

# Bukhara Road Network Improvement Project, Phase 2

*Environmental and Social Impact  
Assessment and Paris Alignment and  
Climate Finance Assessment for Bukhara  
Road Network Improvement Project,  
Phase 2: M37 Corridor Improvement  
Project – Phase I*



## Labor Management Procedures

September 2026



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## Document Information and Control

|                |                                                                                                                                                                                                          |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Document Title | Labor Management Plan                                                                                                                                                                                    |
| Project        | M37 Corridor Improvement Project – Phase I                                                                                                                                                               |
| Contract No.   | BRNIP2/QCBS/01                                                                                                                                                                                           |
| Financier      | Asian Infrastructure Investment Bank                                                                                                                                                                     |
| Assignment     | Environmental and Social Impact Assessment (ESIA) and Paris Alignment and Climate Finance Assessment for Bukhara Road Network Improvement Project, Phase 2 – M37 National Highway Rehabilitation Project |
| Client         | “Avtoyulinvest” Agency under the Committee for Roads                                                                                                                                                     |

| Version | Date       | Author(s)      | Approved       | Comments                          |
|---------|------------|----------------|----------------|-----------------------------------|
| V1      | 19.06.2026 | Laly Sattarova | Murod Sattarov | The Bank's comments of 10.07.2026 |
| V2      | 15.07.2026 | Laly Sattarova | Murod Sattarov | The Bank's comments of 18.08.2026 |
| V3      | 04.09.2026 | Laly Sattarova | Murod Sattarov | The Bank's comments of 23.09.2026 |
| V4      | 23.09.2026 | Laly Sattarova | Murod Sattarov | approved                          |



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## Acronyms

|                |                                                      |
|----------------|------------------------------------------------------|
| <b>AIB</b>     | Asian Infrastructure Investment Bank                 |
| <b>AoI</b>     | Area of Influence                                    |
| <b>BBs</b>     | Building Blocks                                      |
| <b>C-ESMPs</b> | Contractor Environmental and Social Management Plans |
| <b>E&amp;S</b> | Environmental and Social                             |
| <b>EHS</b>     | Environment, Health and Safety                       |
| <b>ESIA</b>    | Environmental and Social Impact Assessment           |
| <b>ESF</b>     | Environmental and Social Framework                   |
| <b>ESMP</b>    | Environmental and Social Management Plan             |
| <b>ESP</b>     | Environmental and Social Policy                      |
| <b>ESS</b>     | Environmental and Social Standards                   |
| <b>FGD</b>     | Focus Group Discussion                               |
| <b>GAP</b>     | Gender Action Plan                                   |
| <b>GBV</b>     | Gender-Based Violence                                |
| <b>GHG</b>     | Greenhouse Gases                                     |
| <b>GIIP</b>    | Good International Industry Practice                 |
| <b>GoU</b>     | Government of Uzbekistan                             |
| <b>GRM</b>     | Grievance Redress Mechanism                          |
| <b>GRC</b>     | Grievance Redress Committee                          |
| <b>IFC</b>     | International Finance Corporation                    |
| <b>ILO</b>     | International Labor Organization                     |
| <b>IUCN</b>    | International Union for Conservation of Nature       |



|             |                                     |
|-------------|-------------------------------------|
| <b>KII</b>  | Key Informant Interview             |
| <b>LMP</b>  | Labor Management Plan               |
| <b>LOTO</b> | Lock-Out/Tag-Out                    |
| <b>MDB</b>  | Multilateral Development Bank       |
| <b>MSDS</b> | Material Safety Data Sheet          |
| <b>NDCs</b> | Nationally Determined Contributions |
| <b>OHS</b>  | Occupational health and safety      |
| <b>PAPs</b> | Project-affected persons            |
| <b>PMO</b>  | Project Implementation Unit         |
| <b>PMO</b>  | Project Management Office           |
| <b>PPE</b>  | Personal Protective Equipment       |
| <b>PS</b>   | Performance Standard                |
| <b>PTW</b>  | Permit-to-Work                      |
| <b>RAP</b>  | Resettlement Action Plan            |
| <b>RC</b>   | Road Committee                      |
| <b>SCs</b>  | PMCs                                |
| <b>SEA</b>  | Sexual Exploitation and Abuse       |
| <b>SEP</b>  | Stakeholder Engagement Plan         |
| <b>SH</b>   | Sexual Harassment                   |
| <b>TMP</b>  | Traffic Management Plan             |
| <b>UV</b>   | Ultraviolet                         |
| <b>WBG</b>  | World Bank Guidelines               |



# 1. INTRODUCTION

## 1.1. Project Background

The Government of the Republic of Uzbekistan (GoU), through the Committee for Roads (RC), is preparing the *M37 Corridor Improvement Project – Phase I* (the Project). The project includes rehabilitation and upgrading of approximately 69 km of the existing M37 national highway corridor together with construction of a new western bypass around Bukhara city and associated missing link sections.

The M37 highway forms part of an important national and regional transport corridor connecting central Uzbekistan with the western regions of the country and the Turkmenistan border. The corridor supports domestic and international movement of passengers and freight and provides strategic connectivity between major economic centers including Samarkand, Navoi, and Bukhara.

Significant sections of the existing corridor are currently in poor to fair condition due to long-term operation, increasing traffic volumes, and heavy freight movement. Existing constraints include deteriorated pavement conditions, insufficient road safety infrastructure, inadequate drainage systems, congestion within populated areas, and limited road capacity. The absence of a completed bypass around Bukhara further contributes to traffic congestion, increased accident risks, and environmental nuisance within urban and peri-urban areas.

The project includes rehabilitation and widening of existing road sections, construction of grade-separated interchanges, bypass sections, bridges and culverts, drainage infrastructure, pedestrian facilities, road safety improvements, and other associated infrastructure necessary to improve transport efficiency and road safety conditions along the corridor.

The project is located within Navoi and Bukhara Provinces and traverses predominantly agricultural areas, roadside settlements, irrigated lands, and semi-desert terrain. Construction activities are expected to involve multiple contractors and subcontractors, temporary construction camps, borrow areas, asphalt and batching plants, transportation of construction materials, and operation of heavy machinery and equipment.

The RC will serve as the Executing Agency and will be responsible for overall project management and implementation, including environmental and social compliance, contractor supervision, stakeholder coordination, and monitoring of project activities.

The Asian Infrastructure Investment Bank (AIIB) is considering financing for the project. In accordance with applicable national legislation and the requirements of the AIIB Environmental and Social Framework (ESF), this Labor Management Plan (LMP) has



been prepared as part of the project's environmental and social management documentation to establish procedures for management of labor and working conditions during project implementation.

## 1.2. Objectives of the LMP

The purpose of this LMP is to establish the principles, procedures, and management measures for labor and working conditions during the implementation of the project in Bukhara and Navoi Provinces, Uzbekistan. The LMP has been prepared in accordance with:

- AIB ESF, including Environmental and Social Standard 1 (ESS 1): Environmental and Social Assessment and Management
- applicable national labor legislation of Uzbekistan
- Good International Industry Practice (GIIP)
- applicable environmental and social management requirements established for the Project.

The LMP aims to ensure that project workers are employed and managed in a safe, fair, and non-discriminatory manner throughout all phases of project implementation.

The specific objectives of this LMP are to:

- Promote fair treatment, non-discrimination, and equal opportunity for all project workers
- Ensure compliance with applicable national labor legislation and relevant international labor standards
- Establish effective labor management procedures for the project
- Promote safe and healthy working conditions and protect the health, safety, and welfare of workers
- Identify and manage labor-related risks associated with road construction, earthworks, transportation activities, operation of heavy machinery, bridge works, drainage works, and temporary facilities
- Prevent occupational accidents, injuries, and work-related illnesses through implementation of appropriate Occupational Health and Safety (OHS) measures
- Protect vulnerable workers, including women, migrant workers, seasonal workers, and workers employed through contractors and subcontractors
- Prohibit and prevent child labor, forced labor, coercion, and exploitation
- Establish procedures for labor influx management and mitigation of associated environmental and social risks
- Prevent and address Gender-Based Violence (GBV), Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), bullying, intimidation, and other inappropriate workplace behavior



- Establish accessible worker grievance mechanisms for receiving and resolving labor-related complaints
- Ensure that contractors, subcontractors, and primary suppliers implement labor management procedures consistent with this LMP
- Promote regular training and awareness related to labor management, OHS, emergency preparedness, and code of conduct requirements
- Establish monitoring and reporting procedures for assessing labor management performance and contractor compliance throughout the project lifecycle.

The LMP is a living document and may be updated during project implementation to reflect changes in project activities, workforce requirements, applicable legislation, institutional arrangements, or identified labor-related risks.

### 1.3. Scope of the LMP

The LMP establishes the framework for management of labor and working conditions associated with the project and defines the procedures, responsibilities, and mitigation measures necessary to address labor-related risks during all phases of project implementation.

The scope of the LMP covers labor management, occupational health and safety, worker welfare, labor influx, contractor management, worker grievance mechanisms, and monitoring arrangements associated with implementation of the project.

The LMP applies to all the following project-related activities:

- rehabilitation of approximately 69 km of the existing M37 highway corridor
- construction of the Bukhara western bypass and missing link sections
- construction of interchanges, bridges, culverts, and drainage systems
- operation of temporary access roads and construction camps
- establishment and operation of ancillary facilities including borrow areas, asphalt plants, batching plants, material storage areas, and machinery yards.

The requirements of this LMP apply to all categories of workers engaged under the project, including:

- **Direct Workers:** Personnel employed directly by the Project Management Office (PMO), RC, PMCs, and other entities directly involved in project management and implementation.
- **Contracted Workers:** Workers employed or engaged by contractors, subcontractors, and service providers to perform construction works and other project-related activities.
- **Primary Supply Workers:** Workers employed by suppliers provide construction materials and equipment essential for core project activities, including asphalt, aggregates, sand, cement, fuel, and other construction materials.



- **Migrant and Seasonal Workers:** Workers recruited from outside the project area or engaged temporarily during peak construction periods.
- **Government Workers:** Government personnel assigned to the project in accordance with national legislation and administrative arrangements.

The scope of the LMP includes, but is not limited to the following aspects:

- recruitment and employment procedures
- terms and conditions of employment
- occupational health and safety
- prevention of child labor and forced labor
- labor influx and worker accommodation management
- SEA/SH and GBV prevention measures
- worker welfare and sanitation facilities
- emergency preparedness and response
- worker grievance mechanisms
- contractor and subcontractor management
- monitoring and reporting arrangements
- labor-related training and capacity building.

The requirements of this LMP apply throughout all phases of the project and will be incorporated into bidding documents, construction contracts, contractor management plans, occupational health and safety (OHS) procedures, codes of conduct, and other relevant project documentation. All contractors and subcontractors engaged under the project will comply with the requirements of this LMP and applicable national legislation.

## 1.4. Structure of the LMP

The LMP is organized into the following parts:

- **Part 1 – Introduction**  
Provides the project background, objectives of the LMP, and the overall scope and applicability of the document.
- **Part 2 – Project Description**  
Describes the project components, main engineering characteristics, anticipated labor use, worker typology, estimated workforce requirements, and expected timing of labor demand throughout Project implementation.
- **Part 3 – Regulatory Framework and Gap Analysis**  
Summarizes the applicable national labor and occupational health and safety legislation, AIIB ESF requirements, relevant international conventions, and Good International Industry Practice. The section also includes a gap analysis between national legislation and applicable international requirements.



- **Part 4 – Assessment of Key Labor Risks**  
Identifies and evaluates the principal labor-related risks associated with the Project, including occupational health and safety risks, labor influx, child and forced labor risks, labor disputes, GBV/SEA/SH risks, worker accommodation risks, communicable disease risks, and other labor-related impacts associated with construction activities.
- **Part 5 – Responsible Staff and Implementation Arrangements**  
Defines the institutional arrangements and responsibilities of the Executing Agency, PMO, Design Institute, PMCs, Contractors, and Subcontractors for implementation and oversight of labor management requirements under the project.
- **Part 6 – Policies and Procedures**  
Establishes the labor management policies, occupational health and safety procedures, worker welfare requirements, non-discrimination provisions, incident reporting procedures, labor influx management measures, worker accommodation requirements, training obligations, and other procedures applicable to project workers and contractors.
- **Part 7 – Worker Grievance Redress Mechanism**  
Describes the procedures for submission, registration, assessment, resolution, monitoring, and reporting of worker grievances. The section also includes procedures for confidential handling of GBV/SEA/SH-related grievances and labor disputes.
- **Part 8 – Contractor Management**  
Defines the requirements applicable to Contractors and Subcontractors, including contractor due diligence during procurement, incorporation of labor requirements into bidding and contract documents, contractor obligations related to labor management and occupational health and safety, worker codes of conduct, contractor monitoring, and corrective action procedures.
- **Part 9 – Monitoring and Reporting**  
Establishes the procedures and responsibilities for monitoring implementation of the LMP, labor inspections, reporting obligations, corrective actions, adaptive management, and overall labor performance monitoring throughout project implementation.
- **Appendices**  
Include supporting documents, templates, forms, codes of conduct, and other supplementary materials relevant to implementation of the LMP.

The structure of this LMP is intended to ensure that labor management requirements are integrated into all phases of project implementation.



## 2. PROJECT DESCRIPTION

### 2.1. Project Overview

The project involves rehabilitation and upgrading of approximately 158 km of the existing M37 international highway corridor together with construction of a new western bypass around Bukhara City in Navoi and Bukhara Provinces of Uzbekistan.

The project corridor extends between approximately km 207 and km 276 of the M37 highway and forms part of a major national and international transport route connecting central Uzbekistan with the Turkmenistan border.

The alignment starts near the Kyzyltepa interchange in Navoi Province and continues southwest through Gijduvon, Vobkent, and Bukhara districts before terminating near the Turkmenbashi border checkpoint at the international border with Turkmenistan.

The corridor traverses predominantly rural and peri-urban areas, including agricultural lands, roadside settlements, irrigated areas, and semi-desert landscapes characteristic of the Kyzylkum region. Approximately 40 mahallas (local communities) are located along or adjacent to the project corridor.

In addition to rehabilitation of the existing M37 corridor, the Project includes:

- construction of an approximately 7.5 km western bypass around Bukhara city
- construction of an approximately 4.5 km greenfield connection section linking the M37 corridor with the Bukhara Ring Road
- construction of associated interchanges, bridges, culverts, drainage systems, pedestrian infrastructure, livestock crossings, and road safety facilities.

The project is intended to improve operational efficiency, road safety, regional connectivity, and traffic circulation along one of Uzbekistan's strategic transport corridors.

### 2.2. Project Design and Main Engineering Characteristics

The project is designed as a Category IB highway in accordance with applicable national road design standards of Uzbekistan. The principal design parameters include:

- dual carriageway configuration (2x2 lanes)
- localized expansion to 2 x3 lanes in selected settlement areas
- design speed of 120 km/h in rural sections
- standard lane width of 3.75 m
- cement concrete pavement in rural sections



- asphalt pavement in urban and settlement areas.

Construction activities will involve multiple simultaneous work fronts distributed along the project corridor and operation of heavy construction machinery, haulage vehicles, asphalt and concrete paving equipment, cranes, compactors, generators, and transport vehicles. The project is divided into procurement lots summarized in Table 1.

Table 1: Project Lots

| Lot   | Chainage   | Length | Main Characteristics                                           |
|-------|------------|--------|----------------------------------------------------------------|
| Lot 1 | km 207–249 | 42 km  | Rehabilitation and widening of existing M37 corridor           |
| Lot 2 | km 249–276 | 27 km  | Rehabilitation plus greenfield bypass and ring road connection |

(Source: Project Design)

Construction activities relevant to labor management under the project are expected to include:

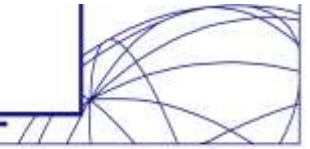
- site clearance and vegetation removal
- pavement demolition and rehabilitation
- earthworks and embankment formation
- widening of existing carriageways
- construction of bridges, culverts, and drainage structures
- construction of interchanges and junctions
- utility relocation works
- asphalt and concrete paving
- installation of traffic safety infrastructure
- construction of pedestrian facilities and bus stops
- operation of temporary facilities and construction camps
- transportation and handling of construction materials and heavy machinery.

The project includes substantial earthworks estimated at approximately 1.51 million m<sup>3</sup> for Lot 1 and 1.02 million m<sup>3</sup> for Lot 2, and an estimated total of approximately 5.2–6.5 million m<sup>3</sup> across the entire corridor.

Construction activities will involve multiple simultaneous work fronts distributed along the corridor and will involve operation of heavy construction machinery, haulage vehicles, asphalt and concrete paving equipment, cranes, compactors, generators, and transport vehicles.

## 2.3. Anticipated Labor Use in the Project

Construction activities will be implemented through contractors and subcontractors under supervision of the PMO, PMCs, and relevant government authorities.



The project will require a substantial workforce distributed across multiple construction lots and work fronts during different phases of implementation. Workforce demand will vary depending on construction stage, seasonal conditions, availability of construction materials and equipment, and mobilization schedules of contractors.

Due to the linear nature of the project and the distribution of construction activities along approximately 69 km of the M37 corridor, workers are not expected to concentrate in a single location for extended periods. Construction activities are anticipated to occur simultaneously at multiple sites, including rehabilitation sections, bypass sections, interchanges, bridges, culverts, drainage structures, asphalt plants, borrow areas, and temporary construction facilities.

The project will involve direct workers, contracted workers, primary supply workers, and migrant or seasonal workers associated with construction activities, supervision, material supply, and operation of temporary facilities.

### 2.3.1. Typology of Project Workers

The project workforce is expected to comprise the following categories of workers:

- management and engineering personnel
- environmental, social, OHS, and traffic safety staff
- survey and laboratory personnel
- machine operators and drivers
- skilled construction workers
- semi-skilled technical assistants
- unskilled laborers
- camp, security, and welfare personnel.

The project will promote equal employment opportunities for women and vulnerable groups. The minimum levels of women's participation are those set in the Gender Action Plan (GAP, Activities 1-3 and 7) and are mandatory:

- (a) **Contractors (each Lot):** mandatory minimums by job category: at least 10% of unskilled and semi-skilled site labor positions; at least 25% of professional and technical positions; and at least 30% of administrative and community liaison positions. Each Contractor submits a staffing schedule by job category and sex before mobilization and reports against these minimums monthly (Section 9.4). These minimums are incorporated into the bidding documents and civil works contracts for each Lot.
- (b) **PMO:** at least 30% of positions occupied by women, with a gender focal point and a Gender Specialist appointed. This is an Executing Agency commitment, monitored by AIIB through the semi-annual GAP monitoring report.



- (c) **PMC and other consultants:** at least 20% women in key and non-key roles, including a Gender Specialist. This requirement is incorporated into the bidding documents and contracts for consulting services.

The overall share of women across all positions in a Lot is calculated from the staffing schedule and reported (GAP indicator C5). It is not a target and does not replace the category minimums.

Contractors will advertise all positions with a statement encouraging women to apply and will identify and pursue opportunities to engage women in skilled and semi-skilled roles beyond the minimums.

Where a Contractor minimum in (a) is not met, the corrective action process in Section 8.10 applies. Where the PMO or consultant figure in (b) or (c) is not met, the cause and a time-bound corrective action are documented and reported to AIIB in the next semi-annual GAP Monitoring Report (GAP Sections 4.2 and 4.5).

#### **2.3.1.1. Direct workers**

Direct workers engaged under the project may include PMO staff, PMCs, environmental and social specialists, engineers, procurement personnel, financial specialists, administrative staff, and other personnel directly associated with project management and oversight functions.

Direct workers will be employed or engaged directly by the RC and will perform project management, supervision, coordination, administrative, environmental, social, procurement, and reporting functions associated with project implementation. The final staffing structure and number of personnel will be determined during detailed implementation planning.

If government civil servants are involved in the Project on either a full-time or part-time basis, they will continue to be governed by the terms and conditions of their existing public sector employment agreements or arrangements unless there has been a formal legal transfer of their employment to the Project.

#### **2.3.1.2. Contracted Workers**

Contracted workers will include personnel employed by contractors and subcontractors responsible for road rehabilitation, bypass construction, bridge and drainage works, utility relocation, transportation activities, operation of heavy machinery, and construction camp management.

Construction activities will involve operation of heavy machinery, haulage vehicles, asphalt and concrete plants, borrow areas, batching plants, and transportation activities requiring specialized operators, drivers, mechanics, technical personnel, and support staff.



Contractors may engage specialized operators, drivers, technical personnel, and support staff either directly or through subcontracting and service arrangements in accordance with applicable labor legislation. Contractors will remain responsible for ensuring compliance with labor management, occupational health and safety, and worker welfare requirements under this LMP.

Based on project requirements, contractors may engage subcontractors to undertake specific construction activities. Subcontractors will comply with the labor management requirements established under this LMP and applicable national labor legislation.

Contractors will maintain accurate records of workers engaged under the project, including working hours, wages, employment terms, occupational health and safety training, and workforce composition by category and gender. Such records will be made available for inspection by authorized government representatives and lender representatives, where required.

Security personnel engaged under the project, whether employed directly by contractors or through third-party security providers, will be managed in accordance with applicable national legislation and principles of proportional and appropriate conduct. Security personnel will receive induction and training regarding use of force and proportionality, human rights principles, worker conduct, interaction with local communities, prohibition of harassment and abuse, GBV/SEA/SH prevention measures, and applicable codes of conduct established for the project. Security personnel will only use force when strictly necessary and proportionate to the threat and will not use firearms except in cases of self-defense or defense of others against imminent threat of death or serious injury, consistent with GIMP and international human rights standards.

#### **2.3.1.3. Migrant and Foreign Workers**

The project may involve the employment of migrant or foreign workers for specialized technical, engineering, equipment operation, or management roles, especially in areas where local expertise or workforce availability is limited. It is not anticipated that there will be a large-scale reliance on foreign labor. Instead, foreign workers will be engaged primarily in specialized technical or management positions where local expertise is not available.

Temporary facilities and worker accommodation camps may be established progressively along the project corridor to accommodate migrant workers and personnel associated with construction activities in remote or distributed work locations.

Contractors engaging foreign workers will comply with all applicable national labor, immigration, and work permit requirements of Uzbekistan. Contractors will be responsible for obtaining required permits and ensuring that foreign workers are employed in accordance with applicable legislation.

Foreign and migrant workers will have access to:



- equal working conditions and labor protections
- occupational health and safety measures
- worker grievance mechanisms
- training and induction programs
- worker welfare and accommodation facilities.

Where worker accommodation is required, contractors will ensure that migrant and foreign workers are provided with adequate living conditions consistent with national requirements, AIB ESF requirements, and good international industry practice.

#### **2.3.1.4. Primary Supply Workers**

Primary supply workers associated with licensed quarries, borrow areas, asphalt plants, batching plants, fuel suppliers, transport companies, and suppliers of construction materials may be involved in project implementation. Contractors will include labor, occupational health and safety, and prohibition of forced labor and child labor requirements in contractual agreements with primary suppliers of aggregates, asphalt, fuel, quarry materials, and other construction materials. Prior to engaging primary suppliers, Contractors will conduct risk-based due diligence to screen for labor, OHS, child labor, and forced labor risks, based on factors such as the supplier's sector, location, workforce size, history of labor or safety violations, and reliance on informal or migrant labor. Suppliers identified as higher-risk through this screening will be subject to enhanced contractual requirements and closer monitoring. The PMO and PMC will conduct periodic inspections, document reviews, or audits of high-risk suppliers identified through this due diligence process, or where concerns subsequently arise during project implementation.

The PMO and contractors will take reasonable measures to ensure that primary suppliers comply with applicable labor legislation and do not engage in child labor, forced labor, or unsafe working practices, informed by the due diligence and risk screening described above. Where significant labor risks associated with primary suppliers are identified, the project may require suppliers to implement corrective measures, improve labor management practices, or demonstrate compliance with applicable labor and occupational health and safety requirements.

Contractors will maintain records related to supplier compliance, workforce management, occupational health and safety performance, and worker grievances associated with primary supply activities, where relevant.

#### **2.3.1.5. Community Workers**

The project is not expected to involve community workers or voluntary labor arrangements.



### 2.3.2. Characteristics of Project Workers

Due to the nature of road construction activities and operation of heavy machinery, the workforce is expected to consist predominantly of male workers, particularly in manual and heavy-equipment roles. The project will actively promote employment of women across a broad range of positions, including management, engineering, environmental, social, OHS, survey and laboratory, traffic management, community liaison, and administrative roles, consistent with the minimum requirements set out in Section 2.3.1. Women will be considered for these positions based on qualifications and suitability, without being limited to a predefined set of roles.

The project will promote equal opportunity and non-discrimination in recruitment and employment practices in accordance with applicable national legislation and AIB requirements. Recruitment processes will be based on qualifications, experience, and suitability for assigned tasks.

The project will prioritize local employment opportunities, particularly for unskilled and semi-skilled positions. Contractors will communicate job opportunities transparently to local communities along the project corridor, including through local government (mahalla/district administration) channels, public notices, and community liaison personnel, in advance of mobilization for each project section. Recruitment will be conducted on a fair and non-discriminatory basis, using clear and publicly disclosed criteria, and will not be limited to informal or word-of-mouth channels that could exclude eligible community members, including women and vulnerable groups. A significant proportion of general labor is expected to be recruited from local communities located along the project corridor, subject to workforce availability and qualifications. Contractors will maintain records of local recruitment outreach and outcomes, which will be made available to the PMC and PMO for monitoring purposes (Section 9).

All workers engaged under the project will be employed under written contracts or legally recognized employment arrangements specifying terms and conditions of employment, working hours, wages, leave entitlements, occupational health and safety requirements, and worker obligations.

The project workforce may include temporary, seasonal, part-time, and migrant workers depending on construction stage and contractor mobilization requirements. Contractors will prohibit recruitment-related discrimination, charging of recruitment fees to workers, retention of worker identity documents, and other exploitative labor practices.



### 2.3.3. Estimated Number of Workers

The workforce will vary depending on construction stage, contractor mobilization schedules, and progress of individual construction lots. Multiple construction teams are expected to operate simultaneously along different sections of the corridor.

The peak workforce is preliminarily estimated at approximately 200–274 workers per lot, or approximately 4476–655 workers across project lots. Table 2 presents the preliminary workforce estimate based on current engineering and construction assumptions.

