibition of child entering into hazardous or harmful practices to his or her education, health or well-being (Article 36).

2.1.2 Labour Proclamation (Amended n° 494/2006)

The Labour Proclamation is the principal national legislation on labour issues. It covers all establishments with one or more workers and addresses a wide range of issues, such as employment relations and contracts, obligations of employers and workers, wages and working time, working conditions and occupational safety and health, occupational injuries, labour disputes and conciliation.

The Proclamation also sets out provisions for the labour inspection service, giving inspectors wide-ranging duties and enforcement powers and prohibiting obstruction of inspectors in performing their duties. The
Proclamation was amended in 2006 to give workers the right to severance pay where their employment contracts are terminated because of HIV/AIDS.

2.1.3 *Occupational Health and Safety Directive (2008)*

This Directive has made both general and specific provisions regarding to:

- Health and safety;
- Arrangements in the workplace;
- Ambient working conditions;
- Hazardous jobs or undertakings; and
- Specific occupations and processes and requirements (machinery and process guards).

The Directive also identifies general duties of employers, and the duties and rights of workers including organizational measures such as a safety and health policy and arrangements, and for personal protective equipment (PPE). The Directive also includes measures for controlling a wide range of risks, including chemicals, noise and machinery and makes specific provisions for the recording and notifying of occupational accidents and diseases. The Ethiopia Health Policy (1993) also included OHS promotion in its priorities.

2.1.4 *Institutional Framework*

The Ministry of Labour and Social Affairs (MOLSA) is responsible for developing and promoting peaceful industrial relations by ensuring successful management of labour conditions and health and safety in the working environment, both at the national and regional level.

The regional Bureaus of Labour and Social Affairs (BOLSA) are responsible for conducting inspections on labour standards for private enterprises within each region.

2.2 *IFC STANDARDS*

The WkMP has been guided by international good practice regarding workforce management and OHS. Yara Dallol BV have committed to meeting the International Finance Corporation Environmental and Social Performance Standards (*IFC Performance Standards*). In practical terms, this means that Yara Dallol BV and its contractors will satisfy the requirements of IFC PS 2.

IFC PS 2 recognises that the pursuit of economic growth through employment creation and income generation should be accompanied by the protection of the fundamental rights of workers. The IFC General and Project Specific Environmental, Health, and Safety (EHS) Standards are also of relevance to the WkMP and the relevant requirements have been incorporated herein.
Ethiopia has ratified several of the International Labour Organisation’s (ILO) conventions. Of relevance are the following:

- Forced Labour Convention, 1930 (No. 29);
- Freedom of Association and Protection of the Right to Organise Convention, 1949 (No. 87);
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
- Equal Remuneration Convention, 1951 (No. 100);
- Abolition of Forced Labour Convention, 1957 (No. 105);
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111);
- Minimum Age Convention, 1973, (No. 138);
- Occupational Safety and Health Convention, 1991 (No. 155); and
- Worst Forms of Child Labour Convention, 2003 (No. 182).
With respect to this Plan, Yara Dallol BV has the responsibility to provide workforce and management and to structure and coordinate workforce health and safety management procedures for the Yara Dallol Potash Project. The roles and responsibilities within Yara Dallol BV for the implementation of the WkMP are presented in Table 3.1 Responsible Parties and Roles and Responsibilities.

**Table 3.1 Responsible Parties and Roles and Responsibilities**

<table>
<thead>
<tr>
<th>Responsible Parties</th>
<th>Roles and Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Human Resources Manager</td>
<td>Responsible for the development and implementation of procedures and protocols relating to labour and working conditions.</td>
</tr>
<tr>
<td>Dallol General Manager</td>
<td>Responsible for signing off various policies and procedures developed for the management of the workforce and their health and safety.</td>
</tr>
<tr>
<td>Health and Safety Manager</td>
<td>Responsible for the implementation and management of all measures in relation to OHS inclusive in the WkMP</td>
</tr>
</tbody>
</table>
4 IMPACT MANAGEMENT

4.1 SUMMARY OF IMPACT MANAGEMENT

As with any project of this scale and nature, there are certain impacts that cannot be entirely eliminated, i.e. residual impacts after implementing mitigation measures. With respect to impact mitigation, the Project subscribes to the philosophy of impact avoidance (by changes to project planning and/or design) and impact reduction (to reduce impacts that cannot be avoided to acceptable levels). What follows, is a description of the potential residual impacts and the mitigation measures proposed to reduce them to acceptable levels. The plan seeks to address potential impacts related to inadequate:

- Labour and working conditions;
- Accommodation conditions; and
- Occupational Health and Safety (OHS).

