

GURUGRAM METRO RAIL PROJECT

Sustainable Multimodal and Resilient Transport for Haryana



Labour Management Procedure

Metro Connectivity from Millennium City Centre to Cyber City

June 2026



Swift Safe and Sustainable

GURUGRAM METRO RAIL LIMITED

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List of Acronyms

CAP	Corrective Action Plan
C-ESMP	Contractor's ESMP
CHS	Community Health and Safety Plan
CoC	Code of Conduct
DA	Dissolved acetylene
DDC	Detailed Design Consultant
DG	Diesel Generator
DoPT	Department of Personnel and Training
E&S	Environmental & Social
EHS	Environment, Health & Safety
ESCP	Environmental & Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESHS	Environment, Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESMU	Environmental and Social Management Unit
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GC	General Consultants
GM	Grievance Mechanism
GMRL	Gurugram Metro Rail Limited
GMRP	Gurugram Metro Rail Project
GoH	Government of Haryana
GoI	Government of India
GRC	Governance, Risk, and Compliance
HT	High Tension
LMP	Labour Management Procedure
LPG	Liquefied Petroleum Gas
LT	Low Tension
MCC	Millennium City Centre
MD	Managing Director
NOC	No Objection Certificate
NPSHEW	National Policy on Safety, Health, and Environment at Workplace
OHS	Occupational, Health and Safety
PCBs	Polychlorinated Biphenyls
PMC	Project Management Consultancy
POSH	Prevention of Sexual Harassment
PPE	Personal Protective Equipment
PWD	Persons with Disabilities
QCBS	Quality and Cost-Based Selection
QPR	Quarterly Progress Report
RCA	Root Cause Analysis
SC	Scheduled Castes
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SoP	Standard Operating Procedures
ST	Scheduled Tribes
TA	Technical Assistance
TLs	Transmission Lines
TOD	Transit-Oriented Development
VOCs	Volatile Organic Compounds
WB	World Bank
WBG	World Bank Group

1 Labour Management Procedure

1.1 Background

Gurugram city is known as the "Millennium City" due to its remarkable shift from an agricultural region to a major financial and industrial hub in India. This transformation has seen the rise of multinational corporations, IT firms, business centres, and towering skyscrapers, making Gurugram a significant driver of India's economy. The city's rapid growth can be attributed to extensive urbanisation and robust economic development owing to its strategic location proximal to New Delhi and its airport, in the National Capital Region (NCR).

Gurugram has been improving its transportation infrastructure, but with urban mobility needs evolving, there's a demand for an efficient Mass Rapid Transit System (MRTS). Gurugram Metro Rail Limited (GMRL) intends to utilize financial support from the World Bank (WB) for the Sustainable Multimodal and Resilient Transport for Haryana (SMART-H, PHASE 1). The initial phase focuses on enhancing urban public transport in major cities, beginning with the Gurugram Metro Rail Project (GMRP), which will connect Millennium City Centre (MCC) station to Cyber City station.

The Labour Management Procedure (LMP) has been prepared in accordance with the WB Environmental and Social Framework (ESF).

1.2 Project Objective

To enhance accessibility across the Gurugram Metropolitan Area by developing an efficient, seamless and integrated multimodal public transport system under the GMRP.

1.3 Project Components

The GMRP consists of approximately 29.05 km of elevated metro line in Gurugram, with 27 metro stations, a depot, rolling stock, and electric, telecommunication, signalling, and control systems, including Multimodal integration with first- and last- mile connectivity for the stations.

1.4 Project Corridor

The GMRP corridor is 29.05 km in length and has 27 elevated stations. The primary corridor, spanning 27.20 km from MCC to Cyber City, includes 26 stations. A spur of 1.85 km is proposed to connect Dwarka Expressway from Basai Village with a single station. The GMRP corridor details are provided in **Table 1-1** and the location Map of the project area is shown in **Figure 2-1**.

Table 1-1: Project Corridor

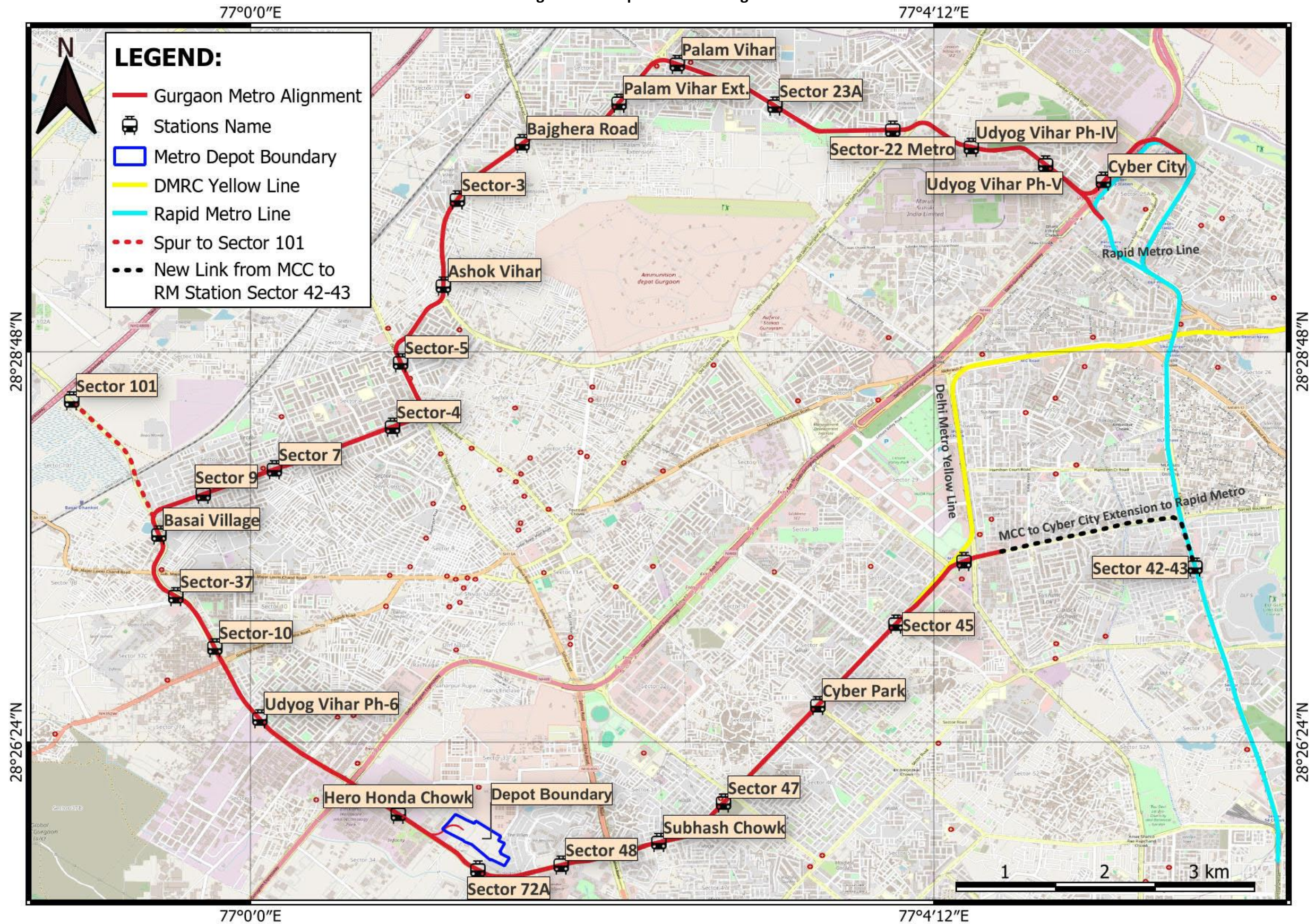
S. No.	Route	Length in Kms	No. of Stations
1	MCC – Cyber City	27.20	26
2	Spur from Basai Village to Dwarka Expressway	1.85	1
Total		29.05	27

2 Objectives of Labour Management Procedure (LMP)

The objectives of LMP are as follows:

- To promote occupational health and safety at the workplace.
- To promote fair treatment, non-discrimination and equal opportunity for all project workers.
- To protect the rights of project workers, including vulnerable workers such as women, persons with disabilities (PWD), children and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labour and child labour.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national laws and regulations.
- To provide project workers with accessible means to raise workplace concerns and grievances.

Figure 2-1: Proposed Metro Alignment



3 Overview of Labour Use on the Project

The LMP applies to all project workers, including those employed on a full-time, part-time, temporary, seasonal or migrant workers. The LMP applies to the project in the following manner:

- i. **Direct Workers:** People employed or engaged directly by GMRL, including government officials or officers from other agencies/departments who are deputed specifically for project-related activities.
- ii. **Contracted Workers:** People employed or engaged by contractors, General Consultants (GC), Resettlement Action Plan (RAP) implementation support agencies, External consultants, etc., hired to perform works related to the core functions of the project, regardless of their work location.
- iii. **Primary Supply Workers:** Workers engaged by primary suppliers that are engaged by GMRL to provide goods or materials essential for the project's core functions.

3.1 Number of Workers

The estimated number of workers required for the GMRP is presented in **Table 3-1**.

Table 3-1: Estimate of Project Workers (Tentative)*

S. No.	Type of Project Workers	Requirement in Number
1	Direct Workers	40
2	Contracted Workers	
2 (a)	Detailed Design Consultant (DDC) and GC	100
2 (b)	Third Party Audit, Quality and Safety Audit, Independent Monitoring Consultants etc.	10
2 (c)	Construction workers	1200
3	Primary Supply Workers	200
Total		1550

**These numbers are tentative and may increase or decrease throughout the project lifecycle.*

3.2 Characteristics of Project Workers

The Project's workforce will include direct workers (employed directly by GMRL), contracted workers (recruited by third parties such as contractors or consultants), and primary supply workers. The engagement of community workers is not anticipated under GMRP considering the high-risk project requiring skilled and specialized labour. The following section provides a detailed description of the types and estimated number of workers to be engaged throughout the project lifecycle.

- 1. Direct Workers:** Under the GMRP, direct workers refer to individuals employed directly by GMRL. These employees are responsible for managing and supervising the overall implementation of the project, including supervision of construction activities carried out by contractors. The number of direct workers is expected to vary across different phases of the project, from preparation to completion.

- 2. Contracted Workers:** As GMRL may not possess the full range of technical expertise required to manage the entire project independently, and requires support from consultants in specific technical areas such as project management and coordination, financial management, procurement, construction, environmental and social experts, monitoring and evaluation, among others. To implement various components of the project, GMRL has engaged DDC, GC, contractors, Independent Monitoring Consultants, and other relevant entities.

