

VIET NAM ELECTRICITY
NATIONAL POWER TRANSMISSION CORPORATION

RENEWABLE ENERGY ACCELERATING CHANGE (REACH)
(P516693)

LABOUR MANAGEMENT PROCEDURES
(LMP)

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ABBREVIATIONS

AH	Affected Household
APs	Affected Persons (APs)
SPMB	Southern Vietnam Power Projects Management Board
CoC	Code of Conduct
Contractor	Construction Contractor
CSC	Construction Supervision Consultant
DAE	Department of Agriculture and Environment
DMS	Detailed Measurement Survey
DOC	Department of Construction
DOF	Department of Finance
DOHA	Department of Home Affairs
DOST	Department of Science and Technology
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework (ESF)
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESIRT	Environmental and Social Incident Reporting Tool
ESMP	Environmental and Social Management Plan (ESMP)
ESS	Environmental and Social Standards
GBV	Gender-Based Violence (GBV)
GoV	Government of Viet Nam (GoV)
GRM	Grievance Redress Mechanism
IBRD	International Bank for Reconstruction and Development
IDA	International Development Association
LFDC	Land Fund Development Center
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation (M&E)
MOHA	Ministry of Home Affairs (MOHA)

Near-miss	Near-miss Incident
OHS	Occupational Health and Safety
PC	People's Committee (PC)
PPE	Personal Protective Equipment
Primary Supplier	Primary Supply Contractor
ROW	Right of Way
RP	Resettlement Plan
SEA	Sexual Exploitation and Abuse (SEA)
SEA/SH	Sexual Exploitation, Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment (SH)
Subcontractor	Subcontracted Supplier/Worker
WB	World Bank

1. PROJECT INTRODUCTION

1.1 Project Context

1. The proposed 500 kV Krong Buk – Tay Ninh 1 Transmission Line Project aims to enhance power transmission capacity from the Central and Central Highlands regions, thereby evacuating power from regional energy sources—including hydropower, solar power, wind power, and gas turbine power plants—into the national grid. The project will contribute to improving power supply capacity for the Southern, Central, and Central Highlands regions, enhancing grid reliability, securing national energy security, reducing power losses, and improving the operational efficiency of the transmission grid.
2. The project aligns with the Adjusted National Power Development Plan for the 2021–2030 period, with a vision to 2050 (Adjusted Power Development Plan VIII / Adjusted PDP8), approved by the Prime Minister under Decision No. 768/QD-TTg dated April 15, 2025. Specifically, the project is listed in Appendix III.2, Table 8 – List of newly constructed and rehabilitated 500 kV transmission lines in the Central Region (Item No. 21). Additionally, the project is included in the List of National Important and Key Energy Sector Works and Projects approved by the Prime Minister under Decision No. 2634/QD-TTg dated December 2, 2025, categorized under Table IV – Transmission Line and Substation Projects (specifically under Item 11, Section C, Table IV).
3. The entire project is located within 34 communes/wards across 5 provinces and cities: Dak Lak, Lam Dong, Dong Nai, Ho Chi Minh City, and Tay Ninh. The route alignment has been agreed upon by the People's Committees of the five provinces and cities in the following official letters: No. 2716/UBND-CN dated April 1, 2021 (Dak Lak Province); No. 95/UBND-KTN dated January 7, 2022 (Lam Dong Province); No. 2888/UBND-KT dated June 16, 2025 (Dong Nai City); No. 4017/UBND-KT dated July 26, 2024 (Ho Chi Minh City); and No. 666/UBND-KT dated February 23, 2022 (Tay Ninh Province). The project has received Investment Policy Approval along with investor designation from the People's Committee of Lam Dong Province under Decision No. 3319/QD-UBND dated July 6, 2026.

1.2 Project Objectives

4. The investment in the 500 kV Krong Buk – Tay Ninh 1 Transmission Line Project is driven by the following key objectives:
 - Ensuring the full evacuation of power generation capacity from energy sources in the Central and Central Highlands regions (including hydropower, solar, gas turbine, and wind power plants) into the national power system, thereby enhancing the power supply capacity for the Southern, Central, and Central Highlands regions.
 - Guaranteeing national energy security.
 - Enhancing transmission capacity and reducing grid losses across the regional power network.

1.3 Project Components

5. The scope of the project comprises:
 - Construction of a new 500 kV double-circuit transmission line with a route length of approximately 330 km, stretching from the proposed 500 kV Krong Buk Substation (located in Ea Kiet Commune, Dak Lak Province) to the proposed 500 kV Tay Ninh 1 Substation (located in Hung Thuan Commune, Tay Ninh Province).
 - Construction and installation of 02 new feeder bays on the reserved land plots within the proposed 500 kV Krong Buk Substation and 500 kV Tay Ninh 1 Substation.

- Construction of 02 optical repeater stations, each with a footprint of approximately 900 m² and a 10-meter-wide access road.

Table 1: Summary of the Project's Investment Scope

No.	Work item	Scale
A	MAIN WORK ITEM	
1	500 kV Transmission Line Section	Total length: ~330 km
1.1	Number of circuits	Double-circuit (02 circuits)
1.2	Tower foundations	657 foundations, cast-in-place reinforced concrete
1.3	Towers	657 towers, hot-dip galvanized steel lattice type, bolt-connected
1.4	Right-of-Way (ROW) width	36 m (18 m from the route centerline to each side)
1.5	Vertical clearance	≥ 15 m
2	500 kV Outgoing Feeder Bays at 500 kV Krong Buk Substation <i>(Complete construction and equipment installation for 02 outgoing bays)</i>	Within the perimeter of the proposed 500 kV Krong Buk Substation
3	500 kV Outgoing Feeder Bays at 500 kV Tay Ninh 1 Substation <i>(Complete construction and equipment installation for 02 outgoing bays)</i>	Within the perimeter of the proposed 500 kV Tay Ninh 1 Substation
4	Optical Repeater Stations <i>(Construction and installation of optical communication and auxiliary systems)</i>	02 stations (footprint: 900 m ² /station)
B	AUXILIARY AND TEMPORARY WORKS	
1	Temporary construction laydown areas (main warehouses)	16 sites (1.6 ha)
2	Foundation excavation and tower assembly sites	657 sites (71.85 ha)
3	Conductor stringing and tensioning yards	117 sites (3.51 ha)
4	Temporary access roads and construction road rehabilitation	- Temporary access roads: 120,955 m (42.33 ha) - Road rehabilitation: 211,080 m
5	Unexploded Ordnance (UXO) clearance	173.74 ha
C	WASTE TREATMENT AND ENVIRONMENTAL PROTECTION FACILITIES	
1	Sedimentation pits for foundation excavation wastewater	01 pit per active construction site, capacity: 6 m ³
2	Portable toilets	01 unit per active construction site (depending on the site location)
3	Domestic solid waste bins	02 lidded plastic bins per construction site, capacity: 200 liters

