

LABOR MANAGEMENT PROCEDURES

1. OVERVIEW OF LABOR USE ON THE PROJECT

The Labor Management Plan (LMP) is a living document to be reviewed and updated throughout development and implementation of the *Public Information and Awareness Services for Vulnerable Communities in Lao PDR* (P170640) project. The LMP applies to all project workers, irrespective of contracts being full-time, part-time, temporary or casual.

The World Bank ESS2 defines four categories of project workers:

- **Direct workers** - people employed or engaged directly by the Implementing Agency, Helvetas, to work specifically in relation to the project.
- **Contracted workers** - people employed or engaged by sub-grantees to perform work related to core functions of the project, regardless of their location.
- **Community workers** - people engaged in providing community labor, generally voluntarily. Community workers will be mobilized and supported by the sub-grantees.
- **Primary supply workers** - people employed or engaged by primary suppliers to Helvetas and sub-grantees. Primary suppliers are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project. They will not be addressed under this LMP.

The Project is expected to engage a variety of staff and workers listed below.

Project Component	Estimated Number of Project Workers	Characteristics of Project Workers	Timing of Labor Requirements	Direct Workers, Contracted Workers, Community Workers
Component 1: CSO Capacity Building	6 (estimated 6 sub-grantees)	Project Coordinators of LIWG member organisations (sub-grantees)	Throughout project cycle	Sub-contracted (sub-grantees)
	12 (estimated 6 sub-grantees)	Trainers/Field Facilitators of LIWG member organisations (sub-grantees)		Sub-contracted (sub-grantees)
	18 (estimated 6 sub-grantees)	Finance, administrative and support staff of LIWG member		Sub-contracted (sub-grantees)

		<p>organisations (sub-grantees)</p> <p>Others: local community members, government officials and representatives from mass organisations (e.g. LWU)</p>		<p>Community Workers/ Volunteers (only receiving DSA, and travel expenses when they attend activities)</p>
Component 2: Sub-grants	Unknown at this stage	<p>Technical Advisor (sub-grantees)</p> <p>Trainers /Field facilitators (sub-grantees)</p> <p>Community Volunteers, VMC members</p>	Throughout project cycle	<p>Sub-contracted (sub-grantees)</p> <p>Sub-contracted (sub-grantees)</p> <p>Volunteers (only receiving DSA, and travel expenses when they attend activities)</p>
Component 3: Project Management, Monitoring and Evaluation	<p>1</p> <p>1</p> <p>1</p> <p>1</p>	<p>Project Manager (Helvetas)</p> <p>Procurement Specialist (Helvetas)</p> <p>Finance Manager (Helvetas)</p> <p>CSO Capacity building Expert (Sub-grantee)</p>	Throughout project cycle	<p>Direct worker</p> <p>Direct worker</p> <p>Direct worker</p> <p>Sub-contracted (Sub-grantee)</p>

Helvetas: Prepares and manages the project; organizes activities, technical supervision, facilitation, and monitoring. Helvetas will provide overall management and oversight of the project and will bear overall

responsible for: (i) developing detailed implementation plans and timeframes; (ii) facilitating stakeholder consultations; (iii) contracting and overseeing the work of the sub-grantees; (iv) establishing and implementing monitoring and evaluation plans; (v) conducting periodic performance appraisals and reviews; and (vi) conducting annual audits of activities throughout the life of the grant. Helvetas will make reasonable efforts to ascertain that the below mentioned sub-grantees who engage contracted workers are legitimate and reliable entities and have in place *labor management procedures* applicable to the project that will allow them to operate in accordance with the requirements of this ESS.