Table 2: Workforce Estimate

| Workforce Category                                  | Typical Positions / Functions                                                                                                     | Estimated Number per Lot |        |        | Estimated Total for 5 Lots |
|-----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------|--------|----------------------------|
|                                                     |                                                                                                                                   | International            | Local  | Total  |                            |
| 1. Civil Works Workforce                            |                                                                                                                                   |                          |        |        |                            |
| Management and engineering staff                    | Project manager, site manager, road engineers, bridge/structure engineers, planning engineer, quantity surveyor, quality engineer | 1-2                      | 9-10   | 10-12  | 20-24                      |
| Environmental, social, OHS and traffic safety staff | Environmental specialist, social/GRM officer, OHS officer, traffic safety officer, community liaison officer                      | 0-1                      | 5      | 5-6    | 10-12                      |
| Survey and laboratory staff                         | Survey engineers, surveyors, materials testing technicians, laboratory assistants                                                 | 0                        | 5-6    | 5-6    | 10-12                      |
| Machine and equipment operators                     | Excavator operators, grader operators, roller operators, paver operators, crane operators, loader operators                       | 0                        | 20-30  | 20-30  | 40-60                      |
| Drivers and transport personnel                     | Dump truck drivers, water tanker drivers, fuel tanker drivers, concrete mixer drivers, light vehicle drivers                      | 0                        | 20-30  | 20-30  | 40-60                      |
| Skilled construction workers                        | Steel fixers, carpenters, masons, welders, electricians, mechanics, asphalt crew, concrete crew                                   | 1-2                      | 19-28  | 20-30  | 40-60                      |
| Semi-skilled workers / technical assistants         | Equipment assistants, traffic marshals, laboratory assistants, survey assistants, store assistants, maintenance helpers           | 0                        | 20-30  | 20-30  | 40-60                      |
| Unskilled labor                                     | General laborers, cleaners, flag persons, vegetation clearance workers, manual                                                    | 0                        | 80-100 | 80-100 | 160-200                    |



| Workforce Category                                   | Typical Positions / Functions                                                                                                  | Estimated Number per Lot |                |                | Estimated Total for 5 Lots |
|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|--------------------------|----------------|----------------|----------------------------|
|                                                      |                                                                                                                                | International            | Local          | Total          |                            |
|                                                      | earthwork support, site helpers                                                                                                |                          |                |                |                            |
| Utilities relocation team                            | Utility relocation supervisors, pipefitters, electricians, linesmen, telecom technicians, gas line technicians                 | 0-1                      | 7-9            | 8-10           | 16-20                      |
| Logistics support team                               | Warehouse and store personnel, materials handlers, procurement/logistics coordinators, equipment maintenance support           | 0                        | 5-8            | 5-8            | 10-16                      |
| Smart transport systems (ITS) team                   | ITS engineers, sensor and camera installation technicians, systems integration specialists, electrical and network technicians | 1-2                      | 2-3            | 3-5            | 6-10                       |
| Security, camp, welfare staff, and support personnel | Guards, cleaners, cooks/catering staff, camp support, first-aid support, community liaison personnel                           | 0                        | 20-30          | 20-30          | 40-60                      |
| <i>Subtotal for Civil works:</i>                     |                                                                                                                                | <i>3-8</i>               | <i>212-289</i> | <i>216-297</i> | <i>432-594</i>             |
| <b>2. Consultants</b>                                |                                                                                                                                |                          |                |                |                            |
| ESIA Consultant                                      | Environmental, social, resettlement, economic, climate, and gender specialists; road engineer                                  | 2-3                      | 4-5            | 6-9            | 6-9                        |
| PMC                                                  | Resident engineers, OHS and E&S supervision staff, quality control staff, procurement and financial management specialists     | 5-8                      | 15-20          | 20-28          | 20-28                      |
| Independent/ External E&S Monitoring Consultant      | External monitor for compliance verification                                                                                   | 1                        | 1-2            | 2-3            | 2-3                        |
| Design Institute                                     | Design engineers, survey specialists, bridge/structure engineers, planning engineer, quantity surveyor                         | 0                        | 10-15          | ---            | 10-15                      |
| <i>Subtotal for Consultants:</i>                     |                                                                                                                                | <i>8-12</i>              | <i>30-42</i>   | <i>---</i>     | <i>38-55</i>               |
| <b>3. PMO</b>                                        |                                                                                                                                |                          |                |                |                            |
| PMO                                                  | Project director, E&S, procurement and financial management staff, field coordinator                                           | ---                      | 15             | ---            | 15                         |



| Workforce Category | Typical Positions / Functions     | Estimated Number per Lot |         |         | Estimated Total for 5 Lots |
|--------------------|-----------------------------------|--------------------------|---------|---------|----------------------------|
|                    |                                   | International            | Local   | Total   |                            |
|                    | <i>Subtotal for PMO:</i>          | ---                      | 15      | ---     | 15                         |
|                    | <b>Total estimated workforce:</b> | 11–20                    | 257–346 | 260–358 | 485–664                    |

(Source: ESIA)

The workforce estimates are preliminary and may change during detailed design, procurement, contractor mobilization, and construction implementation phases.

### 2.3.4. Timing of Labor Requirements

Labor demand under the Project will vary throughout different stages of implementation.

During the mobilization and site preparation phase, workforce requirements will primarily include management personnel, survey teams, environmental and social specialists, camp establishment personnel, equipment operators, and initial construction crews.

Peak labor demand is expected during active construction periods involving simultaneous earthworks, pavement works, bridge and culvert construction, drainage works, asphalt paving, transportation activities, and operation of temporary facilities across multiple lots.

Construction activities may be influenced by seasonal weather conditions, including high summer temperatures characteristic of the Bukhara and Kyzylkum regions. Workforce numbers and working schedules may therefore fluctuate depending on climatic conditions, contractor scheduling, and construction progress.

During demobilization and finalization stages, workforce demand is expected to decrease progressively as construction activities are completed and temporary facilities are removed.

Direct workers associated with project management and supervision functions are expected to remain engaged throughout the Project implementation period, while contracted workers will be mobilized by contractors and subcontractors in accordance with construction schedules and specific work requirements.

Contractors will prepare workforce mobilization schedules and manpower plans consistent with construction sequencing, camp capacity, traffic management requirements, and occupational health and safety provisions.



## 3. REGULATORY FRAMEWORK AND GAP ANALYSIS

### 3.1. Overview

The purpose of this review is to identify the key legal and institutional requirements relevant to labor management under the project and assess consistency between national legislation and international lender requirements, including:

- national labor legislation of the Republic of Uzbekistan
- occupational health and safety (OHS) regulations applicable to construction activities
- AIIB Environmental and Social Framework (ESF) requirements, particularly ESS1
- IFC Performance Standard 2 (PS2) on Labor and Working Conditions
- IFC Environmental, Health and Safety (EHS) Guidelines
- International Labour Organization (ILO) conventions and occupational safety frameworks
- applicable good international industry practice (GIIP).

### 3.2. Applicable National Regulatory Framework

Labor management and occupational health and safety in Uzbekistan are regulated through the Constitution of the Republic of Uzbekistan, the Labor Code, laws governing occupational safety and health, social protection, emergency preparedness, and associated implementing regulations and construction standards.

The regulatory framework establishes requirements related to:

- labor rights and non-discrimination
- prohibition of forced labor and child labor
- employment conditions and working hours
- occupational health and safety
- accident prevention and investigation
- worker welfare and social protection
- emergency preparedness and fire safety
- worker grievance and appeals mechanisms
- contractor responsibilities during construction activities.

The principal national legislation applicable to the project is summarized in Table 3.

Table 3: Applicable National Labor and OHS Legislation

| #  | Policy/Acts/Rules               | Key provisions and purpose                                                                                            | Applicability to the Project                                                                                          |
|----|---------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| 1. | Constitution of the Republic of | <ul style="list-style-type: none"> <li>▪ Establishes the constitutional principles governing labor rights,</li> </ul> | <ul style="list-style-type: none"> <li>▪ Provides the overarching legal and constitutional basis for labor</li> </ul> |



| #  | Policy/Acts/Rules                                                                          | Key provisions and purpose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicability to the Project                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----|--------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | Uzbekistan (as amended 2023)                                                               | <p>equality, social protection, environmental protection, and access to justice.</p> <ul style="list-style-type: none"> <li>Guarantees the right to work, fair and safe working conditions, social security, healthcare, rest and leisure, and protection against discrimination.</li> <li>Prohibits forced labor and provides equal rights and freedoms regardless of gender, nationality, language, religion, social origin, or other status.</li> <li>Establishes the right of citizens to submit complaints and appeals to competent authorities and obtain legal protection of their rights and interests.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>management, occupational health and safety, equal opportunity, prohibition of forced labor and discrimination, worker welfare, and grievance redress mechanisms applicable to all project workers engaged under the Project.</p> <ul style="list-style-type: none"> <li>The LMP, contractor management procedures, OHS requirements, worker grievance mechanisms, and labor management practices implemented under the project will be consistent with the constitutional rights and protections established under the legislation of Uzbekistan.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2. | Labor Code of Uzbekistan (adopted 28.10.2022, effective 30.04.2023, with later amendments) | <ul style="list-style-type: none"> <li>Regulates labor relations, employment conditions, working hours, leave, wages, labor protection, OHS obligations, prohibition of forced labor and child labor, accident reporting, and worker rights.</li> <li>Articles 3 and 4 – Establish the fundamental principles of labor relations, including equality of labor rights, prohibition of discrimination in employment, and inadmissibility of forced labor.</li> <li>Articles 118–121 – Regulate minimum age for employment, conditions for employing minors, restrictions on child labor, and prohibition of hazardous or harmful work for persons under 18 years of age.</li> <li>Article 209 – Defines obligations for ensuring safe and healthy working conditions, including implementation of occupational safety and health measures and compliance with labor protection requirements.</li> <li>Articles 302–311 – Regulate procedures for investigation, recording, reporting, and responsibility regarding occupational accidents, injuries, and work-related incidents.</li> <li>Articles 352–355 – Establish requirements for labor protection, including provision of safe working conditions, use of personal protective equipment (PPE), responsibility for occupational safety, and preventive safety measures.</li> </ul> | <ul style="list-style-type: none"> <li>Provides the primary national legal framework governing labor management, employment relations, occupational health and safety, working conditions, workers' rights and obligations, accident prevention, and labor protection measure applicable to all project workers engaged under the Project.</li> <li>The code establishes requirements related to employment contracts, working hours, wages, leave entitlements, non-discrimination, prohibition of forced labor and child labor, protection of women and young workers, occupational accident reporting, and obligations for provision of safe and healthy working conditions.</li> <li>The provisions of the code will apply to direct workers, contracted workers, migrant workers, seasonal workers, and other personnel engaged under the Project. Contractors and subcontractors will be required to comply with applicable provisions of the Labor Code, including implementation of occupational health and safety measures, provision of personal protective equipment (PPE), worker training and induction, accident reporting procedures, worker welfare measures, and legally compliant employment practices.</li> <li>The requirements established under the Labor Code form the</li> </ul> |



| #  | Policy/Acts/Rules                                                                                                         | Key provisions and purpose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Applicability to the Project                                                                                                                                                                                                                                                                                      |
|----|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                           | <ul style="list-style-type: none"> <li>Article 359 – Requires safe work processes, develop safety instructions, and ensure compliance with occupational safety procedures.</li> <li>Article 360 – Requires mandatory preliminary and periodic medical examinations for employees engaged in hazardous, harmful, or high-risk work.</li> <li>Article 361 – Establishes requirements for occupational safety training, instruction, supervision, and ensuring workers are informed about workplace hazards and protection measures.</li> </ul>             | core legal basis for preparation and implementation of this LMP, contractor management procedures, OHS plans, worker grievance mechanisms, and labor compliance monitoring during project implementation.                                                                                                         |
| 3. | Law on occupational safety and health, No. № 839-XII (amended in 2016)                                                    | <ul style="list-style-type: none"> <li>Establishes obligations regarding safe working conditions, hazard communication, worker training, medical examinations, risk prevention, and worker protection, including use of PPE and responsibility for occupational safety.</li> </ul>                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>Applicable to all construction and operation activities, construction compounds, work camps, and contractor OHS systems.</li> </ul>                                                                                                                                        |
| 4. | Cabinet of Ministers Resolution on implementation of the occupational health and safety management system, No. 454 (2025) | <ul style="list-style-type: none"> <li>Provides a current implementing framework for OHS management systems and strengthens practical OHS administration.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>Applicable to contractor OHS systems, site management, monitoring, and compliance under the ESMP and LMP.</li> </ul>                                                                                                                                                       |
| 5. | Building Code No. KMK 3.01.02-00 "Safety in Construction"                                                                 | <ul style="list-style-type: none"> <li>Establishes mandatory occupational health and safety requirements for construction and installation works.</li> <li>Covers site organization, work permits, safety briefings, designation of responsible personnel, use of personal protective equipment (PPE), safe execution of works at height, excavation and earthworks, operation of machinery and cranes, electrical safety, fire safety, and worker training.</li> <li>Requires proper site layout, fencing, lighting, and safe access routes.</li> </ul> | <ul style="list-style-type: none"> <li>Directly applicable to all construction activities under the Project, including road rehabilitation and greenfield bypass works. Forms the technical basis for contractor OHS procedures, method statements, and site safety management under the ESMP and LMP.</li> </ul> |
| 6. | Public Health Standard No. 0346-17, Sanitary rules on labour and working conditions                                       | <ul style="list-style-type: none"> <li>Establishes sanitary and hygienic requirements for working conditions and occupational exposure environments.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>Applicable to worker welfare, noise, vibration, dust, sanitation, and camp/site conditions.</li> </ul>                                                                                                                                                                     |



| #   | Policy/Acts/Rules                                                                                                                                          | Key provisions and purpose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicability to the Project                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.  | Law on mandatory state social insurance against industrial accidents and occupational diseases, No. ZRU-174 (2008)                                         | <ul style="list-style-type: none"> <li>Establishes a mandatory state insurance system providing compensation for harm to workers' health resulting from occupational accidents and diseases.</li> <li>Defines obligations to insure workers, coverage of all employees under labor contracts, and entitlement to compensation in cases of temporary or permanent disability or death.</li> <li>Establishes procedures for recognition of insurance events and compensation payments.</li> </ul>                                                                                                                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>Directly applicable to all project workers.</li> <li>Requires contractors to ensure insurance coverage, compensation mechanisms, and proper reporting of occupational accidents.</li> <li>Supports compliance with OHS requirements under the LMP and ESS1.</li> </ul>                                                                                                                                                                                                                                                                                           |
| 8.  | Law on fire safety, No. ZRU-226 (2009)                                                                                                                     | <ul style="list-style-type: none"> <li>Defines fire prevention measures, duties of responsible parties, emergency response requirements, and safe handling of flammable materials.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>Applicable to construction camps, fuel storage, equipment operation, asphalt works, electrical equipment, machinery yards, and emergency preparedness.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                |
| 9.  | Regulation of the Cabinet of Ministers on investigation and registration of occupational accidents and other work-related injury to health, No. 286 (1997) | <ul style="list-style-type: none"> <li>Establishes rules for recording, investigating, and reporting industrial accidents and work-related injuries.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>Relevant to contractor incident reporting, investigation procedures, and ESMP/LMP compliance.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10. | Law on protection of population and territories from natural and technogenic emergencies, No. ZRU-790 (2022)                                               | <ul style="list-style-type: none"> <li>Establishes the legal framework for prevention, preparedness, response, and recovery related to emergency situations in Uzbekistan.</li> <li>Requires identification and assessment of natural and technological hazards, development of emergency preparedness and response plans, and implementation of preventive measures to reduce risks.</li> <li>Requires ensuring emergency preparedness at workplaces, including evacuation procedures, first aid arrangements, fire safety measures, emergency communication, and coordination with relevant authorities.</li> <li>Provides for protection of workers and the public through warning systems, evacuation procedures, use of protective equipment, rescue operations, and post-emergency recovery measures.</li> </ul> | <ul style="list-style-type: none"> <li>Applicable to the project due to construction-related risks associated with road rehabilitation works, operation of heavy machinery, fuel and bitumen storage, asphalt plants, workers' camps, and traffic management along active transport corridors.</li> <li>Relevant for contractor ESMPs, OHS management, emergency preparedness and response, including emergency evacuation planning, first-aid provision, coordination with local emergency services, and protection of nearby communities and road users during construction and operation.</li> </ul> |



### **3.3. AIIB Environmental and Social Framework**

#### **3.3.1. Environmental and Social Standard 1 (ESS1)**

The project is subject to the AIIB ESF requirements, including Environmental and Social Standard 1 (ESS1): Environmental and Social Assessment and Management.

ESS1 establishes the overarching framework for identification, assessment, mitigation, management, monitoring, and reporting of environmental and social risks and impacts throughout the Project lifecycle. The standard requires integration of environmental, social, labor, occupational health and safety (OHS), and community health and safety considerations into project planning, construction, operation, and monitoring activities.

ESS1 requires:

- preparation and implementation of environmental and social assessment documentation
- identification and assessment of direct, indirect, induced, and cumulative impacts
- application of the mitigation hierarchy (avoid, minimize, restore, offset)
- implementation of environmental and social management measures
- stakeholder engagement and information disclosure
- establishment of grievance redress mechanisms
- monitoring and reporting of environmental and social performance
- application of international good industry practice (GIIP).

For the project, ESS1 requirements are addressed through the ESIA, Environmental and Social Management Plan (ESMP), LMP, Stakeholder Engagement Plan (SEP), Gender Action Plan (GAP), contractor-specific C-ESMPs, Occupational Health and Safety (OHS) Plans, Traffic Management Plans, Emergency Preparedness and Response Plans, and other associated management procedures.

#### **3.3.2. Labor, OHS, and Community Health and Safety under ESS1**

In accordance with ESS1 requirements related to labor and working conditions, occupational health and safety, and community health and safety, the Project shall implement measures to:

- provide safe and healthy working conditions for all project workers
- prevent occupational injuries, incidents, and fatalities
- establish and maintain occupational health and safety procedures consistent with GIIP
- ensure provision and use of appropriate personal protective equipment (PPE)
- prevent child labor and forced labor



- prohibit discrimination, harassment, GBV/SEA/SH, and other forms of worker misconduct
- manage labor influx and associated community risks
- establish accessible worker grievance mechanisms
- ensure contractor and subcontractor compliance with labor and OHS requirements
- manage traffic and community health and safety risks associated with construction activities
- implement emergency preparedness and incident response procedures
- provide worker induction, training, and awareness programs.

The Project shall also ensure that all contractors and subcontractors prepare and implement site-specific management plans consistent with the requirements of the ESMP and this LMP.

### **3.3.3. Applicability of ESS1 to the Project**

ESS1 is applicable to all phases of the project, including pre-construction, construction, operation, and maintenance activities.

Key ESS1-related labor and OHS risks associated with the project include:

- occupational health and safety risks associated with road construction activities, heavy equipment operation, earthworks, excavation works, traffic management, and work at active road sections
- labor influx and worker accommodation risks
- worker fatigue and road traffic safety risks
- risks associated with GBV/SEA/SH and inappropriate worker conduct
- community health and safety risks associated with construction traffic, dust, noise, and temporary access restrictions
- emergency incidents, spills, fires, and accidents
- communicable disease transmission risks
- contractor management and subcontractor compliance risks.

The project shall implement mitigation and monitoring measures through the ESMP, LMP, contractor management procedures, OHS Plans, codes of conduct, training programs, and incident reporting systems.

### **3.3.4. Worker Grievance Mechanism Requirements**

ESS1 requires establishment of accessible grievance mechanisms for project workers and affected communities. Accordingly, the project shall establish:

- a worker grievance redress mechanism (GRM) for direct and contracted workers
- procedures for confidential submission and resolution of grievances



- separate procedures for handling sensitive grievances, including GBV/SEA/SH-related complaints
- anonymous grievance submission channels
- grievance monitoring, documentation, and reporting procedures.

The worker GRM shall operate throughout the project lifecycle and shall be communicated to all project workers during induction and training activities.

### **3.3.5. Contractor Obligations under the ESF**

All contractors and subcontractors engaged under the Project shall comply with the requirements of the AIIB ESF, this LMP, the ESMP, and applicable national labor and OHS legislation.

Contractors shall be required to:

- prepare and implement site-specific C-ESMPs and OHS plans
- provide qualified environmental, social, labor, and OHS personnel
- implement worker codes of conduct
- maintain labor and OHS records
- conduct worker induction and training
- implement incident notification and reporting procedures
- provide worker accommodation and welfare facilities where applicable
- establish emergency preparedness and response procedures
- cooperate with monitoring, audits, inspections, and reporting activities conducted by the PMO, PMCs, and AIIB.

Non-compliance with labor, OHS, and social requirements may result in corrective actions, contractual penalties, suspension of work, or other enforcement measures in accordance with contractual obligations.

## **3.4. International Good Industry Practice and Standards**

### **3.4.1. IFC General EHS Guidelines**

The IFC General Environmental, Health and Safety (EHS) Guidelines provide internationally recognized technical guidance for management of:

- occupational health and safety
- community health and safety
- waste management
- hazardous materials management
- air emissions
- noise and vibration
- emergency preparedness and response



- construction-related environmental and social impacts.

The Guidelines are applicable to all phases of the project and constitute an important source of good international industry practice for:

- worker health and safety
- traffic safety management
- worker accommodation
- emergency preparedness
- hazardous materials handling
- accident prevention
- contractor environmental and social management.

### **3.4.2. IFC EHS Guidelines for Roads and Highways**

The IFC EHS Guidelines for Roads and Highways provide sector-specific guidance applicable to:

- road rehabilitation
- highway construction
- drainage and culvert work
- borrow pits and quarry management
- traffic management
- construction camps
- road safety
- erosion control
- community health and safety.

The Guidelines are directly relevant to the project due to:

- rehabilitation of approximately 158 km of the M37 highway
- construction of greenfield bypass sections
- operation of heavy construction equipment
- traffic diversion and management
- worker and community safety risks
- construction activities adjacent to settlements and agricultural areas.

### **3.4.3. IFC Performance Standard 2 – Labor and Working Conditions**

IFC Performance Standard 2 (PS2) establishes international requirements related to:

- fair treatment of workers
- non-discrimination and equal opportunity
- prohibition of forced labor and child labor
- occupational health and safety
- worker grievance mechanisms



- contractor management
- protection of vulnerable workers
- labor influx management
- worker accommodation.

The project applies to the principles of IFC PS2 in conjunction with AIIB ESS requirements and applicable national legislation.

PS2 is particularly relevant due to:

- the large construction workforce expected under the project
- operation of multiple contractor work fronts
- use of subcontractors and primary suppliers
- occupational hazards associated with road construction
- potential labor influx and worker accommodation requirements.

#### **3.4.4. ILO OHS Management System, ILO-OSH 2001**

The International Labour Organization (ILO) Occupational Safety and Health Management System Guidelines (ILO-OSH 2001) provide an internationally recognized framework for establishing, implementing, and continuously improving occupational health and safety (OHS) management systems. The guidelines promote a systematic approach to workplace safety by integrating OHS into overall project management and organizational decision-making. Although not legally binding, they are widely applied as good international industry practice for infrastructure projects and are particularly relevant for large-scale construction activities involving multiple contractors and high-risk operations.

The ILO-OSH 2001 framework covers key elements including OHS policy, hazard identification, risk assessment, preventive and protective measures, worker training, emergency preparedness, accident prevention and reporting, contractor management, worker participation, monitoring, and continuous performance improvement. The framework is relevant to:

- heavy machinery operation
- excavation and earthworks
- asphalt works
- traffic interface risks
- work at height
- fuel and hazardous materials handling
- contractor camp management.

#### **3.4.5. ISO 45001**

ISO 45001 establishes internationally recognized requirements for occupational health and safety management systems.



The standard supports:

- systematic OHS management
- contractor oversight
- worker participation
- incident investigation
- emergency preparedness
- legal compliance
- continual improvement of workplace safety performance.

ISO 45001 principles are applicable to contractor OHS management systems and site-specific safety management under the project. For the project, ISO 45001 is highly applicable due to the significant occupational risks associated with road construction activities such as excavation, embankment works, bridge and culvert construction, asphalt production and paving, operation of heavy machinery, borrow pit activities, traffic diversion management, and work adjacent to live traffic.

The standard is particularly relevant for contractor and subcontractor management, ensuring that all construction personnel operate under unified OHS procedures with clear responsibilities, mandatory training, use of PPE, permit-to-work systems, accident prevention measures, and emergency response protocols. It also supports management of occupational risks related to dust, noise, vibration, fuel handling, bitumen works, hazardous materials transport, confined spaces, extreme temperatures, and camp health and sanitation.

### **3.5. International Labor Conventions and Treaties**

Uzbekistan is party to several international labor conventions relevant to labor management, worker protection, occupational safety and health, and prevention of forced and child labor.

The principal conventions relevant to the project include:

- ILO Forced Labour Convention (C29)
- ILO Freedom of Association Convention (C87)
- ILO Right to Organize and Collective Bargaining Convention (C98)
- ILO Equal Remuneration Convention (C100)
- ILO Discrimination (Employment and Occupation) Convention (C111)
- ILO Minimum Age Convention (C138).

Additional international conventions and standards not formally ratified by Uzbekistan but considered relevant as good international industry practice include:

- ILO Occupational Safety and Health Convention (C155)
- ILO Safety and Health in Construction Convention (C167)



- ILO Chemicals Convention (C170)
- ILO Prevention of Major Industrial Accidents Convention (C174)
- ILO Violence and Harassment Convention (C190).

These international standards support implementation of:

- safe working conditions
- labor rights protection
- worker participation
- contractor OHS management
- prevention of workplace harassment and SEA/SH risks
- accident prevention measures.

### **3.6. Gap Analysis Between National Legislation and AIIB / International Requirements**

A review of the applicable national labor framework indicates that Uzbekistan's labor and occupational health and safety legislation is generally consistent with the core principles of AIIB ESS requirements and international labor standards.

National legislation establishes comprehensive requirements related to:

- labor protection
- prohibition of forced labor and child labor
- occupational health and safety
- accident investigation
- worker insurance
- emergency preparedness
- worker compensation.

However, several areas required under international lender standards require strengthening through project-specific management measures under the LMP and ESMP.

Key areas requiring additional project-level measures include:

- contractor labor management plan
- labor influx management
- worker grievance mechanisms
- SEA/SH prevention and Codes of Conduct
- monitoring of primary suppliers
- worker accommodation standards
- contractor-specific OHS management systems
- project-level consultation and worker engagement procedures
- management of subcontractor compliance.



These gaps are addressed through LMP, contractor ESMPs (C-ESMPs), Occupational Health and Safety Plans, Worker Codes of Conduct, worker grievance redress mechanisms (GRM), contractor monitoring procedures, and emergency preparedness and response plans.