The WkMP also relates to impacts associated with interaction between the workforce and local communities namely in relation to:

- Transmission of HIV/AIDS and other sexually transmitted infections (STIs) and other vector borne and communicable diseases;
- Tension and conflict between communities and employees and contractors;
- Localised inflation driven by increased demand for products and services as a result of the presence of the Yara Dallol BV workforce in the area; and
- Health and safety accidents and incidents associated with Project activities, such as increased vehicle movement on public roads, etc.

4.2 MANAGEMENT DURING CONSTRUCTION

4.2.1 Impacts

The impacts during construction will be similar to those identified in Section 4.1. The impacts during construction relevant to the WkMP are:

- Exposure of workforce (including contractors) to potential harm, injury, ill-health and to enjoyment of human rights, etc.
- Exposure of the workforce (including contractors) to poor accommodation standards (both in design and operation).
• Exposure of workforce (including contractors) to inadequate OHS standards.

• Conflict and tension associated with interaction between the workforce (including contractors) and local communities.

4.2.2 Objectives and Targets

The objective of the WkMP during construction will be consistent with those established in Section 1.1.2. Table 7.1 identifies the specific targets required to ensure proper management of impacts.

4.2.3 Management Actions

During construction the management of impacts related to labour and accommodation conditions and OHS for the Yara Dallol BV workforce (including contractors and supply chain) will focus on the establishment of relevant policies and monitoring systems and corrective actions. These will include:

• The development of an OHS management system and OHS monitoring and surveillance programme.

• Fitness-for-work health screening.

• The development of a worker health awareness programme.

• The development of worker engagement procedures.

• Development of a worker feedback mechanism.

• The development of relevant Human Resource (HR) policies and procedures.

• The development of auditing programme for contractors and supply chain; and

• The development of a worker code of conduct.

Specific details surrounding the management actions required are included within Table 7.1.

Contractor Control System

Yara Dallol BV will develop a contractor control system that establishes clear accountabilities and responsibilities to ensure active engagement of contractors, and provide a consistent process to avoid, eliminate, reduce, minimize or offset environmental, labour and community impacts and risks to the Project.
This system will recognise that risks vary from contractor to contractor depending on the scope of work, the activities involved and the sensitive receptors and resources that may be impacted in the area of work. A risk based approach is therefore essential in determining which control measures are most important for the contractor to implement and manage. The risk based approach is utilised at three stages:

- Applicability of management plans to individual scopes of work (internal review and assessment);
- Tender review of control measures; and
- Pre commencement-work review.

Yara Dallol BV will consider during the qualification and selection process the ability of the contractor to understand and meet the requirements of the ESIA Management Plans. As part of this process contractors will be provided with the relevant management plans. The evaluation process will consider their ability to conform to the management plans.

During contract award, Yara Dallol BV will conduct a ‘commence-work’ review to refine, clarify, prioritise and focus on the key legislation, standards, risks and commitments as relevant to contractor’s scope of work ensure that they meet set standards. New control measures that are identified will be discussed and agreed for inclusion into the relevant plans.

Contractors will be required to establish OHS management arrangements in coordination with Yara Dallol BV to ensure conformance to the management plans and other contractual commitments. These may include development of procedures and work instructions; training, definition of Key Performance Indicators (KPIs), monitoring and auditing schedules, reporting requirements, management reviews etc.

4.3 \textit{Management During Operation}

4.3.1 \textit{Impacts}

The impacts during operation are likely to be similar to those identified in Section 4.2.1; however, the nature of the impacts may vary due to changes in labour requirements due to changes in activities. The extent and scale of these impacts will be less than during construction due to a reduction in the size of the workforce and a more limited use of contractors. Impacts will include:

- Exposure of workforce (including contractors) to potential harm, injury, ill-health and to enjoyment of human rights, etc.
- Exposure of the workforce (including contractors) to poor accommodation standards (both in design and operation).

- Exposure of workforce (including contractors) to health and safety incidents.