LIWG member organisations: LIWG is a Laotian CSO network that serves as an umbrella organisation for more than forty national and international CSOs that actively work with local communities in Lao PDR on a variety of diverse socio-economic development issues. Helvetas is also part of the network. The implementation of the project activities will be conducted through provisions of up to up to 12 sub-grants to LIWG member CSOs. The project is expected to build capacities of LIWG members to conduct in collaboration with MoNRE and mass organisations local branches quality public information and awareness activities. Where appropriate, LIWG members will partner with the district legal clinics under the MoJ and village representatives of the mass organisations to facilitate mediation for situations in conflict. LIWG member organisations will lead the implementation of field activities; provide technical support and coordination in conducting case studies; provide capacity building for local communities, staff and authorities; connect local stakeholders and authorities with grassroots organisations; provide Helvetas with financial and narrative reports; mobilize and coordinate among civil society; share expertise and learnings through a knowledge management process.

Trainers/Technical advisors for Field facilitators (Community Volunteers and VMC members): Trainers and technical experts/advisors will be engaged on a need basis, to fill the gap in legal advisory services in remote areas with limited access to government services. Selected local community member and village focal persons will be trained on basic legal knowledge on natural resource rights and other rights related to social issues to provide information and advice to their own communities on a voluntary basis.

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

Project Activities:

Component 1: CSO Capacity Building A1.1) Build capacities of LIWG members to deliver support on public information and awareness related to natural resources and other basic legal rights on social issues.

A1.1.1) Produce user-friendly awareness and information tools, including e.g. village level information/awareness sessions, short video clips, radio talk shows etc.

A1.2) Train trainers of LIWG member CSO staff to enhance their capacity to train local para-legal volunteers, lawyers at LACs and VMC members.

A1.3) Tailor the training and awareness raising tools to the local contexts.

Component 2: Sub-grants

A2.1) Conduct information awareness campaigns.

A2.2) Mobilize local community members to self-evaluate services where possible with the use of ICT. A2.3) Set up local counselling services to provide vulnerable persons or groups more personal advice on the exercise of rights and access to services.

A2.3) Train volunteer paralegal advisors and VMC members on basic legal knowledge on natural resource rights and other rights related to social issues as village focal persons to provide information and advice to their own communities on a voluntary basis.

A2.4) Support the facilitation of (VMC) mediation for situations of conflict (if appropriate)

Component 3: Project Management, Monitoring and Evaluation

A3.1) Provide capacity-building to Helvetas and LIWG.

A3.2) Develop all relevant assessments and audits and all relevant monitoring and evaluation reports.

A3.3) Disseminate knowledge of the outcomes and findings of the grant activities through various forms of media.

Key Labor Risks:

Helvetas Laos has **Safety & Security Guidelines** in place, which are based on a country and project specific risk assessment. The following information about key labor risks which may be associated with the project is taken from Helvetas' Safety and Security Risk Assessment for Laos. It is grouped into categories 1 to 5, with 1 being a low risk and 5 being a high risk:

Clusters	Threat / Hazard	Description / Information	Rank 1 – 5
Health & stress	Tropical diseases	Malaria; dengue fever; yellow fever; hepatitis etc.	3
	Diseases and epidemics	Tetanus, Hepatitis A, B, C; Diarrhoea; food poisoning; typhus; Covid19; sexually transmitted diseases etc.	3
	Exhaustion, fatigue, stress symptoms	Over-work; alcoholism; drug abuse; nervous breakdown; hypervigilance etc.	2
Conflicts	Attitude, behaviour	Problems with image & perception; behaviour at work and outside work; disgruntled staff (ex-staff); hiring and firing methods and approach; not respecting rules; blatant disregard for rules	N/A
	Discrimination and gender-based violence	Inappropriate treatment or harassment of project workers related, for example, to gender, age, disability, ethnicity, or religion; unequal opportunities for women and men, with emphasis on equal criteria for selection, remuneration, and promotion, and equal application of these criteria; measures to prevent harassment of project workers, including sexual harassment, not in place	3
	Negative interaction between project workers and local communities	No respect for local communities, inappropriate behavior, disrespect for the Code of Conduct	2

3. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Lao PDR has national legislation that outlines worker's rights. The Labor Law (revised in 2016) is the key document governing the regulatory framework for labor in Lao PDR. The Lao government has also ratified a number of ILO conventions, including on forced labor, child labor, minimum age and equal remuneration. These can be found at the following website:

(https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:103060).