Table 4: Gap Analysis Between National Legislation and AIIB and GIIP Requirements

| Area                                | National Framework                                                                                                                       | AIIB / GIIP Requirement                                                                                                                              | Gap / Concern / Project Measures                                                                                                                                                                                                                                                                                                       |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Child and Forced Labor              | Forced labor and child labor are prohibited under the Labor Code of Uzbekistan. Hazardous work for persons under 18 years is prohibited. | AIIB ESS1, IFC PS2, and ILO conventions require strict prohibition, worker verification, monitoring, and corrective mechanisms.                      | National legislation is generally aligned; however, project-level verification and monitoring mechanisms are required. The project will apply minimum age verification procedures, maintain worker documentation, prohibit retention of identity documents, and include contractual prohibitions against forced labor and child labor. |
| Minimum Working Age                 | National legislation permits employment from age 16 under certain conditions and prohibits hazardous work for persons under 18.          | International good practice requires minimum age of 18 years for hazardous construction activities.                                                  | Due to hazardous road construction activities, the project will apply a minimum employment age of 18 years for all construction workers engaged in civil works, machinery operation, asphalt works, excavation, and traffic management activities.                                                                                     |
| Occupational Health and Safety      | Uzbekistan has a comprehensive OHS framework under the Labor Code and OHS legislation.                                                   | AIIB and IFC require proactive risk-based OHS management systems consistent with GIIP and ISO-45001 principles.                                      | National legislation is generally aligned but less prescriptive regarding project-level OHS management systems and contractor oversight. Contractors will prepare site-specific OHS Plans, conduct risk assessments, implement permit-to-work systems, provide PPE, and establish emergency preparedness procedures.                   |
| Worker Grievance Mechanism          | General complaint and appeals procedures exist under national legislation.                                                               | AIIB ESS requires accessible, confidential, and project-specific worker grievance mechanisms, including SEA/SH-sensitive procedures.                 | National legislation does not specifically require dedicated project-level worker GRMs. The project will establish a worker GRM accessible to direct and contracted workers, including confidential reporting channels for SEA/SH-related complaints.                                                                                  |
| GBV/SEA/SH and Workplace Harassment | General legal protection against harassment and discrimination exist.                                                                    | AIIB and IFC PS2 require preventive measures, Codes of Conduct, confidential reporting, awareness training, and survivor-centered response measures. | National legislation does not fully address project-specific SEA/SH risk management and confidential grievance procedures. The project will implement Codes of Conduct, mandatory training, confidential reporting procedures, disciplinary measures, and referral pathways where required.                                            |



| Area                                             | National Framework                                                                                | AIIB / GIIP Requirement                                                                                                                                             | Gap / Concern / Project Measures                                                                                                                                                                                                                                                    |
|--------------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contractor and Subcontractor Management          | General labor obligations apply to employers and contractors.                                     | AIIB requires active contractor management, monitoring, reporting, and labor compliance supervision.                                                                | National legislation does not provide detailed project-specific contractor labor management procedures. Contractors and subcontractors will be required to comply with the LMP, C-ESMP, OHS Plans, and contractual labor obligations subject to monitoring by the PMO and PMCs.     |
| Primary Supply Workers                           | National legislation provides limited oversight of labor risks within supply chains.              | AIIB and IFC PS2 require monitoring of significant labor risks associated with primary suppliers.                                                                   | Additional project-level procedures are required for supplier screening and monitoring, particularly for quarries, borrow pits, asphalt plants, and material suppliers.                                                                                                             |
| Worker Accommodation                             | Limited national requirements exist regarding worker accommodation standards.                     | IFC GIIP requires safe and hygienic worker accommodation with adequate sanitation, water supply, waste management, and security.                                    | Contractor camps will be managed in accordance with GIIP worker accommodation principles and subject to inspection and monitoring requirements.                                                                                                                                     |
| Labor Influx and Community Safety                | National legislation contains limited provisions addressing labor influx management.              | AIIB requires management of labor influx risks, community interaction, traffic safety, and worker behavior.                                                         | Labor influx management measures, camp rules, Codes of Conduct, community safety provisions, and workforce transportation management measures will be implemented under the ESMP and LMP.                                                                                           |
| Freedom of Association and Non-Discrimination    | National legislation recognizes equality of labor rights and freedom of association.              | AIIB and ILO conventions require non-discrimination and protection of workers' rights to organize.                                                                  | The project will apply equal opportunity principles and prohibit discrimination based on gender, ethnicity, disability, religion, or social status.                                                                                                                                 |
| Emergency Preparedness and Response              | National legislation establishes emergency response obligations.                                  | AIIB and IFC require project-specific emergency preparedness systems and coordination with local emergency services.                                                | Contractors will prepare Emergency Preparedness and Response Plans covering accidents, fires, spills, traffic incidents, extreme weather events, and medical emergencies.                                                                                                           |
| Occupational Accident Reporting                  | National legislation establishes procedures for accident investigation and reporting.             | International standards require immediate reporting, corrective actions, root cause analysis, and continuous monitoring.                                            | Contractors will implement incident reporting systems consistent with AIIB and IFC requirements, including reporting of near misses, lost time incidents, and serious accidents.                                                                                                    |
| Freedom of Association and Collective Bargaining | National legislation provides for workers' right to organize and engage in collective bargaining. | AIIB ESS1/ILO core conventions require contractors to respect workers' freedom of association and collective bargaining and not interfere with or retaliate against | Contractors will not interfere with, restrict, or retaliate against workers' lawful exercise of their right to organize or bargain collectively. Contractor contracts and Codes of Conduct will include an explicit non-interference and non-retaliation clause. Where formal union |



| Area                                    | National Framework                                                                                              | AIIB / GIIP Requirement                                                                                                                                                                                  | Gap / Concern / Project Measures                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                         |                                                                                                                 | workers exercising these rights.                                                                                                                                                                         | representation is not established at a worksite, Contractors will support alternative worker representative mechanisms (e.g., worker committees) to ensure workers have a channel to raise collective concerns, in addition to the individual worker GRM.                                                                                                        |
| Informal Employment                     | National legislation requires written employment contracts for workers.                                         | AIIB ESS1 requires all project workers, including casual and short-term labor, to have documented terms of employment and access to core labor protections regardless of the nature of their engagement. | Contractors will formally register and provide written terms of employment to all workers engaged on the Project, including casual, day, and short-term labor, with no informal or undocumented labor arrangements permitted. This requirement will be incorporated into Contractor and Subcontractor agreements and monitored through labor audits (Section 9). |
| Migrant and Seasonal Workers            | National legislation provides for social security contributions and legal protections for registered employees. | AIIB ESS1 requires equal treatment of migrant and seasonal workers, including access to grievance mechanisms and applicable social protections, regardless of employment duration or origin.             | Contractor contracts will require equal treatment of migrant and seasonal workers with respect to registration, social security contributions, and access to the Worker GRM (Section 7), with no distinction in protections based on migration status or contract duration. Cross-reference Section 4.7 (Risks Related to Migrant Workers).                      |
| Pay Parity and Discrimination           | National legislation requires equal pay for equal work.                                                         | AIIB ESS1 and ILO Convention 100 require equal remuneration for work of equal value, regardless of gender.                                                                                               | Contractor contracts will require equal pay for equal work/work of equal value regardless of gender, and Contractors will maintain gender-disaggregated payroll records for verification. Wage compliance will be monitored through labor audits and reporting under Section 9.                                                                                  |
| Occupational Safety & Health (OSH)      | National legislation establishes OHS requirements and standards for employers.                                  | AIIB and IFC require proactive, risk-based OHS management systems with active worker participation, consistent with GIIP and ISO 45001 principles.                                                       | Contractor contracts will require establishment of worker safety committees or worker OHS representatives, regular toolbox talks, accessible channels for reporting unsafe conditions, and transparent sharing of OHS performance data with workers, in addition to site-specific OHS Plans and PMO/PMC monitoring (Section 9).                                  |
| Enforcement and Institutional Oversight | The State Labor Inspectorate of the Ministry of Employment and Poverty Reduction                                | AIIB ESS1 requires project-level monitoring of contractor labor and OHS compliance, in                                                                                                                   | The project is subject to Uzbekistan's national labor law enforcement system, which operates independently of and in parallel to project-level                                                                                                                                                                                                                   |



| Area | National Framework                                                                                                                                                                                                             | AIIB / GIIP Requirement                                 | Gap / Concern / Project Measures                                                                                                                                                                                                                                                              |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | conducts planned and unannounced inspections of employers nationwide to verify compliance with labor legislation and labor protection rules, with authority to issue binding remediation orders (Labor Code, Articles 534–536) | addition to applicable national enforcement mechanisms. | monitoring. Project-level monitoring under this LMP (Section 9) is complementary to, and does not substitute for, this statutory oversight; Contractors remain subject to inspection, audit, and enforcement action by the State Labor Inspectorate regardless of Project-level arrangements. |

AIIB = Asian Investment Infrastructure Bank; ESS = Environmental and Social Standard; ILO = International Labor Organization; OHS = Occupational Health and Safety; PPE = Personal Protective Equipment; GRM = Grievance Redress Mechanism; GBV = Gender-Based Violence; SEA = Sexual Exploitation and Abuse; SH = Sexual Harassment; GIIP = Good International Industry Practice

### 3.6.1. Key Implications of the Gap Analysis

The gap analysis confirms that the labor and occupational health and safety legislation of Uzbekistan generally provides a strong legal basis for labor protection, occupational safety, prohibition of forced labor and child labor, and worker welfare. However, international lender requirements and good international industry practice applicable to the project require several additional project-specific management measures and implementation mechanisms.

Key implications of the gap analysis for the project include:

- the need to establish and maintain a project-specific LMP consistent with AIIB ESS requirements and IFC PS2
- preparation and implementation of contractor-specific labor management plan and OHS plans
- establishment of a dedicated worker GRM, including confidential procedures for GBV/SEA/SH-related complaints
- implementation of codes of conduct for all project workers and contractors
- application of a minimum working age of 18 years for hazardous construction activities
- implementation of contractor monitoring and reporting procedures to ensure compliance with labor and OHS requirements
- establishment of emergency preparedness and response procedures for construction activities, contractor camps, fuel handling, asphalt works, and traffic-related incidents
- implementation of labor influx management and community safety measures
- monitoring labor conditions associated with primary suppliers, including borrow pits, quarries, asphalt plants, and material suppliers
- provision of worker induction, OHS training, and regular toolbox talks throughout construction



- implementation of incident reporting and accident investigation procedures consistent with international good industry practice
- allocation of sufficient financial and human resources for implementation of labor management and occupational health and safety measures throughout the project lifecycle
- application of equal pay for equal work/work of equal value regardless of gender, with gender-disaggregated payroll monitoring to verify compliance
- prohibition of forced labor, including recruitment fees, retention of workers' identity documents, and debt bondage, consistent with Section 6.2 (Recruitment Procedures)
- implementation of transparent recruitment procedures, including due diligence on recruitment agencies/labor brokers where used, and verification of worker identity and age prior to engagement
- establishment of worker accommodation standards for contractor camps, covering sanitation, safety, and welfare conditions
- non-interference with workers' freedom of association and collective bargaining rights, and support for worker representative mechanisms where applicable
- application of non-discrimination and equal opportunity principles in recruitment and employment, in addition to pay parity
- formal registration and written terms of employment for all workers, including casual and short-term labor, to prevent informal employment arrangements
- equal access to labor protections, social security registration, and the Worker GRM for migrant and seasonal workers
- establishment of worker safety committees or OHS worker representatives to strengthen OHS monitoring and worker involvement.

The measures identified through the gap analysis are incorporated into the LMP, the ESMP, contractor ESMPs (C-ESMPs), OHS plans, worker codes of conduct, and associated contractor management procedures.



## 4. ASSESSMENT OF KEY LABOR RISKS

The rehabilitation and upgrading of the M37 highway corridor between Kyzyltepa district of Navoi Province and Alat district of Bukhara Province, including construction of the Bukhara western bypass and associated interchanges, culverts, underpasses, bridges, temporary facilities, borrow areas, asphalt plants, batching plants, and workers' camps, may generate a range of labor and working condition risks during pre-construction, construction, and operation phases.

The project is expected to engage a mixed workforce comprising direct workers, contracted workers, primary supply workers, consultants, equipment operators, security personnel, subcontractors, and migrant workers. Labor-related risks are primarily associated with road construction activities, operation of heavy machinery, asphalt and concrete works, excavation and earthworks, traffic management, camp management, utility relocation, transportation of materials, and interaction between workers and local communities.

In accordance with the AIIB ESF, applicable national labor legislation of Uzbekistan, IFC/WBG EHS Guidelines, and GIIP, the project will implement preventive and mitigation measures to avoid, minimize, and manage labor and occupational health and safety risks throughout the project lifecycle.

### 4.1. Key Potential Labor Risks

Table 5 presents key labor-related risks associated with the Project, rated by likelihood and consequence to help prioritize management and monitoring focus. Risk ratings are informed by the nature of road rehabilitation works, site-specific conditions along the M37 corridor, and experience from comparable AIIB-financed and regional highway projects in Uzbekistan (e.g., the A380 road project).

Table 5: Key Potential Labor Risks

| #  | Risk                                                                                                              | Likelihood | Consequence | Overall Rating |
|----|-------------------------------------------------------------------------------------------------------------------|------------|-------------|----------------|
| 1. | OHS risks associated with road construction activities                                                            | High       | High        | High           |
| 2. | Traffic and transportation-related accidents involving workers, machinery, and communities                        | High       | High        | High           |
| 3. | Risks associated with excavation, trenching, confined spaces, lifting operations, and working at heights          | Medium     | High        | High           |
| 4. | Exposure to dust, noise, vibration, asphalt fumes, bitumen, fuels, lubricants, chemicals, and hazardous materials | High       | Medium      | High           |



| #   | Risk                                                                                                                                           | Likelihood | Consequence | Overall Rating |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------------|----------------|
| 5.  | Heat stress, dehydration, and adverse weather conditions associated with the arid desert climate of Bukhara and Navoi Provinces                | High       | Medium      | High           |
| 6.  | Fire, explosion, and electrical hazards                                                                                                        | Medium     | High        | High           |
| 7.  | Child labor and forced labor risks                                                                                                             | Low        | High        | Medium         |
| 8.  | Risks associated with subcontractors and primary supply chain workers                                                                          | Medium     | Medium      | Medium         |
| 9.  | Labor influx and worker-community interaction risks                                                                                            | Medium     | Medium      | Medium         |
| 10. | SEA/SH and gender-based violence risks                                                                                                         | Medium     | High        | High           |
| 11. | Discrimination and unequal treatment of workers                                                                                                | Medium     | Medium      | Medium         |
| 12. | Inadequate worker accommodation and sanitation conditions                                                                                      | Medium     | Medium      | Medium         |
| 13. | Wage disputes, delayed payments, and unfair terms and conditions of employment                                                                 | Medium     | Medium      | Medium         |
| 14. | Lack of accessible worker grievance mechanisms                                                                                                 | Low        | Medium      | Low            |
| 15. | Risks associated with migrant and temporary workers                                                                                            | Medium     | Medium      | Medium         |
| 16. | Spread of communicable diseases and inadequate health services                                                                                 | Low        | Medium      | Low            |
| 17. | Unsafe potable water and poor hygiene conditions                                                                                               | Low        | Medium      | Low            |
| 18. | Poor housekeeping and camp management practices                                                                                                | Medium     | Low         | Low            |
| 19. | Improper use or absence of PPE                                                                                                                 | Medium     | High        | High           |
| 20. | Fatigue associated with long-distance transportation and shift work                                                                            | Medium     | Medium      | Medium         |
| 21. | Risks associated with inappropriate conduct or inadequate training of security personnel                                                       | Low        | High        | Medium         |
| 22. | Fatigue associated with night work and extended working hours                                                                                  | Medium     | Medium      | Medium         |
| 23. | Risks associated with subcontractor non-compliance with labor and OHS requirement                                                              | Medium     | Medium      | Medium         |
| 24. | Emergency response and medical evacuation challenges in remote sections of the project corridor                                                | Medium     | High        | High           |
| 25. | Recruitment-related risks, including charging of recruitment fees, use of unlicensed or non-compliant labor brokers, and contract substitution | Medium     | High        | High           |
| 26. | Gender pay gap and unequal remuneration for work of equal value                                                                                | Medium     | Medium      | Medium         |
| 27. | Interference with workers' freedom of association and collective bargaining rights                                                             | Low        | Medium      | Low            |



| #   | Risk                                                                                           | Likelihood | Consequence | Overall Rating |
|-----|------------------------------------------------------------------------------------------------|------------|-------------|----------------|
| 28. | Informal or undocumented labor engagement lacking written contracts and associated protections | Medium     | Medium      | Medium         |
| 29. | Insufficient worker participation and transparency in OHS monitoring and reporting             | Medium     | Medium      | Medium         |

These risks are expected to vary depending on the construction stage, contractor arrangements, workforce composition, and location-specific conditions along the Project corridor. Risk ratings presented above are preliminary and will be reviewed and refined during detailed design, contractor mobilization, and throughout construction, consistent with the adaptive management approach described in Section 9.5.

## 4.2. Occupational Health and Safety Risks

### 4.2.1. Potential OHS risks

The project's construction activities are expected to present significant occupational health and safety risks to workers, particularly during earthworks, pavement rehabilitation, bridge and culvert construction, asphalt laying, operation of heavy machinery, and traffic management activities along active highways.

Potential OHS risks include:

- Struck-by incidents involving moving vehicles and machinery
- Equipment rollover and collision accidents
- Falls from height and slips/trips/falls
- Collapse of trenches and excavations
- Contact with underground or overhead utilities
- Exposure to dust, silica, bitumen fumes, and hazardous chemicals
- Burns from hot asphalt and welding activities
- Electrocution from temporary electrical systems and equipment
- Manual handling injuries and musculoskeletal disorders
- Fire and explosion hazards associated with fuel storage and hot works
- Noise-induced hearing loss and vibration-related impacts
- Heat exhaustion and dehydration during summer operations
- Worker fatigue associated with extended working hours, night shifts, and long-distance transportation to remote sections of the corridor, increasing risk of accidents and errors
- Traffic accidents involving workers and road users
- Confined space hazards
- Exposure to wastewater, sewage, and vector-borne diseases
- Inadequate emergency preparedness and delayed emergency response.



The project will apply the hierarchy of controls approach for management of OHS risks, prioritizing elimination, substitution, engineering controls, administrative controls, and PPE. Contractors will establish:

- OHS management systems
- Emergency preparedness and response procedures
- Permit-to-work systems
- Incident reporting and investigation procedures
- Toolbox talks and induction training
- Traffic management plans
- Heat stress management procedures
- PPE management systems
- Medical response and evacuation procedures.

Only trained, competent, medically fit, and authorized personnel will be permitted to perform hazardous work. Each contractor will appoint qualified OHS personnel proportionate to workforce size and construction risk level, including dedicated OHS officers at active construction sites and camps. Contractors will also designate emergency response personnel, first aiders, fire wardens, and traffic safety personnel. The PMO and PMC will oversee contractor compliance through regular inspections and audits.

All workers will have the right to refuse or stop unsafe work where there is reasonable concern regarding imminent danger to life or health without fear of retaliation. Contractors will establish procedures for reporting unsafe conditions, near misses, hazards, and incidents, and workers will be encouraged to actively participate in occupational health and safety monitoring and prevention measures.

Workers will be consulted on occupational health and safety matters and encouraged to participate in hazard identification, reporting of unsafe conditions, toolbox meetings, and development of corrective measures.

Key occupational hazards/risks and control measures related to the project are summarized in Table 6.

**Table 6: Key Potential Occupational Hazards/Risks and Control Measures**

| Activity                            | Hazards / Risks Involved                                                                                                                                                                                                                                 | Prevention / Control Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mobilization and site establishment | Unauthorized access by community members or untrained personnel; vehicle accidents during mobilization; injuries associated with loading and unloading of materials; inadequate site preparation; conflicts with nearby communities; improper storage of | Construction sites, storage areas, and temporary facilities will be clearly demarcated and secured using fencing, barriers, and warning signage. Access to work areas will be restricted to authorized personnel only. All workers and visitors will undergo induction training prior to entering the site, including information on occupational health and safety requirements, emergency procedures, community interaction protocols, and use of PPE. Traffic movement during mobilization will be controlled through designated access routes, speed limits, flagmen, and warning systems. Temporary storage areas will be organized to |



| Activity                  | Hazards / Risks Involved                                                                                                                                                                                                                                                                                           | Prevention / Control Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | equipment and materials; exposure to dust, noise, and moving machinery during establishment activities.                                                                                                                                                                                                            | minimize safety risks and environmental contamination. Community notification will be undertaken prior to major mobilization activities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Heavy Machinery Operation | Risks include collision between machinery and workers, equipment overturning, blind-spot incidents, mechanical failure, struck-by injuries, entanglement in moving parts, excessive noise and vibration exposure, utility damage, and fatalities associated with unsafe operation of heavy construction equipment. | Only certified/licensed, trained, medically fit, and authorized personnel will operate heavy machinery. Contractors will implement preventive maintenance and inspection programs for all equipment, including daily pre-start inspections and maintenance logs. Machinery will be equipped with operational reverse alarms, flashing lights, mirrors, cameras, and emergency stop systems where appropriate. Exclusion zones will be established around operating machinery and clearly marked to prevent unauthorized access. Spotters and flagmen will be used during reversing and maneuvering operations, especially near settlements, traffic areas, or confined workspaces. Operators will comply with safe operating procedures, speed limits, and fatigue management requirements. Night operations will only occur where adequate lighting and visibility controls are provided.     |
| Asphalt and bitumen work  | Exposure to hot bitumen and asphalt materials causing burns and skin injuries; inhalation of fumes and airborne pollutants; fire and explosion hazards; heat stress and dehydration; respiratory irritation; slips and falls caused by spilled materials; and prolonged exposure to elevated temperatures.         | Workers involved in asphalt and bitumen operations will receive task-specific training on safe handling procedures and emergency response measures. Appropriate PPE including heat-resistant gloves, long-sleeved protective clothing, eye protection, respiratory protection, and safety boots will be provided and mandatory. Heating equipment and bitumen tanks will be regularly inspected and maintained in safe working conditions. Fire extinguishers and spill response equipment will be available at all asphalt production and laying areas. Adequate ventilation will be maintained around asphalt plants and enclosed workspaces. Work schedules will include rest breaks, shaded areas, and hydration measures during high-temperature conditions. Bitumen transfer and application areas will be isolated from unauthorized personnel and clearly marked with warning signage. |
| Lifting operations        | Falling loads, crane collapse, equipment failure, struck-by incidents, improper rigging, instability of lifting platforms, contact with overhead powerlines, and injuries or fatalities resulting from unsafe lifting practices.                                                                                   | All lifting operations will be carried out using certified cranes, lifting gear, slings, hooks, and rigging equipment that have undergone regular inspection and load testing. Contractors will prepare lift plans for critical lifting activities and ensure that only trained and certified crane operators, riggers, and signalers perform lifting operations. Exclusion zones will be established beneath suspended loads and unauthorized personnel prohibited from entering lifting areas. Ground conditions will be assessed before crane setup to ensure stability. Lifting operations will not be conducted during adverse weather conditions such as strong winds or poor visibility. Tag lines will be used to control load movement where necessary. Safe distances from overhead utilities and energized powerlines will be maintained at all times.                              |
| Earthworks and excavation | Trench collapse, falls into excavations, underground utility damage, flooding of trenches, confined space                                                                                                                                                                                                          | Excavations will be designed with proper benching, sloping, or shoring systems. Excavation areas will be fenced and clearly marked. Underground utilities will be identified before excavation activities commence. Safe access and egress will be provided for trenches deeper                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |



| Activity                                      | Hazards / Risks Involved                                                                                                                                                                                                        | Prevention / Control Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                               | hazards, and worker entrapment.                                                                                                                                                                                                 | than 1.2 m. Excavations will not be entered during water accumulation or unstable conditions. Emergency rescue procedures will be established for deep excavations and confined spaces.                                                                                                                                                                                                                                                                                                                                                                                                |
| Chemical and fuel handling                    | Exposure to hazardous chemicals, inhalation of fumes, spills, groundwater contamination, fire, explosion, and skin irritation.                                                                                                  | Hazardous materials will be stored in designated, ventilated, and secure areas with secondary containment systems. Material Safety Data Sheets (MSDS) will be available at all storage and handling locations. Spill kits and firefighting equipment will be maintained on-site. Workers handling fuels and chemicals will receive specialized training. Fuel transfer operations will use drip trays and spill prevention measures. Hazardous waste will be collected and disposed of through licensed facilities.                                                                    |
| Electrical works                              | Electrical shock, burns, electrocution, short circuits, damaged cables, and fire hazards.                                                                                                                                       | All electrical work will be conducted by qualified electricians. Temporary electrical systems will comply with safety standards and include grounding, insulation, and overload protection devices. Lock-Out/Tag-Out (LOTO) procedures will be implemented during maintenance activities. Damaged electrical equipment and cables will be removed from service immediately. Electrical installations will be regularly inspected and maintained.                                                                                                                                       |
| Welding and hot works                         | Burns, fire outbreaks, explosions, eye injuries, and ignition of combustible materials.                                                                                                                                         | Hot works will only be conducted under a Permit-to-Work (PTW) system. Fire extinguishers and firefighting equipment will be available near work areas. Combustible materials will be cleared before hot works commence. Workers will wear appropriate PPE including face shields, gloves, and fire-resistant clothing. Gas cylinders will be stored upright and away from ignition sources. Fire watch personnel will remain present during and after hot work activities.                                                                                                             |
| Manual handling                               | Musculoskeletal injuries, strains, sprains, and repetitive stress injuries.                                                                                                                                                     | Workers will receive training on safe lifting techniques and proper manual handling procedures. Mechanical lifting equipment will be used. Loads will be assessed prior to lifting. Team lifting will be used for heavy or awkward materials. Work rotation will be implemented where repetitive manual handling is required.                                                                                                                                                                                                                                                          |
| Labor Influx and Worker-Community Interaction | Social tensions, conflicts with local communities, inappropriate worker behavior, pressure on local resources, and increased SEA/SH risks.                                                                                      | Preference will be given to local labor to minimize labor influx. Contractors will implement codes of conduct governing worker behavior toward local communities. Workers will receive training on respectful behavior, cultural sensitivity, SEA/SH prevention, and community relations. Construction camps will be located away from settlements where feasible. Worker transportation and movement will be controlled to reduce unnecessary interaction with nearby communities. Community awareness activities and grievance mechanisms will be maintained throughout the Project. |
| Working near live traffic                     | Risks of collision between construction vehicles and public traffic; pedestrian injuries; traffic congestion; reduced visibility; driver distraction; community safety hazards; and accidents associated with temporary traffic | Contractors will prepare and implement site-specific Traffic Management Plans consistent with good international practice and national road safety requirements. Traffic control measures will include warning signage, barriers, reflective delineators, temporary lane markings, flagmen, and speed restrictions within construction zones. Pedestrian access routes and crossings will be maintained wherever feasible. Workers operating near live traffic will wear high-visibility reflective                                                                                    |



| Activity                   | Hazards / Risks Involved                                                                                                                                                                                                                    | Prevention / Control Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                            | diversions and lane closures.                                                                                                                                                                                                               | PPE. Construction vehicle movements will be coordinated to minimize disruption to public traffic and local communities. Adequate lighting and visibility measures will be implemented for night work. Public awareness signage and advance notification of traffic diversions will be provided in nearby settlements and road sections affected by construction activities.                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Confined space entry       | Oxygen deficiency, accumulation of toxic or flammable gases, fire and explosion hazards, asphyxiation, heat stress, restricted movement, poor visibility, flooding, and delayed emergency response during confined space activities.        | All confined space activities will be conducted under a formal Permit-to-Work (PTW) system. Atmospheric testing for oxygen levels, toxic gases, and flammable substances will be carried out before and during entry into confined spaces. Mechanical ventilation systems will be used where required to maintain safe air quality. Only trained and authorized personnel will enter confined spaces. Rescue and emergency response equipment will be readily available, including retrieval systems, breathing apparatus, and first aid supplies. Standby personnel will remain outside confined spaces throughout operations to maintain communication and initiate emergency procedures if required. Entry and exit points will remain unobstructed and clearly identified.                                                 |
| Work at height             | Falls from scaffolding, bridges, elevated platforms, ladders, machinery, and structures; falling objects; unstable working surfaces; improper use of fall arrest systems; injuries and fatalities associated with elevated work activities. | Work at height activities will only be conducted by trained and authorized personnel. Contractors will implement fall prevention and fall protection measures including guardrails, secured platforms, safety nets, and certified fall arrest systems. Full-body harnesses and lifelines will be mandatory where fall hazards exist. Scaffolding and elevated work platforms will be inspected regularly by competent personnel. Tools and materials at height will be secured to prevent object hazards falling. Work at height will be suspended during strong winds, storms, or unsafe weather conditions. Rescue procedures for fall incidents will be established and workers trained accordingly.                                                                                                                        |
| Camp operations            | Poor sanitation, communicable disease transmission, inadequate waste management, fire hazards, gender-related safety concerns, overcrowding, poor living conditions, and conflicts among workers or with nearby communities.                | Labor camps will comply with national sanitary requirements and good international practice for worker accommodation. Camps will provide adequate sleeping space, ventilation, lighting, potable water supply, sanitation facilities, drainage systems, waste collection areas, medical support, fire safety equipment, and recreational areas where appropriate. Separate sanitation and accommodation facilities will be provided for women workers where applicable. Camps will maintain regular cleaning, pest control, and disinfection programs. Camp residents will receive induction training on camp rules, hygiene requirements, grievance procedures, emergency response, and community relations. Security arrangements and perimeter controls will be implemented to protect both workers and nearby communities. |
| Adverse weather conditions | Heat stress, dehydration, reduced visibility, strong winds, lightning strikes, flooding, dust storms, slippery conditions, reduced equipment stability, and increased                                                                       | Contractors will monitor weather forecasts and suspend hazardous activities during severe weather conditions where necessary. Work-rest cycles will be implemented during high-temperature periods to reduce heat stress. Shaded rest areas, potable drinking water, and electrolyte replacement will be provided to workers at all times. Dust suppression measures including water spraying will be implemented during dry and windy                                                                                                                                                                                                                                                                                                                                                                                         |



| Activity                  | Hazards / Risks Involved                                                                                                                                                 | Prevention / Control Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | accident risks during extreme weather events.                                                                                                                            | conditions. Emergency preparedness procedures will address flooding, storms, and extreme weather scenarios. Workers will receive training on recognizing symptoms of heat exhaustion, dehydration, and weather-related hazards.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Transportation of workers | Road traffic accidents, driver fatigue, vehicle overcrowding, mechanical failure, unsafe driving practices, and injuries associated with poor transportation conditions. | All vehicles used for worker transportation will be roadworthy, regularly inspected, and maintained in safe operating condition. Drivers will possess valid licenses and receive defensive driving and road safety training. Seatbelt use will be mandatory for all occupants. Overloading vehicles will be strictly prohibited. Travel routes and schedules will be planned to minimize fatigue and avoid high-risk road conditions where feasible. Emergency communication systems and first aid kits will be available in transport vehicles. Contractors will maintain records of vehicle inspections, driver qualifications, and transportation incidents. |

PPE = personal protective equipment; MSDS = Material Safety Data Sheet; LOTO = Lockout/Tagout

#### 4.2.2. Personal Protective Equipment

Road rehabilitation and construction activities associated with the project will expose workers to a wide range of occupational hazards including moving machinery, heavy traffic, falling objects, excavation hazards, work at height, confined spaces, excessive noise and vibration, dust, asphalt fumes, bitumen, chemicals, welding activities, electrical systems, heat stress, and adverse weather conditions typical for the arid climate of Bukhara and Navoi Provinces. Appropriate personal protective equipment will therefore be provided and used as an essential component of the project's occupational health and safety management system.