- Conflict and tension associated with interaction between the workforce (including contractors) and local communities.

### 4.3.2 Objectives and Targets

The objectives during operation will be to maintain the achievement of objectives identified in Section 1.1.2 and to prepare for Project phase transition from construction to operations. Although the majority of the construction workforce will be on short-term contracts, it is anticipated that a significant number will be recruited from the local area.

In addition to the objectives mentioned in Section 1.1.2, the following should be achieved:

- Management of impacts associated with downscaling of the workforce.

- Continuation of procedures and systems implemented during construction, and tailored as well as develop new procedures to meet workforce requirements and changes during the operations phase; and

- Ensure that all new workers and contractors are provided with or have developed policies and procedures on labour and working conditions and OHS standards.

*Table 7.1* identifies relevant targets for impact management during operations.

### 4.3.3 Management Actions

During operations the management of impacts related to labour and accommodation conditions and OHS for the Yara Dallol BV workforce (including contractors and supply chain) will focus on the maintaining and monitoring the implementation of relevant policies. Specifically these will include:

- The development of an OHS management system and OHS monitoring and surveillance programme;

- Fitness-for-work health screening;

- The development of a worker health awareness programme;

- The development of worker engagement procedures;
- Development of a worker feedback mechanism;

- The development of relevant HR policies and procedures;

- The development of auditing programme for contractors and supply chain; and

- The development of a worker code of conduct.

Specific details surrounding the management actions required are included within Table 7.1

4.4 MANAGEMENT FOR DECOMMISSIONING AND CLOSURE

4.4.1 Impacts

The cessation of mining activities during decommissioning and closure will result in a significant downsizing of the workforce and issues associated with redundancy and accompanying economic impacts locally will be significant.

4.4.2 Objectives and Targets

The objectives during decommissioning and closure will be to continue to maintain the objectives identified (Section 4.2.2). Given that job losses will occur, objectives and targets will focus on the training personnel to extend their skill sets to get employed in alternative livelihoods.

To develop a retrenchment plan (well in advance of retrenchments), which identifies the negative impacts of retrenchment and identifies mitigation measures to address these as far as is practicable (further details on the development of a retrenchment plan are included in Table 7.1).

Table 7.1 identifies relevant targets for impact management during decommissioning and closure.

4.4.3 Management Actions

During closure the management of impacts related to labour and accommodation conditions and OHS for the Yara Dallol BV workforce (including contractors and supply chain) will focus on maintaining and monitoring relevant policies while planning for retrenchment. The management actions will be similar to those during construction and discussed in Section 4.3.3 but will also include:

- Development of a retrenchment plan in advance of decommissioning and closure; and
• Engagement with workers and local communities well in advance of planned decommissioning and closure activities.

Specific details surrounding the management actions required are included within Table 7.1.
In order to verify the management measures, Yara Dallol BV will require several monitoring systems as part of its overall Environmental and Social Management System (ES-MS). These will include the following:

- **Human Resources Employee Database** - this will track the data about employees working for Yara Dallol BV including wages, benefits, working hours, eligibility for overtime etc. The database will also record information on the personal details of employees (such as home address, next of kin/emergency contact); their job description, role and responsibilities, training records and training needs, and details of health surveillance.

- **Contractor Database** - this will be used to record the range of primary and secondary contractors for the Project. The database will record a summary of their scope of work, business origins, the results of biannual auditing programmes, details of the origins of their employees (home village in the local area, Afar, Ethiopian, expatriate), their respective positions; training received, PPE given, and date of fitness to work health screening. The database will also identify any gaps (such as training needs) that require addressing, and assess the success of previous actions to address gaps in the timeframes identified.

- **Supply Chain Database** - this will be used to monitor the primary supply chain and record results of risk assessments for incidents of child and / or forced labour and significant safety issues.

- **Worker Feedback System** - the worker feedback system will log all grievances, issues and concerns raised by workers during engagement sessions. The system will also include areas to record information on measures to address issues, timeframes, personnel responsible and any subsequent feedback that is required.

- **Accident and Incident Recording, Reporting and Investigation System** - this will be used to record number and type of accidents and incidents including near misses occurring in the workplace both at site and in offices, details and outcomes of any required investigation; corrective actions required to address incidents, and trend analysis to detect themes such as the recurrence of type of incidents. In addition the system should identify roles and responsibilities for recording, reporting and investigating incidents and for corrective action planning.