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No.	Work item	Scale
4	Hazardous waste bins	03 lidded plastic bins per construction site, capacity: 100 liters

Source: FS, PECC2-PECC3-PECC4, 3/2026

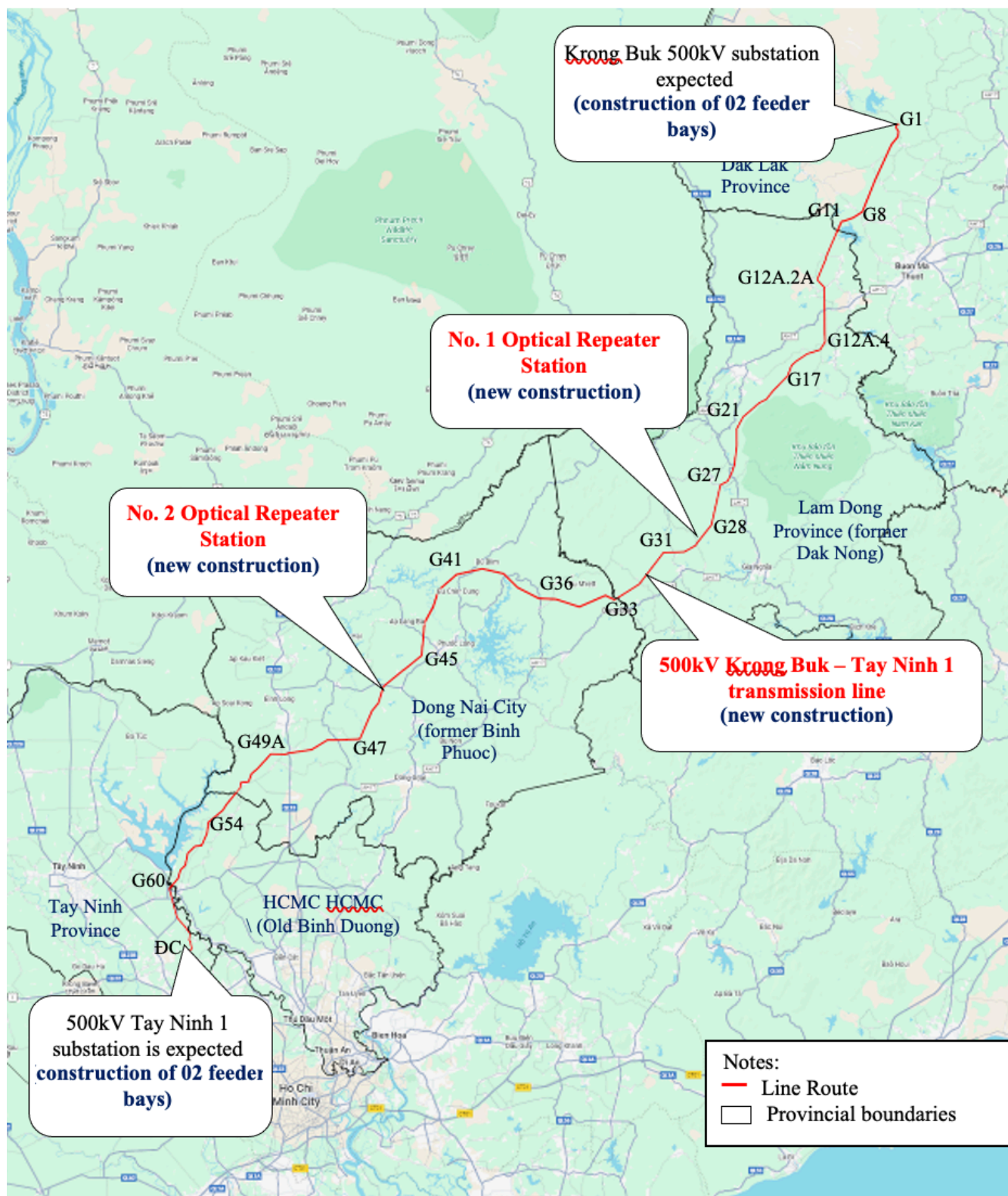


Figure 1: General Project Layouts

2. OVERVIEW OF LABOR USE ON THE PROJECT

2.1 Project workers

6. In accordance with ESS2, Project workers are classified into the following categories:
- **Direct Workers:** Direct workers refer to personnel directly recruited and employed by the Southern Vietnam Power Projects Management Board (SPMB), including SPMB officers and staff working under employment or service contracts with SPMB.
 - **Contracted Workers:** Contracted workers include individuals engaged through third-party contracts for Project-related activities. This category covers workers employed by consulting firms and contractors engaged by SPMB, including but not limited to detailed design consultants, Construction Supervision Consultants (CSC), Independent Environmental and Social Monitoring Consultants (IESMC), civil works contractors and subcontractors, and other service providers.
 - **Primary Supplier Workers:** Workers employed by primary suppliers providing construction materials and equipment on an ongoing basis for the Project, as defined under ESS2.
 - **Community Workers:** Not applicable for this Project.