The project will apply the hierarchy of controls approach for management of occupational hazards, prioritizing elimination, substitution, engineering controls, and administrative controls before reliance on PPE. PPE will be considered the final layer of protection and will be used in conjunction with other workplace safety measures.

All contractors and subcontractors will be required to:

- Provide appropriate PPE free of charge to all workers.
- Ensure that PPE is suitable for specific work activities and hazards identified through risk assessments.
- Maintain adequate stocks of replacement PPE on-site.
- Ensure proper fitting, maintenance, cleaning, and storage of PPE.
- Replace damaged, defective, or expired PPE immediately.
- Enforce mandatory PPE use through the following supervision and disciplinary procedures:
  - Daily visual PPE compliance checks conducted by site supervisors and OHS Officers at the start of each shift and during routine site walks.



- Formal weekly PPE compliance inspections, documented and retained as part of site OHS records.
- A graduated disciplinary response for non-compliance:
  - (i) first instance, verbal warning and re-instruction on PPE requirements, recorded in the site log;
  - (ii) repeated instance, written warning and mandatory refresher training;
  - (iii) continued non-compliance, temporary suspension from the work activity pending compliance, and further disciplinary action in accordance with the Contractor's internal disciplinary procedures and the Worker Code of Conduct (Appendix 2);
- Immediate removal from the work area of any worker whose PPE non-compliance creates an imminent safety risk to themselves or others, regardless of prior warning history.
- Supervisors and OHS Officers will have the authority to stop work where PPE non-compliance poses an immediate hazard, consistent with the OHS Officer authority set out in Section 8.4.
- Conduct regular inspections to verify proper use and condition of PPE.
- Provide workers with training on correct PPE use, limitations, maintenance, and disposal.

Minimum PPE requirements for workers will include:

- Safety helmets
- High-visibility reflective clothing and vests
- Protective footwear and safety boots
- Protective gloves suitable for specific tasks
- Eye and face protection
- Hearing protection
- Respiratory protection
- Fall protection equipment including full-body harnesses and lifelines
- Welding shields and fire-resistant clothing
- Chemical-resistant PPE where hazardous substances are handled.

Task-specific PPE requirements will be determined through site-specific hazard identification and risk assessments conducted by contractors prior to commencement of activities. Additional PPE requirements may apply for hazardous activities including confined space entry, hot works, asphalt and bitumen handling, chemical storage and transfer, electrical works, welding operations, lifting activities, and work at height.

Given the desert and semi-arid climate conditions along the Project corridor, contractors will also provide climate-appropriate protective equipment and worker welfare measures to reduce risks associated with:

- Extreme summer temperatures and heat stress
- Dust storms and airborne particulates



- Solar radiation and UV exposure
- High wind conditions
- Cold weather exposure during winter operations.

Such measures may include breathable protective clothing, UV-resistant eye protection, dust respirators, shaded rest areas, cooling measures, hydration stations, and weather-appropriate seasonal clothing.

Special consideration will be given to provision of inclusive and gender-sensitive PPE for women workers and vulnerable groups. Contractors will ensure availability of PPE in appropriate sizes and configurations suitable for female workers, including properly fitted safety harnesses, gloves, footwear, helmets, reflective clothing, and other protective equipment. Ill-fitting PPE may create additional occupational hazards and reduce effectiveness of protection measures. Where applicable, contractors will also consider maternity-compatible PPE and culturally appropriate protective equipment arrangements.

Workers will receive induction and refresher training regarding:

- Mandatory PPE requirements
- Proper fitting and adjustment
- Inspection and maintenance procedures
- Storage and replacement requirements
- Limitations of PPE
- Reporting damaged or inadequate equipment.

Supervisors and OHS personnel will routinely monitor PPE compliance at all worksites, camps, borrow areas, asphalt plants, batching plants, and temporary facilities. Repeated failure to use mandatory PPE may result in disciplinary action consistent with contractor OHS procedures. All PPE used under the project will comply with applicable national standards, manufacturer specifications, IFC/WBG EHS Guidelines, GIIP, and relevant international occupational safety standards.

#### **4.2.3. Interface Risks Between Concurrent Contract Packages**

Given that construction is expected to be undertaken under multiple contract packages (Lots) simultaneously along the M37 corridor, and given that utilities relocation, logistics, and ITS works may be carried out by separate teams operating in parallel with civil works, interface risks may arise at lot boundaries, shared access routes, shared borrow areas or material sources, and locations where multiple contractors' activities or personnel overlap in time and space. Potential interface risks include:

- Conflicting or uncoordinated traffic management arrangements at lot boundaries or shared haul routes, creating confusion for drivers, workers, and the public.



- Overlapping or conflicting work activities at shared or adjacent worksites, increasing risk of struck-by incidents, equipment collisions, or uncoordinated excavation/lifting operations.
- Ambiguity over responsibility for hazard identification, incident response, or emergency coordination at locations where jurisdiction between contractors is unclear.
- Inconsistent OHS standards, PPE requirements, or induction/toolbox content between contractors operating in proximity to one another.
- Delayed or fragmented incident reporting where an incident affects personnel or the public across contractor boundaries
- Utility relocation or ITS installation crews operating within or adjacent to active civil works zones without coordinated scheduling.

Minimum coordination requirements to manage interface risks will include:

- **OHS Coordination:** Contractors operating in adjacent or overlapping areas will conduct joint hazard identification and risk assessment at shared or boundary locations prior to commencement of concurrent activities and will align permit-to-work systems where activities intersect (e.g., excavation, lifting, hot works near a Lot boundary).
- **Traffic Management Coordination:** Contractors will align Traffic Management Plans at lot boundaries and shared haul routes, ensuring consistent signage, speed limits, and haul route sequencing, coordinated through the PMC.
- **Emergency Response Coordination:** Contractors will establish joint or mutually compatible emergency response arrangements for shared or boundary areas, including shared knowledge of emergency contacts, nearest medical facilities, and rendezvous points, and will participate in joint emergency drills where activities are directly adjacent.
- **Incident Reporting and Communication:** Any incident occurring at or affecting a shared or boundary location will be reported to all affected contractors and the PMC/PMO without delay, regardless of which contractor's personnel were directly involved, consistent with the incident reporting procedures in Section 6.7 (Incident Management and Reporting).
- **Coordination Mechanism:** The PMC will convene regular (at minimum monthly, or more frequently during periods of overlapping mobilization) inter-contractor coordination meetings to identify and manage interface risks, review upcoming works schedules at lot boundaries, and resolve any conflicts in OHS or traffic management arrangements. The PMO will resolve any interface disputes between contractors that cannot be settled at the coordination meeting level.

### 4.3. Child and Forced Labor

In accordance with Uzbekistan legislation, AIIB ESF, and international labor standards, the project will prohibit all forms of child labor and forced labor. No person under the



age of 18 years will be employed in hazardous construction activities associated with the project. Contractors will:

- Verify worker age through official identification documents
- Maintain employment records
- Include contractual prohibitions against child and forced labor
- Monitor subcontractors and suppliers
- Immediately report any violations.

Forced labor practices including coercion, withholding wages, confiscation of documents, bonded labor, trafficking, or involuntary labor will be strictly prohibited. The PMO and Contractors will conduct periodic due diligence of subcontractors and primary suppliers to identify potential risks of child labor, forced labor, and labor exploitation.

The project will establish a worker grievance mechanism, including a grievance tracking system to ensure that all grievances, whether submitted verbally or in writing, are formally recorded, assigned a unique reference, tracked through to resolution, and regularly updated and reviewed, in addition to anonymous reporting channels, supplier monitoring and audits, and contractual sanctions for non-compliance, consistent with the grievance registration, tracking, and documentation procedures set out in Section 7.7 and Appendix 4.

#### **4.4. Labor Influx**

Most unskilled and semi-skilled workers are expected to be recruited locally from districts along the project corridor, including Kyzyltepa, Gijduvon, Vobkent, Bukhara district, Jondor, Karakul, and Alat districts. Based on preliminary workforce estimates (Table 2), the civil works workforce is expected to reach approximately 476–655 workers at peak across the two project lots, of whom the majority, unskilled, semi-skilled, and general labor positions (approximately 600–800 workers<sup>1</sup>), are expected to be sourced locally where sufficient local labor supply exists.

Labor influx is expected to primarily involve an estimated 300–500 non-local workers at peak, comprising skilled construction personnel, machine and equipment operators, drivers, and specialized technical staff (survey, laboratory, utilities relocation, and ITS installation) sourced from outside the immediate project districts, together with a smaller number of international personnel (estimated 3–8 per lot) engaged in senior management, technical, and specialized roles. These figures are preliminary and will be

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<sup>1</sup> This local and non-local distribution is estimated based on the composition of workforce categories in Table 2, assuming unskilled, semi-skilled, and general labor positions are predominantly filled locally, while skilled, technical, and specialized roles draw more heavily on non-local and international labor markets; the actual distribution will be confirmed through contractor mobilization plans and workforce monitoring under Section 9.



refined as contractor mobilization plans and detailed workforce breakdowns become available (Section 2.3.3).

Labor influx is expected to be highest during peak construction phases (earthwork, paving, and structures works) and will vary by lot depending on construction sequencing (Section 2.3.4). Camp-based accommodation is expected to be required for a portion of the non-local workforce, with the remainder housed in nearby settlements or commuting from within the project districts; final camp occupancy estimates will be confirmed during contractor mobilization planning (Section 6.7).

Potential labor influx risks include:

- Increased pressure on local infrastructure and services
- Community tensions
- Inflation of prices and rental costs
- Worker misconduct
- Increased traffic and road safety risks
- SEA/SH risks
- Spread of communicable diseases.

Mitigation measures will include:

- Prioritization of local employment where feasible
- Worker Codes of Conduct
- Community awareness and engagement
- Worker training on cultural sensitivity
- Restrictions on worker movement in sensitive community areas
- Camp management procedures
- Security management procedures
- Community grievance mechanisms.

Special attention will be given to preventing adverse impacts of labor influx on women, children, and vulnerable groups in nearby communities. Contractors will implement codes of conduct, worker awareness programs, controlled worker mobility, and community engagement measures to minimize risks associated with inappropriate worker behavior, harassment, and GBV/SEA/SH.

## **4.5. Labor Disputes over Terms and Conditions of Employment**

Potential labor disputes may arise due to wage disagreements, delayed salary payments, working hours and overtime disputes, discrimination or unequal treatment, unsafe working conditions, termination disputes, inadequate accommodation conditions, and other employment-related grievances. To minimize such risks:

- All workers will receive written employment contracts.



- Contractors will clearly communicate employment terms and conditions.
- Equal pay for equal work principles will be applied.
- Contractors will maintain accurate payroll and attendance records, consistent with Section 6.1, to support timely and verifiable wage payments and reduce the risk of wage-related disputes.
- Worker grievance mechanisms will be established and maintained.
- Retaliation against workers raising grievances will be prohibited.
- Workers will have the right to organize, appoint worker representatives, engage in collective discussions consistent with national legislation, and raise workplace concerns without fear of retaliation.

Labor disputes will be monitored through the Worker GRM established under Section 7, which provides a structured escalation pathway.

- (1) Disputes will first be addressed at the site/contractor level, through direct engagement between the worker (or worker representative) and site management or the designated GRM focal point.
- (2) Where a dispute cannot be resolved at this level within the timeframe specified in the site-specific GRM procedures, or involves a serious or collective grievance, it will be escalated to the Contractor's senior management and, where necessary, to the PMO and PMC for review and resolution, consistent with the grievance escalation procedures in Section 7.8.
- (3) Collective labor disputes involving multiple workers will be addressed in accordance with Section 7.10.

At any stage, use of the Worker GRM does not preclude a worker's right to pursue formal legal recourse, including through the labor inspectorate or courts, in accordance with national legislation.

The PMO and PMCs will monitor the status, frequency, and resolution of labor disputes through routine labor monitoring (Section 9), including review of grievance logs and worker interviews, and will identify recurring dispute patterns that may indicate systemic labor management issues requiring corrective action (Section 9.5).

#### **4.6. GBV/SEA/SH Risks**

Construction activities may create risks of gender-based violence (GBV), sexual exploitation and abuse (SEA), sexual harassment (SH), and other forms of gender-based violence. Risks may arise from:

- Interaction between workers and local communities
- Presence of temporary labor camps
- Power imbalances
- Inadequate supervision and grievance mechanisms.



Mitigation measures will include:

- Mandatory codes of conduct for all workers
- SEA/SH awareness and training programs
- Confidential grievance channels
- Survivor-centered response procedures
- Contractor sanctions for violations
- Worker camp management controls
- Community consultations and awareness activities.

All contractors will adopt and enforce zero-tolerance policies for GBV/SEA/SH. Contractors will prepare and implement codes of conduct addressing GBV/SEA/SH risks, worker behavior, non-discrimination, and interaction with local communities. The codes of conduct will be reviewed and approved by the PMO and signed by all workers prior to commencement of work.

Additional measures for protection of women and vulnerable groups include:

- protection of nearby communities
- women-worker protections
- confidential grievance channels
- separate sanitation/accommodation
- lighting/security
- worker conduct restrictions
- gender-sensitive consultations
- designated SEA/SH focal points.

The project will identify available local referral pathways and support services for GBV/SEA/SH survivors, including medical, psychosocial, legal, and protection services where available.

## **4.7. Risks Related to Migrant Workers**

Although the Project is expected to primarily rely on local labor, migrant workers may be engaged for specialized activities. Potential risks include language barriers, discrimination, lack of awareness of worker rights, unsafe accommodation conditions, excessive working hours, retention of identification documents, limited access to grievance mechanisms, etc. The project will ensure:

- Equal treatment of migrant workers and equal pay.
- Provision of contracts in understandable language.
- No retention of identity documents.
- Access to grievance mechanisms in a language understood by the worker, including translated grievance forms and access to interpretation or translation support where needed, consistent with Section 7.



- Induction and refresher training for migrant workers on their labor rights, OHS requirements, camp/accommodation rules, and the Worker Code of Conduct, delivered in a language understood by the worker or with translation support, consistent with Section 8.8.
- Prohibition of recruitment fees and exploitative recruitment practices for migrant workers, including due diligence on any recruitment agencies or labor brokers involved, consistent with Section 6.2.
- Verification that all migrant workers hold valid work authorization/registration in accordance with applicable Uzbek migration and labor legislation prior to engagement.
- Timely and verifiable wage payment consistent with Section 6.1, recognizing migrant workers' particular vulnerability to wage withholding as a means of restricting movement.
- Contractor responsibility for return transportation arrangements at the end of a migrant worker's contract or upon termination, to prevent workers being stranded away from their place of origin.
- Adequate accommodation and sanitation facilities.
- Access to healthcare and emergency services; freedom of movement.

Compliance with these measures will be verified through routine labor monitoring under Section 9, including worker interviews with migrant workers.

#### **4.8. Worker Accommodation and Camp Management Risks**

Where worker camps are established, contractors will ensure that accommodation facilities comply with GIIP and IFC/WBG guidance on workers' accommodation. Potential risks include overcrowding, poor sanitation, fire hazards, spread of communicable diseases, poor waste management, conflict among workers, security risks, etc. Minimum requirements for worker accommodation and camp management will include:

- Adequate sleeping space and ventilation
- Separate sanitation facilities
- Potable water supply
- Waste collection and disposal
- Fire safety equipment
- First aid facilities
- Lighting and security fencing
- Recreational facilities where feasible
- Separate accommodation arrangements for female workers where applicable.

Workers will be periodically consulted about their accommodation conditions, sanitation, security, and camp management issues. The Contractor, PMC, and PMO will



conduct regular inspections of the accommodation facilities to ensure they meet sanitary, fire safety, security, and worker welfare standards.

#### **4.9. Communicable Diseases and Public Health Risks**

Construction activities may contribute to transmission of communicable diseases including respiratory infections, gastrointestinal diseases, and other infectious conditions. Risks may increase due to shared accommodation, poor hygiene, labor influx, limited healthcare access.

Mitigation measures will include:

- Worker awareness training
- Health screening procedures
- Availability of clean drinking water
- Sanitation and hygiene facilities
- Medical referrals and emergency response procedures
- Vector control where necessary
- Coordination with local health authorities.



## 4.10. Summary of Labor Risks and Mitigation Measures

Table 7: Summary of Identified Labor Risks, Impacts, and Mitigation Measures

| Category                                   | Worker Impacts / Risks                                                                                                                                                                                                                                               | Project Impacts / Risks                                                                                                                                                                    | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Responsibility         | Monitoring                                                                                                                                          | Indicators                                                                                                                                                                                                                                                   |
|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Recruitment and hiring practices           | Workers may perceive recruitment and selection processes as unfair, non-transparent, discriminatory, or politically influenced. Vulnerable groups, including women, youth, migrants, and low-income households, may have limited access to employment opportunities. | Community dissatisfaction, complaints, reputational risks, reduced trust in the Project, social tension between local and outside workers, and possible delays to construction activities. | <ul style="list-style-type: none"> <li>Contractors will develop transparent recruitment procedures with clearly defined qualification criteria, publicly disclosed vacancies, equal opportunity principles, and non-discrimination provisions.</li> <li>Priority will be given to local labor where technically feasible.</li> <li>Recruitment fees will not be charged to workers.</li> <li>Hiring records will be maintained and periodically reviewed by the PMO and PMCs.</li> <li>All contractors and subcontractors will comply with the Labor Code of the Republic of Uzbekistan and AIB ESS1 requirements.</li> </ul> | PMO, Contractors, PMCs | Monthly review by PMO, PMCs;<br>Annual review by Independent Monitoring Consultant;<br>Annual/periodic review by State Labor Inspectorate (Table 4) | <ul style="list-style-type: none"> <li>% of positions filled through a transparent, publicized recruitment process</li> <li>Number of recruitment-fee-related grievances received</li> <li>Number of hiring records reviewed per monitoring cycle</li> </ul> |
| Employment conditions, wages, and benefits | Workers may experience delayed wage payments, unequal pay, excessive overtime, lack of rest periods, unclear contract terms, or                                                                                                                                      | Labor dissatisfaction, absenteeism, strikes, reduced productivity, work stoppages, labor disputes, and reputational                                                                        | <ul style="list-style-type: none"> <li>All workers will receive written employment contracts in understandable language describing wages, working hours, overtime, leave entitlements, disciplinary procedures, and grievance mechanisms.</li> <li>Contractors will ensure equal pay for equal work and timely</li> </ul>                                                                                                                                                                                                                                                                                                     | Contractors, PMO       | Monthly payroll audit by PMCs;<br>Quarterly wage compliance audit by PMO;<br>Annual/periodic review by State Labor Inspectorate (Table 4)           | <ul style="list-style-type: none"> <li>% of workers paid within contractually agreed timeframes</li> <li>Number of wage-related grievances received</li> <li>Payroll audit completion rate (audits completed vs. scheduled)</li> </ul>                       |



| Category                             | Worker Impacts / Risks                                                                                                                                                                                                                   | Project Impacts / Risks                                                                                                                                             | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Responsibility                 | Monitoring                                                                                                                               | Indicators                                                                                                                                                                                                                                                                                    |
|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                      | inadequate benefits. Migrant and temporary workers may be particularly vulnerable.                                                                                                                                                       | risks to the Project.                                                                                                                                               | wage payments consistent with national labor legislation and AIB ESF requirements.<br><ul style="list-style-type: none"> <li>Payroll records will be maintained and audited periodically.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                |                                                                                                                                          |                                                                                                                                                                                                                                                                                               |
| Occupational Health and Safety (OHS) | Workers may be exposed to injuries, fatalities, falls, struck-by incidents, trench collapse, electrical shock, moving machinery, dust, asphalt fumes, excessive noise, vibration, heat stress, chemical exposure, and traffic accidents. | Serious injuries or fatalities may lead to work stoppages, legal liabilities, compensation claims, schedule delays, regulatory sanctions, and reputational impacts. | <ul style="list-style-type: none"> <li>Contractors will prepare and implement site-specific OHS Plans and C-ESMP.</li> <li>Hazard identification and risk assessments will be conducted before commencement of work.</li> <li>Workers will receive induction training, regular toolbox talks, refresher training, and task-specific safety instructions.</li> <li>Appropriate PPE will be provided free of charge and its use strictly enforced.</li> <li>Worksites will include warning signage, barricades, emergency response procedures, first aid kits, and trained emergency personnel.</li> <li>All accidents, incidents, and near misses will be recorded and investigated.</li> <li>Measures will include risk assessments, permit-to-work systems, PPE provision, induction training, toolbox talks, emergency response plans, traffic management plans, heat stress prevention, first aid facilities, incident reporting systems, and regular safety inspections.</li> </ul> | Contractors, OHS Officers, PMO | Daily supervision by Contractors;<br>Monthly monitoring by PMO and PMCs;<br>Annual/periodic review by State Labor Inspectorate (Table 4) | <ul style="list-style-type: none"> <li>Number of incidents, near-misses, and lost-time injuries recorded</li> <li>Lost-Time Injury Frequency Rate (LTIFR)</li> <li>% PPE compliance observed during inspections</li> <li>Number of toolboxes talks and safety inductions conducted</li> </ul> |



| Category                                      | Worker Impacts / Risks                                                                                                                                                                                                          | Project Impacts / Risks                                                                                                                                | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Responsibility    | Monitoring                                                                                                                                                                                                                                                                   | Indicators                                                                                                                                                                                                                                                              |
|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                               |                                                                                                                                                                                                                                 |                                                                                                                                                        | <ul style="list-style-type: none"> <li>Only trained and authorized personnel will perform hazardous works.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                   |                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                         |
| Child labor and forced labor                  | Children or vulnerable individuals could be exposed to hazardous construction activities, exploitative labor practices, coercion, withholding of wages, confiscation of identification documents, or unsafe working conditions. | Non-compliance with AIB ESF and national legislation, reputational damage, contract violations, legal penalties, and suspension of works.              | <ul style="list-style-type: none"> <li>Child labor and forced labor will be strictly prohibited.</li> <li>Employment of persons under 18 years of age in hazardous construction activities will be strictly prohibited.</li> <li>Contractors will verify worker age using official identification documents and maintain employment records. Forced labor, bonded labor, human trafficking, withholding of wages, and retention of worker documents will be prohibited.</li> <li>Contractors and suppliers will be monitored through audits and contractual obligations.</li> </ul> | Contractors, PMO  | <p>Age and identity verification at 100% of hires by Contractors, PMO, and PMCs;</p> <p>Monthly employment-record review by PMO and PMCs;</p> <p>Annual/periodic review by State Labor Inspectorate (Table 4);</p> <p>Annual review by Independent Monitoring Consultant</p> | <ul style="list-style-type: none"> <li>% of workers with verified age/identity documentation on file</li> <li>Number of child labor or forced labor complaints received</li> <li>Number of findings from independent audits and status of corrective actions</li> </ul> |
| Labor influx and worker-community interaction | Influx of outside workers may create tensions with local communities, increase pressure on local services, generate cultural conflicts, and contribute to inappropriate worker behavior.                                        | Community grievances, conflict between workers and residents, obstruction of works, reputational impacts, and increased social risks including SEA/SH. | <ul style="list-style-type: none"> <li>Local labor recruitment will be prioritized to the extent feasible.</li> <li>Contractors will implement codes of conduct, awareness training, worker behavioral rules, restricted movement protocols, and community engagement measures.</li> <li>Worker camps will be located away from sensitive receptors where possible.</li> </ul>                                                                                                                                                                                                      | Contractors, PMO  | <p>Ongoing/weekly community engagement log maintenance by Contractors, PMO, Community Liaison Officers ("mahalla committee");</p> <p>Monthly review of community grievances and labor influx indicators by PMC and PMO</p>                                                   | <ul style="list-style-type: none"> <li>Number of community grievances related to labor influx</li> <li>Number of community engagement activities conducted</li> <li>% of worker camps sited in accordance with approved siting criteria</li> </ul>                      |
| GBV/SEA/SH risks                              | Women and vulnerable groups may face sexual                                                                                                                                                                                     | Community opposition, serious                                                                                                                          | <ul style="list-style-type: none"> <li>Contractors will implement mandatory codes of conduct addressing SEA/SH.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Contractors, PMO, | Monthly review of GBV/SEA/SH grievances and training records by                                                                                                                                                                                                              | <ul style="list-style-type: none"> <li>% of workers who have signed the Code of Conduct</li> </ul>                                                                                                                                                                      |



| Category | Worker Impacts / Risks                                                                                                                                                              | Project Impacts / Risks                                                        | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Responsibility     | Monitoring                                                                                                                         | Indicators                                                                                                                                                                                                                                                                                       |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | harassment, exploitation, abuse, intimidation, or inappropriate behavior by workers or supervisors. Female workers may also face discrimination or unsafe accommodation conditions. | reputational risks, legal liabilities, and potential harm to affected persons. | <ul style="list-style-type: none"> <li>All contractor and subcontractor personnel will sign mandatory codes of conduct prohibiting sexual harassment, exploitation, abuse, intimidation, discrimination, and inappropriate interaction with local communities. Violations will result in disciplinary measures, including dismissal and referral to law enforcement where required.</li> <li>Contractors will establish confidential, survivor-centered SEA/SH grievance procedures with multiple reporting channels, including anonymous reporting options.</li> <li>All workers will receive regular training on acceptable behavior and sanctions for violations. Awareness campaigns regarding SEA/SH risks, reporting mechanisms, and available support services will be conducted for both workers and nearby communities, including women and vulnerable groups.</li> <li>Camps and work sites will include adequate lighting and security measures.</li> <li>Camp security personnel will receive gender-sensitive training and will not engage in intimidation or inappropriate conduct toward workers or communities.</li> </ul> | Gender Specialists | Contractors, PMO, PMCs;<br>Quarterly compliance audit by Gender Specialists;<br>Annual review by Independent Monitoring Consultant | <ul style="list-style-type: none"> <li>Number of GBV/SEA/SH-related grievances received and resolution status</li> <li>Number of awareness and training sessions conducted for workers and communities</li> <li>Number of confidential reporting channels operational and functioning</li> </ul> |



| Category                   | Worker Impacts / Risks                                                                                                                                     | Project Impacts / Risks                                                                           | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Responsibility            | Monitoring                                                                                                            | Indicators                                                                                                                                                                                                             |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                            |                                                                                                                                                            |                                                                                                   | <ul style="list-style-type: none"> <li>Contractor will ensure separate facilities for women, confidential reporting, women-only consultations where needed, restrictions on worker movement, camp distance from settlements, female grievance focal points, prohibition of harassment/discrimination.</li> </ul>                                                                                                                                                                                                                                                                                                 |                           |                                                                                                                       |                                                                                                                                                                                                                        |
| Worker grievance mechanism | Workers may not understand how to raise concerns or may fear retaliation for reporting workplace issues, unsafe conditions, discrimination, or harassment. | Escalation of labor disputes, strikes, reduced worker morale, and unresolved workplace conflicts. | <ul style="list-style-type: none"> <li>A worker grievance mechanism (Worker GRM) will be established prior to mobilization of workers.</li> <li>The mechanism will be confidential, accessible, understandable, and free of retaliation.</li> <li>Multiple channels for grievance submission will be available, including anonymous reporting options.</li> <li>Grievances will be tracked, investigated, resolved, and documented within specified timeframes.</li> <li>Workers may submit grievances anonymously and directly without requiring approval from supervisors or contractor management.</li> </ul> | Contractors, PMO          | <p>Monthly review of the grievance log by PMO and PMCs;</p> <p>Annual review by Independent Monitoring Consultant</p> | <ul style="list-style-type: none"> <li>Number of grievances received, resolved, and outstanding</li> <li>Average grievance resolution time</li> <li>% of grievances resolved within the specified timeframe</li> </ul> |
| Migrant workers            | Migrant workers may face discrimination, language barriers, lack of awareness of rights, unsafe                                                            | Increased risk of labor exploitation, disputes, social tensions, and non-                         | <ul style="list-style-type: none"> <li>Migrant workers will receive equal treatment and access to project grievance mechanisms, healthcare, accommodation, and safety measures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                       | Contractors, PMO, and PMC | Quarterly review of migrant worker records by PMO and PMCs                                                            | <ul style="list-style-type: none"> <li>% of migrant workers with verified work authorization/ registration</li> </ul>                                                                                                  |