The 2013 Labor Law (Amended) defines non-discrimination in employment and in wages. It establishes the need to abide by at least the government minimum wage. Working hours are limited to 8 hours per day, 6 days a week. The law is extensive and covers discrimination in the workplace, equal opportunity, gender aspects, labor disputes and collective bargaining, among others. A whole chapter in the Law is dedicated to health and safety in the workplace. The Law covers formal and informal workers but does not apply to government officials, soldiers, police, Lao Front for National Development, and mass organisations.

In addition, the Law on Civil Servants, 2016 and associated Decree on Code of Conduct for Civil Servants, 2019 also largely consistent with ESS2 and applicable for the project. The Civil Servant Law and Decree on Code of Conduct provide provisions and measures to manage, prevent and address misbehaviors and misconduct that may be observed among civil servants including health workers and staff. Compliance of these legislations are monitored by Department of Personal and Organization under MOH or concerned ministries and Ministry of Home Affairs (MOHA).

Child labor remains a noticeable gap in the legal framework despite many years of participation in related international programs. The Labor Law defines 12 years old as the minimum working age for children, though 12-14-year old ones are meant to only engage in certain light jobs. Yet this is not always closely monitored. Article 102 states that youth employees are prohibited from engaging in work that is unsafe, forced labor, work to pay off debts, human trafficking, and hazardous work. No persons under the age of 18 will be allowed work on any aspect relating to the project and forced or indentured labor of any kind will be prohibited.

4. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

The Labor Law includes provisions on Occupational Health and Safety (OHS) mostly consistent with ESS2 of the World Bank's Environmental and Social Framework (ESF). Additional measures must also be taken compliant with WHO guidelines on COVID-19.

The Law on Social Security (2018) provides provision on life and health insurances for public servants. Thus, all of them are already covered by the social security/insurances managed through MLSW.

At the beginning of this project, Helvetas will undertake an analysis of the project's potential adverse impacts and risks on occupational and community health and safety and develop, if needed additional preventive and protective measures. When needed, the LMP will be updated. This will ensure that:

- Workplace health and safety standards are in full compliance with Lao PDR law. This refers particularly to: (1) basic safety awareness training to be provided to all persons as well as on COVID-19 prevention and related measures; (2) All vehicle drivers to have appropriate licenses; (3) First aid equipment and facilities to be provided in accordance with the Labor Law; and (4) Adequate provision of hygiene facilities (toilets, hand-washing basins) separated by gender as needed and with distancing guidelines in place;

- All workplace health and safety incidents will be properly recorded in a register detailing the type of incident, injury, people affected, time/place and actions taken, including COVID-19 cases in the workforce, which should be reported to MOH and the World Bank immediately;
- All workers (irrespective of contracts being full-time, part-time, temporary or casual) to be covered by insurance against occupational hazards and COVID-19, including ability to access medical care and take paid leave if they need to self-isolate as a result of contracting COVID-19;
- Fair and non-discriminatory employment practices are in place;
- A balanced representation of women will help design policies and practices responding to the needs of female project workers;
- Provide PPE as suitable to the task and hazards of each worker, without cost to the worker;
- Under no circumstances will contractors, suppliers or sub-contractors engage forced labor or children under the age of 18;
- All employees are aware of their rights under the Labour Law, including the right to organize;
- All employees are to be informed of their rights to submit a grievance through the established Grievance Mechanism;
- All employees are to be provided with training on appropriate behavior with communities, gender-based violence and violence against children (also see Codes of Conduct).