2.1.1 Direct Workers

7. Under the Project, direct workers are directly employed by SPMB. They include SPMB officers and staff, as well as consultants hired by SPMB to work for the Project.

8. SPMB is responsible for the overall management and supervision of Project implementation, including contractors' construction activities. SPMB will require support from consultants in specific technical areas such as Project management and coordination, financial management, procurement, construction, environmental and social protection, monitoring and evaluation, and other related activities. SPMB will employ approximately 25 staff members and individual consultants to carry out these tasks. They will be expected to work full-time to support the Project owner in the Project preparation, implementation, supervision, and reports. Labor requirements are calculated from the start of the Project through to its end.

2.1.2 Contracted Workers

9. Contracted workers are those engaged through consulting or construction contracts signed between SPMB and third-party service providers. These include, among others, workers of the detailed design consultant, CSC, IESMC, contractors and subcontractors. All contracted workers are subject to the requirements of this LMP, as applicable, and their respective employers are responsible for ensuring compliance with national labor legislation and ESS2.

10. Labor requirements will depend on the scale of each civil work under the respective construction packages. The timing of labor needs will vary, depending on construction phases. The different categories of contracted workers are described below.

11. For construction, it is estimated that a total of 695 personnel and workers will be mobilized by SPMB, consulting firms, contractors, primary suppliers for Project construction activities (details provided in Table 2).

- **Technical workers of contractors/subcontractors:** Officers and technical personnel of the contractors will participate in the Project, including Project managers, Project engineers, environmental engineers, construction supervisors, medical staff, administrative personnel, financial officers, etc. Depending on the technical requirements of each investment item and other factors, contractors may hire local subcontractors to perform certain technical tasks, which may

include operators of heavy machinery for transportation, road/soil compaction, loading/unloading of sand/stone, grading/excavation. Approximately 180 workers are estimated for this category.

- **Contractors and subcontractors:** A total of approximately 670 contracted workers is anticipated, comprising about 90 consulting and specialized personnel, 180 technical and skilled personnel of contractors and subcontractors, and 400 unskilled workers expected to be recruited primarily from local communities. The skilled members of contractors/subcontractors are mostly immigrant workers while the unskilled locally recruited workers are local to minimize the impacts due to the mobilization of labor influx mainly from other areas and create job opportunities for communities affected by the Project.
- **Consultants** will be engaged during different phases of the Project lifecycle, including: (i) Project preparation phase, during which consulting firms will be mobilized to undertake activities such as feasibility studies, environmental and social assessments and procurement support; and (ii) Project implementation phase, during which detailed design, UXO clearance, construction supervision consultants, CSC, IESMC and M&E consultants will be mobilized.

2.1.3 Primary Supplier Workers

12. Construction activities under the Project will require primary supplies necessary for the functionality of priority infrastructure, such as construction materials including structural steel for transmission towers, conductors, ground wires and optical ground wires (OPGW), insulators and fittings, reinforcement steel, cement, electrical equipment, cables, and other materials and equipment required for the transmission line, outgoing feeder bays, and optical repeater stations. In cases where contractors source these materials directly from primary suppliers on an ongoing basis, the workers of such primary suppliers are considered “primary supplier workers” as defined in ESS2.

13. The number and categories of primary suppliers will be determined during Project implementation. The labor engagement period associated with primary suppliers will span the entire construction phase of the Project (see Chapter 12 for additional details on primary supplier workers). Contractors shall, where technically and commercially feasible, give consideration to qualified suppliers that meet the Project’s technical, quality, environmental, social, labor, and occupational health and safety requirements.

2.1.4 Community Workers

14. SPMB will not require or encourage community labor contributions. Community members hired by contractors will be classified and managed as “unskilled contracted workers”.

15. Local residents may voluntarily participate in community monitoring activities to observe Project construction activities in their areas. Such community monitoring is not required by the Project and does not constitute employment or a labor relationship with SPMB or its contractors; therefore, community monitors are not considered “community workers” under ESS2. Nevertheless, where community monitors are permitted to enter or approach active construction sites, they may be exposed to occupational and community health and safety risks associated with 500 kV transmission line construction, including open excavations, working-at-height activities, falling objects, lifting operations, moving vehicles and heavy machinery, conductor stringing and tensioning, and electrical hazards, particularly at locations close to existing energized transmission lines.

16. Accordingly, community monitors shall not be permitted to enter active construction or restricted areas without prior authorization from the responsible site management. Where site access is necessary for monitoring purposes, the contractor shall provide appropriate site-specific safety induction and instructions, required personal protective equipment (PPE), and safe access

arrangements, and shall ensure that community monitors are accompanied by authorized site personnel, where necessary. Community monitors shall comply with all applicable site safety rules, warning signs, exclusion zones and instructions of the contractor/CSC. Access shall be prohibited during high-risk activities where adequate separation from construction hazards cannot be maintained.

2.1.5 Other Project-Related Workers

17. Project-related workers, aside from those directly working for the Project, will include government civil servants from departments and agencies of the city, such as Department of Finance (DOF), Department of Construction (DOC), Department of Agriculture and Environment (DAE), Land Fund Development Centers (LFDC), Commune/Ward Site Clearance and Compensation Councils (SCCCs), and city/commune/ward People's Committees (PCs). They will continue to follow their existing public-sector employment terms and conditions, governed by the Viet Nam's Labor Code, the Law on Public Employees, and the Law on Cadres and Civil Servants. There will be no transfer of employment or legal engagement with the Project. ESS2 does not apply to government civil servants. However, if they visit the Project sites, they must adhere to E&S risk management regulations¹.

2.2 Timing of Labor Requirements

18. The direct workers, i.e. SPMB staff, will generally be required full-time and around the year for the Project preparation and implementation.

19. The contracted workers working as consultants for development of Pre-FS, FSs, E&S instruments will be engaged during the Project preparation period.