The labour requirements will vary depending on the scope and scale of individual civil works within each construction package. Furthermore, the timing and labour requirements will fluctuate depending on the construction phase. The different categories of anticipated contracted workers are outlined below.

- **Skilled permanent staff of contractors:** The contractor's technical staff will be engaged in GMRP, including key personnel such as project managers, project engineers, environmental engineers, construction foremen, medical officers, administrative officer, finance officers and other team members.
- **Skilled and unskilled workers engaged by contractors:** Depending on the available in-house expertise and other operational factors, the contractor may engage sub-contractors to carry out specific technical works. These may include operating heavy machinery for activities such as hauling, soil compaction (road roller), sand or quarry material loading, and grading or /excavation. Wherever feasible, such sub-contractors may be sourced locally.
- **DDC, GC, Consultants for Technical Assistance, etc:** A DDC has been engaged to prepare the designs for elevated stations and viaduct superstructures. Also, GC has been engaged by GMRL to provide day-to-day construction supervision for civil works. The GC team consists of national experts, including specialists in Planning & Coordination, Structural Design, Quality Assurance, Quality Control, Construction Safety, Signal Train, Telecom, Traction and Power Supply, Track, Rolling Stock, Geospatial Technology, Quantity and Cost Estimation, Environmental, Social, Environment Health and Safety (EHS), etc. The procurement process for the consultant team will start during the project preparation phase, with the consultants expected to be onboard in the early stages of project implementation. The GC will support GMRL throughout the implementation period, until the completion of civil works. TA consultants and other specialists will also be engaged to carry out studies for GMRP.
- **Independent Monitoring Consultants:** Independent Monitoring Consultants will be engaged by GMRL to monitor the implementation of environmental and social aspects of the project. The consultants shall be responsible for ensuring compliance with the approved plans and programs related to environmental and social issues. The consultants will be engaged during the construction (Four Years) and operation (One Year) phases and will review that all resettlement/environmental activities have been satisfactorily completed.

- 3. Primary Supply Workers:** The GMRL will procure essential goods, including rolling stock and signalling systems for the operation of the GMRP. These materials will be sourced directly from primary suppliers on an ongoing basis. Workers engaged by these suppliers are classified as "primary supply workers," as defined in WB Environmental and Social Standard 2 (ESS2).

3.3 Workers Requirements and Timing

The project is expected to require an estimated workforce of approximately 1550 personnel, comprising around 40 direct employees of GMRL, 1,310 contracted workers including 1,200 construction labourers/workers and consultants, 100 experts from GC and DDC teams, and 10 personnel for quality assurance, safety audits, and independent monitoring consultants. Additionally, 200 primary supply workers are also expected to be engaged. These workforce numbers are indicative and may increase or decrease depending on the construction progress and the awarding of other consultancy assignments. A detailed breakdown of the estimated workforce by category is provided in the **Table 3-2**.

Table 3-2: Workers Requirement under Different Categories

Type of Project Workers	Characteristics of Project Workers	Timing of Labour Requirements	Indicative Number of Workers
Direct Workers GMRL	Staff and Advisors	From Project Preparation till Project Completion and its operation	GMRL staff: approximately 40 Total: 40
Contracted Workers - DDC and GC - Audit, Quality and Safety Audit, Independent Monitoring Consultants - Construction Workers	- National experts - Technical staff - Local Workers	- From early stage of project design, project construction and operation - The labour requirement will fluctuate, depending upon the construction stages, which will be determined by individual contractors at the contract award stage.	- DDC and GC: approximately 100 - Audit, Quality and Safety Audit, Independent Monitoring Consultants: Approximately 10 - Construction workers: approximately 1200 Total: 1310
Primary supply workers Workers engaged by primary suppliers.	Technical Staff.	Construction and operation stage of the project.	The primary supply workers will be identified during the project implementation stage: approximately 200.

Type of Project Workers	Characteristics of Project Workers	Timing of Labour Requirements	Indicative Number of Workers
			Total: 200
Community workers	Not Applicable	Not Applicable	Not Applicable

4 Assessment of Key Potential Labour Risks Activities

4.1 Project Activities

The major components of the project include the construction of metro structures, track laying work, station facilities, maintenance and operations yards and buildings, ventilation systems, hot mix plants, concrete batching plants and specialised systems such as electrification, traction power, communications and signalling equipment. For the selected sections, construction activities will commence simultaneously at different locations along the corridor, with various project elements being developed in parallel. During the peak construction phase, simultaneous works will be carried out at several station sites to ensure timely project execution.

4.2 Key Labour Risks

- 1. Child Labour Risks:** Child labour shall be strictly prohibited at the construction site of the proposed project. To ensure adherence to this mandate, all workers will be required to provide legally recognised documents as proof of age, such as Aadhaar Card, Birth Certificate, Voter ID Card, or 10th Grade Marksheet/Certificate. Relevant provisions related to the minimum age requirement for labour engagement will be clearly specified in the contractor's contract and bidding documents. These provisions will form a basis for monitoring compliance with Environmental & Social (E&S) safeguards throughout the implementation of the GMRP.
- 2. Risks due to Labour influx:** It is anticipated that migrant workers may be required during project implementation, although a large influx of labour is not expected due to the availability of local labour. However, cultural differences may lead to conflicts between local and migrant workers at construction sites and worker camps. Additionally, the presence of male migrant workers may pose risks of gender-based violence (GBV) and sexual harassment (SH), potentially affecting the mental well-being and personal freedom of female workers.
- 3. Risks of Labour Disputes:** Labour disputes may arise at metro construction sites due to various factors, including limited employment opportunities, wage disparities, delayed payments, disagreements over working conditions, contractual issues, union activities, health and safety concerns, etc. In some cases, contractors and subcontractors may retaliate against workers for voicing concerns about safety and grievances or demanding better working conditions, which can escalate tensions and potentially lead to labour unrest.

4. **Discrimination and exclusion of vulnerable/disadvantaged groups:** Vulnerable and disadvantaged groups, including women and PWD, may face an increased risk of exclusion from employment opportunities during both the construction and operational phases of the project.
5. **GBV:** Construction workers are predominantly younger males, many of whom are away from their families and outside their usual social environment. This separation may contribute to inappropriate or criminal behaviour, including SH of women and girls, exploitative sexual relationships and illicit sexual relations with minors from the local community.
6. **Occupational Health and Safety Risks**
 - Hazard assessment will be undertaken to identify High Energy Hazards & critical controls for the same will be implemented to prevent incidents
 - **Health risks:** Health risks may arise from working in a polluted environment with high dust concentrations generated by construction activities such as site clearance, soil excavation, levelling, machine operation and material transportation.
 - **Collapse of nearby structures:** Excavation and demolition activities can damage the foundations of nearby existing structures, potentially leading to structural collapse and causing serious injuries to workers.
 - **Risks of falling from high levels:** Workers may fall from heights due to improperly installed scaffolding, unsecured ladders and unprotected steel bars during construction of metro facilities, which may lead to labour accidents.
 - **Risks of falling objects:** Workers working below under construction metro facilities may be injured by hard objects, including massive concrete structures falling from heights.
 - **Fire and other risks:** During metro operations, several risks may arise, including fire and explosion hazards, accidents, power substation failures, stampedes at platforms or station entry and /exit points.
 - **Risks due to heavy machinery.** The construction of metro facilities requires the use of heavy machinery; however, its movement poses a risk of injury to nearby workers if they are struck or hit.
 - **Risks due to Fatigue:** During both the construction and operational phases of the metro project, workers may be required to work irregular or extended hours, potentially leading to fatigue. Such fatigue can impair concentration, reduce alertness, and negatively affect performance in safety-critical tasks. This poses a significant safety risk not only to the workforce but also to the general public.
 - **Risks due to Signalling, Telecommunication and Electrical Systems:** Installation, testing, operation and maintenance of signalling, telecommunication and electrical systems may expose workers to electrical hazards such as electric shock, arc flash, electrocution and burns. Equipment malfunction or system failure may also disrupt train operations, increasing the risk of operational incidents. These hazards may pose

significant health and safety risks to workers, passengers and the public if not properly managed.

- **Risks during maintenance of metro:** These hazards include physical risks from moving equipment and machinery, chemical exposure to hazardous substances such as asbestos, PCBs, and VOCs, risks of fire or explosion during hot work, biological exposure from sewage systems, and confined space entry risks during the maintenance of tanks and compartments. These factors may pose significant health and safety risks to maintenance personnel if not properly managed.
- **Risks due to derailment of metro train:** Metro train derailments pose significant risks to both passengers and staff, including physical injuries and fatalities.
- **High Energy Hazards:**
 - a. **Risks of Fire and Explosion:** During construction, welding activities can generate sparks that may ignite nearby flammable materials such as fuels and gases, leading to fires or explosions with serious consequences for both workers and surrounding communities. In the operational stage, the risk of fires at stations and depot locations may also arise, which could affect employees, passengers and nearby communities.
 - b. **Electrical Hazards:** During construction, workers may be exposed to live electricity while testing TLs, substations or using electrical power for soldering, which can result in serious injuries or fatalities due to electric shock.
During metro operation, electrical accidents may happen due to the following reasons:
 - Live mains: Low Tension or High Tension (LT or HT),
 - Overhead power lines,
 - Parts which have become live due to leakage either because of low insulation resistance of the electrical windings, high earth resistance or discontinuity of the earthing leads.
 - Areas that develop a high potential gradient, such as near an earth electrode where fault currents flow, are insufficient to trip circuit breakers or blow fuses.
The impact associated with electricity includes electric shocks or burns, whether minor, major or fatal, affecting both metro personnel and others.
 - c. **Possible risks due to depot:** Depot operations involve various potential risks, such as handling heavy parts, the possibility of collisions, trips or falls into maintenance pits, electrical hazards, and slips on oily floors. Additionally, improper waste management can lead to safety risks, environmental pollution and operational inefficiencies.
 - d. **Risks due to birds:** Bird presence at metro lines and maintenance depots can lead to safety hazards, equipment damage, electrical malfunctions, health hazards, and increased maintenance costs due to collisions, droppings and nesting activities.
 - e. **Risks due to storage of Gas/ Liquefied petroleum gas (LPG):** During construction, workers may face significant risks of serious injury due to the storage of GAS/LPG

cylinders, particularly from potential explosions caused by gas leaks or damage to cylinders.

- f. Risks Associated with Iron Cutting and Soldering:** Workers engaged in cutting iron and soldering without proper personal protective equipment (PPE), such as face shields, gloves, safety glasses, and high-top boots, may be at significant risk of serious injuries. The absence of high-top boots increases the risk of electric shock, while the lack of gloves can lead to injury to the wrists and forearms from heat, sparks, molten metal, and radiation.