| Category                             | Worker Impacts / Risks                                                                                                                                                                 | Project Impacts / Risks                                                                                        | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Responsibility                       | Monitoring                                                                                                      | Indicators                                                                                                                                                                                              |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                      | accommodation, excessive working hours, or restricted access to grievance mechanisms and healthcare.                                                                                   | compliance with labor standards.                                                                               | <ul style="list-style-type: none"> <li>Employment contracts will be provided in languages understood by workers. Contractors will prohibit confiscation of passports or personal documents.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                      |                                                                                                                 | <ul style="list-style-type: none"> <li>Number of migrant-worker grievances received</li> <li>% of migrant workers who completed induction/training in a language they understand</li> </ul>             |
| Worker accommodation and labor camps | Poor camp conditions may result in overcrowding, communicable diseases, poor sanitation, fire hazards, inadequate potable water, conflict among workers, and reduced worker wellbeing. | Low worker morale, reduced productivity, community complaints, public health concerns, and reputational risks. | <ul style="list-style-type: none"> <li>Worker camps will comply with GIIP and IFC/WBG guidance on worker accommodation.</li> <li>Camps will provide adequate sleeping space, potable water, sanitation facilities, waste management, fire safety systems, lighting, drainage, medical support, and recreational areas where feasible. Separate facilities will be considered for female workers where applicable.</li> <li>Specific gender-sensitive camp provisions will include separate sleeping quarters for women, lockable sanitation facilities, adequate lighting, privacy and security measures, separate hygiene facilities, female-friendly grievance access, restrictions on unauthorized camp entry.</li> </ul> | Contractors                          | Daily camp inspections by Contractors;<br>Monthly camp inspections by PMO and PMCs                              | <ul style="list-style-type: none"> <li>Number of camp inspections conducted</li> <li>% compliance with GIIP/IFC camp standards checklist</li> <li>Number of camp-related complaints received</li> </ul> |
| Traffic and transportation safety    | Workers and nearby communities may be exposed to accidents involving heavy                                                                                                             | Injuries, fatalities, traffic disruption, damage to local infrastructure,                                      | <ul style="list-style-type: none"> <li>Contractors will prepare and implement Traffic Management Plans (TMPs) including signage, flagmen, speed limits, designated haul routes, driver training, vehicle</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Contractors, Traffic Safety Officers | Daily inspection of cargo, routes, technical condition of vehicles, and medical condition of drivers by Traffic | <ul style="list-style-type: none"> <li>Number of traffic-related incidents/accidents recorded</li> <li>Number of TMP compliance</li> </ul>                                                              |



| Category                                  | Worker Impacts / Risks                                                                                                                            | Project Impacts / Risks                                                                                  | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Responsibility             | Monitoring                                                                                                                                                                                                             | Indicators                                                                                                                                                                                                                      |
|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                           | trucks, construction machinery, transport vehicles, and traffic diversions along active road sections.                                            | and public complaints.                                                                                   | inspections, and public safety awareness measures.<br><ul style="list-style-type: none"> <li>Transportation schedules will minimize impacts on local communities and sensitive receptors such as schools and markets.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                        |                            | Safety Officers of Contractors<br>Monthly TMP compliance review by PMO and PMCs                                                                                                                                        | inspections conducted<br><ul style="list-style-type: none"> <li>% of drivers with valid training/certification on file</li> </ul>                                                                                               |
| Communicable diseases and public health   | Workers may be exposed to communicable diseases due to crowded accommodations, poor hygiene, unsafe water, or interaction with local communities. | Disease outbreaks may affect workforce availability, local healthcare services, and community wellbeing. | <ul style="list-style-type: none"> <li>Contractors will provide potable water, sanitation facilities, hygiene awareness training, waste management, vector control measures, and access to healthcare services.</li> <li>Emergency medical response procedures and referral arrangements with local healthcare facilities will be established.</li> <li>Contractors will establish procedures for disease outbreak management, including worker awareness measures, medical referral arrangements, isolation procedures where necessary, and coordination with local healthcare authorities.</li> </ul> | Contractors, Camp Managers | Daily inspection of medical condition of workers and hygiene condition of worksite and camps by Contractors;<br>Monthly review of health and hygiene facility conditions and disease-outbreak reporting by PMO and PMC | <ul style="list-style-type: none"> <li>Number of reported communicable disease cases</li> <li>% compliance with hygiene facility standards during inspections</li> <li>Number of health awareness sessions conducted</li> </ul> |
| Supply chain and subcontractor management | Primary supply workers and subcontractors may operate under poor labor conditions with limited oversight.                                         | Reputational risks and indirect non-compliance with AIB ESF labor requirements.                          | <ul style="list-style-type: none"> <li>Contractors will extend labor and OHS requirements to subcontractors and primary suppliers through contractual obligations.</li> <li>Periodic audits and inspections will be conducted to verify compliance with labor, OHS,</li> </ul>                                                                                                                                                                                                                                                                                                                          | Contractors, PMO           | Audit of primary suppliers and subcontractors by Contractors, PMCs, and PMO at least once every six months                                                                                                             | <ul style="list-style-type: none"> <li>Number of subcontractor/supplier audits conducted</li> <li>% of subcontracts with labor and OHS clauses incorporated</li> <li>Number of non-compliance findings</li> </ul>               |



| Category | Worker Impacts / Risks | Project Impacts / Risks | Mitigation Measures              | Responsibility | Monitoring | Indicators                       |
|----------|------------------------|-------------------------|----------------------------------|----------------|------------|----------------------------------|
|          |                        |                         | and worker welfare requirements. |                |            | and status of corrective actions |

AIIB = Asian Infrastructure Investment Bank; ESF = environmental and social framework; OHS = occupational health and safety; GIIP = good international industry practice; IFC/WBG = International Financial Corporation/ World Bank Guidelines; PMO = Project Management Office; TMP = Traffic Management Plans; GRM = grievance redress mechanism; GBV/SEA/SH = gender-based violence/ sexual exploitation and abuse/sexual harassment



## 4.11. Key Implications of Labor Risk Assessment

Based on the identified labor risks and the gap analysis between national legislation and AIIB ESF requirements, the following key actions will be implemented throughout the Project:

- Contractors will establish and maintain labor management systems consistent with AIIB ESF and GIIP.
- Site-specific Occupational Health and Safety Plans will be prepared prior to commencement of works.
- Worker grievance mechanisms will be operational before mobilization of labor.
- Codes of conduct addressing SEA/SH and worker behavior will be mandatory.
- Contractors will allocate adequate budgetary resources for OHS, worker welfare, camp management, and emergency preparedness.
- Worker accommodation facilities will comply with GIIP and IFC/WBG guidance.
- All workers will receive induction and periodic refresher training.
- Independent supervision and monitoring of labor and OHS performance will be conducted.
- Supply chain monitoring will be implemented to address forced labor and child labor risks.
- Emergency response and medical referral arrangements will be established with nearby healthcare facilities.
- Labor and OHS requirements will be incorporated into bidding documents and contractor contracts.
- Contractors will implement corrective action procedures and periodic reporting systems for labor, OHS, worker welfare, and grievance management performance.
- Monitoring and reporting systems will be established for incidents, grievances, and non-compliance.

Labor and occupational health and safety requirements identified in this LMP will be integrated into Contractor Environmental and Social Management Plans (C-ESMPs), method statements, and site-specific management procedures.



## 5. RESPONSIBLE STAFF AND IMPLEMENTATION ARRANGEMENTS

Implementation of this LMP will involve coordinated responsibilities among the Committee for Roads (RC), PMO, Design Institute, PMCs, Contractors, Subcontractors, and relevant government authorities. Contractors will be responsible for day-to-day labor management and occupational health and safety performance, while the PMO and PMCs will monitor compliance with national legislation, AIIB ESS requirements, and this LMP through inspections, audits, reporting, and corrective action procedures. The institutional arrangements are consistent with implementation mechanisms applied under ongoing AIIB-financed road sector projects in Uzbekistan.

The project will use implementation arrangements similar to those applied under ongoing AIIB-financed road projects in Uzbekistan. By utilizing established institutional arrangements and implementation mechanisms, the Project will improve coordination among project stakeholders, strengthen implementation efficiency, and reduce duplication of administrative procedures.

### 5.1. Executing Agency

The overall management and implementation of the Project falls under the responsibility of the Committee for Roads (RC) under the Ministry of Transport of the Republic of Uzbekistan.

The Committee for Roads is the primary state authority responsible for the development, management, rehabilitation, and maintenance of the national public highway network. The RC is responsible for implementation of national road sector policies, modernization of international transport corridors, and ensuring compliance with national technical and safety standards.

The key responsibilities of the RC include:

- Development and implementation of national road sector programs and transport corridor strategies.
- Financing, coordination, and supervision of road construction, rehabilitation, and maintenance activities.
- Technical supervision and quality assurance of road infrastructure projects.
- Coordination with national and local government authorities, development partners, and project stakeholders.
- Monitoring implementation of labor management, occupational health and safety, and community health and safety requirements.
- Ensuring that labor management and OHS obligations are integrated into bidding documents and civil works contracts.



- Oversight of implementation of corrective actions related to labor, working conditions, OHS, and GBV/SEA/SH issues.
- Consolidation of project implementation and monitoring reports submitted to AIIB.

The RC has overall responsibility for ensuring project compliance with the AIIB ESP, national legislation, this LMP, and other project environmental and social management instruments.

The RC will ensure that all contractors, subcontractors, consultants, and suppliers comply with the labor management requirements established under this LMP and associated contractual obligations.

## 5.2. PMO

The PMO established under the RC will be responsible for day-to-day management and coordination of project implementation.

The PMO will include qualified personnel responsible for technical, procurement, financial, environmental, social, labor, gender, and occupational health and safety aspects of the project. A Project Coordinator will operate in Bukhara and Navoi Provinces to support implementation and coordination at regional and district levels.

The PMO's responsibilities will include, but not be limited to:

- General project management and coordination.
- Management of procurement and contract administration processes.
- Coordination of environmental and social safeguard implementation.
- Monitoring compliance with this LMP and other E&S instruments.
- Coordination with local authorities, communities, contractors, and consultants.
- Review and approval of contractors' labor management plan and OHS documentation.
- Review and approval of Contractors' C-ESMPs, including labor and OHS sections.
- Ensuring labor management and OHS requirements are incorporated into bidding documents and contracts.
- Conducting regular monitoring visits and compliance inspections.
- Monitoring implementation of worker grievance mechanisms.
- Monitoring implementation of GBV/SEA/SH prevention and response measures.
- Consolidation of labor and OHS monitoring data and reporting to AIIB.
- Ensuring corrective actions are implemented where non-compliance is identified.

The PMO Environmental and Social specialists will supervise implementation of the LMP throughout the project lifecycle. Specifically, the PMO E&S personnel will:



- Ensure compliance with national labor legislation, AIB ESP requirements, and this LMP.
- Verify that contractors provide workers with appropriate contracts, wages, accommodation, welfare facilities, and safe working conditions.
- Monitor worker induction, training, and awareness programs.
- Monitor implementation of OHS requirements and emergency preparedness measures.
- Ensure proper maintenance of records related to recruitment, payroll, incidents, grievances, and training.
- Monitor labor influx management and community interaction measures.
- Ensure worker grievances are addressed promptly and transparently.
- Verify that contractors maintain functioning grievance mechanisms accessible to all workers, including subcontractors.
- Ensure that serious incidents, fatalities, dangerous occurrences, or GBV/SEA/SH allegations are immediately reported to the PMO and AIB in accordance with applicable notification requirements.
- Maintain regular communication with PMCs and contractors regarding labor and OHS performance.

### 5.3. Design Institute

The project design activities are undertaken by the Uzbek State Road Design Institute, O'zYo'ILoyiha, operating under the Committee for Roads.

The Design Institute is responsible for preparing conceptual and detailed engineering designs for the project, including technical specifications and supporting engineering studies.

The responsibilities of the Design Institute include:

- Preparation of detailed road, bridge, interchange, drainage, and traffic safety designs.
- Conducting engineering, geological, hydrological, and topographical surveys.
- Incorporation of environmental and social considerations into the project design.
- Integration of occupational health and safety requirements into technical specifications.
- Incorporation of traffic safety, pedestrian safety, and accessibility measures into road design.
- Integration of climate resilience and road safety considerations into engineering solutions.
- Coordination with PMO and PMCs regarding design revisions and technical clarifications.
- Support during construction supervision and resolution of technical design issues.



The Design Institute will ensure that occupational health and safety risks, worker welfare considerations, road user safety, and community health and safety aspects are adequately reflected in the final design documentation and technical specifications.

## 5.4. PMCs

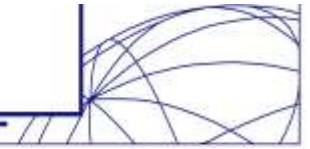
The PMCs (SCs) will support the PMO in supervising construction activities and monitoring compliance with labor management, occupational health and safety, and environmental and social requirements.

The responsibilities of the PMCs will include:

- Review contractors' reports related to labor management and OHS implementation.
- Monitor contractors' and subcontractors' compliance with this LMP and associated contractual obligations.
- Conduct regular site inspections, audits, and worker interviews.
- Monitor implementation of worker accommodation and welfare measures.
- Verify implementation of worker grievance mechanisms.
- Verify implementation of GBV/SEA/SH prevention measures and Codes of Conduct.
- Monitor compliance with occupational health and safety requirements.
- Verify proper use and availability of PPE.
- Monitor first aid, emergency preparedness, and incident response arrangements.
- Ensure contractors conduct regular induction training and toolbox talks.
- Verify implementation of corrective actions where non-compliance is identified.
- Maintain records of inspections, incidents, corrective actions, and follow-up measures.
- Coordinate with PMO E&S staff regarding significant labor and OHS issues.
- Participate in investigation of serious incidents and accidents.
- Review contractors' monthly labor and OHS performance reports.
- Prepare monitoring reports for submission to the PMO and AIIB, where required.

The PMCs will have authority to issue corrective action requests to contractors where deficiencies or non-compliance are identified.

The PMCs may recommend suspension of unsafe work where serious OHS non-compliance presents immediate danger to workers or the public.



## 5.5. Contractors and Subcontractors

Contractors will bear primary responsibility for implementation of labor management, worker welfare, occupational health and safety, and GBV/SEA/SH prevention measures during construction activities.

All contractors and subcontractors will comply with national labor legislation, AIIB ESP requirements, this LMP, Contractor ESMPs (C-ESMPs), codes of conduct, and contractual obligations. Compliance will be verified in practice through:

- (i) Routine monitoring, inspections, and audits conducted by the PMO and PMCs, as detailed by category in Section 9 and Table 7 (monitoring frequency and indicators).
- (ii) Contractual mechanisms, including incorporation of labor and OHS requirements into bidding and contract documents (Section 8.3) and corrective action procedures for non-compliance (Section 8.10).
- (iii) Statutory labor inspection carried out independently by the State Labor Inspectorate of the Ministry of Employment and Poverty Reduction, in accordance with [Articles 534–536 of the Labor Code](#), which operates in addition to and independently of project-level monitoring.

### 5.5.1. Occupational Health and Safety

Contractors will prepare and implement site-specific Occupational Health and Safety Plans as part of their C-ESMPs prior to commencement of works.

Contractors will:

- Designate qualified environmental, social, labor, and OHS personnel for each construction site.
- Conduct risk assessments for all construction activities.
- Conduct induction training for all workers prior to commencement of work.
- Conduct regular toolbox talks and refresher safety training sessions.
- Provide task-specific PPE free of charge to all workers.
- Ensure proper use, maintenance, and replacement of PPE.
- Maintain first aid facilities and trained first aid personnel at all active construction sites.
- Establish emergency preparedness and response procedures.
- Ensure safe operation of construction machinery and vehicles.
- Implement traffic management measures near active work zones.
- Ensure safe excavation, trenching, lifting, confined space, and work-at-height procedures.
- Implement heat stress prevention measures during high-temperature periods.
- Establish procedures for emergency medical response, evacuation, and transportation of injured workers to appropriate medical facilities.



- Maintain records of incidents, near misses, training, inspections, and corrective actions.
- Immediately report serious incidents, fatalities, dangerous occurrences, or major spills to the PMO and PMCs.

### **5.5.2. Labor and Working Conditions**

Contractors will ensure compliance with national labor legislation and this LMP regarding recruitment, working conditions, wages, working hours, overtime, leave, and non-discrimination. Contractors will:

- Provide workers with written employment contracts in a language understandable to them.
- Prohibit child labor and forced labor.
- Ensure fair recruitment and equal employment opportunities.
- Ensure timely payment of wages and benefits.
- Maintain records of recruitment, attendance, overtime, payroll, and age verification.
- Provide workers with access to potable water, sanitation facilities, rest areas, and hygienic accommodation where applicable.
- Ensure labor camps and worker accommodation facilities comply with national sanitary and safety standards.
- Provide separate sanitation and hygiene facilities for male and female workers.
- Ensure adequate lighting and security measures at labor accommodation facilities.
- Ensure workers have the right to report unsafe conditions without retaliation.

Workers will have the right to remove themselves from dangerous work situations which they reasonably believe present imminent and serious danger to life or health without retaliation.

### **5.5.3. Subcontractor Management**

Contractors will ensure that subcontractors comply with the requirements of this LMP and associated contractual obligations.

Contractors will:

- Monitor subcontractor compliance with labor and OHS requirements.
- Ensure subcontractor workers receive induction and safety training.
- Ensure subcontractor workers have access to grievance mechanisms.
- Monitor subcontractor implementation of SEA/SH prevention measures.
- Maintain records of subcontractor inspections and corrective actions.



#### **5.5.4. GBV/SEA/SH Prevention and Code of Conduct**

Contractors will adopt and enforce Codes of Conduct addressing:

- Respectful behavior in the workplace and local communities
- Prohibition of harassment, discrimination, exploitation, and abuse
- Prevention of SEA/SH
- Prohibition of violence against women and children
- Alcohol and substance abuse restrictions
- Appropriate behavior toward local communities.

All workers, including subcontractor personnel, will receive mandatory training on Codes of Conduct and SEA/SH prevention prior to commencement of works.

#### **5.6. Primary Supply Chain Management**

Contractors will conduct due diligence regarding primary suppliers of construction materials including aggregates, asphalt, cement, fuel, and quarry materials.

The due diligence process will identify significant risks related to:

- Child labor
- Forced labor
- Unsafe working conditions
- Serious occupational health and safety violations.

Contractors will maintain records demonstrating that suppliers comply with applicable labor legislation and occupational health and safety requirements.

The PMO and PMCs may conduct inspections or audits of high-risk suppliers where significant labor or OHS risks are identified.

#### **5.7. Capacity Building and Training**

The project will implement continuous capacity building and training programs related to labor management, occupational health and safety, SEA/SH prevention, and emergency preparedness.

Training programs will include:

- Worker induction training
- Occupational health and safety awareness
- Proper use of PPE
- Emergency preparedness and response
- Fire prevention and first aid



- Traffic and road safety
- Hazardous materials handling
- Heat stress prevention
- Worker grievance procedures
- SEA/SH prevention and Codes of Conduct
- Community interaction and respectful behavior.

All workers will receive induction training prior to commencing work, followed by daily or weekly toolbox talks and formal refresher training at least every six months, or more frequently where required by task-specific risks (e.g., prior to commencing new high-risk activities) or following an incident, near miss, or significant non-compliance finding.

Specialized training will be provided to PMO staff, PMCs, contractors, subcontractors, and OHS personnel.

Contractors will maintain training records for all workers, including induction training completion, toolbox talk attendance, refresher training dates, and specialized and task-specific certifications. These records will be made available to the PMO and PMCs for monitoring purposes (Section 9 and Table 7) and retained for the duration of the project.

## **5.8. Monitoring and Reporting**

The PMO and PMCs will monitor implementation of this LMP throughout the construction period.

Monitoring activities will include:

- Site inspections and audits
- Review of labor and OHS records
- Worker interviews
- Monitoring worker accommodation facilities
- Monitoring grievance mechanisms
- Verification of training records
- Monitoring implementation of corrective actions.

The PMO and Contractors will periodically consult workers regarding labor conditions, accommodation, occupational health and safety concerns, and effectiveness of grievance mechanisms.

Monitoring indicators may include:

- Number of workers employed
- Number of training sessions conducted
- Number of grievances received and resolved



- Number of incidents, injuries, and near misses
- Lost-time injury frequency rate
- Number of site inspections conducted
- PPE compliance rates
- Number of corrective actions issued and closed
- Number of GBV/SEA/SH-related complaints received and resolved.

Contractors will submit monthly labor and OHS reports to the PMCs and PMO. Serious incidents, fatalities, dangerous occurrences, or GBV/SEA/SH allegations will be reported immediately in accordance with project incident notification procedures.

Contractors will maintain labor, OHS, grievance, training, payroll, and incident records throughout the construction period and make such records available for inspection upon request by the PMO, PMCs, AIB, or relevant authorities.



## 6. POLICIES AND PROCEDURES

This section establishes the labor management policies and procedures applicable to all categories of project workers engaged under the Project, including direct workers, contracted workers, subcontractor personnel, migrant workers, temporary workers, and primary supply chain workers where relevant.

The policies and procedures described herein are intended to ensure compliance with:

- Labor Code of the Republic of Uzbekistan
- Law on Occupational Health and Safety
- Applicable OHS and sanitary regulations of Uzbekistan
- AIIB ESP and ESS1
- IFC General EHS Guidelines
- IFC EHS Guidelines for Toll Roads and Road Construction
- ILO core labor standards
- Applicable labor and OHS provisions included in bidding and contractual documentation.

The project will adopt a preventive, risk-based, and non-discriminatory approach to labor management throughout the project lifecycle. All contractors and subcontractors engaged under the project will comply with the requirements of this LMP, site-specific C-ESMPs, OHS plans, codes of conduct, and contractual obligations.

The RC, PMO, PMCs, contractors, and subcontractors will each bear responsibilities for implementation and monitoring of labor management measures in accordance with the institutional arrangements described in Part 5 of this LMP.

### 6.1. Labor Policies and Working Conditions

All project workers will be employed and managed in accordance with the requirements of national labor legislation and the principles of fair treatment, equal opportunity, non-discrimination, transparency, and safe working conditions. The requirements of this Section apply to all personnel engaged in project implementation, including personnel of international Contractors, Subcontractors, and Consultants performing work within Uzbekistan. In accordance with [Article 11 of the Labor Code](#), national labor legislation extends to labor relations involving foreign legal entities and organizations with foreign participation operating in Uzbekistan; foreign workers engaged on the project are required to obtain confirmation of their right to work in Uzbekistan prior to commencing work, in accordance with [Article 30 of the Labor Code](#).

The following labor management principles will apply throughout project implementation:



- Recruitment processes will be transparent, fair, and based on qualifications, experience, and competency requirements.
- Recruitment and employment practices will not discriminate based on gender, ethnicity, nationality, religion, disability, age, social origin, or other status unrelated to job requirements.
- Workers will not be charged recruitment or hiring fees.
- All workers will receive written employment contracts in a language understandable to them prior to commencement of employment.
- Employment contracts will clearly define terms and conditions of employment, including wages, working hours, overtime arrangements, leave entitlements, disciplinary procedures, and termination conditions.
- Workers will receive equal pay for equal work.
- Wages will be paid regularly and in accordance with applicable legislation and contractual obligations.
- Contractors will maintain payroll and attendance records for all workers.
- Contractors will comply with legal requirements regarding working hours, overtime, rest periods, annual leave, and public holidays, in accordance with the [Labor Code of Uzbekistan](#) and consistent with [GIIP](#) requirements on safe and reasonable working hours, including:
  - Standard working hours do not exceed 40 hours per week, with daily limits of 8 hours (five-day week) or 7 hours (six-day week) ([Labor Code, Art. 182, 185](#)).
  - Night work (performed between 22:00 and 06:00) subject to a one-hour reduction in shift duration where at least half the shift falls within night hours and compensated at no less than 1.5 times the standard rate ([Labor Code, Art. 188, 264](#)). Engagement of workers under 18 in night work or overtime is prohibited ([Labor Code, Art. 417](#)), and special conditions apply to the engagement of pregnant women, workers with children, and workers with disabilities in night work, overtime, and related arrangements ([Labor Code, Art. 396, 428](#)).
  - A minimum of 12 hours of daily rest between the end of one shift and the start of the next ([Labor Code, Art. 206](#)).
  - Overtime undertaken only with the worker's written consent, except in narrow emergency circumstances defined by law; overtime is not permitted where a shift already lasts 12 hours or in especially hazardous work and is limited to 4 hours over 2 consecutive days (2 hours per day in unfavorable conditions), compensated at 1.5 times the rate for the first two hours and 2 times thereafter ([Labor Code, Art. 189, 190, 262](#)).
  - Termination of employment will be conducted in accordance with the Labor Code, including applicable notice periods and final settlement of wages and entitlements, particularly in connection with demobilization at the completion of construction activities.
  - Workers will be registered for applicable social security and insurance contributions in accordance with national requirements.



- Workers will have the right to organize and participate in workers' associations or trade unions in accordance with national legislation.
- Any form of retaliation, intimidation, harassment, or abuse toward workers will be prohibited.
- Contractors will maintain records of recruitment, contracts, training, grievances, disciplinary measures, incidents, and inspections.

Contractors will prioritize recruitment of local labor from settlements located along the project corridor, particularly for unskilled and semi-skilled labor positions, to support local employment opportunities and reduce labor influx-related risks. Local employment opportunities will be communicated transparently through local government (mahalla/district administration) channels, public notices, and community liaison personnel in advance of mobilization for each project section, using clear and publicly disclosed recruitment criteria consistent with the non-discrimination principles set out above. Where local labor supply is insufficient to meet project requirements, contractors may engage domestic migrant or, where necessary, foreign workers, subject to the requirements of this Section and Section 4.7 (Risks Related to Migrant Workers).

Where migrant or non-local workers are employed, contractors will ensure compliance with applicable migration, registration, accommodation, labor, and health requirements under Uzbek legislation, in addition to the risk management measures set out in Section 4.7.

Compliance with the labor policies and working conditions set out in this Section will be monitored and verified through: (i) routine monitoring, payroll and record audits, and worker interviews conducted by the PMO and PMCs, with frequency and indicators specified by category in Section 9 and Table 7; (ii) contractual obligations incorporated into bidding and contract documents, including cooperation with inspections and audits (Section 8.3), with corrective action and escalating enforcement procedures for non-compliance (Section 8.10); and (iii) statutory labor inspection carried out independently by the State Labor Inspectorate of the Ministry of Employment and Poverty Reduction, which conducts planned and unannounced inspections of employers under [Articles 534–536 of the Labor Code](#), operating in addition to and independently of project-level monitoring.

## 6.2. Recruitment Procedures

This section establishes the recruitment procedures applicable to all personnel engaged in the preparation and implementation of the project, including direct and contracted workers of civil works Contractors and Subcontractors, personnel of the Design Institute and PMCs (SC), and staff of the PMO. These requirements apply uniformly across all project locations spanning the seven districts of Navoi and Bukhara provinces traversed by the M37 corridor, regardless of whether personnel are engaged directly, through a labor agency or broker, or on a temporary or casual basis.



### **6.2.1. Recruitment Channels and Use of Labor Agencies and Brokers**

Contractors, Consultants, and the PMO may recruit personnel directly or through third-party recruitment agencies and labor brokers, provided the following conditions are met:

- All recruitment agencies and labor brokers engaged by Contractors or Consultants must be formally registered and licensed in accordance with national law and must be disclosed to the PMC and PMO prior to engagement.
- Contractors and Consultants remain fully responsible and liable for the compliance of any recruitment agency or labor broker they engage with the requirements of this LMP, regardless of whether the agency is contracted directly by the Contractor, Consultant or by a Subcontractor.
- Written agreements with recruitment agencies and labor brokers must explicitly incorporate the recruitment-related obligations of this section (prohibition of fees, age and identity verification, non-deceptive practices) as binding contractual clauses.
- The PMO and PMCs will maintain a register of all recruitment agencies and labor brokers used across the seven districts and will periodically verify their licensing status and compliance record.
- Given the geographic spread of the corridor across Navoi and Bukhara provinces, Contractors are encouraged to prioritize recruitment from local communities within the districts crossed by the project to support local employment, while ensuring the same safeguards apply equally to locally and non-locally sourced labor, including migrant workers.
- Where local labor supply is insufficient and workers are sourced from outside the two provinces (domestic labor migration) or from abroad, the applicable provisions of Section 4.7 (Risks Related to Migrant Workers) and Section 6.5.1 (Labor Influx Management Measures) apply in addition to this section.