- **Health Surveillance and Monitoring System** - this system will be used to record details of similar exposure groups in the workforce including the nature of health exposures; the exposure monitoring plan; results of monitoring campaigns; and actions to be taken to address any cases of
detected exceedances of workplace exposure limits, recognising that air quality is poor in the area due to levels of particulate matter. Information, data and records relating to the health surveillance carried out on individuals including the nature and type of exposures and any related health effects shall be held Human Resources Employee Database. Information obtained from exposure monitoring and surveillance campaigns can be used to tailor health awareness and training programmes for the workforce.

5.1 **COMMUNITY FEEDBACK, COMPLAINTS AND GRIEVANCES**

Community complaints and concerns will be captured and addressed through External Yara Dallol BV’s Feedback and Grievance Mechanism (refer to Stakeholder Engagement Programme in Annex C of Part II of this ESIA). The procedure has been designed to provide a simple, fair and transparent process for all external parties to provide feedback and to raise grievances.
6 REPORTING AND DOCUMENTATION

6.1 GOVERNMENT/AUTHORITY REPORTING

Yara Dallol BV will comply with any Ethiopian Government reporting requirements relating to worker management.

6.2 INTERNAL REPORTING

Yara Dallol BV will develop an internal reporting programme relating to worker management. Internal management reports will be published on at least six monthly basis.

6.3 COMMUNITY REPORTING

On a six monthly basis internal reporting, a summary report suitable for digestion by a non-technical community audience will be developed and disclosed on an annual basis. This report will focus upon graphical representation of information, and in particular outcomes of any community complaints and those actions taken to remedy significant impacts. This will be undertaken in non-technical languages and in suitable local languages in a culturally appropriate manner.
## WORKFORCE MANAGEMENT PLAN SUMMARY