5. RESPONSIBLE STAFF

The functions and responsibilities for the implementation and maintenance of the labor and work conditions will be as follows:

- **Engagement and Management of Direct Workers:** Helvetas will be responsible for the engagement and management of direct workers, of the sub-grantees and of sub-contracted service providers and for their compliance with Helvetas safeguard policies and the contract conditions, including labour and work conditions. Helvetas will address all LMP aspects and vulnerabilities of project workers as part of its human resources management and service procurement. A Project Management Unit established within Helvetas will be responsible for overseeing all aspects of implementation of the project, including the management and monitoring of the direct project workers and of the contracts with sub-grantees and sub-contracted service providers. The Project Management Unit will be supervised by the Helvetas Laos County Directorate, in all aspects related to the management of contracts and personnel. The ultimate responsibility lies with the Country Director of Helvetas in Laos.
- **Engagement and Management of Sub-Contracted Workers:** The sub-grantees will be responsible for the management of their workers and indirect workers including possible sub-contracted suppliers or service providers if hired in accordance with this LMP and general OHS standards. Helvetas will make reasonable efforts to ascertain that contracted parties (e.g. subgrantees and their sub-contracted suppliers or service providers) address vulnerabilities of their employees and any person working for them. In signing their contract, contracted parties will take on the commitment to observe the Helvetas Code of Conduct and to behave accordingly. Any action violating the Code of Conduct may entail an enquiry and the imposition of measures relating to non-compliance with contractual obligations, or of other measures.
- **Labor and Working Conditions:** It is the responsibility of the Helvetas Country Director to oversee and enforce policies and guidelines related to occupational health and safety (OHS). He/She is supported by

the Finance & Administration Unit of the Helvetas Country Directorate and the Deputy Country Director who oversees the implementation of the safety and security guidelines and procedures.

- **Training of Workers:** Helvetas will ensure that its direct workers are trained on OHS measures and other aspects of this LMP as appropriate, and – if necessary – provide guidance and supervision to sub-grantees to ensure that they also take adequate measures.
- **Addressing Worker Grievances:** Helvetas will implement a Grievance Redress Mechanism (GRM) for workers which responds to the minimum requirements in this LMP and labor dispute under the Labor Law.

6. POLICIES AND PROCEDURES

Helvetas has a range of organizational policies and guidelines in place to address safety risks as they were identified in Section 2, and to address vulnerabilities of project workers, including specific groups of workers, such as women and people with disabilities. They are:

Environmental and Social Management and Safeguards System: Helvetas implements an **Environmental and Social Management and Safeguards System (ESMS)** fully integrated into the HELVETAS Project Cycle Management system. The ESMS policy serves to identify and if necessary, address environmental and/or social potential adverse impacts of projects and programmes supported and/or implemented by Helvetas. The ESMS ensures that project and programmes supported and/or implemented by Helvetas will not cause significant adverse environmental and social impacts, and that any adverse environmental and social impacts generated from the implementation of projects and programmes will be mitigated to acceptable levels. Among other aspects, the policy is enforced for instance to prevent any kind of pollution or consumption of protected natural resources by project staff and workers, and to support the protection of cultural heritage etc.

The Environment and Social Safeguard principles applied by Helvetas emphasize a “do no harm” outcome for affected communities, the environment, and fiduciary aspects, and therefore it seeks to avoid, minimize, or mitigate adverse environmental and social adverse impacts, including protecting the rights of those likely to be affected or marginalized by the development process. The key principles of the Helvetas ESMS are to:

- Identify and evaluate environmental and social risks and adverse impacts of the project;
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize, and, where residual adverse impacts remain, compensate/offset for risks and adverse impacts to workers, affected communities, and the environment;
- Promote improved environmental and social performance of subcontracted parties;
- Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately; and
- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and ensure that relevant environmental and social information is disclosed and disseminated.

Helvetas’ Code of Conduct: In addition to the Environment and Social Safeguard principles, **Helvetas’ Code of Conduct** defines the basic ethical behavior which are binding for all employees and subcontractors. It is based on the Mission Statement, the Human Resource Policy and the Personnel Regulations of Helvetas. It thereby reflects values and principles of Helvetas, to be applied irrespective of cultural contexts. The Code of Conduct expresses the commitment of each collaborator to adhere to and to promote high ethical

standards in their work and as part of the working culture. It constitutes a compulsory annex to the employment contract.