7. Other Occupational Risks:

- Workers exposed to noise generated by heavy machinery may be at risk of developing occupational diseases such as hearing loss.
- Risks due to lack of full height fences, barriers, or barricades around the construction site.
- Obstructions caused by vehicles parked in no-parking zones.
- Use of vehicles, machinery and other equipment without valid fitness certificates.
- Safety issues, including injuries or fatalities, due to lack of PPE and inadequate safety measures.
- Exposure to mental or physical harassment, including Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH).
- Health risks related to HIV/AIDS and other sexually transmitted diseases among labourers.
- Risk of contamination during infectious disease outbreaks if proper and frequent hygiene practices are not maintained.

Labour risk mitigation and Occupational, Health and Safety (OHS) management for contracted workers and related issues during construction works will be the direct responsibility of contractors. Therefore, ensuring effective management of the OHS plan for contracted workers by the contractor is essential to the successful implementation of the LMP by GMRL.

The Environment, Social, Health and Safety (ESHS) requirements under GMRL will be included as special conditions and performance requirements in all bid documents of contract packages. Cost provisions for implementation of ESHS requirements will be integrated into item rates to enable contractors to fulfil these requirements. In addition, during bid preparation, GMRL will assess the need for a specific E&S Performance Security to ensure compliance with the measures outlined in the LMP, ESHS guidelines and contractual obligations. This will ensure that potential bidders are fully aware of ESHS performance requirements and can accordingly incorporate them into their bids.

5 Brief Overview of Labour Legislation: Terms and Conditions

The Labour Conventions ratified by India are summarised in **Table 5-1**, while the labour-related regulations currently in force and applicable are presented in **Table 5-2**.

Table 5-1: International Labour Law Convention

S. No.	International Labour Law Convention	Stipulation/ Terms and Conditions	Relevance
1	Forced Labour Convention, 1930 (No. 29),	Prohibits all forms of forced or compulsory labour, which is defined as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.” The convention also requires that the illegal extraction of forced or compulsory labour is punishable as a penal offence and that ratifying states ensure that the relevant penalties imposed by law are adequate and strictly enforced.	Relevant to ensuring that all workers, including contract labourers, are engaged voluntarily and are not subject to coercion or threats during construction and operations.
2	Abolition of Forced Labour Convention, 1957 (No. 105),	Prohibits forced or compulsory labour as a means of political coercion or education or as a punishment for holding or expressing political views or views ideologically opposed to the established political, social, or economic system; as a method of mobilizing and using labour for economic development; as a means of labour discipline; as a punishment for having participated in strikes; and as a means of racial, social, national, or religious discrimination.	Applicable to prevent misuse of labour for disciplinary purposes or any form of discrimination. GMRP contractors must adhere strictly to voluntary labour engagement.
3	Equal Remuneration Convention, 1951 (No. 100)	Lays out the principles for equal remuneration for work of equal value and addresses gender discrimination.	Maintaining wage equity, especially for women workers or differently abled persons involved in the GMRP’s construction or support services.
4	Discrimination (Employment and Occupation) Convention, 1958 (No. 111),	Prohibits all discrimination and exclusion on any basis, including race or colour, sex, religion, political opinion, national or social origin in employment and repeals legislation that is not based on equal opportunities.	To promote fair hiring practices, especially among subcontractors and ensure an inclusive work environment across the GMRP workforce.
5	Minimum Age Convention, 1973 (No. 138)	To ensure the effective abolition of child labour and to progressively increase the minimum age for admission to employment or work. India has ratified this convention with a minimum age of 14 years.	Applicable to prevent child labour on construction sites and among subcontractors working on the project.

S. No.	International Labour Law Convention	Stipulation/ Terms and Conditions	Relevance
			Contractor compliance is mandatory.
6	Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999 (No. 182).	Prohibition and elimination of the worst forms of child labour, including slavery, forced labour and trafficking in human beings. It prohibits the use of children in armed conflicts, prostitution and pornography, illegal activities such as drug trafficking and dangerous work.	Relevant for ensuring strict prohibition of hazardous child labour in any aspect of the GMRP, including material handling, site operations, or auxiliary services.

Table 5-2: Applicable Labour Regulations

S. No.	Gol Regulations/Guidelines/ Orders	Stipulations/ Terms and Conditions
1	The Building and Other Construction Workers (Regulation of Employment and Conditions of Services) Act, 1996 and Rules 1998 and Haryana Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Rules, 2005.	To regulate the employment and conditions of service of building and other construction workers and to provide their safety, health, and welfare measures and for other matters connected therewith or incidental thereto.
2	The Building and Other Construction Workers Welfare Cess Act, 1996	Provides for levy and collection of a cess on the cost of construction incurred by employers to augment the resources of the Building and Other Construction Workers' Welfare Board constituted under the Building and Other Construction Workers (Regulation of Employment and conditions of service) Act, 1996
3	The Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 and its amendment	This Act prohibits employment of children below 14 years of age in certain occupations and provides for regulation of employment of children in all other occupations and processes. Employment of child labour is prohibited in the building and construction industry.
4	The Payment of Wages Act, 1936	Lays down as to by what date wages are to be paid, when it will be paid and what deductions be made from the wages of the workers, if any.
5	The Payment of Gratuity Act, 1972	Gratuity is payable to an employee under the Act on satisfaction of certain conditions on separation, if an employee has completed 5 years of service with the employer.
6	The Employees Provident Fund and Miscellaneous Provisions Act, 1952	The Act ensures that workers receive provident fund benefits, which can provide financial security and retirement savings, and it places obligations on employers to make contributions and maintain records.

S. No.	Gol Regulations/Guidelines/ Orders	Stipulations/ Terms and Conditions
7	The Maternity Benefit Act, 1961	Protects the employment of women during the time of her maternity and entitles her to a 'maternity benefit' - i.e., fully paid absence from work - to take care of her child. The Act applies to all establishments employing 10 or more persons.
8	The Paternity Leave Entitlement	Provides for paternity leave for men during wife's pregnancy and after giving birth and in case of medical recommendation of bed rest or miscarriage, etc for wife.
9	The Equal Remuneration Act, 1976	Payment of equal remuneration to men and women workers and for the prevention of discrimination, on the ground of sex, against women in the matter of employment and for matters connected therewith or incidental thereto.
10	The Payment of Bonus Act, 1965	Provides for payments of annual bonus subject to a minimum of 8.33% of wages and maximum of 20% of wages.
11	The Bonded Labour (Abolition) Act, 1976	To prevent the economic and physical exploitation of the weaker sections of the people and for matters connected therewith or incidental thereto.
12	The Trade Union Act, 1926	Lays down the procedure for registration of trade unions of workers and employers. The trade unions registered under the Act have been given certain immunities from civil and criminal liabilities.
13	The Minimum Wages Act, 1948	The Act ensures payment of minimum wages as fixed by the appropriate State Government as per provisions of the Act. All employers are to pay the wages not less than the fixed Minimum Wages for the state/region/union territory. The Minimum Wages Act empowers appropriate governments to fix and revise minimum rates of wages for different scheduled employments.
14	The Workmen's Compensation Act, 1923 (Amended 2009)	It provides compensation to employees or their dependents in case of injuries or death arising out of and in the course of employment. The Act is aimed at ensuring financial protection for workers and their families in the event of accidents or injuries at the workplace.
15	The Contract Labour (Regulation & Abolition) Act, 1970 and Rules	To prevent exploitation of contract labour and to introduce better conditions of work. Applicable for every establishment in which 20 or more workmen are employed or were employed on any day of the preceding 12 months as contract labour.
16	The Employees State Insurance Act, 1948	Protects the interest of workers in contingencies such as sickness, maternity, temporary or permanent physical disablement, death due to employment injury resulting in loss of wages or

S. No.	Gol Regulations/Guidelines/ Orders	Stipulations/ Terms and Conditions
		earning capacity. Act also guarantees reasonably good medical care.
17	The Inter-state Migrant Workmen's (Regulation of Employment and Conditions of Service) Act, 1979	To protect workers whose services are requisitioned outside their native states in India. Whenever an employer faces a shortage of skills among the locally available workers, the Act creates a provision to employ better-skilled workers available outside the state. It is designed to protect the rights and welfare of inter-state migrant workmen by regulating their employment, working conditions, and ensuring their proper accommodation and transportation.
18	The SH at the Workplace (Prevention, Prohibition and Redressal) Act, 2013 and amendments	The Act provides for protection against SH of women at the workplace and for the prevention and redressal of complaints of SH and for matters connected therewith or incidental thereto.
19	The Factories Act, 1948	The Act is to consolidate and amend the law regulating labour in factories. Factory includes premises where a "manufacturing process" including repair and maintenance of trains, which can qualify thus. Health, Safety, Welfare, and other provisions are mentioned specifically for compliance in workshop/yard/depot areas. Necessary provisions and permits may be obtained from concerned authorities as applicable under this Regulation
Labour Codes¹		
1	The Code on Wages, 2019	For ensuring workers' right to minimum wages, the Central Government has amalgamated four laws in the Code on Wages, 2019, which serves as a comprehensive legal framework that addresses various aspects of wage regulation and workers' rights, with the ultimate goal of promoting fairness and justice in employment relationships while simplifying compliance for employers.
2	The Occupational Safety, Health and Working Conditions Code, 2020	13 existing Labour Laws have been subsumed in the OHS and Working Conditions Code, 2020.

¹The rules prepared by States (including Haryana) and Union Territories, in accordance with the four labour codes established by the Central Government, aimed at consolidating 29 central labour laws covering wages, industrial relations, social security, occupational safety, welfare, and working conditions, have not been enforced yet. These codes will come into effect from a date to be notified by the Central Government, except for provisions already enforced. For instance, certain sections under the Code on Wages, 2019, related to the Central Advisory Board, and provisions under the Code on Social Security, 2020, relating to establishing employees' and their family members' or dependents' identities through respective Aadhaar numbers, have already been enforced.

S. No.	Gol Regulations/Guidelines/ Orders	Stipulations/ Terms and Conditions
		The Code promotes the safety, health, and well-being of workers and regulates working conditions in India.
3	The Code of Social Security, 2020	To ensure security for all workers, the Government has amalgamated nine Labour Laws into the Social Security Code in order to secure the rights of workers for insurance, pension, gratuity, maternity benefit, etc. The code mandates that social security must be created so that workers can receive social security completely. A system would be institutionalised for the contributions received from the employer and worker. The Government can fund the contributions of workers from the disadvantaged section.
4	The Industrial Relations Code, 2020	The Industrial Relations Code, 2020 is part of a broader labour law reform agenda in India and is aimed at balancing the interests of employers and employees while fostering a more conducive environment for industrial growth. 3 Labour Laws have been amalgamated into the Industrial Relations Code, 2020.