### Table 7.1 Management Measures for Construction, Operation and Decommissioning/Closure

<table>
<thead>
<tr>
<th>Phase</th>
<th>Objective</th>
<th>Mitigation Measures</th>
<th>Monitoring Plan</th>
<th>Responsibility</th>
</tr>
</thead>
</table>
| **Construction**       | Review and update the existing OHS Management System                      | • Review OHS Management System in alignment with the requirements of IFC PS 2 and national standards, including requirements associated with the protection of contractors.  
  • The OHS Management System should provide the framework for managing all OHS issues and management programs (risk assessment, training etc.)  
  • Review and update existing OHS operating procedures to ensure that they meet the necessary national and international requirements. Develop specific operating procedures related to OHS as required.  
  • Develop and implement a task-based Hazard Identification and Risk Assessment procedure.  
  • Develop and implement a Hazard Identification and Risk Assessment to analyse and manage OHS risks related to construction and operations activities.  
  • Develop and implement a task-based OHS Action Plan to assess and action any OHS risk identified as part of the risk assessment.  
  • Develop OHS training plans based on policies, procedures and risk/hazard assessment to define OHS training requirements for staff.  
  • Provide OHS training to all workers as part of the recruitment and induction procedures.  
  • Deliver role-specific OHS training for workers assigned to tasks associated with specific OHS risks. Training will be based on the task-based Hazard Identification and Risk Assessment. The training may include safe storage and handling.  
  • Provide staff basic hygiene and sanitation training, including training on food hygiene standards.  
  • Provide specific wound health training including HIV/AIDS awareness and prevention program, which will include voluntary testing, the provision of condoms in suitable locations etc. | • Presence of a comprehensive OHS Management System  
  • Annual Review  
  • Identified gaps-achieved  
  • Presence of an Organisation-wide Hazard Identification and Risk Assessment Procedure  
  • Annual Review  
  • Identified gaps-achieved  
  • Presence of OHS risk action plans  
  • Six-monthly Review  
  • Percentage of workers that receive OHS training  
  • Percentage of workers that receive training in use of PPE  
  • Appropriate use of PPE (assessed through regular monthly audits by OHS Manager)  
  • Percentage of workers that receive hygiene and sanitation training  
  • Percentage of workers that receive social health training  
  • Percentage of workers that receive wound health training  
  • Presence of OHS training plan  
  • Health and Safety Manager  
  • Contractor Health and Safety Manager | Dallol General Manager  
  • Health and Safety Manager  
  • Contractor Health and Safety Manager  
  • Onsite Medical Officer  
  • Project Manager  
  • Health and Safety Manager  
  • Contractor Health and Safety Manager  
  • Onsite Medical Officer  
  • Human Resources Manager  
  • Health and Safety Manager  
  • Contractor Health and Safety Manager  
  • Health and Safety Manager  
  | **Operation**            | Implement OHS training programmes                                         | • Presence of OHS action plans  
  • Annual Review  
  • Identified gaps-achieved  
  • Presence of OHS risk action plans  
  • Six-monthly Review  
  • Percentage of workers that receive OHS training  
  • Percentage of workers that receive training in use of PPE  
  • Appropriate use of PPE (assessed through regular monthly audits by OHS Manager)  
  • Percentage of workers that receive hygiene and sanitation training  
  • Percentage of workers that receive social health training  
  • Percentage of workers that receive wound health training  
  • Presence of OHS training plan  
  • Health and Safety Manager  
  • Contractor Health and Safety Manager | Dallol General Manager  
  • Health and Safety Manager  
  • Contractor Health and Safety Manager  
  • Onsite Medical Officer  
  • Human Resources Manager  
  • Health and Safety Manager  
  • Contractor Health and Safety Manager  
  | **Decommissioning and Closure** | Provide workforce suitable PPE                                            | • Presence of Personal Protective Equipment (PPE) for workforce based on task-based Hazard Identification and Risk Assessment. Provide relevant training on PPE use. Audit PPE use on monthly basis. | Dallol General Manager  
  • Health and Safety Manager  
  • Contractor Health and Safety Manager  
<p>|</p>
<table>
<thead>
<tr>
<th>Phase</th>
<th>Objective</th>
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<th>Monitoring Plan</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>✔</td>
<td>Develop and implement OHS policy and procedure</td>
<td>Set safe driving policy and procedure.</td>
<td></td>
<td>Health and Safety Manager, Contractor Health and Safety Manager, Onsite Medical Officer</td>
</tr>
<tr>
<td>✔</td>
<td>Develop worker health screening and monitoring programme</td>
<td>Implement annual health and fitness monitoring programme where workers (including long-term contractors) have routine medical check-ups.</td>
<td></td>
<td>Health and Safety Manager, Contractor Health and Safety Manager, Human Resources Manager, Onsite Medical Officer</td>
</tr>
<tr>
<td>✔</td>
<td>Develop and implement safe driving policy</td>
<td>Develop Driving Policy that provides the driving requirements, speed limits, non-stopping requirements, safety protocols etc.</td>
<td></td>
<td>Field General Manager, Health and Safety Manager</td>
</tr>
<tr>
<td>Phase</td>
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<td></td>
<td></td>
<td>Establish monthly internal communications through project meetings to discuss OHS performance.</td>
<td>Meetings held monthly</td>
<td>Health and Safety Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Develop and implement Human Resources policies and protocols that meet the Ethiopian legal requirements, as well as the requirements of IFC PN.</td>
<td>Presence of HR policies and protocols; Annual review of policy</td>
<td>Dallol General Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Develop and implement Human Resources policies and protocols that include: wages and benefits; training and retraining; collective bargaining; working hours and overtime; recruitment; contracts of employment; and company policies.</td>
<td>HR Audit Action Plan (annual review); Percentage completion of audits undertaken</td>
<td>Human Resources Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Deliver workforce training on human resources policies and procedures</td>
<td>Number of workers that receive induction on HR and HR policies</td>
<td>HR Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Provide workforce training to workers on HR policies and procedures</td>
<td>Result of workforce training</td>
<td>HR Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Review daily worker rates to ensure that it allows workers to both meet the wage and benefits needs (housing, energy, nutrition, clothing, health-care, education, potable water, childcare and transportation) and provide some discretionary income.</td>
<td>Percentage of wages and benefits paid in relevant languages.</td>
<td>Dallol General Manager</td>
</tr>
</tbody>
</table>