The correct conduct of employees is of specific relevance to Helvetas. First, the intercultural context in which collaborators of Helvetas operate makes their conduct particularly exposed and sensitive. Unethical conduct of a collaborator can, beyond its direct consequences, have far reaching negative impacts on the effectiveness of the work and on the reputation. Second, as a development organization receiving donations from thousands of individual and institutional donors, Helvetas and its employees are accountable to these donors and subject to a high degree of scrutiny by the public and the media.

The Code of Conduct is binding for all employees and workers in any contractual relationship with Helvetas at all times during their assignment with Helvetas. The Code of Conduct will be binding for all the project's workers and partners. It will be signed by all direct (project) workers and sub-grantees (see also below under "Contractor Management"). It is expected that principles of this Code of Conduct are also respected outside the workplace and working time. When Government counterparts (MONRE, LFND, LWU and others) will be appointed to join field activities, their letter of appointment will make reference to the national legislation governing the conduct of public servants, incl. the Labor Law (2013), the Decree on Code of Conduct for Public Servants (2019) and the Law on Preventing and Combating Violence against Women and Children (2014), which are largely in line with ESS2 and ESS4.

Besides the Environmental and Social Management and Safeguards and the Code of Conduct Helvetas will monitor that direct workers, sub-grantees and sub-contracted service providers operate in accordance with the following Helvetas regulations:

Regulations on Mobbing, Sexual Harassment & Abuse of Authority: These regulations reflect the principles and responsibility of Helvetas to prevent and address mobbing, sexual harassment and abuse of authority. All forms of mobbing, sexual harassment and abuse of authority are explicitly forbidden. Such behavior or conduct manifest a considerable encroachment on the basic principles of equality and fundamental rights of those affected and is contrary to the principles and values of Helvetas as stated in the Human Resource Policy, Code of Conduct and our mission statement. Helvetas promotes the respect and protection of all its employees, partners and primary stakeholders against all forms of emotional, physical and sexual misconduct and/or aggression. Everyone has a right to their physical and mental integrity, while those in breach will be held accountable. Employees of Helvetas or any other person involved in our activities responsible for such behavior or conduct shall be subject to sanctions and/or disciplinary measures.

Regulations on Child Protection: Helvetas recognizes that especially in situations of poverty, humanitarian crisis and/or conflict, children can be extremely vulnerable and acknowledges its fundamental duty to protect them. These regulations have been developed to ensure maximum protection of children within our activities from all forms of abuse and exploitation. It ensures that Helvetas has procedures in place to prevent and deal with child abuse, child exploitation and breach of regulations. Additionally, Helvetas aims at protecting Helvetas staff from false or malicious allegations of misconduct. Furthermore, Helvetas seeks safeguarding of Helvetas' organisational integrity and reputation, as well as that of its partners, by introducing sound Child Protection Regulations. In all aspects of our work, Helvetas is committed to the key principles of the UN Convention on the Rights of the Child, specifically: guaranteeing, without any form of discrimination, the rights of children; considering the best interests of children in all actions relating to them; recognizing the right to life, survival and development of each child; reflecting children's views in matters affecting them.

Regulations on anti-money laundering, anti-organized crime and countering the financing of terrorism: The purpose of the regulations is to provide principles and guidance regarding AML/AOC/CFT requirements

and risks and to meet the following objectives: Prevent the abuse of the funds of Helvetas or the funds of the funding organisations for Money Laundering (ML), Organized Crime (OC) and/or Financing of Terrorism (FT); Meet applicable legal requirements, national and international standards in jurisdictions where Helvetas operates; Mitigate any reputational risk; Support the establishing and/or strengthening of capacities in countries to meet the Helvetas' fiduciary standards regarding AML/AOC/CFT; Guard against establishing any relations or undertaking any transaction that may relate to or may facilitate ML, OC and/or FT or any other illicit activity; Exercise due diligence (DD) when dealing with collaborative organisations; and periodically review and update the AML/AOC/CFT regulations and its corresponding guidelines to evolve to prevent and detect ML, OC and/or FT.