6 Brief Overview of Labour Legislation: Occupational Safety, Health and Environment at Workplace

6.1 Objectives of National Policy on Safety, Health, and Environment at Workplace

The National Policy on Safety, Health, and Environment at Workplace (NPSHEW) was declared by the Ministry of Labour and Employment, GoI, in February 2009. The policy aims to foster a preventative culture of safety and health, reduce workplace-related incidents, and enhance overall standards of safety, health, and the environment at the workplace. The policy seeks to achieve these goals by minimising injuries, diseases, fatalities, and disasters in the workplace. The policy aims to achieve:

- Continuously reduce the occurrence of work-related injuries, fatalities, diseases, disasters, and loss of national assets.
- Enhance the coverage of work-related injuries, fatalities, and diseases to establish a more comprehensive database for improved performance monitoring.
- Raise community awareness regarding safety, health, and environmental issues in the workplace.
- Elevate community expectations regarding workplace health and safety standards over time.

- Improve workplace safety, health, and environment by fostering the creation of "green jobs" that contribute to sustainable enterprise development.

The action points for achieving the objectives of the NPSHEW are provided below:



ENFORCEMENT

Establish an effective enforcement mechanism with provisions for compensating and rehabilitating affected individuals.



RESEARCH AND DEVELOPMENT

Support research in safety, health, and environmental aspects of workplaces, including social and psychological factors, and develop innovative methods to establish standards



NATIONAL STANDARDS

Develop standards, codes of practice, and manuals on safety, health, and environment to ensure national uniformity across all economic activities, aligned with international standards, and implement them consistently.



OCCUPATIONAL SAFETY AND HEALTH SKILLS DEVELOPMENT

Enhance the number and competency of personnel engaged in occupational safety, health, and environmental fields through information dissemination and comprehensive training programs.



COMPLIANCE

Encourage appropriate government bodies to take full responsibility for administering and enforcing occupational safety, health, and environmental regulations in the workplace.



DATA COLLECTION

Compile statistics related to workplace safety, health, and environment, and prioritise key issues for action.



AWARENESS

Promote awareness of workplace safety, health, and environmental issues through various channels and facilitate stakeholder participation and consultations.



REVIEW

National Policy and the action programme shall be reviewed at least once in five years or earlier if felt necessary to assess the relevance of the national goals and objectives.

6.2 Regulatory Framework

The GoI has enacted legislation focused on ensuring safety, health, and proper working conditions at the workplace. These laws encompass provisions for the use of PPE, accident reporting procedures, and preventive measures such as awareness campaigns, toolbox meetings, and guidance sessions. The legislation also covers employee welfare, including regulations on leave entitlements and working hours.

The legislation duly covers Building and Other Construction Workers to be engaged for construction works under GMRP and aligns with ESS2: Labour and Working Conditions.

The Haryana Building and Other Construction Workers (Regulation of Employment and Condition of Services) Rules, 2005, provides guidance to ensure safety at work sites through the adoption of safe work practices, use of safety gear and PPE, periodic health check-ups, provision of drinking water, canteen facilities, separate latrines and urinals for men and women, first aid at work sites, creche facilities, etc.

WBG's EHS guidelines

The World Bank Group (WBG) guidelines for EHS, which serve as valuable references for both general and sector-specific activities. Projects financed by the WBG are obligated to comply with these guidelines, as stipulated by the relevant policies and standards. The EHS guidelines primarily focus on OHS, Community Health and Safety (CHS), and aspects related to construction and decommissioning. They also include cross-cutting guidelines addressing environmental concerns such as waste management, ambient air quality, noise, and water pollution, along with occupational health and safety measures, applicable across all industry sectors.

7 Institutional Responsibilities

7.1 GMRL

The primary responsibility for project implementation lies with GMRL and will be headed by the Managing Director (MD). GMRL will oversee construction, operations, and the implementation of safeguards arrangements. An Environmental and Social Management Unit (ESMU) will be established within GMRL to manage the overall implementation of the Environmental and Social Management Plan (ESMP), RAP, LMP, Stakeholder Engagement Plan (SEP) and Environmental and Social Commitment Plan (ESCP). These activities will be carried out by GMRL staff, with support from consultants as required.

The MD, supported by the Director Project & Planning, who in turn is supported by the Social Expert and EHS Expert, will ensure that all ESS2 provisions related to workers' safety, health, fair treatment, non-discrimination, protection of project and vulnerable workers, and the prevention of child, forced, or bonded labour are effectively monitored and complied. This also includes safeguarding workers' rights to collective bargaining and the ability to raise workplace concerns. GMRL will be responsible for the following tasks relevant to labour and working conditions:

- To undertake the overall responsibility for implementing this LMP.
- To engage and manage contractors/subcontractors in accordance with this LMP and the applicable procurement documents.
- To ensure that contractors develop their labour management plan (Contractor's LMP) that complies with this LMP and Contractor's ESMP (C-ESMP) (including OHS Policy and provisions), for approval before site mobilisation.

- To ensure contractors/subcontractors comply with labour standards outlined in their LMPs, ESMPs, and procurement documents.
- To monitor and address potential risks to child labour, forced labour, and serious safety concerns.
- To monitor training of relevant project workers.
- To ensure Grievance Mechanism (GM) is established, implemented and communicated to all project workers.
- To monitor implementation of the Code of Conduct (CoC) and the implementation of measures to mitigate GBV risks.
- To report to the WB on labour management and OHS performance.

7.2 GC

GMRL will be supported by the GC, who will be responsible for monitoring all works related to the implementation of GMRP, including civil work contractors and ensuring compliance with this LMP and the Project's E&S documents. The GC-GMRL will oversee labour and working conditions daily on behalf of GMRL, as explicitly set out in their contract. Qualified expert(s) will be employed by the GC-GMRL for this purpose, and they will regularly report performance to GMRL.

7.3 Engagement and Management of Project Workers

Direct Workers: All Direct Workers engaged under GMRP will be managed and overseen by the MD of GMRL.

GMRL will have senior and middle-level officers, consultants, subject matter specialists, technical, administrative and support staff. These Direct Workers will be supervised by their respective reporting heads, with the overall responsibility for ensuring compliance with ESS2 requirements resting with the MD, supported by the Social Safeguard Expert at GMRL.

Contracted Workers: All workers engaged through third parties, including contractors, to perform core project functions will include construction workers, consultants' employees and support staff. GMRL will ensure their employment or contracting complies with ESS2 requirements. For civil works, these workers will be managed by a Project-in-charge representing the contractor for the respective construction package. The Project-in-charge will also manage the contracted workers of sub-contractors and primary suppliers for their packages. For consultancy services, the various teams will be managed by their respective Team Leaders under the directions of GMRL.

Regarding all contract management matters at field level, including engagement and management of contracted workers, the Project-in-charge of each construction package will report to GMRL.

Primary Supply Workers: The Primary Supply Workers associated with the project will need to comply with ESS2 requirements related to workers' safety. It will be ensured that all primary supply workers are provided with safe working conditions and that the organisation has been screened to confirm the absence of forced, bonded or child labour. GMRL shall ensure that ESS2 requirements for primary supply workers are met and regularly monitored to ensure their compliance. If any serious safety risks are identified, GMRL shall report the findings, recommend corrective actions, and monitor the implementation of mitigation measures by the primary supplier.

The engagement and management of project workers under the GMRP is described in **Table 7-1**.

Table 7-1: Engagement and Management of Project Workers under GMRP

Category of Project Workers	Project Workers by Role	Responsible Staff of Department	Project Location
Direct Workers	All GMRL staff engaged for GMRP.	MD, GMRL	Gurugram
Contracted Workers	Other specialist consultants like social specialist/Env. Specialist, etc. supporting GMRL	Concerned officers	Gurugram
	DDC, GC-GMRL, External Monitoring Consultant staff supporting GMRL	MD, Directors and concerned officers	Gurugram
	All managerial and professionally qualified staff deployed by contractor	Directors and concerned officers	Gurugram
	All Workers deployed by the Contractor.	Concerned officers	Gurugram
	All workers of specialist agencies engaged by Contractor.	Concerned officers	Gurugram
	Staff of Implementation Support Agency for RAP	Director Project & Planning and concerned officers	Gurugram
	Consultancy Agencies for various studies	Directors and concerned officers	Gurugram
Primary Supply Workers	Workers of suppliers of Rolling Stocks and Signalling & Telecom equipments	MD, Director Rolling Stock & Electrical and concerned officers	Manufacturing Unit/Gurugram

7.4 Engagement and Management of Contractors and sub-Contractors

The contractors/subcontractors will be responsible for the following:

- Employ or appoint qualified environmental, social, occupational health, and safety expert(s) to manage OHS issues.
- Prepare and implement their LMP (Contractor's LMP) and C- ESMP (including OHS provisions) applicable to contracted workers on the project. These plans will be submitted to the GC-GMRL for review and approval before site mobilisation.
- Supervise subcontractors to ensure adherence to the LMP and ESMP.
- Maintain recruitment and employment records of contracted workers (including subcontractors), with age verification to prevent child labour.
- Provide induction and regular training to contracted workers on environmental, social, and occupational health and safety issues, including prevention of GBV.
- Require primary suppliers to identify and mitigate risks related to child labour, forced labour, and serious safety issues, and risks of discrimination among primary supply workers.
- Develop and implement the GM for contracted workers, ensuring timely resolution and regular reporting of grievance status and resolutions.
- Ensure all contractor and subcontractor workers understand, sign, and comply with the CoC before commencing work, and supervise compliance with GBV risk mitigation measures as specified in the contractor's LMP/ESMP.
- Report labour and OHS performance to GMRL.

7.5 Occupational Health and Safety (OHS)

The ESMPs prepared for the project include measures to mitigate its E&S risks and impacts. The institutional arrangements detailed in the ESMPs outline the roles and responsibilities of various project stakeholders, including the contractor's Environmental Officer and Health and Safety Officer. The Environmental and Social Safeguard Experts of GMRL and GC-GMRL will coordinate and ensure effective implementation of the measures approved in the C-ESMP.

The contractor's approved C-ESMP will be reviewed periodically (whenever there is a change in project design) and updated in a timely manner to address any changed requirements during project implementation.