### **6.2.2. Prohibition of Recruitment Fees (Employer Pays Principle)**

In line with the ILO Employer Pays Principle, AIB ESS1, and IFC PS2 requirements:

- No worker, at any stage of recruitment or employment, shall be charged directly or indirectly any fee or cost associated with their recruitment, including but not limited to fees for job placement, processing of documents, transportation to the worksite, medical examinations required for hiring, or provision of personal protective equipment.
- This prohibition applies equally to recruitment conducted directly by Contractors, Consultants, PMO and to recruitment conducted through third-party labor agencies or brokers. Contractors and Consultants are responsible for ensuring no such fees are charged by any agency or broker acting on their behalf, including at any point along a chain of subcontracted recruitment.



- Contractors and Consultants must include an explicit no-recruitment-fee clause in all contracts with recruitment agencies/brokers and must inform all workers, at the point of hire and through induction (Section 8.8), of their right to recruitment free of charge.
- Where it is found that a worker has paid a recruitment fee (to the Contractor, Consultant, or any third-party agency and broker engaged on their behalf), full reimbursement to the worker is mandatory and must be verified by the Contractor and Consultant and reported to the PMCs and PMO as a corrective action (Section 8.10).
- Compliance with this provision will be monitored through worker interviews conducted as part of routine labor monitoring (Section 9) and through the Worker Grievance Redress Mechanism (Section 7), which workers may use to report fee-related violations, including anonymously (Section 7.9).

### **6.2.3. Verification of Worker Identity and Age**

Prior to engagement, all Contractors, Consultants, and the PMO must verify the identity and age of every worker, including workers engaged through recruitment agencies and labor brokers, and casual, day, labor, and subcontracted personnel:

- Verification must be conducted using official government-issued identity documents (national ID, passport, or birth certificate) prior to the commencement of work; no worker may begin work pending verification.
- The minimum age of employment shall follow the higher of national legal requirements or AIIB ESS1 and IFC PS2 and applicable ILO Conventions (Minimum Age Convention No. 138 and Worst Forms of Child Labour Convention No. 182), consistent with Section 6.3 (Child Labor and Forced Labor).
- Where age documentation is ambiguous, unavailable, or reasonably doubted, Contractors and Consultants must apply a conservative age-assessment procedure and, where necessary, decline engagement until age can be reliably confirmed.
- Original identity documents must never be retained, held, or confiscated by the employer, recruitment agency, or labor broker as a condition of employment; workers must retain full control of their own documents at all times, consistent with the prohibition on forced labor indicators in Section 6.3.
- Records of identity and age verification for all workers (direct and subcontracted) must be maintained by the Contractors and Consultant and made available to the PMCs and PMO for audit purposes (Section 8.9).

### **6.2.4. Prevention of Exploitative and Deceptive Recruitment Practices**

Contractors, Consultants, and the PMO must ensure that recruitment practices, whether conducted directly or through agencies and brokers, do not involve deception, coercion, or exploitation of workers, including:



- **Contract clarity and no substitution:** Workers must be provided with a written employment contract or offer letter, in a language and format they understand, prior to commencing work, clearly stating wages, working hours, job location(s) across the project districts, duration of engagement, and terms of termination. The terms offered at the point of recruitment must not be altered or substituted upon arrival at the worksite ("contract substitution").
- **No deposits or debt bondage:** Workers must not be required to pay deposits, provide collateral, or take on debt (to the employer, recruiter, or broker) as a condition of recruitment or continued employment.
- **Freedom of movement and association:** Recruitment arrangements must not restrict a worker's freedom of movement or their right to terminate employment and leave the worksite, and must not involve threats, intimidation, or retention of wages as a means of preventing a worker from leaving.
- **Transparent terms for migrant and out-of-province workers:** For workers recruited from outside their home district or province to work at any point along the M37 corridor, Contractors/Consultants must ensure transport, accommodation, and repatriation arrangements are clearly disclosed prior to recruitment and are not used as leverage to bind workers to exploitative terms (cross-reference Section 4.7 and Section 6.7 on Worker Accommodation).
- **Non-discriminatory recruitment:** Recruitment criteria and practices must not discriminate based on gender, ethnicity, religion, disability, or other status, consistent with Section 6.6 (Non-Discrimination and Equal Opportunity).
- **Oversight across the supply chain:** These prevention measures extend to Subcontractors and any recruitment agencies/brokers engaged at any tier, consistent with Section 5.5.3 (Subcontractor Management) and Section 5.6 (Primary Supply Chain Management).

Violations of any of the above will be treated as non-conformance under Section 8.10 (Corrective Actions and Non-Compliance) and are subject to escalation, remediation, and, where warranted, termination of the responsible Contractor and Consultant's or Subcontractor's engagement of the recruitment channel involved.

### 6.3. Occupational Health and Safety

The project will implement comprehensive occupational health and safety measures to protect workers from occupational injuries, illnesses, accidents, and hazardous working conditions during construction activities.

Occupational health and safety management will comply with:

- Labor Code of Uzbekistan
- Applicable occupational safety regulations and sanitary norms
- IFC General EHS Guidelines
- IFC EHS Guidelines for Toll Roads and Highways



- AIIB ESP and ESS1 requirements
- Good international industry practice (GIIP).

The PMO and Contractors will ensure that all works are implemented in accordance with approved OHS plans forming part of the Contractor's C-ESMP.

Each contractor will appoint qualified OHS personnel responsible for implementation and monitoring of workplace health and safety requirements. The contractor's OHS personnel will possess appropriate qualifications, certifications, and relevant experience in infrastructure construction projects.

### **6.3.1. Occupational Health and Safety Measures**

Contractors will implement the following minimum OHS measures:

- Conduct site-specific hazard identification and risk assessments.
- Provide worker induction training prior to commencement of work.
- Conduct regular toolbox talks and refresher safety training sessions.
- Provide appropriate PPE free of charge to workers.
- Ensure mandatory use of PPE at active construction sites.
- Implement traffic and road safety management measures.
- Implement safe work procedures for excavation, lifting operations, work at heights, confined spaces, electrical works, and operation of heavy machinery.
- Establish emergency preparedness and response procedures.
- Implement fire prevention and firefighting measures.
- Maintain first aid kits, trained first aid personnel, and emergency medical response arrangements.
- Establish emergency medical referral and transportation procedures for injured workers.
- Implement heat stress prevention measures during periods of extreme temperatures.
- Ensure safe storage, handling, and transportation of fuel, chemicals, and hazardous materials.
- Implement safe worker accommodation and camp management measures.
- Maintain safe sanitation and hygiene conditions.
- Ensure appropriate lighting, ventilation, and electrical safety measures.
- Conduct routine workplace inspections and safety audits.
- Establish incident reporting, investigation, and corrective action procedures.

The contractors will ensure that all workers receive training relevant to their assigned activities and associated occupational hazards.

Workers will have the right to remove themselves from work situations which they reasonably believe present imminent and serious danger to life or health without retaliation.



Workers will be consulted regarding occupational health and safety issues and encouraged to participate in hazard identification, reporting of unsafe conditions, toolbox meetings, and development of corrective measures.

### **6.3.2. OHS Plans**

Prior to commencement of construction activities, contractors will prepare and submit site-specific OHS plans for review and approval by the PMO and PMCs.

At a minimum, the OHS plan will include:

- Occupational health and safety policy
- Roles and responsibilities
- Hazard identification and risk assessment procedures
- Safe work method statements
- Emergency preparedness and response procedures
- Incident notification and investigation procedures
- PPE management procedures
- Training and competency requirements
- Traffic management procedures
- Camp management procedures
- Procedures for hazardous materials management
- Procedures for excavation and confined space works
- Fatigue and heat stress management
- Communicable disease prevention measures where applicable
- Internal inspection and auditing procedures
- Monthly OHS reporting procedures.

## **6.4. Child Labor and Forced Labor**

The project will apply strict prohibition on child labor and forced labor in all project-related activities.

No individual under the age of 18 will be employed in hazardous work, construction activities, operation of machinery, work at heights, electrical activities, or any other activity associated with occupational risks.

Contractors and subcontractors will implement age verification procedures during recruitment and maintain copies of identification documents confirming workers' age.

Forced labor, bonded labor, trafficked labor, involuntary prison labor, and any form of coercive employment practices are strictly prohibited.

All workers will:



- Enter employment voluntarily
- Be free to terminate employment in accordance with contractual conditions and national legislation
- Retain control over their identification documents and personal belongings
- Not be subjected to threats, intimidation, wage withholding, or coercion
- Not be required to surrender passports, identity documents, or personal documentation to employers or labor brokers.

Contractors will ensure that these requirements are also applied by subcontractors and primary suppliers where relevant.

## **6.5. Labor Influx, Worker Conduct, and SEA/SH Prevention**

The project may require temporary mobilization of workers from outside the project area, particularly during peak construction activities and specialized works. Labor influx may increase risks related to community tensions, communicable diseases, inappropriate worker behavior, and GBV/SEA/SH risks if not properly managed.

To minimize such risks, contractors will implement labor influx management measures as part of the C-ESMP and workforce management procedures.

### **6.5.1. Labor Influx Management Measures**

The following measures will be implemented:

- Preference for local recruitment where feasible
- Minimization of non-local labor where local capacity is available
- Worker induction regarding local customs, traditions, and community sensitivities
- Enforcement of codes of conduct
- Prohibition of harassment, violence, exploitation, discrimination, and abusive behavior
- Restriction of unauthorized access to nearby communities and sensitive areas
- Implementation of worker accommodation management procedures
- Prohibition of hunting, fishing, illegal resource collection, and wildlife disturbance
- Implementation of alcohol and drug control measures
- Monitoring of worker-community interactions.

### **6.5.2. GBV/SEA/SH Prevention Measures**

The project will implement a zero-tolerance policy regarding GBV/SEA/SH, child abuse, and exploitation. All contractors and subcontractors will:

- Adopt and enforce codes of conduct addressing GBV/SEA/SH risks
- Require all workers to sign codes of conduct prior to commencement of employment



- Conduct mandatory GBV/SEA/SH awareness and prevention training
- Establish confidential reporting channels for GBV/SEA/SH-related grievances
- Ensure survivor-centered handling of GBV/SEA/SH complaints
- Prohibit retaliation against complainants
- Apply disciplinary measures for violations, including dismissal where appropriate.

GBV/SEA/SH-related grievances will be handled confidentially and separately from standard grievance procedures described in Part 7 of this LMP.

## **6.6. Non-Discrimination and Equal Opportunity**

The project will provide equal employment opportunities and fair treatment to all project workers. No discrimination will occur in relation to:

- Recruitment and hiring
- Compensation and benefits
- Working conditions
- Promotion opportunities
- Access to training
- Disciplinary measures
- Termination of employment.

Contractors will provide separate and adequate sanitation facilities for male and female workers and ensure that worker accommodation facilities meet appropriate health, safety, and privacy standards.

Women's employment is subject to the mandatory minimums set out in Section 2.3.1, and all vacancies will state that women are encouraged to apply. Appropriate consideration will also be given to employment opportunities for other vulnerable groups.

## **6.7. Worker Accommodation and Welfare Facilities**

Where worker camps or temporary accommodation facilities are established, contractors will ensure that such facilities comply with applicable national sanitary and safety standards and GIIP.

Worker accommodation facilities will include:

- Potable drinking water supply
- Adequate sanitation and hygiene facilities
- Separate facilities for men and women
- Safe electrical installations
- Ventilation and lighting



- Fire protection equipment
- Waste management systems
- Clean sleeping areas and cooking facilities
- Adequate drainage and housekeeping conditions
- First aid and emergency response arrangements.

Worker camps will be subject to routine inspections by contractors, PMCs, and the PMO to verify compliance with sanitary, fire safety, worker welfare, health, and security requirements.

Workers will be periodically consulted regarding accommodation conditions, sanitation, camp management issues, and worker welfare concerns.

## **6.8. Incident Management and Reporting**

Contractors will establish and implement procedures for reporting, recording, investigating, responding to, and correcting labor, occupational health and safety, and worker welfare incidents associated with the project. All occupational incidents, dangerous occurrences, near misses, injuries, and fatalities will be documented, investigated, and addressed through corrective and preventive measures.

Contractors will immediately notify the PMO of any fatality, serious injury, dangerous occurrence, major fire, explosion, significant environmental incident affecting workers, or other serious labor-related incidents associated with project activities.

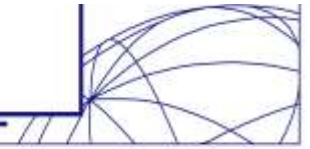
Preliminary notification of serious incidents and fatalities will be submitted to the PMO within 24 hours of occurrence.

Contractors will:

- Maintain incident and accident registers
- Investigate incidents, near misses, and dangerous occurrences
- Identify root causes and corrective actions
- Implement preventive measures to avoid recurrence
- Maintain records of corrective actions and follow-up measures
- Cooperate with the PMO, PMC, and relevant authorities during investigations.

The PMO and PMC will monitor contractor compliance with incident reporting requirements through regular inspections, audits, and review of incident records and corrective action reports.

Serious incidents, including fatalities, severe injuries, major spills, fires, structural failures, worker unrest, or significant GBV/SEA/SH allegations, will be immediately reported to the PMO and AIIB in accordance with applicable incident notification procedures.



Incident investigations will include root cause analysis, corrective and preventive actions, identification of systemic failures, recommendations for improvement. Corrective measures will be implemented promptly and monitored until closure.

## **6.9. Alcohol and Drug Policy**

The project will maintain a drug- and alcohol-free workplace.

The following will be prohibited at all project sites and worker accommodation facilities:

- Possession or consumption of illegal drugs
- Alcohol abuse affecting workplace safety
- Operation of machinery or vehicles under the influence of alcohol or drugs
- Distribution or sale of illegal substances.

Contractors may implement reasonable testing procedures for safety-sensitive positions in accordance with applicable legislation and privacy requirements.

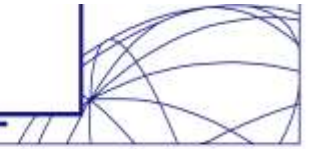
Workers under the influence of drugs or alcohol will not be permitted to perform work activities.

## **6.10. Training and Awareness**

Contractors will implement ongoing worker training and awareness programs throughout project implementation.

Training programs will include:

- Worker induction
- Occupational health and safety
- Hazard identification
- Safe use of PPE
- Emergency preparedness and response
- Traffic safety
- Incident reporting procedures
- GBV/SEA/SH prevention
- Code of conduct requirements
- Worker grievance procedures
- Community interaction and respectful behavior
- Environmental awareness and waste management
- Security personnel conduct and community interaction procedures, where applicable.



Training attendance records will be maintained and made available for inspection by the PMO and PMCs.

## 6.11. Monitoring, Auditing, and Reporting

The PMO, PMCs, and Contractors will undertake regular monitoring and reporting regarding implementation of labor management requirements under the project.

Monitoring activities will include:

- Routine workplace inspections
- Worker interviews
- OHS audits
- Camp inspections
- Review of grievance records
- Review of training records
- Verification of corrective actions
- Monitoring of subcontractor compliance.

Workers will be periodically consulted regarding labor conditions, accommodation facilities, occupational health and safety concerns, and effectiveness of labor management measures implemented under the project.

Contractors will submit regular labor and OHS reports to the PMCs and PMO. The reports will include, at minimum:

- Workforce statistics
- Training activities conducted
- OHS incidents and near misses
- Lost-time injuries
- Worker grievances and resolution status
- Corrective actions implemented
- Non-compliance observations
- GBV/SEA/SH-related reporting without disclosure of confidential survivor information
- Labor camp inspection results
- Subcontractor performance.

The PMO and PMCs may conduct periodic audits of contractors, subcontractors, labor camps, suppliers, and associated facilities to verify compliance with this LMP and applicable contractual obligations.



## 6.12. Worker Consultation and Participation

### 6.12.1. Objective

While worker consultation is referenced throughout this LMP in relation to specific topics, occupational health and safety (Section 6.3), accommodation and welfare (Section 6.7), and training (Section 6.10), this section consolidates the framework through which workers will be informed, consulted, and enabled to participate in decisions affecting their health, safety, welfare, and working conditions throughout project implementation across the four project districts (Kyzyltepa, Gijduvon, Vobkent, and Bukhara).

### 6.12.2. Consultation Mechanisms

Contractors will establish the following channels for ongoing worker consultation and participation:

- **Induction and toolbox talks:** All workers will receive site induction covering OHS, accommodation standards, grievance procedures, and codes of conduct, followed by regular (at minimum weekly) toolbox talks where workers can raise concerns and receive updates.
- **Worker representatives/OHS committees:** Each contractor will establish a worker-elected OHS committee or designate worker representatives (including, where the workforce composition allows, women workers) to serve as a formal channel between the workforce and site management for issues spanning OHS, accommodation, welfare, and working conditions.
- **Camp committees:** Where labor camps are established, camp-level consultation committees will meet regularly to address accommodation, sanitation, catering, and welfare concerns (Section 6.7).
- **Direct engagement with OHS/HR personnel:** Workers may raise concerns directly with contractor OHS officers, HR/welfare officers, or site supervisors at any time.
- **GRM:** The project-level worker GRM (Section 7) serves as a formal, confidential channel for individual or collective grievances, including on wages, working conditions, discipline, harassment, and SEA/SH.

### 6.12.3. Topics for Consultation

Worker consultation will cover, at minimum:

- Occupational health and safety hazards, controls, and incident findings
- Accommodation and camp living conditions
- Working hours, rest periods, and welfare provisions
- Wages, benefits, and terms of employment
- Grievance mechanism awareness, accessibility, and performance
- Status and effectiveness of corrective actions arising from inspections, audits, incidents, or prior worker feedback.



#### **6.12.4. Roles and Responsibilities**

- **Contractors** will facilitate consultation through the mechanisms above, document worker feedback and concerns raised, and track corrective actions to closure, consistent with contractor monitoring and reporting obligations under Section 8.9.
- **Contractor OHS/HR/welfare** officers will compile and report consultation outcomes to site management and the PMC.
- **PMC** will verify that consultation mechanisms are functioning through site visits and review of contractor records and will flag gaps to the PMO.
- **PMO** will oversee overall compliance, review aggregated consultation and grievance data, and ensure corrective actions are implemented and communicated back to workers, in line with the monitoring responsibilities and corrective action framework in Sections 9.2 and 9.5.

#### **6.12.5. Documentation and Reporting**

Contractors will maintain records of consultation meetings (attendance, issues raised, actions agreed), which will be summarized in monthly OHS/social monitoring reports to the PMC and PMO under the reporting requirements of Section 9.4. Corrective action status, including timelines and responsible parties, will be tracked and reported until closure per Section 9.5, and outcomes will be communicated back to workers through toolbox talks or notice boards to demonstrate responsiveness.

#### **6.12.6. Non-Retaliation**

Consistent with Section 4.2, workers will not face retaliation, discrimination, or adverse consequences for raising concerns, refusing unsafe work, or participating in consultation activities in good faith.



## 7. WORKER GRIEVANCE REDRESS MECHANISM

### 7.1. General Provisions

A Worker Grievance Redress Mechanism (GRM) will be established for the project to ensure that concerns, complaints, disputes, and grievances raised by project workers are addressed promptly, transparently, fairly, and without retaliation.

The GRM will apply to all categories of project workers, including:

- Direct workers
- Contracted workers
- Subcontractor personnel
- Temporary and seasonal workers
- Migrant workers
- Security personnel
- Primary supplier workers, where relevant.

The GRM will operate throughout the entire project lifecycle, including mobilization, construction, demobilization, and defect liability periods.

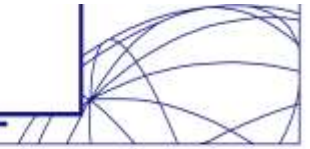
Serious occupational incidents, fatalities, dangerous occurrences, and emergency situations will additionally be managed in accordance with the project incident notification, incident reporting, occupational health and safety, and emergency preparedness and response procedures.

The mechanism will be established, as described in this LMP, and in accordance with:

- Labor Code of Uzbekistan
- Applicable labor dispute legislation
- AIIB ESP and ESS1
- IFC Good International Industry Practice (GIIP)
- Principles of transparency, accessibility, confidentiality, and non-retaliation.

The GRM will not impede access to judicial or administrative remedies available under national legislation. Use of the GRM will be free of charge for all workers.

While the Worker GRM is intended for use by project workers, it operates as a supplement to, and does not replace, the broader Project GRM established under the ESMP, which covers all categories of affected persons, including local communities, and operates through a two-tier structure: Settlement-level Grievance Redress Committees (GRC) (Level 1) and Project-level GRC (Level 2). Grievances raised by members of local communities arising from interactions with project workers, including labor influx-related concerns, worker conduct, traffic incidents, or SEA/SH allegations involving project workers, fall within the scope of the Project GRM. Where a grievance



received through either mechanism concerns matters more appropriately addressed by the other (e.g., a community grievance implicating a specific worker's conduct, or a worker grievance involving a community member), the Worker GRM and Project GRM focal points will coordinate to ensure the grievance is properly registered, investigated, and resolved without duplication or delay, consistent with Section 6.5.2 (GBV/SEA/SH Prevention Measures) and Section 4.4 (Labor Influx).

## 7.2. Objectives of the GRM

The objectives of the worker grievance mechanism are to:

- Provide workers with accessible channels to raise workplace concerns and complaints.
- Resolve grievances in a timely and fair manner.
- Prevent escalation of disputes.
- Improve communication between workers and management.
- Promote safe and respectful working conditions.
- Ensure accountability of contractors and subcontractors.
- Protect workers from retaliation or discrimination related to grievance submission.
- Identify recurring issues and implement corrective actions.
- Provide a defined interface with the Project-level GRM for community grievances that relate to or arise from worker conduct, ensuring such grievances are appropriately channeled rather than processed under the Worker GRM.

## 7.3. Scope of Worker Grievances

The GRM will cover grievances related to, but not limited to:

- Recruitment and hiring practices
- Employment contracts and terms of employment
- Wage payments and deductions
- Working hours and overtime
- Leave entitlements
- Discrimination and unequal treatment
- Workplace harassment and intimidation
- Occupational health and safety concerns
- Unsafe working conditions
- Accommodation and camp conditions
- Access to sanitation, water, and welfare facilities
- Disciplinary actions
- Supervisor or management conduct
- Labor influx-related issues
- Worker-community conflicts



- Retaliation against workers
- SEA/SH and GBV-related complaints
- Child labor or forced labor concerns
- Access to PPE and medical support
- Environmental conditions affecting workers.

The Worker GRM addresses labor-related grievances raised by project workers, including those listed above. Grievances raised by members of the local community, including complaints related to interactions with project workers, labor influx impacts, or worker conduct affecting communities, will remain under the jurisdiction of the Project GRM established under the project's environmental and social management framework, and will not be processed through the Worker GRM.

Where a grievance received through either mechanism concerns matter within the other mechanism's jurisdiction (e.g., a community complaint referencing a specific worker's conduct, or a worker complaint concerning a community-related dispute), the receiving mechanism will:

- Log the grievance and notify the responsible focal point of the other mechanism;
- Refer the grievance to the appropriate mechanism for resolution, retaining a cross-reference record; and
- Coordinate as needed on cases involving overlapping subject matter (e.g., GBV/SEA/SH incidents), consistent with Section 6.5.2 and Section 7.11.
- The PMO will maintain oversight of both mechanisms to ensure grievances are not lost, duplicated, or delayed at the interface between them.

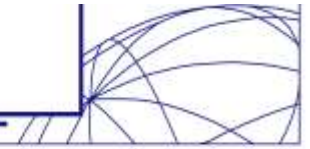
## 7.4. Principles of the GRM

The grievance mechanism will operate according to the following principles:

- (a) **Accessibility:** The GRM will be accessible to all workers regardless of literacy level, language, nationality, gender, or employment status. Information regarding the GRM will be communicated through:
- Worker induction training activities
  - Toolbox talks
  - Noticeboards at worksites and camps
  - Worker handbooks
  - Employment contracts
  - Posters in local languages
  - Digital communication channels.

GRM information will be provided in languages understandable to workers, including migrant workers where applicable.

- (b) **Transparency:** Workers will be informed of:



- How grievances can be submitted
- Applicable timelines
- Responsible persons
- Investigation procedures
- Appeal mechanisms
- Resolution outcomes.

(c) **Confidentiality:** All grievances will be treated confidentially. Personal information related to complainants will be protected and disclosed only on a need-to-know basis. Access to grievance records and digital grievance databases will be restricted to authorized personnel only.

(d) **Non-Retaliation:** Retaliation in any form against complainants, witnesses, worker representatives, or individuals participating in grievance investigations shall be strictly prohibited.

(e) **Fairness and Impartiality:** All grievances will be investigated objectively and resolved fairly.

(f) **Timeliness:** Grievances will be addressed within clearly defined timeframes.

(g) **Survivor-Centered Approach:** SEA/SH and GBV-related grievances will follow a survivor-centered approach prioritizing safety, confidentiality, respect, informed consent, non-discrimination, and access to support services.

The GRM will ensure safe, confidential, and gender-sensitive grievance channels for women workers and women affected by labor-related issues associated with the Project. A designated female grievance focal point will be assigned at any worksite or camp where 10 or more women are employed, to receive complaints from women workers, particularly regarding harassment, discrimination, workplace safety, or GBV/SEA/SH-related concerns. Where a worksite or camp does not meet this threshold, women workers will instead have access to a female focal point at the nearest project site, the PMO and PMC's Gender Specialists, or the confidential GRM hotline and reporting channel, and will be informed of these alternative channels during induction. In all cases, women workers may request that their grievance be handled by female personnel, and this preference will be accommodated wherever practicable.

## 7.5. Grievance Submission Channels

Workers may submit grievances through any of the following channels:

- Verbal complaint to supervisor or GRM focal point
- Written complaint forms
- Suggestion/complaint boxes
- E-mail



- Telephone hotline
- SMS or messaging applications where available
- Direct submission to PMO or PMC
- Anonymous submissions.

Complaints may be submitted individually or collectively. Contractors will ensure that grievance submission channels are clearly visible and easily accessible at construction sites, worker camps, site offices, and welfare facilities.

Assistance will be provided to workers with limited literacy or language barriers to ensure equitable access to the grievance mechanism.

## 7.6. Grievance Redress Structure

The GRM will operate through a multi-level structure designed to resolve grievances at the lowest appropriate level while allowing escalation where necessary.

### Level 1: Contractor-Level Resolution

The first level of grievance resolution will be managed by the Contractor through designated GRM focal points and site management personnel.

The Contractor-Level Grievance Redress Committee (GRC) will typically include:

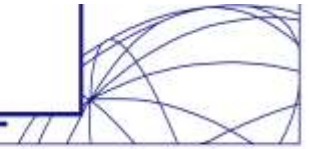
- Contractor representative
- Site manager
- OHS officer(s)
- Environmental and Social Specialist(s)
- Worker representatives
- Female representative or female grievance focal point, at any worksite or camp employing 10 or more women
- Camp manager where relevant.

The Contractor-Level GRC will:

- Receive grievances
- Register complaints
- Conduct preliminary review and investigation
- Communicate with complainants
- Propose corrective actions
- Monitor implementation of agreed actions
- Maintain grievance records.

The Contractor will acknowledge receipt of grievances within three (3) working days.

Routine grievances should be resolved within 15 working days whenever possible.



## **Level 2: PMO and PMC Level**

If the grievance cannot be resolved at Contractor level, or if the complainant is dissatisfied with the proposed resolution, the grievance may be escalated to the PMO and PMC.

The PMO-Level GRC may include:

- PMO Environmental Specialist
- PMO Social Specialist
- Labor/OHS Officer
- PMC representatives
- Contractor representatives
- Worker representatives.