20. The contracted workers, comprising detailed design consultants, CSCs, IESMCs, and M&E consultants. They will be respectively responsible for delivering design service, supervision and monitoring of technical and environmental and social performance throughout Project implementation. The CSC is expected to be deployed on a full-time basis, working daily at the construction conduct continuous technical and E&S supervision. The IESMC is expected to be mobilized to work quarterly or biannually depending on the Project requirement.

21. Contractors and subcontractors will be mobilized during the civil works period. Based on the current implementation schedule, construction activities are expected to take place during 2027–2028, with the duration and peak labor demand of individual packages varying according to work sequencing and site conditions. The indicative schedule and workforce estimates will be updated when the detailed procurement and construction schedules are finalized.

22. **Worker origin and characteristics.** According to the ESIA, approximately 80% of workers will be recruited locally, while 20% will be migrant workers requiring temporary accommodation. Technical staff and specialists are often mobilized from other cities/provinces, while unskilled laborers are mostly local residents.

23. **Labor demand by component.** Based on FS estimates, to ensure the construction progress of the Project, the transmission line is divided into 16 sections corresponding to 16 construction teams, along with 04 construction teams for sub-stations and feeder bays. The maximum number of workers mobilized will be approximately 400 workers/day, distributed as follows:

¹ ESS2 applies in part to government workers, through the provision of paragraphs 17 to 20 (Protecting the Work Force) and paragraphs 24 to 30 (Occupational Health and Safety).

- 16 transmission line construction teams (16-line sections): approx. 320 workers (max. 20 workers/team/day for foundation excavation, tower erection, insulator/fitting installation, and stringing works)
 - 04 feeder bay construction teams (Optical Repeater Station No. 1, Optical Repeater Station No. 2, Feeder Bay at 500 kV Krong Buk Substation, and Feeder Bay at 500 kV Tay Ninh 1 Substation): approx. 80 workers (max. 20 workers/team/day).
24. Worker mobilization timeline (2027–2028):
- Contractor selection: 01 – 02/2027.
 - Approval of construction drawing design: 02-03/2027.
 - Commencement: Quarter I/2027.
 - QI/2027– QIII/ 2028: Peak construction labor demand (up to 400 workers)
 - QIV/2028: Gradual demobilization; transition to commissioning and finishing works.
25. Project-specific labor management characteristics:
- Construction activities are linearly distributed across multiple localities, spanning 34 communes/wards across 5 provinces/cities.
 - Substantial-risk civil works: Deep foundation excavation & concrete works, high-altitude steel tower erection, conductor and OPGW stringing and tensioning, civil works near energized high-voltage transmission lines, overhead stringing across major transportation corridors and waterways, heavy machinery and equipment operation on steep and complex terrain.
 - High proportion of local labor reduces social risks
 - Need for strict management of temporary accommodation for approx. 20% of the workforce
26. Estimated labor quantities by category are presented in Table 2.

Table 2. Estimated Number of Workers to Be Mobilized for the Project

Classification of Project Workers	Characteristics of Project Workers	Timing of Labor Requirements	Required Number of Workers
1. Direct Workers			25
SPMB officers and staff	National officers and staff	From Project preparation through Project completion	25
2. Contracted Workers			670
Project preparation consultants (technical consultants, environmental and social consultants, supervision consultants, independent monitoring consultants)	National experts	From the early stage of Project implementation through Project completion	80
UXO clearance consultants	National experts	Prior to Project implementation	10
Technical personnel the contractor (construction companies)	International and national technical experts	Worker mobilization period varies depending on construction stages and needs	180

Classification of Project Workers	Characteristics of Project Workers	Timing of Labor Requirements	Required Number of Workers
Unskilled laborers from local communities	Local workers	Worker mobilization period varies depending on construction stages and needs	400
3. Workers of Primary Suppliers			
Workers from primary suppliers at quarry sites (construction materials)	Most likely local workers	Construction phase	To be determined during Project implementation
Total			695
<i>Remarks: Additional mobilizable manpower by implementation phase</i>			

3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

3.1 Project Activities

27. The 500 kV Transmission Line Project encompasses a wide range of energy infrastructure construction works and specialized electrical installation activities executed across numerous sites spanning the target provinces and cities. Construction activities will be carried out concurrently and continuously along the entire alignment, including tower foundation construction, steel tower erection, conductor stringing and tensioning, alongside the construction of optical repeater stations and 500 kV outgoing bays. These activities require the sustained mobilization of the project workforce throughout the construction phase.

Item 1 – Construction of the 500 kV Transmission Line

28. Construction activities for the 500 kV transmission line are divided into 16 segments executed using a progressive (rolling) construction approach. The primary construction activities include:

- Right-of-Way (ROW) handover, site clearance and preparation, and temporary access road construction at tower foundation locations;
- Foundation construction: excavation of foundation pits, installation of temporary drainage channels and sump pits, reinforcement steel fabrication and installation, and cast-in-place monolithic concrete pouring using a combination of machinery and manual labor;
- Installation of the grounding (earthing) system (combining radial counterpoises and earth rods) concurrently with foundation works, including threading the grounding tails (leads) through the foundation pedestals;
- Backfilling of foundation pits and layer-by-layer compaction in accordance with design specifications; construction of retaining walls to reinforce and protect foundation structures at sloped terrains prone to landslide risks;
- Erection of bolted hot-dip galvanized steel towers using climbing cranes (gin poles) combined with ground-based mechanized hoisting from the bottom up;
- Manual installation of composite insulator strings and galvanized hardware at heights;
- Conductor stringing, tensioning, and sagging (utilizing tensioners/pullers and sag scopes), installation of spacer dampers (accessed via conductor carts/trolleys), and final clipping-in (securing) of conductors to the insulator strings.

29. These works are performed concurrently at multiple tower locations and tension sections (spans) along the entire transmission line route.