7.6 Training of Workers

The OHS plan will be submitted by the contractor and approved by GMRL before the commencement of construction activities. It will include detailed procedures and protocols for worker training at various phases of the project, as detailed below:

- Induction training for new workers will cover OHS regulations, site-specific guidance, hazard assessments including high energy hazards and associated critical control measures.
- Daily toolbox briefings conducted by work supervisors to sensitise workers on the day's safety procedures.
- Safety briefings conducted before the initiation of any new activity or task.
- Periodic tailgate sessions to review and refresh safety protocols at the worksite.
- Procedures for responding to and reporting injuries or safety-related incidents, including conducting incident investigations, Root Cause Analysis (RCA), and preparing a Corrective Action Plan (CAP) to prevent recurrence. The investigation procedure is provided in **Annexure 1**.
- Periodic health check-ups and encouragement to report occupational health concerns.
- Create awareness and reporting of unsafe conditions and all injuries, including minor ones.
- Conduct of emergency preparedness sessions and mock drills on emergency response and reporting protocols at the worksite.
- Briefing and awareness campaigns on community safety during construction activities.
- Awareness and briefings on the GM, ensuring access and redressal without fear of retribution.
- Mandatory use of PPEs and timely replacement as needed.
- Sensitisation of all contractor personnel on the CoC and consequences of non-compliance.
- Orientation sessions for workers on identifying and preventing GBV and understanding acceptable workplace behaviour.

The contractors will be encouraged to deploy EHS officers and work supervisors who have received professional training or hold certifications in OHS from accredited institutions. Additionally, supervisors and managers appointed by the contractors shall be provided with a copy of the GBV (SEA-SH) declaration signed by their employers, along with a clearly defined list of their responsibilities and expected CoC.

8 Age of Employment

8.1 Direct Workers

The Direct workers shall possess the required technical qualifications, and the minimum age at the time of recruitment shall not be less than 18 years.

8.2 Contracted Workers

The age of technically qualified, skilled and unskilled contracted workers shall range between a minimum of 18 years and a maximum of 60 years. However, in exceptional cases, certain

personnel (especially consultants) engaged by GC-GMRL, ESIA Consultant, RAP Implementation Support Agency, External Monitoring Consultant, etc. may be permitted up to the age of 65 years. Similarly, managerial or supervisory level contracted workers deployed by the contractor may also be allowed, on a case-by-case basis, up to the age of 65 years. It shall be ensured that no workers above the age of 65 years are deployed in roles that involve heavy or strenuous physical work.

The age of personnel deployed by the contractor shall be verified by the Project Implementing Units (PIUs) using valid identity documents such as Aadhaar Card, Voter ID, Passport, or a Valid Driving License. In cases where unskilled workers are unable to produce valid proof of age for whatever reason, their age shall be determined through a medical examination conducted by a competent authority at a government hospital, at the contractor's expense. In case of any doubt regarding the minimum age of a worker, clinical or anthropometric assessment may be used to verify minimum age.

Under no circumstance shall individuals below 18 years of age be engaged for any kind of work, in adherence to GoI regulations prohibiting child labour. In case it is found by GMRL officials that the contractor has engaged child labour, a show-cause notice for contract termination will be issued immediately, and the incident will be formally reported to the District Labour Officer.

8.3 Information of Contracted Workers

GMRL shall maintain a database on the engagement of all categories of contracted workers. Contractors will be obligated to maintain updated records of all categories of contracted workers, particularly migrant construction workers and periodically share this information with GMRL.

The format for submission of this information shall be finalised during the contractor's mobilisation phase. The workers information database to be maintained by the contractor shall include, but not be limited to, the following details:

The format for submission of this information shall be finalized during the contractor's Name and Age (to be supported by AADHAR /Voter Card or any other recognized government document)

- Father's name and permanent address
- Marital status and name of the Spouse (if married)
- Number of children with gender (as applicable)
- Place of residence of spouse and children during the worker's engagement under the project.
- Address and contact number (in case of any emergency)
- Key skills and years of experience

- Assigned work activities, work schedule and duration of engagement
- Duration of contract and details of rotation arrangements
- Facilities shall be provided by the contractor including health check-ups before engagement, accommodation arrangements (onsite labour camps, rented with local community), transportation to the work site and any other facilities (to be specified by Contractor).
- Pre-employment check-ups, fitness tests and health awareness campaign for workers

9 Terms and Conditions

9.1 Specific Wages

Direct Workers: Direct workers engaged under the project include GMRL officers whose salaries and other emoluments shall be in accordance with the rules and regulations issued by the Department of Personnel and Training (DoPT), of GoI. In addition, consultants appointed for specialised positions shall be governed by the respective norms of their parent organisations.

Contracted Workers: The remuneration of consultants or personnel deployed through GC-GMRL or other consultancy firms for various studies shall be treated as contracted services and determined through a two-stage competitive bidding procedure (technical and financial), based on prevailing market rates.

The wages for technically qualified, skilled, and unskilled workers engaged by the contractor shall be determined by the Department of Labour and Employment, in accordance with the provisions of the Code on Wages, 2019. There shall be no wage discrimination based on gender, and equal pay shall be ensured for equal work for all workers, in strict conformity with the provisions of the Code on Wages, 2019.

9.2 Work Hours

The Direct workers at GMRL offices shall work as per GoI Rules, as prescribed by the relevant notifications issued by the DoPT, GoI. For contracted workers, the maximum working hours shall not exceed 48 hours per week and 9 hours per day. In cases where contracted workers are required to work beyond these limits, they shall be entitled to overtime compensation in accordance with applicable legislation of GoI.

9.3 Other Specific Terms and Conditions

- No worker shall be required or permitted to work continuously for more than five hours without a rest interval of at least half an hour.
- The working day for any worker, including rest intervals, shall not exceed a total span of twelve hours on any given day.

- Every worker shall be allowed one day of rest every week, which shall ordinarily be Sunday
- No worker shall be engaged on any day that has been declared a National Holiday through notification in the official Gazette by the Central or State Government.
- All contracted workers, particularly unskilled workers, may be either directly employed by the contractor or sourced through labour contractors. In such cases, the labour contractor must possess valid registration with the competent authority in the respective participating state.
- Wages for all contracted workers, especially unskilled workers, shall be paid directly by the contractor, irrespective of whether they are engaged directly or through labour contractors/sub-contractors. The contractor shall maintain verifiable records as proof of regular wage payments.
- Any denial of or delay in wage payments to workers shall render the contractor liable for legal action before the relevant Labour Court or Industrial Tribunals under applicable labour legislation.
- Employment conditions for both skilled and unskilled workers shall confirm to the provisions of the Building and Other Construction Workers Act, 1996.
- Under no circumstances shall child labour or forced labour in any form be employed, as both are strictly prohibited under national labour laws.

In cases of gross negligence, or contravention of statutory obligations resulting in injury or death of workers, the contractor shall be personally liable for prosecution under relevant provisions of the Indian Penal Code, 1860 and other applicable penal laws before competent criminal courts.

10 Policies and procedures for ensuring Workers' Safety

The GMRP will apply the following policies and procedures to address the key labour-related risks identified under Chapter 4.

Labour influx: To minimise the labour influx, GMRL shall contractually require the contractor to give preference to the recruitment of local unskilled labour for simple works such as excavation, levelling, cleaning, loading/unloading of materials, site watering and similar activities. All contracted workers shall be required to sign and comply with the CoC before the commencement of work. This CoC includes provisions to mitigate the risks of GBV and governs both workplace behaviour (including interactions with colleagues) and conduct within the surrounding community. To support this, relevant training shall be provided to workers, including induction programs and daily toolbox talks that outline expected behaviour and respect for local community values. In addition, training and awareness sessions shall be provided on GBV and the GM.

Labour Disputes over Terms and Conditions of Employment: To prevent labour disputes, fair and transparent terms and conditions of employment shall be applied to all project workers. The Project shall establish dedicated GMs for both direct workers and contracted workers to ensure timely resolution of workplace-related grievances. Furthermore, the project shall uphold and respect the workers' right to form or join labour unions and exercise their freedom of association.

Discrimination and Exclusion of Vulnerable/Disadvantaged Groups: Employment under the project shall be guided by the principles of equal opportunity and fair treatment. There shall be no discrimination in any aspect of the employment relationship, including recruitment and hiring, terms and conditions of employment (such as wages and benefits), access to training, or termination. To mitigate the risk of exclusion of vulnerable groups such as women, Scheduled Castes/Scheduled Tribes (SC/ST) groups, and PWD from employment opportunities, the project shall require contractors to actively include such groups within the unskilled workforce. Contractors shall also be required to comply with national legislation on gender equality in the workplace. This includes the provision of maternity leave, nursing breaks, and the availability of sufficient and appropriate latrine and washing facilities, with separate amenities for male and female workers. In addition, contractors shall be responsible for ensuring safety at the workplace to address any form of GBV during both recruitment and employment. Measures shall also be taken to prevent discrimination based on gender, caste, ethnicity, or disability in the recruitment, retention, and treatment of all workers under the project.

GBV related: The majority of the contracted workers are expected to be men, while women's participation is anticipated in the skilled or semi-skilled roles. To maintain harmonious relations with local communities, contractors shall ensure that all workers strictly adhere to a CoC. The CoC, applicable to all individuals engaged by the contractor, including subcontractors and suppliers, sets forth clear acceptable standards of behaviour. The CoC shall also include sanctions for non-compliance, with specific policies related to GBV SEA/SH (e.g., termination, legal action). It will be the contractor's responsibility to ensure that the CoC (**Placed as Annexure 2**) is written in plain language, understandable to both the local and migrant workers and signed by each worker to indicate that they have:

- Received a copy of the CoC as part of their employment contract.
- CoC has been explained to them during the induction process.
- Acknowledged that compliance with the CoC is a mandatory condition of employment.
- Understood that any violations of the CoC may lead to disciplinary measures, including dismissal or referral to legal authorities.

To mitigate potential risks related to on-site safety and GBV/SEA/SH, the contractor/subcontractor will implement the measures presented in **Table 10-1**.

Table 10-1: Contractor Actions for On-site Safety and GBV Risk Mitigation

S. No.	Action	Timelines
1	Separate, safe and easily accessible facilities for women and men in the place of work and the labour camps. (e.g., latrines should be located in separate areas, well-lit)	Throughout construction period
2	Display signs that the project site is an area where SEA/SH is prohibited.	Throughout construction period
3	Conduct community awareness camps, promoting a zero-tolerance approach to SEA/SH.	Half-yearly till completion of civil work
4	Ensure Codes of Conduct are clearly understood and signed by those with a physical presence at the project site;	Upon joining
5	Train project staff on the behaviour obligations under the CoCs and Disseminate CoCs (including visual illustrations) and discuss with employees and local communities.	Periodic
6	Training of Direct Workers (at GMRL) on the Prevention of Sexual Harassment (POSH) Act and constitution of an Internal Complaints Committee, where female workers are employed.	Upon completion of recruitment to GMRL

Fatality and Serious Incidents: In the event of an occupational fatality or serious injury, the contractor shall notify GMRL immediately of the incident. This includes any incident or accident related to Project that has had, or is likely to have, a significant adverse effect on the environment, tangible cultural heritage, affected communities, the general public, or workers. The contractor shall provide sufficient details regarding the incident or accident, its cause, immediate response measures undertaken, steps implemented to prevent recurrence, and any information obtained from subcontractors or supervising agencies. Subsequently, GMRL will share the details of the incident with WB within 48 Hours. In addition, GMRL will ensure that the incident is formally reported to the District Labour Welfare Officer. An RCA will be conducted by the contractor's and GC-GMRL Safety Officer.