The PMO-Level GRC will:

- Review unresolved grievances
- Conduct independent investigations where necessary
- Propose additional corrective measures
- Ensure compliance with LMP requirements
- Monitor contractor performance.

Escalated grievances should normally be resolved within 20 working days.

## **Level 3: Government Authorities and Judicial Remedies**

Where grievances remain unresolved, workers retain the right to refer complaints to:

- Local labor inspection authorities under the Ministry of Labor of Uzbekistan
- Trade unions
- Relevant government agencies
- Courts of the Republic of Uzbekistan.

Access to judicial remedies will not be restricted by the project GRM.

## **7.7. Grievance Registration and Documentation**

All grievances will be formally recorded in a grievance register maintained by the Contractor and reviewed by the PMO and PMC.

The grievance register will include:

- Grievance identification number
- Date of submission
- Name or anonymous status of complainant
- Description of grievance



- Category of grievance
- Responsible department/person
- Investigation actions
- Corrective measures
- Resolution status
- Date of closure.

Grievance records will be maintained throughout the project implementation period and retained in accordance with applicable legal and contractual requirements. Confidential information will be protected and stored securely.

## 7.8. Grievance Resolution Procedure

The worker grievance procedure will include the following steps:

- **Step 1: Submission of Grievance**  
The complainant submits a grievance through any available channel.
- **Step 2: Acknowledgment**  
The grievance is acknowledged and registered according to a defined, multi-level timeframe structure, consistent with Section 7.6 and ESMP:
  - **Level 1 (Contractor-Level GRC):** The grievance is acknowledged and registered by the Contractor-Level GRC within **3 working days** of receipt. Routine grievances are resolved within **15 working days** wherever possible.
  - **Escalation to Level 2:** Where grievance cannot be resolved at Level 1 within this timeframe, or the complainant is dissatisfied with the proposed resolution, the grievance is escalated, with full documentation, to PMO/PMC (Level 2). Escalated grievances are normally resolved within **20 working days**.
  - **Level 3 (Government Authorities and Judicial Remedies):** Where a grievance remains unresolved at Level 2, or the worker is otherwise dissatisfied, the worker retains the right to refer the complaint to local labor inspection authorities, trade unions, relevant government agencies, or the courts of Uzbekistan. Access to these remedies is not restricted or delayed by Worker GRM and is available to the worker at any stage of the process, independent of whether Levels 1 or 2 have been exhausted.
- **Step 3: Screening and Classification**  
The grievance is reviewed and categorized according to severity, urgency, type of complaint, need for immediate action, GBV/SEA/SH sensitivity, potential legal implications. Grievances involving immediate threats to worker health, safety, security, or serious misconduct will receive immediate attention and may be subject to expedited investigation and corrective action procedures.
- **Step 4: Investigation**



Responsible personnel will investigate grievance through worker interviews, site inspections, review of records, consultation with supervisors or witnesses, review of contractual obligations and legal requirements.

- **Step 5: Corrective Action**

Appropriate corrective and preventive actions are identified and implemented.

- **Step 6: Communication of Resolution**

The complainant is informed of the outcome and proposed resolution. If the complainant is dissatisfied with the proposed resolution, the grievance may be appealed and escalated to the next level of the GRM structure.

- **Step 7: Closure**

The grievance is closed only after confirmation that corrective actions have been implemented, and the complainant has been informed of the outcome.

- **Step 8: Trend Analysis and Preventive Action**

The PMO and PMCs will periodically analyze grievance records to identify recurring issues, systemic patterns, or emerging risks by category, location, and worker group, consistent with the grievance monitoring parameters in ESMP. Findings will inform updates to the labor risk register (Table 5), site-specific OHS Plans, and preventive measures under this LMP, and will be reported as part of routine monitoring and reporting under Section 9.

## **7.9. Anonymous Grievances**

Anonymous grievances will be accepted and addressed to the extent feasible. Anonymous complaints will receive the same level of review and investigation as identified grievances.

## **7.10. Collective Labor Disputes**

Collective grievances and labor disputes involving groups of workers may include:

- Wage disputes
- Camp conditions
- Working hours
- OHS concerns
- Employment terms
- Collective bargaining issues.

Contractors will engage worker representatives and attempt amicable resolutions through dialogue and consultation before escalation. Where a collective dispute cannot be resolved between the Contractor and worker representatives within the



timeframes set out in Section 7.8, involves a work stoppage or significant risk of one, or involves 10 or more workers, the PMO will be notified and will facilitate mediation between the parties, which may include convening joint meetings with the Contractor and worker representatives, engaging relevant labor authorities (including the State Labor Inspectorate under the Ministry of Labor of Uzbekistan, consistent with [Articles 534–536 of the Labor Code](#)) for technical or legal guidance, and, where appropriate, referring the matter to formal labor dispute resolution mechanisms under national legislation. Mediation will be documented and tracked as part of the grievance record (Section 7.7) and will not preclude the parties' rights to pursue formal legal remedies at any stage.

## 7.11. GBV/SEA/SH-Related Grievances

Complaints related to GBV/SEA/SH will be handled through confidential and survivor-centered procedures, separate from routine worker grievances, and will not be subject to mandatory informal settlement or mediation processes.

The following principles will apply:

- Confidentiality of survivor identity.
- Informed consent.
- Protection from retaliation.
- Immediate safety assessment.
- Referral to appropriate support services.
- Respectful and non-judgmental communication.
- Limited disclosure of information.
- No mandatory requirement for survivor participation in formal investigations.
- Retaliation, intimidation, harassment, or discrimination against complainants, survivors, witnesses, or individuals participating in investigations will be strictly prohibited.

Referral pathways may include medical services, psychosocial support, legal assistance, law enforcement authorities, or other appropriate support services depending on the nature of the complaint and availability of local services.

Only designated and trained personnel will manage GBV/SEA/SH-related complaints. Information recorded will be limited to:

- Nature of complaint
- Whether the alleged perpetrator is associated with the project
- Referral actions taken
- Status of case management.

No identifying survivor information will be included in routine project reporting.



Women workers will have access to confidential reporting channels and may request that grievances be handled by designated female personnel where feasible and appropriate.

## **7.12. Roles and Responsibilities**

### **7.12.1. Contractors**

Contractors will:

- Establish and maintain worker GRM procedures
- Appoint GRM focal points
- Conduct worker awareness training
- Maintain grievance registers
- Investigate and resolve grievances
- Report grievance statistics to PMO.

### **7.12.2. PMO**

The PMO will:

- Oversee implementation of the GRM
- Monitor contractor compliance
- Review unresolved grievances
- Conduct audits and inspections
- Ensure confidentiality and non-retaliation principles
- Maintain oversight reporting.

### **7.12.3. PMC**

The PMC will:

- Monitor GRM implementation;
- Verify grievance closure;
- Participate in investigations where required;
- Review grievance documentation;
- Recommend corrective actions.

## **7.13. Monitoring and Reporting**

Contractors will submit regular grievance reports to the PMO and PMC. The reports will include:

- Number of grievances received



- Types of grievances
- Resolution status
- Average resolution time
- Outstanding grievances
- Repeated or systemic issues
- Corrective actions implemented
- Aggregated GBV/SEA/SH-related reporting statistics without disclosure of confidential or personally identifiable information.

The PMO will periodically review grievance trends to identify systemic issues and improve labor management performance. Where appropriate and without compromising confidentiality, grievance statistics will be analyzed by gender and grievance category to identify recurring labor and workplace issues affecting women and vulnerable workers.

## 7.14. Worker Awareness and Disclosure

All workers will receive GRM awareness training during induction and refresher training. The following information will be disclosed to workers:

- GRM procedures
- Contact details of GRM focal points
- Complaint submission channel
- Confidentiality protections;
- Non-retaliation commitments
- Appeal procedures.

Information will be provided in languages understandable to workers. Special attention will be given to ensuring that women workers, migrant workers, temporary workers, and vulnerable workers are informed about available grievance procedures and confidential reporting channels.

## 7.15. Monitoring Indicators

The following indicators may be used to assess GRM performance:

- Number of grievances received
- Percentage of overall grievances resolved
- Percentage of grievances resolved within timeframe
- Average grievance resolution time
- Number of repeat grievances
- Number of unresolved grievances
- Number of GBV/SEA/SH-related complaints
- Worker awareness levels



- Frequency of retaliation complaints
- Corrective actions implemented.

Regular review of these indicators will support continuous improvement of the grievance management system.



## **8. CONTRACTOR MANAGEMENT**

### **8.1. General Requirements**

The project will involve engagement of multiple contractors, subcontractors, suppliers, and service providers for implementation of road rehabilitation, bypass construction, ancillary facilities, transportation activities, and associated infrastructure works.

All contractors and subcontractors engaged under the project will comply with applicable labor legislation of Uzbekistan, requirements of this LMP, applicable OHS requirements, AIB ESF requirements, C-ESMPs, contractual obligations, and GIIP.

The PMO and PMCs will monitor contractor compliance with labor management requirements throughout all phases of project implementation.

Contractors will be responsible for management of their workforce, subcontractors, worker accommodation facilities, labor conditions, occupational health and safety performance, worker welfare, and implementation of worker grievance procedures in accordance with this LMP.

### **8.2. Contractor Due Diligence During Procurement**

During the contractor selection and procurement process, the PMO, procurement entities, and PMCs will evaluate the capacity of prospective contractors to comply with labor management, occupational health and safety, and environmental and social requirements applicable to the Project. This due diligence is a mandatory component of contractor evaluation and shall not be waived or treated as optional at any stage of the procurement process.

The evaluation shall include review of:

- company registration and legal compliance records
- previous violations of labor legislation or OHS requirements
- records of workplace accidents, fatalities, and enforcement actions
- existing labor management systems and OHS procedures
- qualifications and certifications of key personnel
- worker training and competency records
- previous experience implementing projects of similar scale and complexity
- GBV/SEA/SH prevention procedures
- availability of qualified OHS personnel
- worker accommodation arrangements where applicable
- records of unresolved labor disputes or grievances



- previous compliance with requirements of international financial institutions or development partners, where applicable.
- use of recruitment agencies or labor brokers, if any, including their licensing status and compliance history with recruitment-related requirements (Section 6.2)
- proposed staffing schedule by job category and sex, demonstrating how the women's employment minimums in Section 2.3.1 will be met, and a key personnel list that includes a social/gender specialist.

Prior to mobilization, the successful Contractor shall be required to submit a consolidated set of documents to the PMC and PMO for review and clearance, as a precondition to commencing works. This documentation shall include, at a minimum:

- The Contractor's Labor Management Plan and OHS Plan, prepared in accordance with this LMP.
- The Contractor's Code of Conduct and Individual Worker Code of Conduct, signed by all personnel (Appendices 1 and 2).
- Evidence of registration and licensing of any recruitment agencies or labor brokers to be engaged, together with copies of the contractual clauses incorporating the recruitment requirements of Section 6.2 (prohibition of recruitment fees, age and identity verification, prevention of exploitative practices).
- A list of proposed key OHS and labor management personnel, with qualifications and certifications.
- Worker accommodation plans, following Section 6.7.
- GBV/SEA/SH prevention and response procedures, including designation of a focal point.
- Confirmation of grievance mechanism arrangements consistent with Section 7.
- Proof of applicable insurance and statutory registrations for workers (e.g., social security, medical insurance).
- The Contractor's staffing schedule by job category and sex (site labor; professional and technical; administrative and community liaison), showing the planned share of women against the minimums in Section 2.3.1, together with the job announcements published in line with Section 2.3.1.

The PMO and PMC shall review this documentation and confirm compliance before issuing a notice to proceed and mobilization approval. Contractors with a history of serious labor violations, repeated OHS non-compliance, child labor, forced labor, or significant environmental and social non-compliance may be disqualified from participation in the procurement process in accordance with applicable procurement procedures and legal requirements.

Each Contractor shall prepare and implement a Contractor Labor Management Plan (CLMP) consistent with the requirements of this LMP. The CLMP shall form part of the Contractor Environmental and Social Management Plan (C-ESMP) and shall be submitted to the PMO and PMC for review and approval prior to mobilization. The CLMP



shall include, at a minimum, workforce management arrangements, recruitment procedures, the staffing schedule by job category and sex and measures to meet the women's employment minimums, labor and working conditions, worker accommodation measures, occupational health and safety management, labor influx management, Codes of Conduct, SEA/SH prevention measures, worker grievance procedures, subcontractor management, training arrangements, monitoring indicators, and reporting requirements.

### **8.3. Incorporation of Labor Requirements into Bidding and Contractual Documents**

The requirements of this LMP will be incorporated into the following documents and procedures:

- bidding documentation
- procurement documents
- construction contracts
- subcontract agreements
- technical specifications
- codes of conduct
- OHS requirements
- contractor management procedures.

Bidding and contractual documentation will require contractors and subcontractors to:

- comply with applicable labor legislation
- implement occupational health and safety measures
- prohibit child labor and forced labor
- comply with worker grievance procedures
- implement GBV/SEA/SH prevention measures
- provide appropriate worker accommodation facilities where required
- maintain labor and incident records
- implement worker induction and training programs
- cooperate with PMO, PMCs, AIB representatives, and relevant authorities during inspections and audits
- employ women in accordance with the minimums by job category set out in Section 2.3.1, submit a staffing schedule by job category and sex before mobilization, and report against the minimums monthly
- pay women employees equal pay for equal work, directly to an individual account in the woman's own name, with Contractor support for account opening where needed (GAP Activity 12)
- provide separate, secure, lockable facilities for women at camps and worksites before camp opening and the start of works (GAP Activity 11).



The Bill of Quantities will include separate priced items for facilities for women and for GAP training and community activities, so that their cost is visible and cannot be omitted.

Contractors will ensure that labor management requirements are communicated to all subcontractors and incorporated into sub-contractual arrangements.

## 8.4. Contractor Staffing Requirements

Each contractor will appoint qualified personnel responsible for labor management and occupational health and safety implementation throughout the construction period.

At minimum, contractors will designate:

- OHS Officer(s)
- E&S Specialist(s)
- Recruitment or HR Personnel responsible for oversight of worker recruitment, including engagement of any recruitment agencies or labor brokers (Section 6.2)
- Community Liaison Personnel, where required
- GBV/SEA/SH focal personnel, where appropriate
- Camp management personnel where worker camps are established
- GRM focal points responsible for worker grievance management.

Contractors will ensure that designated personnel have appropriate qualifications, training, competency, and experience relevant to their assigned responsibilities. OHS personnel shall be familiar with applicable national legislation, AIIB ESF requirements, GIIP, and project-specific environmental, social, labor, and occupational health and safety requirements. Personnel responsible for recruitment shall be familiar with the requirements of Section 6.2, including the prohibition of recruitment fees, verification of worker identity and age, and prevention of exploitative recruitment practices, and shall ensure these requirements are applied consistently across all direct hires, Subcontractors, and any recruitment agencies or labor brokers engaged by the Contractor.

The designated OHS Officer(s) shall have authority to:

- identify unsafe conditions and unsafe acts
- require corrective actions
- suspend unsafe work activities where necessary
- investigate incidents and near misses
- coordinate emergency response activities.

Environmental and social personnel of the contractors will oversee implementation of labor management measures, worker grievance procedures, community interaction



requirements, labor influx management measures, and GBV/SEA/SH prevention measures

Where worker camps are established, camp management personnel will be responsible for:

- camp administration and security
- accommodation and welfare conditions
- sanitation and hygiene management
- worker behavior management
- implementation of camp-related health and safety measures.

GRM focal points will be responsible for receiving, recording, tracking, and facilitating resolution of worker grievances in accordance with the worker GRM procedures established under this LMP.

All designated personnel will remain available throughout the construction period and participate in required coordination meetings, inspections, audits, training activities, and monitoring programs.

The number, qualifications, and competency of personnel will be commensurate with the scale, complexity, workforce size, labor influx, and occupational health and safety risks associated with construction activities. The PMO and PMCs may require contractors to strengthen staffing arrangements where labor or OHS risks, including recruitment-related risks, are not being adequately managed.

## **8.5. Contractor Occupational Health and Safety Obligations**

### **8.5.1. General OHS Requirements**

Contractors will prepare, submit, implement, and maintain site-specific OHS plans as part of their C-ESMPs prior to commencement of construction activities.

Contractors will:

- identify workplace hazards and occupational risks associated with road construction activities
- implement hazard control measures in accordance with the mitigation hierarchy
- provide appropriate PPE free of charge to workers
- ensure mandatory and proper use of PPE at all worksites
- establish and implement safe work procedures for all construction activities
- conduct worker induction training, regular toolbox talks, and task-specific safety training
- ensure that workers are medically fit and appropriately trained for assigned tasks
- establish emergency preparedness and response procedures



- maintain first aid facilities, emergency medical arrangements, and emergency contact systems
- investigate incidents, accidents, dangerous occurrences, and near misses
- implement corrective and preventive actions following incidents
- maintain OHS records, incident registers, inspection records, and reporting systems
- ensure subcontractor compliance with applicable OHS requirements and site safety procedures
- implement traffic and pedestrian safety measures within active work zones
- ensure adequate housekeeping, sanitation, lighting, ventilation, and site safety controls
- comply with applicable national legislation, AIIB ESF requirements, GIIP, and relevant IFC EHS Guidelines.

Workers will not be permitted to perform construction activities without appropriate training, instruction, supervision, and required protective equipment.

Contractors will establish procedures for immediate notification of serious incidents, fatalities, dangerous occurrences, environmental incidents, and significant social incidents to the PMO and PMCs in accordance with the ESMP, incident notification procedures, and contractual requirements.

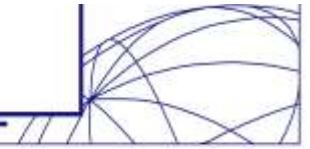
Contractors will also implement permit-to-work procedures for high-risk activities, including:

- confined space entry
- excavation works
- lifting operations
- hot works
- electrical works
- work at height
- activities involving hazardous materials or equipment.

Contractors will have authority to suspend or stop unsafe work activities where conditions present unacceptable risks to workers, nearby communities, property, or the environment.

The PMO and PMCs will monitor contractor OHS performance through:

- routine site inspections
- audits and compliance reviews
- review of incident reports and corrective actions
- worker interviews and consultations
- monitoring of training implementation
- verification of compliance with contractual OHS requirements.



### 8.5.2. Supporting Management Plans and Procedures

Prior to commencement of construction activities, contractors will prepare and submit site-specific management plans and procedures for review and approval by the PMO and PMCs. Depending on the scope of work, these may include:

- OHS Plans
- Emergency Preparedness and Response Plans
- Traffic Management Plans
- Labor Camp Management Plans
- Labor Influx Management Plans
- Waste Management Plans
- Hazardous Materials Management Procedures
- GBV/SEA/SH Action Plans
- Worker Accommodation Management Procedures
- Security Management Procedures
- Communicable Disease Prevention Procedures
- Incident Notification and Reporting Procedures
- other management plans required under the C-ESMPs and contractual documentation.

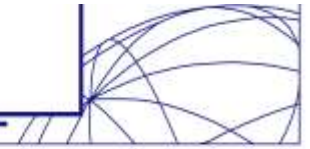
All management plans will be consistent with the requirements of this LMP, the ESMP, applicable national legislation, AIB ESF requirements, and international good industry practice.

### 8.5.3. Worker Accommodation

Where worker camps or accommodation facilities are established, contractors will ensure that such facilities comply with applicable national requirements, GLIP, and relevant principles of the IFC Guidance Note on Workers' Accommodation.

Worker accommodation facilities will include:

- adequate sleeping space and occupancy arrangements
- potable water supply
- sanitation and hygiene facilities
- waste collection and disposal system
- fire safety equipment and emergency evacuation arrangements
- adequate lighting, heating, cooling, and ventilation
- access to medical assistance and first aid
- separate, safe, secure, and lockable accommodation, sanitation, bathing, and hygiene facilities for women workers where female workers are employed
- adequate lighting and security arrangements around accommodation and sanitation facilities



- measures to prevent harassment, GBV/SEA/SH, and inappropriate conduct within worker accommodation areas
- dining and cooking facilities where required
- measures to prevent communicable disease transmission
- security arrangements and controlled access procedures
- regular cleaning, maintenance, and inspection procedures.

Worker accommodation facilities will be maintained in safe, hygienic, and habitable condition throughout the construction period. Contractors will prohibit overcrowding, unsafe electrical connections, inadequate sanitation, and other conditions that may create health, safety, or security risks for workers. Contractors will ensure that worker accommodation arrangements are culturally appropriate, gender-sensitive, and protective of worker dignity, privacy, and safety.

## 8.6. Subcontractor Management

Contractors will remain responsible for ensuring that subcontractors comply with:

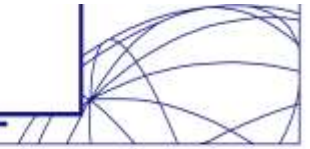
- requirements of this LMP
- applicable labor legislation
- OHS requirements
- worker welfare requirements
- codes of conduct
- applicable environmental and social obligations.

Contractors will:

- supervise subcontractor labor performance
- conduct inspections and audits of subcontractor activities
- verify subcontractor compliance with worker grievance procedures
- monitor subcontractor OHS performance
- maintain records of subcontractor compliance
- implement corrective measures where non-compliance is identified.

Contractors will remain fully responsible for labor management performance and compliance of all subcontractors engaged under the project.

Subcontractors will not engage child labor, forced labor, or discriminatory employment practices. The PMO and PMCs may require removal or replacement of subcontractors demonstrating serious or repeated labor or OHS non-compliance.



## 8.7. Worker Codes of Conduct

All contractors and subcontractors will prepare and implement worker codes of conduct addressing:

- occupational health and safety requirements
- respectful workplace behavior
- prohibition of discrimination and harassment
- prohibition of child labor and forced labor
- prevention of GBV/SEA/SH
- alcohol and drug restrictions
- protection of community property and resources
- respectful interaction with local communities and prohibition of intimidation, abusive behavior, harassment, or violence toward community members
- prohibition of harassment, sexually inappropriate behavior, intimidation, or abuse toward women and girls in nearby communities
- prohibition of unauthorized entry into private property, schools, religious sites, or community facilities
- prohibition of sexual exploitation, abuse, transactional sexual relationships, or relationships involving coercion, intimidation, or exchange of money, employment, goods, or services
- prohibition of online harassment, sharing of inappropriate images or materials, or abusive behavior through digital communication or social media
- respect for local customs, traditions, and cultural sensitivities
- disciplinary consequences for violations.

All workers will sign the applicable code of conduct prior to commencement of employment. Contractors will ensure that all workers fully understand and comply with the codes of conduct through mandatory induction training, regular awareness sessions, toolbox talks, and ongoing supervision. Violations of the codes of conduct, including inappropriate behavior toward community members or GBV/SEA/SH-related misconduct, may result in disciplinary measures, removal from the work site, referral to authorities where required, or termination of employment.

Contractors will ensure equal employment opportunity and non-discrimination in recruitment, remuneration, training, promotion, and working conditions. Appropriate measures will be implemented to provide safe and respectful working conditions for female workers, including separate sanitation facilities where required, prevention of workplace harassment, and implementation of confidential grievance procedures related to discrimination, harassment, and GBV/SEA/SH matters.



## 8.8. Worker Induction and Awareness

Contractors will conduct induction training for all workers prior to commencement of work activities. Induction training will include:

- occupational health and safety requirements
- emergency response procedures
- use of PPE
- worker grievance procedures
- code of conduct requirements
- GBV/SEA/SH prevention
- worker rights and responsibilities
- traffic safety requirements
- environmental protection measures
- respectful interaction with local communities and prohibition of intimidation, abusive behavior, harassment, or violence toward community members
- prohibition of harassment, intimidation, discrimination, and inappropriate conduct toward community members
- cultural awareness and community sensitivity requirements
- reporting procedures for community complaints and incidents
- requirements regarding worker identification badges, site access controls, and restrictions on unauthorized movement into nearby communities
- prohibition of unauthorized photography or recording of community members where culturally sensitive.

Refresher training, toolbox talks, and targeted awareness sessions on OHS, worker conduct, GBV/SEA/SH prevention, and community interaction requirements will be conducted periodically throughout the construction period. Training records will be maintained and made available for inspection upon request by the PMO, PMCs, AIB representatives, or relevant authorities.

## 8.9. Contractor Monitoring, Audits, and Reporting

Contractors will maintain systems for monitoring labor management performance and compliance with this LMP. The PMO and PMCs will conduct periodic:

- labor inspections
- OHS inspections/audits
- unannounced inspections
- reporting obligations
- worker interviews
- labor camp inspections
- document reviews
- compliance audits



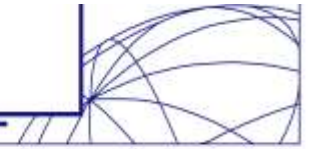
- verification of corrective actions.

The PMO and PMCs may also conduct unannounced inspections of labor camps, worker accommodation facilities, construction sites, and associated facilities to verify compliance with labor management, occupational health and safety, worker welfare, and applicable environmental and social requirements.

Contractors will submit regular labor and OHS reports to the PMO and PMCs. The reports will include:

- workforce statistics
- worker grievances and resolution status
- OHS incidents and near misses
- training activities
- labor camp inspection findings
- subcontractor performance
- GBV/SEA/SH-related reporting statistics without confidential details
- corrective actions implemented.

Serious incidents, fatalities, dangerous occurrences, major labor disputes, or significant GBV/SEA/SH allegations will be reported to the PMO immediately and in accordance with applicable project incident notification procedures. Serious incidents and fatalities will be notified to AIIB within the timeframe established under Project ESMP and incident reporting protocols.



## 8.10. Corrective Actions and Non-Compliance

Where labor, OHS, or worker welfare non-compliance is identified, contractors will implement corrective actions within timeframes specified by the PMO or PMCs. Corrective actions may include:

- additional training
- improvement of worker accommodation conditions
- strengthening of OHS measures
- replacement of unsafe equipment
- disciplinary actions
- removal of non-compliant personnel
- suspension of unsafe activities
- other measures necessary to achieve compliance.

Non-compliance will be escalated according to the following process:

- **First instance:** A written non-compliance notice is issued by the PMO or PMCs, specifying the finding, required corrective action, and a defined timeframe for completion (Section 9.5).
- **Verification:** The PMO and PMCs verify implementation of the corrective action within the specified timeframe, through follow-up inspection, document review, or other means appropriate to the finding.
- **Repeated or unresolved non-compliance:** Where the same or a related non-compliance recurs, or the corrective action is not completed within the specified timeframe, the finding is escalated to Contractor senior management, and the severity/frequency of the finding is recorded against the Contractor's compliance record (Table 7).
- **Serious non-compliance:** Non-compliance involving imminent risk to worker life or safety, child or forced labor, or GBV/SEA/SH violations will bypass the standard escalation sequence and may result in immediate suspension of the relevant activity or personnel, regardless of prior compliance history.

Repeated or serious non-compliance with labor management requirements may result in contractual penalties, suspension of work, withholding of payments, removal of subcontractors, contract termination, and referral to relevant authorities in accordance with applicable legislation and contractual requirements, including the State Labor Inspectorate under [Articles 534–536 of the Labor Code](#) where applicable.

The specific escalation trigger and consequence applied will be proportionate to the severity, frequency, and risk associated with the non-compliance, as determined by the PMO in consultation with the PMC.



## 8.11. Workforce Demobilization and Contract Closure

Contractors will plan and implement demobilization of their workforce, including subcontractor personnel, in a manner that protects workers' rights, minimizes adverse social and economic impacts, and ensures an orderly transition at the completion of construction activities or upon early termination of works.

### 8.11.1. Demobilization Planning

Contractors will prepare a Workforce Demobilization Plan for review and approval by the PMO and PMC prior to the anticipated completion of works, or as early as practicable in the event of early or partial termination. The plan will address, at minimum:

- workforce reduction schedule and phasing, by activity and worker category
- criteria and procedures for selection of workers affected by workforce reductions, ensuring non-discriminatory application
- final wage payment and settlement procedures
- grievance handling arrangements during and after demobilization
- camp and facility decommissioning arrangements
- repatriation arrangements for migrant workers
- communication and advance notice to affected workers
- coordination with local authorities and communities where significant workforce reductions may affect local labor markets or services.