Item 2 – Construction at Specific Crossing Locations

30. Construction activities at crossing locations require rigorous technical procedures and strict safety measures. The primary activities include:

- Crossings with 19 existing transmission lines (110kV, 220kV, and 500 kV): Carrying out foundation construction and tower erection within the crossing tension sections (spans); erecting safety protection scaffolding (gantries); scheduling 3 to 6-hour power shutdowns (outages) to install and dismantle safety catchnets; and executing undercrossing stringing beneath the existing 50kV line or overcrossing stringing above the 110kV and 220kV lines.
- Crossings over transportation corridors (National Highways NH14, NH13, NH14C, provincial roads, and rural roads): Conducting joint-agency field surveys; erecting 6.8-meter-high protection scaffolding frames on both sides of the road; spanning safety cable-netting across the roadway; coordinating with traffic police to regulate traffic; and conducting stringing operations strictly during daytime hours.
- Crossings over major rivers, streams, and reservoirs (Be River, Sai Gon River, Serepok River, Serepok 3 Canal, and branches of Thac Mo Reservoir): Mobilizing tugboats, canoes, and motorboats to pull pilot lines and channelize inland waterway traffic; utilizing two-way radios for cross-bank communication; and installing and tensioning optical ground wires (OPGW) / shield wires first, followed by conductors, to ensure tower structural stability.

31. These activities are closely coordinated with road and waterway management authorities, electrical utility operators, and local governments.

Item 3 – Construction of 500 kV Outgoing Feeder Bays and Optical Repeater Stations

32. Construction activities under this item are executed at the terminal/starting points of the transmission line and at the optical repeater stations. The primary activities include:

- Excavating and backfilling equipment foundation pits, cleaning and maintaining dry conditions at the bottom of the excavation;
- Manual fabrication, quality verification, and installation of foundation reinforcement steel in strict compliance with the approved design drawings;
- Mixing and pouring concrete for equipment foundations using a combination of machinery and manual labor, mechanical vibration, and precise alignment of the foundation anchor bolts;
- Transporting, cribbing, and preserving equipment; and utilizing mechanized equipment (cranes) combined with manual labor to install electrical equipment and accessories with high precision and safety.

Supporting Construction Activities

33. Across the entire Project, supporting activities include the transport of materials, equipment, and conductors to designated temporary storage/laydown yards; operating winches, tensioners, mobile cranes, and power generators; erecting temporary worker camps; implementing environmental protection measures, collecting construction solid waste (such as scrap steel, surplus concrete, etc.), and managing occupational health and safety (OHS) on-site.

34. Due to the extensive length of the alignment and the parallel nature of construction across multiple sections (mobilizing a total of 20 construction and installation crews), labor demand is

expected to fluctuate according to the project implementation phases. To support effective labor management in alignment with the construction schedule presented in the Feasibility Study (FS), ESIA, and EIA reports, Table 3 below provides estimated allocations of the average and peak labor demand categorized by the Project's main work components.

Table 3. Estimated Labor Demand by Project Activities and Sub-items

No.	Project Activities / Sub-items	Average Labor Demand (workers/day)	Peak Labor Demand (workers/day)
1	Construction of Transmission Line Sections (16 construction and installation crews)		
1.1	Foundation construction (<i>foundation pit excavation, grounding system installation, steel reinforcement fabrication, concrete pouring, backfilling and pedestal compaction, retaining wall construction</i>)	160 - 240	320
1.2	Galvanized steel tower erection (<i>using climbing cranes/gin poles</i>)	160 - 240	320
1.3	Installation of composite insulator strings and accessories	160 - 240	
1.4	Conductor and ground wire stringing and tensioning (<i>conductors, optical ground wires/OPGW, sagging, spacer damper installation, and final clipping-in</i>)	160 - 240	320
	Total for Transmission Line Works (16 crews x 20 workers/crew)	160 - 240	320
2	Optical Repeater Stations and Outgoing Feeder Bays (04 construction and installation crews)		
2.1	Construction of Optical Repeater Stations No. 1 and No. 2 (<i>equipment foundations, structural component installation, station housing/enclosures, and optical communication equipment setup</i>)	10 - 15	20
2.2	Construction of Outgoing Feeder Bays at 500 kV Krong Buk Substation (<i>excavation, equipment foundation concrete pouring, primary electrical equipment installation, and cabling/connections</i>)	15 - 20	30
2.3	Construction of Outgoing Feeder Bays at 500 kV Tay Ninh 1 Substation (<i>excavation, equipment foundation concrete pouring, primary electrical equipment installation, and cabling/connections</i>)	15 - 20	30
	Total for Repeater Stations and Outgoing Bays (04 crews x max 20 workers/crew)	40 - 60	80
	TOTAL PROJECT WORKFORCE	200 - 300	400

Note: The above labor estimates are indicative and based on construction sequencing and workforce Projections presented in the Feasibility Study, ESIA, and EIA reports. Peak labor demand is expected during periods when multiple transmission line sections and associated facilities are constructed concurrently, particularly during tower foundation construction, steel tower erection, conductor and OPGW stringing and tensioning, and construction and installation works at the optical repeater stations and 500 kV outgoing feeder bays. Actual workforce mobilization may vary by contractor and work sequencing but is not expected to exceed the estimated peak ranges.

3.2 Assessment of Potential Risks

35. Key potential Project-related risks for workers:
- Occupational Health and Safety (OHS) risks.
 - Potential of Child labor or forced labor cases related to industry or localities.
 - Risks of labor influx or seasonal workers.
 - Risks of labor disputes over terms and conditions of employment.
 - Risks related to labor influx or gender-based violence, discrimination or exclusion of vulnerable/disadvantaged groups.

3.3 Occupational Health and Safety (OHS) Risks Related to Construction Activities

36. The activities under the project comprise large-scale energy infrastructure construction and specialized electrical installation works spanning complex terrains, including tower foundation construction, galvanized steel tower erection, large-span conductor stringing and tensioning, as well as the construction of optical repeater stations and 500 kV outgoing bays. These activities present a range of occupational health and safety (OHS) risks to Project workers; particularly contracted workers engaged in construction activities.