High Energy Hazards:

- **Fire and Explosion:** A comprehensive fire protection system will be implemented during both the construction and operational phases of the project, in compliance with local fire safety regulations and relevant provisions of IS: 2190:2010.

During the operational phase, the following fire safety measures will be installed at all metro stations: a Fire Detection and Alarm System, Public Address System, Fire Extinguishers, Fire Hose Cabinets and Hose Reels, Fire Service Inlets, and an Emergency Ventilation System. Additionally, metro coaches will be equipped with essential fire and emergency safety features such as emergency train intercom, fire extinguishers, emergency exit doors, and emergency telephones.

Furthermore, regular fire drills will be organised during both the construction and operational phases to test system functionality, enhance emergency preparedness, and ensure the safety of all workers, communities and operational staff.

- **Electrical Hazards:** To mitigate electrical risks, the following preventive measures will be implemented:
 - Conduct training on electrical hazards and safety protocols.
 - Utilise approved electrical testing equipment to ensure proper grounding and prevent electrocutions.
 - Install earth leakage circuit breakers, voltage regulators, and surge arresters.
 - Use cord protectors and avoid working in wet conditions.
 - Always wear appropriate PPE.
- **Measures for Responding to Electric Shock Incidents:** Clear and prominently displayed instructions for the treatment of electric shock victims shall be provided at all work sites during both the construction and operational phase of the project. In the event of an electric shock incident, rescuers should avoid direct contact with the victim. Safe rescue methods must be used, such as standing on a dry wooden platform or chair and using non-conductive materials like a dry coat, dry rope, coconut matting, or a wooden stick, etc. to separate the victim from the electrical source. First aid kits must be readily available at all work areas and checked regularly to ensure availability of essential supplies. All electrical incidents must be reported in writing.
- **Risks due to storage of Gas/LPG:** The storage area should be well-screened, adequately ventilated, and kept free of flammable or combustible materials. Gas cylinders should be stored outdoors in an upright position, with appropriate supports to prevent tipping. Leakage prevention measures must be in place, and welding or any ignition-related activities must be prohibited near gas cylinders. Additionally, cylinders should be closed immediately after use, and any unusual gas odour must be investigated promptly.
- **Risks Associated with Iron Cutting and Soldering:** All workers must be equipped with appropriate PPE. Regular safety training sessions should be conducted to reinforce proper use of PPE and compliance with safe work practices. Work areas should be clearly marked, and supervision must be ensured to maintain compliance with established safety norms.

OHS: The construction of metro facilities has several unique challenges, particularly with respect to OHS during the construction stage. The significance of OHS concerns for both workers and nearby communities would increase due to various contributing factors. These may include complex site conditions, limited awareness among workers and the community regarding preventive and protective measures, inadequate contractual provisions, insufficient supervision and monitoring and ineffective enforcement by the implementing

agency. The ESIA has identified likely OHS challenges and potential risk scenarios that are likely to arise during the implementation of the project are provided in **Table 10-2**.

Table 10-2: Potential OHS Risks, Sources/Causes during Project Activities

Potential OHS Risks	Sources/Causes
Earth Slips/ Collapse	• Earthwork excavation • Scaffoldings • Slope failure • Landslide • All other Confined Spaces, including storage tanks and shafts
Falls, Slips	• Work at Height • Slips • Falling of objects
Respiratory illness, Heat Stress & Burns, noise-induced hearing loss, vibration-related illnesses, mental stress, vector-borne diseases, etc.	• Hot Mix Plant, Concrete Batching Plant, Crusher Sites, and operation of Roller, Graders, Loader, Cranes etc. • Inadequate/poor accommodation, waste management, basic amenities, and hygiene
Bulk spillage	• Hazardous substance/ inflammable liquid storage • Vehicular movement on highway
Fire and Explosion	• Inflammable Storage Areas • Gas Cylinder Storage Areas • Electrical Circuits • Welding/ Gas Cutting Activity • Inappropriate Handling of Oxy Acetylene Gas Cylinders (Liquefied Petroleum Gas / Dissolved acetylene (LPG/DA))
Electrical Shock	• HT Line • LT Distribution • Electrically Operated Machines/ Equipment/ Hand Tools/ Electrical Cables
Gaseous Leakage	• Gas Cylinder Storage Areas • Gas Cylinder used in Gas Cutting/ Welding Purposes
Accidents due to use of heavy machinery and vehicle movement Vehicles	• Rollers, Graders, loaders, Cranes, Trucks • Workmen Transport Vehicles (cars / scooters / motorcycles / cycles) • Collapse, toppling or collision of transport equipment
Other Hazards	• Cuts & Wounds • Confined Space (under & inside machinery etc.) • Hot Burns
Accidents and injuries	• Unprotected work sites at narrow roads, bridges and culvert sites, material storage or stockpile locations

The E&S risks and impacts associated with the implementation of the GMRP have been identified and will be addressed through the implementation of the ESMP by the appointed contractors. The OHS risks for workers during construction will be under the direct responsibility of the contractors. They will be responsible for the safety of construction equipment, labourers and workers, and the general public at the worksite, as part of

mandatory safety measures. The requirement for preparing an OHS policy and plan, as part of the C-ESMP, will be integrated into contract documents. This obligation is a key commitment of GMRL under the ESCP. The ESMP will also be periodically updated to include additional measures, including the contractor's responsibility to manage pandemic-related risks such as COVID. The Contractor shall be obligated to include Emergency Response and Management measures within the OHS Plan, which will form an integral part of the C-ESMP submitted to GMRL for approval.

To manage the OHS risks, contractors will be required to prepare and submit the following plans in accordance with GoI regulations and workers accommodation guidelines of WB: an OHS plan, Water and Waste Management Plan, Influx Management Plan, Worker's Camp Management Plan, CHS Plan, Traffic and Road Safety Management Plan, Quarry/Borrow Area Management Plan, GM for labour and Site Restoration Plan. All these plans will constitute the C-ESMP, which shall be reviewed and approved by the GC-GMRL and GMRL before the commencement of any construction works. The approved C-ESMP will be reviewed periodically (at every three months, or whenever there is a change in project design) and updated promptly to address changed requirements during project implementation.

ESHS requirements will be incorporated as special conditions and performance requirements in all contract bid documents. Adequate cost provisions for ESHS implementation will be included in the contract item rates to enable contractors to fulfil these requirements effectively. Thus, the potential bidders will be fully aware of ESHS performance requirements during the bidding stage and price their proposals accordingly.

The implementation of the C-ESMP and compliance with ESHS performance requirements will be overseen and managed by the GMRL Office and the GC-GMRL through THE establishment of an ESMU. The mandate, institutional arrangements and roles & responsibilities of ESMU functionaries will be formally documented, reviewed and adopted.

Under no circumstances shall contractors (including sub-contractors) engaged under GMRP employ any form of forced labour, including but not limited to: bonded labour (working under debt), excessive restrictions on freedom of movement, withholding of identification or personal documents, imposition of recruitment fees or commissions (directly or indirectly), delayed or withheld wages preventing lawful termination,, imposition of inappropriate fines or penalties, physical punishment or coercion, use of security forces to extract work or intimidate workers, or any practice that compels involuntary labour.

To ensure compliance, the following measures will be enforced: i) inclusion of a CoC in all contract documents; ii) ESHS performance requirements, including CoC on handling of workers; and iii) regular monitoring and reporting by ESMU functionaries under GC-GMRL, with oversight from GMRL.

The contractor's OHS plan will have the following specific content:

i. Hazard Identification and Risk Management:

Hazard Identification: To effectively prevent incidents and ensure the safety of both workers and the nearby community, it is essential to first identify all potential hazards and associated risks related to construction activities. These may include risks arising from material handling, the operation and movement of heavy machinery, the use of hazardous substances (such as fuel, oil and paints, flammable gas cylinders), electrical works and unforeseen events such as the COVID-19 pandemic.

In addition, community-related hazards such as fire risks and dust emissions will be assessed. Appropriate mitigation measures will be identified and implemented to ensure community awareness and protection.

Hazard Risk Management: Hazard identification will be followed by the implementation of pre-defined control measures for its effective management for the protection of workers and the nearby community. It will cover the following:

- **Work Zone Classification:** The work zones will be classified based on the level of risk intensity into low-risk and high-risk areas. Access to high-risk areas will be strictly restricted and permitted only to authorised personnel.
Adequate signage will be installed to clearly demarcate high-risk areas and communicate the associated hazards, along with the required preventive measures. Designated personnel will be assigned the responsibility to ensure compliance with access restrictions and enforce all safety protocols within these areas.
- **Task Specific Hazard Prevention:** Procedure and guidelines will be developed in accordance with best industry practices and applicable legislative requirements to ensure task-specific hazard prevention and safety measures. This includes activities involving work at height, which will mandate the use of appropriate PPE, such as safety harnesses and helmets, and the presence of trained rescue personnel to respond to emergencies.
- **Injury Management:** Clear responsibilities and an action sequence will be established for effective injury management at the worksite. This will include the availability of adequately stocked first aid boxes and designated trained first aid providers/attendants. The locations and contents of the first aid boxes will be specified in the OSH Plan.
- **PPE & Hand Tools:** A detailed list of the required PPE and hand tools will be outlined in the OSH Plan, along with measures to ensure their availability. A method will also be defined to enforce the mandatory use of PPE by all workers. Standard PPE equipment such as helmets, safety boots, hand gloves, and other relevant gear will be provided to all personnel engaged in the project.