Regulations on Corruption, Fraud and Conflicts of Interest: The Regulations on Corruption, Fraud and Conflicts of Interest explicitly formulate the stance of Helvetas regarding corruption, fraud and conflicts of interest and define the main principles, roles and responsibilities, prevention measures and sanctions, as well as the complaint mechanism including the case management. These regulations are supposed to contribute to: tackle corruption, fraud and conflicts of interest proactively and through effective preventive efforts; further sensitize the employees and partners of Helvetas about corruption, fraud and conflicts of interest; assist employees and partners in difficult situations and assure others of our commitment and thereby prevent corruption, fraud and conflicts of interest; and to define the roles and responsibilities regarding corruption, fraud and conflicts of interest. Helvetas statutes as well as internal rules and regulations are binding and above all policies. All activities of Helvetas and its contractual partners and suppliers must respect the national civil and penal codes.

The above listed policies and regulations are attached to the LMP.

7. AGE OF EMPLOYMENT

For this project, the minimum age will be 18 years. This rule will apply for both national and international workers. Workers will be required to provide proof of their identify and age before commencing any works on site.

8. TERMS AND CONDITIONS

All terms and conditions as outlined in the World Bank Environmental and Social Framework (ESF) ESS2, paragraphs 10 to 15 apply to contracted workers. In addition:

- In line with national law, the maximum working hours are limited to 8 hours per day, 6 days a week unless there is payment of overtime, or 6 hours a day, 6 days a week if the work is considered hazardous.
- The compensation packages are defined through the National Personnel Regulation of Helvetas Laos, which describes the salary systems, the modalities of salary adjustments as well as all allowances. No salaries paid by Helvetas are lower than the Lao PDR minimum wage.
- Employment opportunities will be available to all. This includes equal pay for equal work, regardless whether the person performing the work is male or female.
- All workers of Helvetas and other project's workers are entitled to insurance against occupational hazards, including ability to access medical care and take paid leave if they need to self-isolate as a result of contracting COVID-19.

9. GRIEVANCE MECHANISM

Grievance Redress Mechanism Guidelines: Helvetas has a grievance mechanism in place, which allows all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers are informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures are put in place to make the grievance mechanism easily accessible to all project workers. The goal is that project workers are able to raise concerns regarding unsafe or unhealthy work situations and other irregularities observed in the working environment. The grievance mechanism is proportionate to the nature and scale and the potential risks and impacts of the project. It is designed to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution, and will operate in an independent and objective manner.

These guidelines provide practical guidance on the implementation of the redress mechanism in the areas procurement, environmental and social safeguard (ESS) and project management. They define the type of eligible complaints that fall under these guidelines. Complaints that allege corruption, coercion, or fraud or conflict of interest are regulated in the Regulations and Guidelines on Dealing with Corruption, Fraud and Conflicts of interest. Cases of mobbing, sexual harassment, child abuse & abuse of authority are regulated in the Regulations and Guidelines on Dealing with Mobbing, Sexual Harassment, Child Abuse and Abuse of Authority.

The Guidelines further outline how a complaint can be filed through the redress mechanism, and the responsibilities of different entities within HELVETAS on how to handle the respective cases:

- **The Administration and Ethics Committee** of Helvetas has the responsibility of establishing a culture of and a commitment to legal compliance and integrity. The Administration and Ethics Committee ensures and overviews the establishment of an appropriately and adequately resourced compliance mechanism.
- **The Management Board** assesses the compliance of Helvetas with the code of conduct and the regulations on corruption, fraud and conflicts of interest. The Board implements an appropriately and adequately resourced compliance mechanism that includes periodic risk assessments, targeted training, and effective monitoring.
- **Country Directors** ensure the effective fight against harassment, corruption, fraud and conflicts of interest, etc. They have the obligation to disseminate information on the regulations in their respective country programs. Country Directors undertake regular local risk assessments and implement preventive measures based on the assessment. They regularly report back to the Sensitization and Accountability Officer at Head Office about plans, progress and challenges and receive assistance from Head Office where needed.
- **Notification Officer:** Through the complaint mechanism the Notification Officer receives notice and establishes a report with recommendations to the Case Management Unit, which decides whether investigations are adequate or not. In case investigations are not initiated the officer informs all involved parties as well as the indicating party.
- **Case Management Unit:** The unit decides, on recommendation of the Notification Officer, whether investigations are adequate or not. The unit has the task of heading investigations upon receiving reports of violations from the notification officer. The unit draws matters within its mandate to the attention of the Management Board as occasion requires. The Case Management Unit is composed of members with altering composition according to the Guidelines on dealing with Harassment, Corruption, Fraud and Conflicts of Interest.