37. Key potential OHS risks include:
- Hazards of operating in extreme terrain and weather conditions: Tower and foundation locations are situated in rugged, mountainous, and forested areas with steep slopes, posing significant landslide and soil slippage risks. Workers are exposed to unpredictable and hostile weather, particularly extreme heatwaves that can cause physical exhaustion, heat stress, and heatstroke.
 - Risks associated with manual handling of heavy materials: Manual loading, carrying, and hauling of heavy steel structures, equipment, and construction materials into rugged, inaccessible terrains (where mechanized access is highly restricted) can easily cause musculoskeletal disorders (MSDs) or lead to accidents from slips, trips, falls, and dropped materials.
 - Working at heights hazards: These risks persist throughout galvanized steel tower erection (using climbing cranes/gin poles), composite insulator string installation, conductor stringing, clipping-in, and overhead spacer damper installation. Working at heights can lead to catastrophic falls if fall protection measures (safety harnesses, lifelines, scaffolding, and conductor carts/trolleys) are not strictly utilized and enforced.
 - Falling objects (struck-by) hazards: Particularly in multi-level work zones such as tower erection and elevated equipment installation sites where mechanized lifting, crane hoisting of steel components, winch operations, and material handling occur, presenting severe risks of ground-based workers being struck by falling objects.
 - Risks in specific high-risk operations: High-tension conductor stringing and tensioning operations over large spans (crossing rivers, streams, reservoirs, transport corridors, or under passing/overpassing 19 existing energized transmission lines) present severe risks of pilot line snaps, cable whipping, winch mechanical failures, or loss of sag control, threatening worker safety.
 - Heavy machinery and crane operation hazards: Risks of crane rollovers, collisions, equipment failures, or hoisting cable snaps during the lifting and positioning of steel tower structures,

transformers, and primary electrical equipment, especially in sloped and confined work areas.

- Confined space hazards: Occurring during deep foundation excavation, inspection, and concrete pouring of deep foundation pits, sump pits, or within tower pedestals, which pose risks of oxygen deficiency, toxic gas accumulation, or sudden soil cave-ins.
- Electrical hazards from temporary construction systems and electrical equipment: Workers may be exposed to electric shock, burns, fire, and arc-flash hazards arising from temporary power supplies, generators, welding machines, electrical tools, damaged cables, inadequate grounding, and electrical equipment used under wet or adverse site conditions. Electrical installations and equipment shall be installed, inspected, maintained, and operated only by competent personnel in accordance with applicable electrical safety requirements.
- Electrical induction, induced voltage, and work near energized transmission lines: Construction and stringing activities undertaken parallel to, beneath, or in proximity to existing energized 110 kV, 220 kV, and 500 kV transmission lines may expose workers to induced voltages, electric fields, inadvertent contact, flashover, and step-and-touch potential. Long conductors, OPGW, pulling ropes, cranes, vehicles, and other conductive equipment may become energized through electromagnetic or electrostatic induction. These risks may be particularly significant during conductor stringing, tensioning, grounding, testing, commissioning, and work at transmission-line crossings.
- Electrical isolation, energization, and interface risks: Construction at crossings with existing energized transmission lines and at the 500 kV outgoing feeder bays requires strict coordination with the relevant power system operators. Inadequate isolation, unauthorized energization, failure of grounding, or ineffective control of simultaneous construction and electrical activities could result in fatal electrocution or arc-flash incidents. Particular risks may arise during planned outages, testing, commissioning, and transition from construction to energization.
- Excavation, slope instability, and foundation collapse risks: Tower foundation construction involves deep excavations at numerous locations, including sloping, mountainous, and weathered terrain. Workers may be exposed to excavation-wall collapse, falling soil or rock, landslides, water ingress, unstable excavation edges, and falls into open foundation pits. Heavy rainfall may rapidly increase these risks, particularly at tower sites on steep slopes or with difficult access.
- Unexploded ordnance (UXO) risks: Construction activities involving vegetation clearance, access-road preparation, excavation of tower foundations, grounding installation, and other ground-disturbing works may expose workers to residual UXO where such hazards are present. Accidental contact with or disturbance of UXO could result in fatalities or serious injuries. UXO survey and clearance shall therefore be completed by competent and authorized entities in identified risk areas before ground-disturbing activities commence.
- Lightning, thunderstorms, strong winds, and extreme weather risks: Workers engaged in tower erection, conductor/OPGW stringing, and other activities at height are particularly vulnerable to lightning strikes, strong winds, heavy rainfall, and sudden thunderstorms. Tall steel towers, cranes, conductors, OPGW, and other metallic components may increase exposure to lightning hazards. Strong winds may also destabilize lifting operations, suspended loads, temporary structures, and workers at height.

- Emergency rescue risks associated with work at height and remote locations: Tower erection and installation activities may take place at considerable heights and at locations with difficult road access. In the event of a fall, suspension trauma (loss of consciousness while suspended in a harness), injury, electrical incident, or sudden illness, delayed rescue and medical evacuation may increase the severity of consequences. Site-specific emergency preparedness shall therefore take account of high-angle rescue, first aid, communications, evacuation routes, and access to appropriate medical facilities.
- Traffic and transportation risks: The transportation of steel tower members, conductors reels and cable drums, construction materials, cranes, winches, tensioners, and other heavy or oversized equipment along national/provincial roads, local roads, temporary access roads, and steep or narrow routes may result in vehicle collisions, overturning, loss of loads, and injuries to drivers, workers, and road users. Risks may be elevated during the rainy season and at remote tower locations with poor road conditions.
- Fire and explosion risks, including forest and vegetation fires: Welding, cutting, grinding, temporary electrical installations, fuel storage and handling, generators, vehicles, and other hot works may cause fires or explosions. At tower locations within or adjacent to forest and densely vegetated areas, sparks, hot surfaces, discarded smoking materials, or equipment failures may initiate forest or vegetation fires, with potential risks to workers, nearby communities, and natural habitats.
- Hazardous substances and materials: Workers may be exposed to fuels, lubricants, oils, paints, solvents, welding fumes, cement, concrete additives, and other hazardous substances used during construction and equipment installation. Improper storage, handling, transfer, or disposal may result in inhalation, skin/eye contact, burns, fire, or accidental spills. Relevant Safety Data Sheets (SDS), appropriate PPE, safe storage, spill-control measures, and worker training shall be provided.
- Remote and isolated working risks: Due to the linear nature of the approximately 330-km transmission line, some construction crews may work at dispersed and remote tower locations with limited access to medical facilities, communications, potable water, sanitation, and emergency support. Such conditions may increase the consequences of occupational accidents, heat stress, snake/insect bites, and other medical emergencies.
- Risks from inadequate OHS training: The mobilization of workers (especially unskilled local laborers) who lack systematic safety training, possess limited hazard identification skills, fail to comply with Standard Operating Procedures (SOPs), or do not properly use Personal Protective Equipment (PPE).