### LABOUR CONDITIONS

<table>
<thead>
<tr>
<th>Phase</th>
<th>Objective</th>
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<td></td>
<td></td>
<td>Develop and implement a policy on working hours and overtime in adherence with Ethiopian legislation and industry good practice (as appropriate to different job categories).</td>
<td>Average man hours for key worker categories; Average hours of overtime in particular jobs where overtime poses a risk; Worker check-in and out procedure to monitor working hours in place</td>
<td>Dallol General Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Develop and implement a policy on working hours and overtime in adherence with Ethiopian legislation and industry good practice (as appropriate to different job categories).</td>
<td>Percentage of workers that receive payslips; Percentage of workers that receive payslips</td>
<td>Dallol General Manager</td>
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<tr>
<td></td>
<td></td>
<td>Develop and implement a policy on working hours and overtime in adherence with Ethiopian legislation and industry good practice (as appropriate to different job categories).</td>
<td>Percentage of contracts that include wages and benefits; Annual review</td>
<td>Dallol General Manager</td>
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<tr>
<td></td>
<td></td>
<td>Develop and implement a policy on working hours and overtime in adherence with Ethiopian legislation and industry good practice (as appropriate to different job categories).</td>
<td>Presence of induction training program</td>
<td>Dallol General Manager</td>
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<td></td>
<td></td>
<td>Develop and implement a policy on working hours and overtime in adherence with Ethiopian legislation and industry good practice (as appropriate to different job categories).</td>
<td>Presence of monitoring mechanisms</td>
<td>Dallol General Manager</td>
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<td></td>
<td></td>
<td>Develop and implement a policy on working hours and overtime in adherence with Ethiopian legislation and industry good practice (as appropriate to different job categories).</td>
<td>Percentage of grievances raised related to hours worked monitored (including contractor performance based on HR Audit Action Plan).</td>
<td>Dallol General Manager</td>
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<td></td>
<td></td>
<td>Ensure that all workers understand that they may lodge grievances or contact trade union representatives in relation to excessive working hours, including contractor performance based on HR Audit Action Plan.</td>
<td>Percentage of grievances raised related to hours worked monitored (including contractor performance based on HR Audit Action Plan).</td>
<td>Dallol General Manager</td>
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<td>Ensure that all workers understand that they may lodge grievances or contact trade union representatives in relation to excessive working hours, including contractor performance based on HR Audit Action Plan.</td>
<td>Presence of Workforce Grievance Procedures</td>
<td>Dallol General Manager</td>
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<td>Review daily worker rates to ensure that it allows workers to both meet the basic needs (housing, energy, nutrition, clothing, health-care, education, potable water, childcare and transportation) and provide some discretionary income.</td>
<td>Foundation of the review of daily worker rates (against wages framework</td>
<td>Dallol General Manager</td>
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<td>Benchmark daily worker rates against the wages of permanent unskilled workers in the project and other companies.</td>
<td>Record of the benchmarking exercise (monthly)</td>
<td>Dallol General Manager</td>
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<td></td>
<td>Benchmark wages in the industry and areas of operation using interviews with local communities and workers.</td>
<td>Record of the wage surveys</td>
<td>HR Manager</td>
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<td></td>
<td>Develop a mechanism for periodic review of wages in consultation with workers’ representatives and based on a series of objective criteria.</td>
<td>Annual activity audit</td>
<td>Dallol General Manager</td>
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<tr>
<td></td>
<td>Ensure an open dialogue with trade unions representatives.</td>
<td>Number of grievances received related to wages</td>
<td>HR Manager</td>
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<td></td>
<td>Take measures to support trade unions representatives understanding of their role and to develop their capacities in the field of labour rights and negotiations.</td>
<td>Presence of quarterly communications/consultation between Yara Dallol BV and trade unions</td>
<td>Dallol General Manager</td>
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<td></td>
<td>Establish an open communication and exchange of information with union representatives to ensure that information needed for meaningful discussion or negotiation is received in a timely fashion.</td>
<td>Presence of updated Retrenchment Plan in advance of planned retrenchment (6 months ahead of planned retrenchment or as close to this time-frame as is practicable)</td>
<td>HR Manager</td>
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<td>Develop a framework to determine areas for consultation with trade union representatives.</td>
<td>Demonstrable liaison with worker representatives and forums regarding planned retrenchment</td>
<td>HR Manager</td>
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<td>Develop an alternative and sustainable livelihood for workers post closure.</td>