### 8.11.2. Workforce Reductions

Where demobilization involves significant workforce reductions, contractors will:

- provide workers with advance notice of termination consistent with the Labor Code of Uzbekistan and contractual terms of employment
- apply transparent, objective, and non-discriminatory criteria in selecting workers for retrenchment
- calculate and pay all severance, notice-period, and other statutory entitlements in accordance with applicable national legislation
- avoid unlawful termination practices, including termination connected to worker grievances, union activity, or exercise of the right to refuse unsafe work
- notify the PMO and PMC in advance of workforce reductions exceeding to allow review of the process for consistency with this LMP and applicable AIIB ESF requirements.

### 8.11.3. Final Wage Payments and Settlement

Contractors will ensure that all workers, including subcontractor and migrant workers, receive full and final payment of outstanding wages, overtime, leave entitlements,



severance, and other statutory or contractual entitlements prior to release from employment. Final settlements will be documented and signed by each worker, with copies retained by the contractor and made available to the PMO and PMC upon request. No worker will be demobilized with outstanding wage or entitlement payments unresolved, except where a payment dispute is actively being addressed through the GRM under Section 8.11.4.

#### **8.11.4. Grievance Resolution After Demobilization**

The Worker GRM (Section 7) will remain accessible to former workers for a defined period following demobilization, to allow submission and resolution of grievances related to final payments, entitlements, or conditions of termination. Contractors will retain designated GRM focal point contact arrangements and worker contact information for this purpose and will report outstanding post-demobilization grievances to the PMO and PMC until closure.

#### **8.11.5. Camp and Facility Decommissioning**

Where labor camps or worker accommodation facilities were established, contractors will prepare and implement a camp decommissioning plan addressing:

- safe and orderly vacation of accommodation facilities
- restoration or rehabilitation of camp sites in accordance with applicable environmental requirements and land-use agreements
- proper decommissioning, removal, or handover of temporary infrastructure, utilities, and waste management facilities
- final waste disposal and site clean-up
- resolution of any outstanding community concerns associated with camp operations prior to site handover.

#### **8.11.6. Repatriation of Migrant Workers**

Where migrant workers (domestic or foreign) have been engaged, contractors will be responsible for arranging and funding return transportation to the worker's place of origin or point of recruitment, consistent with recruitment agreements and applicable legislation. Repatriation arrangements will not be contingent on resolution of unrelated disputes, and workers will not be left stranded, undocumented, or without transportation at the end of their employment. Contractors will maintain records confirming repatriation has occurred for each migrant worker demobilized.

#### **8.11.7. Monitoring and Reporting**

Contractors will report demobilization progress, including workforce reduction numbers, final settlement status, outstanding grievances, camp decommissioning status, and repatriation confirmations, to the PMO and PMC as part of regular reporting under Section 8.9, and in a final demobilization closure report submitted upon completion of



workforce release. The PMO and PMC will verify closure of all outstanding labor obligations prior to confirming completion of the contractor's labor management obligations under the contract.



## 9. MONITORING AND REPORTING

### 9.1. Objectives of Monitoring

Monitoring and reporting activities will be undertaken throughout the project implementation period to ensure compliance with this LMP, applicable national labor legislation, OHS requirements, contractual obligations, and the AIIB ESF, including ESS1 on Labor and Working Conditions (which encompasses labor and OHS requirements).

The objectives of monitoring and reporting are to:

- verify compliance of contractors and subcontractors with labor and OHS requirements
- ensure that workers are employed and managed in accordance with applicable legal and project requirements
- identify and address labor-related risks and non-compliances in a timely manner
- monitor implementation of worker welfare, OHS, and GBV/SEA/SH prevention measures;
- ensure proper operation of the Workers' GRM
- support continuous improvement of labor management performance throughout Project implementation.

Monitoring activities will be proportional to the scale and nature of project activities, workforce size, and associated labor risks.

### 9.2. Monitoring Responsibilities

The overall responsibility for monitoring implementation of the LMP will rest with the PMO and associated PMOs, supported by the PMCs.

The responsibilities of the respective parties will include the following:

#### (a) PMO:

- oversee overall implementation of the LMP
- ensure incorporation of labor and OHS requirements into bidding and contract documents
- monitor compliance of contractors and subcontractors with Project labor requirements
- review labor-related reports submitted by contractors and PMCs
- ensure implementation of corrective actions where non-compliances are identified
- monitor operation of the Workers' GRM
- coordinate reporting to AIIB



- maintain records of labor incidents, grievances, inspections, and corrective actions.

(b) PMC

- conduct routine site inspections and compliance monitoring
- verify implementation of contractor labor and OHS obligations
- review contractor documentation, records, and site-specific management plans
- monitor labor camp conditions, worker welfare, and OHS practices
- verify implementation of corrective actions
- report significant non-compliances to the PMO.

(c) Contractors and Subcontractors

- implement all labor management and OHS requirements specified in this LMP and contractual documentation
- maintain labor records and OHS documentation
- conduct internal inspections and toolbox meetings
- promptly address non-compliances and corrective actions
- maintain functioning Workers' GRM
- submit periodic labor and OHS reports to the PMO and PMCs
- ensure compliance of all subcontractors engaged under the project.

(d) Occupational Health and Safety Personnel

Contractors will appoint qualified OHS personnel responsible for:

- implementation of OHS requirements at construction sites
- monitoring workplace safety conditions
- conducting safety briefings and induction training
- recording incidents and near misses
- monitoring use of PPE
- coordinating emergency preparedness and response activities.

### 9.3. Monitoring Activities

Monitoring frequency and intensity will be risk-based, prioritizing activities and site locations associated with risks rated **High** in Table 5, with **Medium**- and **Low**-rated risks monitored on a routine basis consistent with contractor reporting cycles.

Monitoring activities under the project may include:

- routine labor compliance inspections
- occupational health and safety inspections
- worker interviews and consultations
- inspections of labor camps and worker accommodation facilities
- verification of working conditions and worker welfare arrangements



- verification of worker recruitment practices, including compliance with prohibition of recruitment fees, and audits of recruitment agencies/labor brokers engaged by contractors
- verification of worker identity and age verification records
- monitoring implementation of codes of conduct and GBV/SEA/SH prevention measures
- monitoring operation and effectiveness of the Workers' GRM
- review of labor records, payroll records, and worker contracts
- verification of training records and OHS certifications
- review of incident and accident records
- verification of corrective and preventive actions
- audits of contractors and subcontractor compliance with labor management requirements.

The PMO and PMCs may conduct announced or unannounced inspections of construction sites, labor camps, and associated facilities to verify compliance with labor management, OHS, worker welfare, and environmental and social requirements.

## 9.4. Reporting Requirements

Contractors will prepare and submit periodic labor and occupational health and safety reports to the PMO and PMCs. Reporting frequency may be monthly or otherwise specified in contractual documentation.

The reports will include:

- workforce statistics and labor force composition, disaggregated by sex, GAP job category (site labor; professional and technical; administrative and community liaison), Lot and local/non-local status, and reported against the minimums in Section 2.3.1; retention of women at 3 and 6 months; and women paid directly into their own accounts
- local recruitment outreach activities and outcomes
- recruitment agency/labor broker compliance status
- OHS performance indicators
- incidents, accidents, injuries, near misses, and fatalities
- implementation status of corrective actions
- worker training conducted
- labor grievances received and resolved
- GBV/SEA/SH-related awareness activities
- labor camp management status
- compliance status of subcontractors.

Serious incidents, fatalities, dangerous occurrences, major labor disputes, or significant GBV/SEA/SH allegations will be reported immediately to the PMO and in accordance



with applicable project incident notification procedures. Serious incidents and fatalities will also be reported to AIB in accordance with project reporting protocols and applicable ESMP requirements.

The PMO will maintain consolidated records of labor monitoring activities and may incorporate labor management performance into regular environmental and social monitoring reports prepared for the project.

## **9.5. Corrective Actions and Adaptive Management**

Non-compliances identified during inspections, audits, incident investigations, or monitoring activities will be addressed through corrective and preventive actions within agreed timeframes.

Contractors will implement corrective measures promptly and provide evidence of completed actions to the PMO and PMCs.

Where repeated or significant non-compliances are identified, the PMO may require additional corrective measures, increased supervision, suspension of specific activities, or other contractual remedies as appropriate.

Non-compliances identified during inspections, audits, incident investigations, or monitoring activities will be addressed through corrective and preventive actions within agreed timeframes. Contractors will implement corrective measures promptly and provide evidence of actions completed to the PMO and PMCs. Where repeated or significant non-compliances are identified, the PMO may require additional corrective measures, increased supervision, suspension of specific activities, or other contractual remedies as appropriate.

The labor risk register presented in Table 5 will be reviewed and updated periodically, informed by monitoring findings, incident data, contractor performance, and any changes in project scope, workforce composition, or site conditions. Risk ratings will be adjusted as necessary to reflect actual experience during implementation, and updated ratings will inform the focus and frequency of monitoring activities under Section 9.3.

This LMP may be updated during project implementation, if necessary, to reflect:

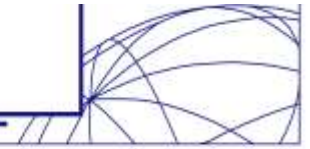
- changes in project scope or activities
- changes in workforce composition
- updated national legislation or regulatory requirements
- lessons learned during implementation
- revised AIB requirements
- emerging labor and occupational health and safety risks.



Any significant revisions to the LMP will be communicated to contractors, subcontractors, workers, and other relevant stakeholders as appropriate.



## Appendices



## Appendix 1. Contractor's Code of Conduct

This Contractor's Code of Conduct will apply to all contractors, subcontractors, suppliers, consultants, and personnel engaged under the Project.

The Contractor acknowledges that compliance with applicable national legislation, AIIB Environmental and Social Framework (ESF), this Labor Management Plan (LMP), Occupational Health and Safety (OHS) requirements, and Environmental and Social Management Plans (ESMP/C-ESMP) is mandatory throughout project implementation.

The Contractor will ensure that all workers are informed of, trained on, and required to comply with this Code of Conduct before commencement of works.

### (1) General Commitments

The Contractor shall:

- Comply with all applicable labor, occupational health and safety, environmental, and social legislation of the Republic of Uzbekistan
- Comply with the requirements of the AIIB Environmental and Social Framework (ESF), including ESS1: Labor and Working Conditions
- Implement the requirements of the Labor Management Plan (LMP), ESMP, C-ESMP, OHS Plans, Traffic Management Plans, and Emergency Response Plans
- Maintain a safe, respectful, inclusive, and non-discriminatory workplace
- Ensure fair treatment of all workers regardless of gender, nationality, ethnicity, religion, disability, social status, or political affiliation
- Prevent child labor, forced labor, trafficking in persons, harassment, intimidation, discrimination, and workplace violence
- Ensure equal employment opportunities and equal pay for equal work
- Respect local communities, customs, traditions, and cultural heritage
- Prevent environmental pollution and minimize disturbance to surrounding communities.

### (2) Occupational Health and Safety

The Contractor shall:

- Provide safe and healthy working conditions for all workers
- Identify workplace hazards and implement mitigation measures
- Ensure mandatory use of appropriate personal protective equipment (PPE)
- Conduct regular safety inductions, toolbox talks, and OHS trainings
- Ensure only trained and authorized personnel operate machinery and equipment
- Provide first aid facilities and trained first aid personnel at all work sites
- Implement emergency preparedness and response procedures



- Maintain incident and accident reporting systems
- Immediately report fatalities, serious incidents, dangerous occurrences, and major accidents to the PMO/PMO and relevant authorities
- Prevent unsafe acts and conditions at construction sites, camps, plants, and storage areas.

### **(3) Labor and Working Conditions**

The Contractor shall:

- Employ workers only under documented employment arrangements
- Pay wages regularly and in accordance with national labor legislation
- Respect legal working hours, overtime limits, leave entitlements, and rest periods
- Prohibit withholding of wages, identity documents, or benefits
- Establish and maintain a worker grievance redress mechanism
- Inform workers of their rights, responsibilities, and grievance procedures
- Ensure that disciplinary actions are lawful, documented, and non-abusive.

### **(4) Prohibition of Child Labor and Forced Labor**

The Contractor shall:

- Prohibit employment of persons below the minimum legal working age established under national legislation
- Verify workers' ages prior to recruitment through official documentation
- Prohibit forced labor, bonded labor, trafficked labor, or involuntary prison labor
- Prohibit retention of workers' identity documents
- Ensure workers are free to terminate employment in accordance with labor contracts and legislation.

### **(5) Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH)**

The Contractor shall maintain zero tolerance toward GBV/SEA/SH. The Contractor and all personnel shall:

- Treat women, men, and children with dignity and respect
- Refrain from any form of sexual harassment, exploitation, abuse, intimidation, or humiliating conduct
- Not engage in sexual activity with persons under 18 years of age regardless of local consent laws
- Not exchange money, employment, goods, or services for sexual favors
- Not engage in inappropriate physical contact, sexually suggestive language, gestures, or behavior
- Not engage in harassment through digital communication or social media



- Immediately report suspected GBV/SEA/SH incidents through confidential reporting channels
- Maintain confidentiality and survivor-centered approaches when handling complaints.

The Contractor shall ensure that:

- all workers receive mandatory GBV/SEA/SH training
- separate sanitary and welfare facilities are available for female workers where feasible
- women workers have equal access to grievance mechanisms and employment opportunities
- retaliation against complainants is strictly prohibited.

#### **(6) Worker Accommodation and Welfare**

Where worker camps or accommodation facilities are established, the Contractor shall ensure:

- adequate sleeping space and ventilation
- safe drinking water supply
- sanitation and hygiene facilities
- separate facilities for women where appropriate
- waste management and wastewater disposal
- fire safety equipment and emergency access
- medical assistance availability
- security arrangements respectful of workers' rights.

#### **(7) Community Relations**

The Contractor and workers shall:

- Respect local communities and avoid conflict with residents
- Avoid nuisance behavior, including excessive noise, disorderly conduct, and harassment
- Follow approved traffic and access arrangements
- Not enter private property without authorization
- Not engage in illegal hunting, fishing, wildlife collection, or damage to vegetation
- Respect local religious, social, and cultural norms.

#### **(8) Alcohol and Drug Policy**

Workers shall:

- Not consume alcohol during working hours



- Not report to work under the influence of alcohol or narcotic substances
- Not possess, distribute, or use illegal drugs at project sites or camps.

#### **(9) Reporting Obligations**

The Contractor shall:

- Maintain records of labor management, training, grievances, inspections, incidents, and corrective actions
- Submit periodic labor and OHS reports to the PMO/PMO
- Cooperate with audits, inspections, and monitoring activities conducted by the PMO/PMO, PMCs, AIB, and regulatory authorities.

#### **(10) Non-Compliance and Corrective Actions**

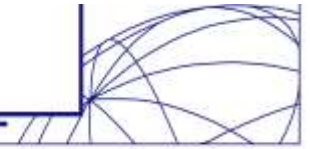
Failure to comply with this Code of Conduct may result in:

- verbal or written warning
- mandatory retraining
- suspension from work
- termination of employment or contract
- removal from project sites
- referral to law enforcement authorities where required.

#### **(11) Contractor Declaration**

The Contractor confirms commitment to implementing this Code of Conduct and ensuring compliance by all personnel, subcontractors, and suppliers engaged under the project.

|                           |  |
|---------------------------|--|
| Contractor Name           |  |
| Authorized Representative |  |
| Position                  |  |
| Signature                 |  |
| Date                      |  |



## Appendix 2. Individual Worker Code of Conduct

I, \_\_\_\_\_, acknowledge that compliance with this Code of Conduct is a condition of my employment under the project.

I understand that failure to comply with this Code may result in disciplinary action, dismissal, or referral to relevant authorities.

While working on the project, I agree that I will:

### (1) Occupational Health and Safety

- Wear required personal protective equipment (PPE) at all times
- Follow all workplace safety instructions and procedures
- Participate in mandatory OHS training and toolbox talks
- Report unsafe conditions, near misses, incidents, and accidents immediately
- Operate only equipment for which I am trained and authorized
- Avoid reckless or unsafe behavior.

### (2) Respectful Workplace Conduct

I will:

- Treat all persons with dignity and respect
- Not discriminate against any person based on gender, nationality, ethnicity, religion, disability, age, or social status
- Not engage in intimidation, bullying, harassment, violence, or abusive behavior
- Respect local communities, traditions, and cultural practices.

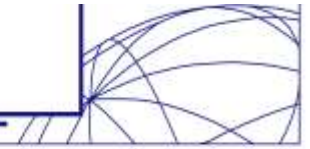
### (3) Prohibition of GBV/SEA/SH

I understand that all forms of GBV/SEA/SH are prohibited.

I will not:

- Engage in sexual harassment or inappropriate sexual behavior
- Use sexually offensive language, gestures, or comments
- Request sexual favors in exchange for employment or benefits
- Engage in sexual activity with persons under 18 years of age
- Engage in exploitative relationships with community members
- Share inappropriate images, videos, or digital content
- Retaliate against any person reporting complaints.

I understand that suspected or actual GBV/SEA/SH incidents must be reported through designated grievance channels.



#### **(4) Child Labor and Forced Labor**

I will:

- Not employing or engaging children in project activities
- Not participating in forced labor practices
- Immediately report suspected child labor or forced labor.

#### **(5) Alcohol and Drugs**

I will:

- Not report to work under the influence of alcohol or drugs
- Not possessing or using illegal substances at project sites or camps.

#### **(6) Environmental Protection and Community Safety**

I will:

- Avoid environmental pollution and unnecessary damage
- Properly dispose of waste
- Follow traffic and community safety requirements
- Respect private property and local residents
- Not engage in illegal hunting, fishing, or wildlife disturbance.

#### **(7) Grievance and Reporting Obligations**

I understand that:

- I may submit grievances through the Worker Grievance Redress Mechanism
- grievances may be submitted confidentially or anonymously
- retaliation against complainants is prohibited.

I agree to report:

- unsafe conditions
- workplace incidents
- misconduct
- GBV/SEA/SH concerns
- violations of this Code of Conduct.

#### **(8) Disciplinary Measures**

I understand that violation of this Code of Conduct may result in verbal warning, written warning, retraining, suspension, dismissal from employment, referral to law enforcement authorities.



## (9) Worker Declaration

☐ I confirm that:

- ☐ I have read and understood this Code of Conduct;
- ☐ I understand my responsibilities;
- ☐ I agree to comply with all requirements stated herein.

|                     |  |
|---------------------|--|
| Worker Name         |  |
| Position            |  |
| Employer/Contractor |  |
| Signature           |  |
| Date                |  |



## Appendix 3. Worker Grievance Form

### (1) Information on Complainant (if not anonymous)

|               |  |
|---------------|--|
| Full Name     |  |
| Address       |  |
| Contact phone |  |
| Gender        |  |
| Age           |  |

### (2) Type of Grievance

|                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>2.1. Labor and Employment:</b><br><input type="checkbox"/> Recruitment or hiring practices<br><input type="checkbox"/> Wages or salary payments<br><input type="checkbox"/> Working hours or overtime<br><input type="checkbox"/> Leave or rest periods<br><input type="checkbox"/> Discrimination or unequal treatment<br><input type="checkbox"/> Unfair disciplinary action<br><input type="checkbox"/> Termination of employment | <b>2.2. Occupational Health and Safety (OHS)</b><br><input type="checkbox"/> Unsafe working conditions<br><input type="checkbox"/> Lack of PPE<br><input type="checkbox"/> Workplace accident or injury<br><input type="checkbox"/> Unsafe machinery or equipment<br><input type="checkbox"/> Traffic or transportation safety |
| <b>2.3. Worker Welfare and Accommodation</b><br><input type="checkbox"/> Camp conditions<br><input type="checkbox"/> Food or drinking water<br><input type="checkbox"/> Sanitation or hygiene<br><input type="checkbox"/> Medical assistance<br><input type="checkbox"/> Worker transportation                                                                                                                                          | <b>2.4. Conduct and Behavior</b><br><input type="checkbox"/> Harassment or intimidation<br><input type="checkbox"/> Workplace violence<br><input type="checkbox"/> Alcohol or drug-related behavior<br><input type="checkbox"/> Abuse of authority                                                                             |
| <b>2.5. GBV / SEA / SH Related</b><br><input type="checkbox"/> Sexual harassment<br><input type="checkbox"/> Sexual exploitation or abuse<br><input type="checkbox"/> Gender-based violence<br><input type="checkbox"/> Confidential complaint                                                                                                                                                                                          | <b>2.6. Other</b><br><input type="checkbox"/> Other (please specify): _____                                                                                                                                                                                                                                                    |

### (3) Grievance Relation to the Project

|                     |                                                                                                                                                                                                                                                                           |
|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contract No.        |                                                                                                                                                                                                                                                                           |
| Package/ Lot No.    |                                                                                                                                                                                                                                                                           |
| Contractor          |                                                                                                                                                                                                                                                                           |
| Subcontractor       |                                                                                                                                                                                                                                                                           |
| District            | <input type="checkbox"/> Kyzyltepa (Navoi Province) <input type="checkbox"/> Gijduvon <input type="checkbox"/> Vobkent <input type="checkbox"/> Bukhara <input type="checkbox"/> Jondor <input type="checkbox"/> Karakul <input type="checkbox"/> Alat (Bukhara Province) |
| Work Site/ Makhalla |                                                                                                                                                                                                                                                                           |
| Date of Submission  |                                                                                                                                                                                                                                                                           |
| Grievance No.       |                                                                                                                                                                                                                                                                           |



#### (4) Description of the Grievance

|                                       |                                                                                                                                                                                                                                                                                                     |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| What happened?                        |                                                                                                                                                                                                                                                                                                     |
| Date of the incident?                 |                                                                                                                                                                                                                                                                                                     |
| What is the location of the incident? |                                                                                                                                                                                                                                                                                                     |
| Any persons involved in the incident? |                                                                                                                                                                                                                                                                                                     |
| Issue has been previously reported?   |                                                                                                                                                                                                                                                                                                     |
| Supporting Information                | Please indicate whether supporting documents or evidence are attached:<br><input type="checkbox"/> Photographs<br><input type="checkbox"/> Medical documents<br><input type="checkbox"/> Witness statements<br><input type="checkbox"/> Employment records<br><input type="checkbox"/> Other: _____ |
| Other details                         |                                                                                                                                                                                                                                                                                                     |

#### (5) Action Required

|                                          |  |
|------------------------------------------|--|
| Immediate action required                |  |
| Long term action required (if necessary) |  |

#### (6) Confidentiality Request

- ☐ I request that my complaint and personal information remain confidential.
- ☐ I understand that anonymous complaints will also be accepted and reviewed.

#### (7) Signature

|                              |  |
|------------------------------|--|
| Name                         |  |
| Signature (if not anonymous) |  |
| Date                         |  |

#### (8) Registration Information

|                            |                                                                                                                                                                          |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Grievance Registration No. |                                                                                                                                                                          |
| Date Received              |                                                                                                                                                                          |
| Received By                |                                                                                                                                                                          |
| Position                   |                                                                                                                                                                          |
| Method of Submission       | <input type="checkbox"/> Verbal <input type="checkbox"/> Written <input type="checkbox"/> Email <input type="checkbox"/> Hotline <input type="checkbox"/> Suggestion Box |



## Appendix 4. Grievance Log

| # | Status | Details of Grievance |      |             |                                |                 | Grievance Resolution |               |
|---|--------|----------------------|------|-------------|--------------------------------|-----------------|----------------------|---------------|
|   |        | Name                 | Date | Description | Method of grievance submission | Contact details | Actions proposed     | Actions Taken |
|   |        |                      |      |             |                                |                 |                      |               |
|   |        |                      |      |             |                                |                 |                      |               |
|   |        |                      |      |             |                                |                 |                      |               |



## Appendix 5. Incident Notification and Reporting Form

### (1) Incident Relation to the Project

|                     |                                                                                                                                                                                                                                                                           |
|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contract No.        |                                                                                                                                                                                                                                                                           |
| Package/ Lot No.    |                                                                                                                                                                                                                                                                           |
| Contractor          |                                                                                                                                                                                                                                                                           |
| Subcontractor       |                                                                                                                                                                                                                                                                           |
| District            | <input type="checkbox"/> Kyzyltepa (Navoi Province) <input type="checkbox"/> Gijduvon <input type="checkbox"/> Vobkent <input type="checkbox"/> Bukhara <input type="checkbox"/> Jondor <input type="checkbox"/> Karakul <input type="checkbox"/> Alat (Bukhara Province) |
| Work Site/ Makhalla |                                                                                                                                                                                                                                                                           |
| Date of Report      |                                                                                                                                                                                                                                                                           |
| Incident No.        |                                                                                                                                                                                                                                                                           |

### (2) Basic Incident Information

|                       |  |
|-----------------------|--|
| Date of Incident      |  |
| Time of Incident      |  |
| Reported By           |  |
| Position/Organization |  |
| Contact Information   |  |

### (3) Type of Incident

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Occupational Health and Safety (OHS)</b><br><input type="checkbox"/> Fatality<br><input type="checkbox"/> Lost Time Injury (LTI)<br><input type="checkbox"/> Medical Treatment Injury<br><input type="checkbox"/> First Aid Case<br><input type="checkbox"/> Near Miss<br><input type="checkbox"/> Dangerous Occurrence<br><input type="checkbox"/> Fire or Explosion<br><input type="checkbox"/> Traffic Accident<br><input type="checkbox"/> Equipment Failure<br><input type="checkbox"/> Electrical Incident<br><input type="checkbox"/> Excavation / Collapse Incident | <b>Environmental</b><br><input type="checkbox"/> Fuel / Oil Spill<br><input type="checkbox"/> Hazardous Material Release<br><input type="checkbox"/> Air Pollution Event<br><input type="checkbox"/> Water Pollution Event<br><input type="checkbox"/> Improper Waste Disposal<br><input type="checkbox"/> Damage to Vegetation or Wildlife |
| <b>Social / Community</b><br><input type="checkbox"/> Community Health and Safety Incident<br><input type="checkbox"/> Damage to Private Property<br><input type="checkbox"/> Traffic Safety Incident Affecting Community<br><input type="checkbox"/> Community Conflict or Disturbance                                                                                                                                                                                                                                                                                        | <b>Labor and Conduct</b><br><input type="checkbox"/> Worker Misconduct<br><input type="checkbox"/> Violence or Physical Assault<br><input type="checkbox"/> Alcohol or Drug-Related Incident<br><input type="checkbox"/> Child Labor<br><input type="checkbox"/> Forced Labor                                                               |
| <b>GBV / SEA / SH Related</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Other</b>                                                                                                                                                                                                                                                                                                                                |



|                                                                                                                                                                                                                     |                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| <input type="checkbox"/> Sexual Harassment<br><input type="checkbox"/> Sexual Exploitation or Abuse<br><input type="checkbox"/> Gender-Based Violence<br><input type="checkbox"/> Confidential / Sensitive Incident | <input type="checkbox"/> Other (please specify): _____ |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|

#### (4) Severity Classification

|                            |                          |
|----------------------------|--------------------------|
| Minor Incident             | <input type="checkbox"/> |
| Moderate Incident          | <input type="checkbox"/> |
| Serious Incident           | <input type="checkbox"/> |
| Severe Incident / Fatality | <input type="checkbox"/> |

#### (5) Description of Incident

Please provide a detailed description including:

- what happened
- sequence of events
- persons involved
- equipment/materials involved
- immediate consequences.

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#### (6) Persons Affected

| Category                   | Number | Description |
|----------------------------|--------|-------------|
| Workers Injured            |        |             |
| Fatalities                 |        |             |
| Community Members Affected |        |             |
| Visitors/Third Parties     |        |             |

#### (7) Immediate Actions Taken

|                                                                                                                                                                                        |                                                                                                                                            |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Work stopped<br><input type="checkbox"/> Area secured<br><input type="checkbox"/> First aid provided<br><input type="checkbox"/> Emergency services contacted | <input type="checkbox"/> Spill contained<br><input type="checkbox"/> Evacuation conducted<br><input type="checkbox"/> Authorities notified |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|



**Details:**

**(8) Notification Requirements**

| Entity Notified            | Date / Time |
|----------------------------|-------------|
| Contractor Management      |             |
| PMC                        |             |
| PMO                        |             |
| Emergency Services         |             |
| Labor Inspectorate         |             |
| Environmental Authorities  |             |
| Police / Local Authorities |             |
| AlIB (if applicable)       |             |