38. The above OHS risks range from moderate to substantial, depending on the type, scale, and location of construction activities, as well as the skills and experience of the workforce. These risks can be effectively managed through the implementation of appropriate OHS measures in accordance with national regulations, ESS2, and World Bank Group Environmental, Health and Safety (EHS) Guidelines, as further detailed in Section 7 of this LMP.

3.4 Other Labor Risks

3.4.1 Child Labor

39. The Project will prohibit child labor in accordance with applicable national law and ESS2. The assessment of child labor risk will consider the nature and location of the work, recruitment channels, the use of subcontractors and labor intermediaries, and risks associated with primary

suppliers. The assessment will not assume that child labor is limited to low-skilled work.

40. Children engaged in work may be exposed to adverse effects on their health, safety, education and development. At this stage, the Project does not have sufficient verified evidence to conclude that the child labor risk is minor. The risk rating will therefore remain subject to confirmation and updating based on completed social assessment, contractor and subcontractor workforce profiles, age-verification records, primary-supplier due diligence and implementation monitoring. Contractual prohibitions, age verification, monitoring and responsible remediation procedures will apply throughout implementation.

3.4.2 Labor Influx

41. The Project construction activities will mobilize workers on site and from other areas (migrant workers). As a result, social risks related to labor influx are identified as follows:

- Conflicts with local people due to contractors' inappropriate management of their workers and worker camps lead to environmental pollution in the local area (e.g., discharging wastewater, dumping solid waste into rivers, canals, or agricultural land).
- Common health problems are caused by the transmission of communicable diseases, such as eye disease, skin disease, and respiratory infections, and sexually transmitted diseases (STDs) such as HIV/AIDS.
- Increased impacts on local services' ability to respond effectively, such as the health care system, which exacerbates the health problem and disease prevalence, water, and electricity supply.
- Potential conflict between workers and local communities because of differences in cultures, customs, habits, and living activities.
- Labor influx and increased interaction between workers and local communities may increase risks of inappropriate conduct, conflict, gender-based violence, sexual exploitation and abuse, and sexual harassment if recruitment, worker accommodation, supervision and community interaction are not adequately managed. Contractors will implement proportionate controls, including a Code of Conduct, induction and refresher training, confidential reporting channels, community liaison, supervision and corrective measures.

42. According to the initial consultation with key staff of the Project communes, the majority of migrant workers may be sourced from other areas, therefore the cultural differences will be expected to be moderate. The labor risk due to migrant influx is considered low to moderate. It can be mitigated by including a Code of Conduct (CoC) for workers (Annex 1) in labor contracts signed by both parties, as well as providing workers with training to raise their awareness of the CoC and the availability of worker GRM for them to ask for solving once any case of noncompliance with the CoC is identified.

3.4.3 Labor Disputes Over Terms and Conditions of Employment

43. Labor disputes are common in the infrastructure construction field in Viet Nam. Demand for limited employment opportunities; labor wage rates and payment delays; disagreement over working conditions; and health and safety concerns in the workplace are all potential causes of labor disputes. Additionally, employers such as contractors/subcontractors may retaliate against employees who demand better working conditions, raise concerns about unsafe or unhealthy work environments, or voice any grievances. These kinds of circumstances may result in labor unrest.

44. This risk is assessed to be medium. However, to implement the Project's policy on fair labor

treatment in accordance with ESS2, Project contractors/subcontractors will be required to provide information about employment to their laborers while negotiating to reach an agreement on labor terms and conditions prior to signing labor contracts. Monitoring compliance with the labor contract terms and conditions and strictly enforcing the GRM for laborers will be effective mitigation measures for resolving labor conflicts during the implementation of the Project.

3.4.4 Discrimination and Exclusion of Vulnerable/Disadvantaged Groups

45. Women, ethnic minorities, persons with disabilities and other workers who may face barriers to employment could be exposed to unequal access, discriminatory treatment or harassment if equal-opportunity requirements are not effectively implemented. These are potential risks rather than confirmed Project findings. Employers will apply transparent recruitment, equal opportunity and fair treatment, equal remuneration for work of equal value, reasonable accommodation where applicable, suitable workplace facilities, and confidential grievance channels, in accordance with national law and ESS2.

4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

4.1 Overview

46. The following is an overview of the key aspects of the Labor Code 2019 with regard to working terms and conditions that address the requirements of ESS2 (paragraph 11). Where there are gaps between national legislation and ESS2, the procedures, terms, and conditions outlined in this LMP will be followed.

47. Labor Code 2019 No. 45/2019/QH14 dated November 20, 2019 is the current legal document that establishes labor standards; rights, obligations, and responsibilities of employees, employers, internal representative organizations of employees, representative organizations of employers in labor relations and other relationships directly related to labor; and state management of labor-related issues.

48. The Labor Code 2019, which replaces the Labor Code 2012, includes the following new aspects:

- Employees at the enterprise have the right to establish or join an organization representing employees of their choice.
- Definition of sexual harassment in the workplace.
- Women are no longer prohibited from doing certain types of work.
- Legal protection is extended to employees who do not have a written employment contract.

49. Besides, the Labor Code 2019 has been updated with the following improvements:

- Better protection from anti-union discrimination and interference in unions.
- Clearer processes and encouragement for collective bargaining.
- Extended coverage and increased professionalism in labor mediation and arbitration.