Whistleblower Policy: Superiors are obliged and motivated to provide a working atmosphere which allows employees to report any cases of harassment, corruption, fraud and conflicts of interest. With adequate measures, they ensure that employees can report suspicions without fear of reprisal, and they protect employees from pressure of third parties. Therefore, Helvetas has established a **Whistleblower Policy**, which applies to all employees and every other person working for Helvetas.

It meets the following objectives:

- Encourage the reporting of matters that may cause harm to individuals or financial or non-financial loss to Helvetas or damage to its reputation, on a confidential basis.
- Enable Helvetas to deal with complaints in a way that will protect the identity of the whistleblower as far as possible and provide for the secure storage of the information provided.
- Establish appropriate instruments and procedures for protecting whistleblowers against reprisal and retaliatory actions by any person internal or external to the entity.
- Provide for the appropriate reporting channels.
- Help to ensure Helvetas maintains the highest standards of ethical behavior and integrity.

In addition to the Whistleblower Policy, Helvetas has set up an **internal complaint channel**, in case an employee is affected by, or witnessing mobbing / sexual harassment etc. For misconduct or suspicions of mobbing, sexual harassment, abuse of authority can internally be reported to the direct superior or directly to the following email-address: anti-harassment@helvetas.org together with a complaint form.

CONTRACTOR MANAGEMENT

Partnership Policy: The Helvetas Partnership Policy provides guidance for the development of a common understanding of whom Helvetas considers as partners, and what a partnership is. To this end, it formulates six 'key principles' along which Helvetas establishes working relationships with our partners in order to achieve common goals. Helvetas screens possible partners, service providers and assisted organisations systematically before starting or renewing a cooperation. Contracts with partners, service providers and assisted organisations include a specific clause on workplace safety, harassment, corruption, fraud and conflicts of interest. Organisations who do not have any preventive mechanism in place have to develop adequate institutional mechanisms within a clearly defined time frame.

Code of Conduct of Contracted Parties: This Code of Conduct outlines the attitude and the behaviour that Helvetas expects from consultants, services providers of goods and services and implementation partners that are responsible for implementing projects, project components and/or recipients of contributions. It refers to safeguard the personal safety, health and integrity of employees as well as the environmental and social safeguards. Contracted parties are expected to ensure that their employees and any person working for them adhere to this Code of Conduct by putting in place adequate policies and regulations and through sensitization, supervision and training of concerned persons. The Code of Conduct is binding, and an integral part of all contractual agreements made between Helvetas and its contracted parties. In signing their contract, contracted parties take on the commitment to observe the Code of Conduct, to ensure adherence by their personnel and their subcontractors, and to behave accordingly. Any action violating the Code of Conduct may entail an enquiry and the imposition of measures relating to non-compliance with contractual obligations, or of other measures.

Procurement Guidelines: Partner and contractor assessment, selection, contract management and monitoring are regulated in the Financial & Procurement Manual of Helvetas Laos.

10. COMMUNITY WORKERS

The Stakeholder Engagement Plan will specify the way in which community workers can raise grievances in relation to the project. Communication with community workers, in a language and form understandable to them, is important, so that they know what to expect from the project and understand their own responsibilities under the project. Helvetas, and the respective sub-grantees, will inform the affected communities about the mechanism during the stakeholder engagement process. Training of community workers will be conducted, as appropriate to the potential risks and impacts of the project. The grievance redress mechanism will be scaled to the risks and adverse impacts of the project. It seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism will not impede access to judicial or administrative remedies.