- ii. **Staff Health & Fitness on duty:** Staff health plays a major role in incident prevention. The OHS plan will include provisions for mandatory medical check-ups at the time of appointment, with clearly defined periodic follow-up examinations. The OHS plan will also outline measures for managing fatigue, promoting ergonomics, and preventing the use of alcohol and drugs at the workplace.
- iii. **Hygiene and Sanitation:** Adequate attention will be given to workplace and labour camp hygiene. The OHS Plan will have provisions for providing clean and hygienic eating areas and ensuring the availability of safe drinking water at both the workplace and labour camps. Similarly, adequate provision will be made for clean latrines with appropriate sewage treatment systems (such as septic tanks), along with the segregated collection and safe disposal of domestic wastes.
- iv. **Incident and Emergency Management and Preparedness:** The OHS plan will define procedures for incident and emergency management including accident investigation, RCA, and recommendation of corrective and preventive actions. Provisions will be made for the availability of first aid kits, ambulance services, designated safety and health representatives and other essential resources. Coordination with local authorities will be ensured to facilitate an effective emergency response.
- v. **Occupational Health and Safety Monitoring:** The OHS Plan will define the frequency and methodology of periodic monitoring to assess the effectiveness of its implementation. Monitoring will include the analysis of accident and fatality rates as well. These assessments will form a key component of the overall monitoring program.
- vi. **Communication and Consultation (Workers & community):** Awareness, consultation, and communication are vital tools for preventing incidents and avoiding panic during emergencies. The OHS plan will outline programs for community engagement and communication as well as training and awareness programs for workers. It will also specify key stakeholders' communication strategies and define the scope and content of safety signage to be displayed at the workplace and within project areas.
- vii. **Training and Records:** Training is an essential and integrated component of effective OHS Plan implementation. The OHS plan will detail training programs covering overall OHS induction, site-specific inductions, driving safety and refresher training. Records of all training sessions, incident analysis, OHS monitoring, emergency preparedness plan (including mock drills and emergency contact details), and corrective and preventive actions will be systematically maintained.
- viii. **Reporting:** The contractor shall submit OHS Plan monitoring reports to GMRL, and subsequently GMRL shall submit the Quarterly Progress Report (QPR) to the funding agency. GMRL shall notify the funding agency at the earliest possible time, and in any case no later than 48 hours after becoming aware of the incident or accident, providing all available details upon request. Furthermore, GMRL shall submit an investigation report or RCA along with a CAP to the funding agency no later than 10 days from the time of the initial notice.

- ix. **Responsibility:** The primary responsibility for the preparation and implementation of the OHS Plan lies with the Contractor. The Contractor shall ensure the deployment of a qualified OHS officer at the worksite and identify and comply with all applicable health and safety legislation. In consultation with the Contractor, GMRL will oversee the development and implementation of the OHS Plan based on the aspects detailed above. The Contractor shall submit monthly or quarterly OHS monitoring reports to GMRL through GC-GMRL. GMRL will submit consolidated QPR in line with the ESMP and ESCP to the funding agency. Any corrective or preventive actions required to maintain environmental and safety standards will be reported in the subsequent monitoring reports.

11 Grievance Mechanism

11.1 GM Provisions for Direct and Contracted Workers

- i. **Direct Workers:** HR-Head, GMRL shall be responsible for addressing all grievances relating to direct workers in accordance with the applicable legislation.
- ii. **Contracted Workers:** Each contracted firm (consultancy, construction, suppliers) will be obligated to set up a GM, especially to redress complaints related to workers deployed for construction works under GMRP. The GM shall have due representation of GC-GMRL, Contractor, Workers and at least one woman representative (from GC-GMRL/contractor/workers). The GM will function under the supervision of the GC-GMRL. The mandate for GM, institutional arrangements, procedure for receiving complaints, time limits for redressal of complaints and escalation level for unresolved cases and resolution thereof will be finalised during the approval of C-ESMP by GMRL. GMRL will have oversight of this labour GM. The GM for the Workers will be set up during the mobilisation phase of the contracted firm. The minimum requirement for this GM will include:
 - Setting up complaint and suggestion boxes at both work and camp sites.
 - Constituting a local grievance committee with representation from the GC-GMRL and workers, including women.
 - Making available grievance registers at the camp and work sites.
 - Creating awareness among workers on their right to seek redressal to grievances without retribution.
 - Ensuring closure of worker complaints.
 - The Social Expert of GC-GMRL shall monitor the functions of Labour GRM.

Information regarding the availability of the GM without any retribution, its institutional set-up, timings and procedures for receiving complaints, complaint handling mechanisms, timeframes for redressal and escalation protocols for unresolved grievances will be regularly disseminated to all workers. The following channels will be used for GM dissemination:

- Induction training for new workers.
- Toolbox meetings/briefings conducted by work supervisors.
- Periodic tailgate sessions to review and reinforce safety procedures at the worksite.
- Pictorial illustrations and posters in the local language, displayed at prominent locations such as entry/exit points, canteens, entertainment areas, health camp sites, etc.
- Awareness campaigns focused on workplace safety and Emergency Response Plans.
- Briefings on community safety and responsible behaviour while working in or nearby communities.

The Social Safeguard Expert of GMRL and GC-GMRL will support the project to provide implementation and capacity building support related to labour management. The expert will also incorporate updates on workers' grievance status in the QPR and will submit it to the funding agency.

GM shall address all SEA/SH-related grievances raised by female workers and community members. ICC of GMRL shall apply to GMRP (Procedure of GMRL ICC to be incorporated).

12 Contractor Management

12.1 Contractual Provisions for Labour Management and OHS

The E&S risks and impacts associated with the GMRP, including those related to labour management and OHS, will be managed through the implementation of the ESMP, to be executed by contractors and consulting organisations. Labour management, OHS, and related worker welfare concerns arising during the construction phase will fall under the direct purview of the contractors. Therefore, ensuring the effective implementation of the OHS Plan for all contracted workers is a fundamental component of GMRP execution, under the overall supervision of GC-GMRL and GMRL.

The contractual requirements for civil works will require that all contractors undertake the following actions related to OHS:

- Comply with all applicable legislation of GoI and GoH related to OHS.
- Comply with the requirements of WB ESS2 on Labour and Working Conditions and the WB Group's General EHS Guidelines.
- Provide a safe and healthy work environment for workers, including: (a) Access to clean drinking water, adequate sanitation facilities, and first-aid kits, etc. (b) Elimination, substitution, or modification of hazardous conditions or materials at the workplace.
- Provide workers with all required PPE (Personal Protection Equipment) and safety gear.

- Make emergency prevention, preparedness, and response arrangements for emergencies.
- Institute remedies to address and compensate for adverse impacts such as occupational injuries, deaths, disability, and occupational diseases.
- Conduct, keep records and report monthly/quarterly OHS training for workers.
- Monitor, keep records and report OHS incidents and accidents.

The agreement between GMRL and Contractor will incorporate the ESHS requirements and performance requirements. These requirements will obligate the contractor that, upon mobilisation, the contractor shall prepare a C-ESMP. This plan will include OHS Plan, LMP, Labour Influx Management Plan, Workers' Camp Site Management Plan, GM for workers', and any other relevant plans in accordance with GoI & WB requirements. The draft C-ESMP will be submitted to GMRL through GC-GMRL for review and approval before commencement of construction works.

The approved C-ESMP will be subject to periodic reviews and timely updates to reflect any new developments, risks, and regulatory changes arising during the implementation of the project. The outline of the Contractor ESMP is provided in **Annexure 3**.

12.2 Monitoring of Performance of Contractors

GMRL shall establish appropriate resources and procedures for effectively managing and monitoring the performance of contractors in accordance with their contractual obligations and provisions of this LMP. GMRL shall ensure that the contract with the GC-GMRL explicitly defines their responsibility for monitoring the contractor's compliance with labour and working conditions requirements. Monitoring activities may include periodic inspections, spot checks, safety walks at project locations or work sites and review of labour management records and reports submitted by the contractor. The contractor's labour management records and reports shall be reviewed, including but not limited to the following:

- Review of employment contracts and signed CoC.
- Review of grievances received from both the community and workers, including their resolution status.
- Review of monthly reports submitted by the contractor
- Review of incident/accident reports filed by the contractor.
- Periodic monitoring visits to project site involving spot checks and interaction with workers.
- Review of training records related to OHS awareness and preventive measures provided to contracted workers.

Contractors are required to monitor, maintain records and regularly report on key aspects of labour management. The following components shall be included in their reporting:

- Labour conditions: Maintain records of all workers engaged under the project, including contact details, induction/trainings (including CoC), working hours, remuneration and deductions (including overtime).
- Occupational Safety: Document all recordable incidents and corresponding RCA (e.g. lost-time incidents, medical treatment cases), first aid incidents, high potential near misses, and corresponding corrective and preventive actions (e.g. revised job safety analysis, introduction of new equipment or tools, additional skills training, etc.).
- Workers Demographics: Provide information on the number of workers employed, disaggregated by gender and age, with documented evidence confirming the absence of child labour. Include classification by skill level (unskilled, skilled, supervisory, professional or management).
- Training and Induction: Record dates, number of participants, and topics covered in all induction and training sessions.
- Security Risks: Outline any security risks that may impact the contractor while performing project activities, including threats from third parties external to the project.
- Worker Grievances: Maintain records of all grievances received from workers including the date of occurrence, nature of the grievance, date of submission, actions taken with corresponding dates; resolution status, and any pending follow-up actions. Reports should include both newly received grievances and any unresolved cases from previous reporting periods.

13 Primary Supply Workers

The construction activities under the GMRP will require the procurement of essential materials and goods, including rolling stock, telecom and signalling systems. GMRL will source (a) essential materials (b) directly from primary suppliers and (c) on an ongoing basis; workers engaged by such suppliers meeting all three criteria (a) to (c) are deemed “primary supply workers”, as defined in ESS2. As outlined in Chapter 3: Key Labour Risks, the construction sector typically poses significant OHS risks, especially in the absence of effective labour inspection mechanisms. To mitigate these potential risks, the following measures will be adopted:

- 1. Selection of Primary Suppliers:** When procuring essential materials and goods, GMRL will require primary suppliers to assess and identify risks related to child labour, forced labour, and serious safety concerns in their production processes. Based on this assessment and any additional due diligence, GMRL will review and approve the purchase of such materials and goods. Where necessary, GMRL will mandate that all purchase orders with primary suppliers include explicit provisions addressing: the prohibition of child and forced labour and the requirement for adherence to safety standards during production. Contractor is responsible for ensuring that primary supply workers are employed in compliance with labour laws, including the prohibition of child and forced labour and

adherence to occupational health and safety standards. Contractor is required to monitor suppliers' labour practices, maintain labour records, provide GMs for workers and report any issues to GMRL. Contractor shall be required to include terms in the contract that the primary supplier is required to provide information related to labour and working conditions.

2. **Remedial process:** If any instance of child labour, forced labour, or serious safety incidents is identified among primary supply workers under the project, GMRL will require the concerned supplier to implement immediate and appropriate remedial actions. The effectiveness of these actions will be periodically monitored. In cases where remedial measures are found inadequate or non-compliant with ESS2 requirements, GMRL will shift to alternative suppliers who can demonstrate compliance with the applicable labour and safety standards requirements within a reasonable timeframe.