<td>Percentage of HR staff receiving relevant training</td>
<td>HR Manager</td>
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<td>Ensure that human resource staff have received adequate information and training to manage the retrenchment correctly.</td>
<td>Percentage of HR staff receiving relevant training</td>
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<td></td>
<td>Develop and implement a decommissioning and closure process.</td>
<td>Record of the wages surveys</td>
<td>Dallol General Manager</td>
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<td></td>
<td>Develop a plan to support local workers to diversify and develop alternative and sustainable livelihoods following mine closure.</td>
<td>Benchmark daily worker rates. Benchmark wages in the industry and areas of operation using interviews with local communities and workers.</td>
<td>HR Manager</td>
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<td>Determine the post mining land use that affects the closure design.</td>
<td>Percentage of HR staff receiving relevant training</td>
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<td></td>
<td>Accommodation</td>
<td>Design and operate accommodation camps in accordance with international good practice on workers’ accommodation and IFC / EBRD standards.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Accommodation</td>
<td>Develop and implement policies related to closed camp procedures requiring staff to remain within camp when work activities do not require travel outside of Camp.</td>
</tr>
<tr>
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<td></td>
<td>Accommodation</td>
<td>Adopt detailed site non-discriminatory, internal accommodation rules including disciplinary procedures.</td>
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<td>Accommodation</td>
<td>Ensure that policies are explained to all relevant workers upon recruitment and they are made aware of their rights and obligations.</td>
</tr>
<tr>
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<td></td>
<td>Accommodation</td>
<td>Ensure that grievance and conflict resolution mechanisms are available to all workers living in camp accommodation.</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Accommodation</td>
<td>Ensure that all workers are made aware of their rights and obligations in camps.</td>
</tr>
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<td></td>
<td>Accommodation</td>
<td>Conduct regular (monthly) inspections of workforce accommodation to ensure adherence to protocols.</td>
</tr>
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<td></td>
<td>Accommodation</td>
<td>Develop pre-qualification screening procedure for all contractors and suppliers.</td>
</tr>
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<td></td>
<td>Accommodation</td>
<td>Develop and implement auditing programme for contractors and primary suppliers.</td>
</tr>
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<td>Construction</td>
<td>Develop and implement Worker Code of Conduct</td>
<td>Work with local communities and worker representatives to develop a Worker Code of Conduct. This should include but not be limited to standards relating to interaction with local communities, discipline and behaviour within and outside of the camp; alcohol consumption; disciplinary procedures for non-compliance.</td>
<td>Evidence of consultation with local communities and worker representatives and the inclusion of their preferences as far as are practicable and appropriate.</td>
<td>Dallol General Manager</td>
</tr>
<tr>
<td>Operation</td>
<td>Ensure all workers are briefed upon recruitment of requirements and code of conduct for worker-worker interactions, and worker community interactions, with periodic updates thereafter as required.</td>
<td></td>
<td>Number of workers that receive induction on code of conduct and thereafter as required</td>
<td>HR Manager</td>
</tr>
<tr>
<td>Decommission</td>
<td>Implement and monitor adherence to Code of Conduct.</td>
<td></td>
<td>Number of incidents reported</td>
<td>Dallol General Manager; Health and Safety Manager; Contractor Health and Safety Manager; Contractor Manager</td>
</tr>
<tr>
<td></td>
<td>Develop Contractor Control System</td>
<td>Yara Dallol BV will develop an agreed Contractor Control Plan to distribute to tendering companies that outlines the process for contractor management.</td>
<td>Plan developed and distributed</td>
<td>Health and Safety Manager; Contractor Manager; Health and Safety Manager; Contractor Manager</td>
</tr>
<tr>
<td></td>
<td>Yara Dallol BV will include detailed requirements using a risk based approach within tender documentation regarding environment, labour, health and safety, and community relations performance.</td>
<td>Percentage of tendering organisations receiving Contractor Control Plan</td>
<td>Criteria for award of contracts agreed and documented</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Tendering contractors will be assessed according to responses in environment, labour, health and safety, and community relations performance and planned activities.</td>
<td>Percentage of tendering organizations receiving Contractor Control Plan</td>
<td>Percentage of contractors with implementation protocols and plans for contractor environment, labour, health and safety, and community relations management</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Yara Dallol BV and contractors will perform commencement reviews to develop implementation protocols and plans for contractor environment, labour, health and safety, and community relations management.</td>
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</tbody>
</table>