Annexure 1: Procedure for Incident and Accident Investigations

1. Carry out the investigation as quickly as possible.
2. Conduct interviews with as many witnesses as possible
3. Do not rely on any one sole source of evidence
4. Checklists for obtaining basic and typical information for accidents using the following tools:
 - Notebook
 - Tape records
 - Camera
 - Measuring tape
 - Special equipment for the particular investigation
5. Obtain answers to the following questions:
 - When did the accident occur?
 - Where did it occur?
 - What caused the accident?
 - Why did it occur?
 - Who was injured and what was damaged?
 - How could it have been prevented?
 - How its recurrence can be prevented?
6. Prepare a short but sufficient investigation report that contains the following:
 - A summary of what had happened
 - A summary of events prior to the accident
 - Information gathered during the investigation
 - Details of witnesses and their testimony
 - Information on injury or loss sustained
 - Conclusions and possible causes of the accident
 - Recommendations to prevent recurrence
 - Supporting materials (photos, sketches, etc.)

Annexure 2: Code of Conduct**To be signed by Project Manager of Contractor**

This CoC is part of our measures to deal with E&S risks associated with civil works under GMRP. This company-level CoC should be signed by authorized persons and disseminated across all levels of the organisation to ensure awareness and compliance.

[Company/Contractor] is fully committed to fostering and maintaining a work environment in which GBV is not tolerated in any form. This commitment extends to all employees, associate, and representative of the company. In order to prevent, identify, and respond to GBV, the following core principles and minimum standards of behaviour shall apply to all company personnel without exception:

- a. [Company/Contractor] shall comply with this CoC and all applicable laws, regulations, standards, and other requirements, including those aimed at protecting the health, safety and well-being of their personnel and any other individuals.
- b. [Company/Contractor]— all employees, associates, and representatives of company are expected to treat women, men and children (persons under the age of 18) with respect and dignity regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, sexual orientation or gender identity, disability, birth or any other status. Any form of GBV constitutes a violation of this principle.
- c. [Company/Contractor] considers all forms of GBV as gross misconduct and grounds for disciplinary action, including but not limited to penalties, suspension, or termination of employment. GBV is unacceptable under all circumstances, whether it occurs on-site, near the worksite, in worker camps, or off-site (even if involving non-employees). Legal action, including criminal prosecution, will be pursued where appropriate.
- d. The use of demeaning, threatening, harassing, abusive, or sexually provocative language or behaviour is strictly prohibited among all employees, associates, and representatives.
- e. The solicitation or acceptance of sexual favours in exchange for preferential treatment, promotions, or any other benefit is strictly prohibited.
- f. All employees, including volunteers and sub-contractors, are required to report suspected or actual incidents of GBV, whether perpetrated by a co-worker from the same or another. Reports must be made in accordance with established GBV reporting and allegation handling procedures.
- g. All employees shall undergo mandatory training upon joining to ensure their understanding of and compliance with this GBV CoC.
- h. All employees are required to sign the Contractor's Personnel CoC, thereby confirming their commitment to comply its provisions and to adhere to the behavioural standards it outlines.

I do hereby acknowledge that I have read and understood the contents of this CoC. On behalf of the company, I agree to comply with the standards contained herein. I understand my role and responsibilities in preventing and responding to grievances by employees, particularly those related to GBV. I also acknowledge that any action inconsistent with, or any failure to act in accordance with, this CoC may result in disciplinary actions.

Signature: _____

Name of Project Manager: _____

Company/Contractor Name: _____

Date: _____

To be signed by Contractor's Personnel

We, [enter name of Contractor], have entered into a contract with [enter name of Employer] for [enter description of the Works] under the GMRP. These works will be carried out at [enter the Site and other locations where the Works will be carried out]. In compliance with our contractual obligations, we are required to implement effective measures to address E&S risks, including risks related to SEA/SH.

This CoC forms part of our commitment to ethical, safe and inclusive working environments and applies to all employees, labourers, sub-contractors, and personnel engaged in or supporting the execution of the Works. All such persons are referred to as "Contractor's Personnel" and are required to adhere strictly to this CoC.

This CoC identifies the behaviour that we require from all Contractor's Personnel.

We are committed to fostering a work environment that is safe, respectful, and free from abuse, violence, or discrimination, where all personnel can raise concerns without fear of retaliation.

REQUIRED CONDUCT

All Contractor's Personnel shall:

1. Perform their duties competently, responsibly, and diligently.
2. Comply with this CoC and all applicable laws, regulations and other project specific requirements.
3. Promote and maintain a safe and healthy work environment by:
 - a. Ensuring machinery, equipment and workplaces under their control are safe and do not pose a health risk.
 - b. Adhere to PPE requirements by wearing all mandated safety equipment during work activities.

- c. Using and handling all chemical, physical, and biological agents with appropriate safeguards
- d. Following applicable emergency operating procedures without fail.
- 4. Immediately report any unsafe working conditions and withdraw from any work situation they believe presents imminent danger to their life or health.
- 5. Treat all persons with dignity and respect including women, men, and children (under the age of 18) regardless of race, religion, language, political belief, ethnicity, gender identity, disability, or other status.
- 6. Refrain from any language or behaviour that is abusive, harassing, sexually provocative, demeaning, or culturally inappropriate.
- 7. Not engage in SH, which includes unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature involving any project personnel.
- 8. Not engage in Sexual Exploitation, defined as any abuse of a position of vulnerability, differential power, or trust for sexual purposes including financial, social, or political gain.
- 9. Not engage in Sexual Abuse, which includes any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- 10. Provide mandatory training sessions related to environmental, social, health, safety, and SEA/SH issues relevant to the project.
- 11. Promptly report any violations of this CoC; and
- 12. Not retaliate against any person who reports a violation of this CoC, or who uses the GM for Contractor's Personnel or the project's GM.

Annexure 3: Outline of Contractor's ESMP

1. Licensing Requirement
 - 1.1 Statutory Permissions/ No Objection Certificate (NOC)/Approvals/Labour License
 - 1.2 Insurance
 - 1.3 Use of approved quarry/borrow areas, if such material is required
 - 1.4 Any other
2. Workforce management under Pandemic (i.e. COVID 19) considerations
 - 2.1 Profile of work force – work activities, schedule, contract duration, workforce rotation plan, workers place of stay, workers with underlying health issues
 - 2.2 Measures to mitigate risks on account of pandemic.
 - 2.3 Contingency plan covering – pre-health check-up, access restrictions, hygiene, waste management, accommodation arrangements, PPE provision and usage
 - 2.4 Reporting and handling of Instances of pandemic cases, training and communication with workers, training and Standard Operating Procedures (SOPs) on communicating and contact with community
3. Labour Influx and Labour Camp Management (if outside labour is accommodated in a labour camp)
 - 3.1 Labour influx management plan (including maximizing sourcing of local labour and minimizing labour from outside the area)
 - 3.2 Location of Labour Camp
 - 3.3 Number of labours to be housed and duration
 - 3.4 Break-up of labour workforce – male, female, children
 - 3.5 Number of Units in Labour Camp
 - 3.6 Source and Provision of Water and Power Connection including Drinking Water
 - 3.7 Cooking Arrangement – Individual Kitchen/community Kitchen
 - 3.8 Source, Type and Provision of Kitchen Fuel
 - 3.9 Latrine facilities – individual/community; fixed/mobile and sewage disposal arrangement
 - 3.10 Waste collection and disposal arrangement from Labour Camp
 - 3.11 Identify Risk of Community Interface – any fencing/separation requirement
 - 3.12 Security and general lighting arrangement
4. Resource Planning
 - 4.1 Water and power requirement for works and locations
 - 4.2 Need for water line or electrical wiring
 - 4.3 Raw material requirement and source(s)
 - 4.4 Temporary storage(s) at site and location(s) – cover/uncovered
 - 4.5 Transportation route from source to storage
 - 4.6 Identification of accident hotspots on village roads
 - 4.7 Need for speed breakers/governors/signage

5. Pollution Prevention

- 5.1 Potential of dust emission from openly stored raw material and mitigation arrangement – covering, sprinkling, etc.
- 5.2 Potential of water pollution from spillage and leakage from raw material storage and preventive measures
- 5.3 Potential of air emissions from works including toxic emissions from paints and chemicals, emissions from Diesel Generator (DG) sets and other construction equipment – locations where potential is high, possibility of community impact, impact on workers, preventive measures such as dust masks for workers, etc.
- 5.4 Potential of noise generation from works (use of equipment and machinery, demolition work) including from any activity planned at night – locations where potential is high, possibility of community impact, impact on workers, preventive measures such as earmuffs, etc.
- 5.5 Potential of water pollution from works – possibility of leakage to surface water or accumulation in low lying areas; preventive measures/treatment requirement
- 5.6 Estimate of excavated earth/construction debris requiring disposal – quantum, sources(s) of generation, identified dumping sites, transportation mode and route, period of dumping and restoration plan.

6. Occupation Health & Safety and Emergency Management

- 6.1 List of work locations, hazards/risks with PPE requirement and numbers
- 6.2 Lists of tasks and work zone critical for hazard prevention
- 6.3 Location of warning signage for hazard prevention
- 6.4 Requirement of first aid boxes and fire extinguishers – task and location wise
- 6.5 Key person(s) to be contacted during emergency.
- 6.6 Protocol for deciding the level of emergency – need for hospitalisation, information to authorities, etc.
- 6.7 Process of accident analysis, corrective and preventive measures and need for reporting.

7. Addressing GBV Risks

- 7.1 Preventive measures – provision of lighting, separate latrine areas for men and women, increased vigil and security arrangement for community sensitive GBV hotspots, if identified by dam authorities.
- 7.2 Sensitising and awareness of labour on GBV issues, including penalties and legal action against offenders.
- 7.3 Awareness about GM

8. CoC

- 8.1 Preparation of CoC
- 8.2 Making labour aware of conduct with all the provisions, do's and don'ts, penalties for non-compliance, etc.
- 8.3 Displaying CoC at prominent locations
- 8.4 Signing of CoC by workers

9. Awareness and Training

9.1 Plan for training and awareness covering Pollution Prevention, OHS, Use of PPEs, Accident reporting and emergency management, CoC, GBV, GM, etc.

9.2 Training schedule

9.3 Training records

10. Labour GM

10.1 Details of Governance, Risk, and Compliance (GRC)

10.2 Process of receiving, redressing, escalation, reporting back

Consolidated statement on Grievances (segregated by non-pandemic related & pandemic related)