50. The key legal improvements, along with existing provisions relating to various aspects of labor management contribute to the implementation of ESS2 requirements, as follows:

- **Gender equity and specific requirements for female workers.** The Code of Labor 2019 ensures the principle of gender equality in the field of employment (Article 4) and prevents and fights against sexual harassment in the workplace (Article 135). From a state policy perspective, the state policies ensure necessary measures will be in place to create employment opportunities, improve working conditions, develop occupational skills, provide

healthcare, and strengthen the material and spiritual welfare of female employees to assist them in effectively developing their vocational capacities and harmoniously combine their working lives with their family lives (Article 135). As for employers, the Code requires employers to (a) adopt and promote the principle of gender equality in recruitment, job assignment, training, working hours and rest periods, salaries, and other policies (Article 136); and (b) consult with female employees or their representatives when making decisions that affect their rights and interests.

- **Child labor.** The code has provisions that protect employees who are under 18 years of age (the minority). It provided a specific list of jobs and places of work that are not allowed for employees from 15 to under 18, and employees from 13 to under 15 (Article 143). It also provided a guiding principle to ensure the minors are protected (Article 144). Employers who plan to recruit minors under 15 are obliged to follow provisions related to contracting, work time arrangement, and working conditions to ensure the minor workers are safe and the work they undertake does not affect their health and intellectual development (Article 145). The Code also specifies the type of work and location of workers where employers are forbidden to engage employees from 15 to under 18 (Article 147).
- **Workers with disabilities.** The Labor Code 2019 protects the rights to work of people with disability and encourages employers to hire workers with disability following regulations on people with disability (Article 158). The Labor Code 2019 also requires employers to assume responsibility for ensuring appropriate working conditions, working tools, and occupational safety and health measures for employees with disability, including conducting regular health check-ups for them. Employers are also required to consult with employees with a disability before making any decision that affects the rights and interests of employees with disability (Articles 159 and 160).
- **Sexual harassment.** First and foremost, sexual harassment was prohibited in the workplace (Article 8). The code provided that the ultimate right of the employee is to be free from sexual harassment at their workplace and as such requires the employers to fight sexual harassment at the workplace (Article 6). This issue of sexual harassment in the workplace could be escalated to topics subjected to collective negotiation (Article 67). To realize this, the employer is prohibited from committing sexual harassment (Article 165) and is required to take action to prevent and fight sexual harassment in the workplace by prescribing steps and procedures to redress sexual harassment at the workplace (Article 6).

4.2 Viet Nam's Legal Framework on Labor

51. Viet Nam has established a comprehensive legal framework governing labor and working conditions, occupational health and safety (OHS), employment, social insurance, health insurance, trade unions, gender equality, non-discrimination, and the protection of vulnerable workers. The principal legal instrument is the Labor Code No. 45/2019/QH14. The Project will also comply with other applicable laws and their implementing decrees and circulars, as listed below.

52. Following the restructuring of the Government in 2025, state management functions relating to labor, employment, wages, industrial relations, occupational safety and health, and related labor matters are principally administered by the Ministry of Home Affairs (MOHA). References in older legal instruments to the former Ministry of Labor, Invalids and Social Affairs (MOLISA) should therefore be understood in accordance with the current allocation of governmental functions, where applicable.

53. The Project will apply the most up-to-date legal instruments on labor and social insurance during implementation. Where legal documents are amended, replaced, or supplemented during the Project lifecycle, contractors and consulting firms shall be required to comply with the latest applicable regulations, and the LMP shall be updated accordingly if necessary.

4.2.1 Laws

- Consolidated Document No. 125/VBHN-VPQH dated August 27, 2025, issued by the Office of the National Assembly regarding the Labor Code;
- Labor Code 2019 No. 45/2019/QH14, dated November 20, 2019;
- Law on Occupation Safety and Health No. 84/2015/QH13, dated June 25, 2015;
- Law on Social Insurance No. 41/2024/QH15, dated June 29, 2024, effective from July 1, 2025;
- Law on Employment No. 74/2025/QH15, dated June 16, 2025, effective from January 1, 2026;
- Law on Trade Unions No. 50/2024/QH15, dated November 27, 2024, effective from July 1, 2025;
- Law on Health Insurance No. 25/2008/QH12, as amended and supplemented, including by Law No. 51/2024/QH15;
- Law on Persons with Disabilities No. 51/2010/QH12, dated June 17, 2010;
- Law on HIV/AIDS Prevention and Control No. 64/2006/QH11, as amended and supplemented by Law No. 71/2020/QH14;
- Law on Cadres and Civil Servants No. 80/2025/QH15, dated June 24, 2025;
- Law on Public Employees No. 129/2025/QH15, dated December 10, 2025, effective from July 1, 2026; and
- Law on Gender Equality No. 73/2006/QH11, dated November 29, 2006.

4.2.2 Decrees

- Decree 293/2025/ND-CP Prescribing minimum wage levels applicable to employees working under labor contracts;
- Decree No. 158/2025/ND-CP and Decree No. 159/2025/ND-CP introduce implementing provisions under the 2024 Social Insurance Law, including expanded coverage and improved benefits for contributors. These decrees establish the framework for subsequent implementing circulars and shall be applied as relevant during Project implementation;
- Decree No. 145/2020/ND-CP dated 14/12/2020 of the Government detailing and guiding the implementation of number of articles of the Labor Code on working conditions and labor relations;
- Decree No. 135/2020/ND-CP dated 18/11/2020 of the Government regulating the retirement age;
- Decree No. 12/2022/ND-CP dated 17/01/2022 of the Government providing penalties for administrative violations in the fields of labor, social insurance, and contracted overseas manpower supply;
- Decree No.39/2016/ND-CP of the Government dated 15/5/2016, detailing the implementation of some articles of the Law on occupational safety and sanitation;

- Decree No.44/2016/ND-CP dated 15/5/2016 of the Government detailing a number of articles of the Law on occupational safety and sanitation regarding technical inspection of occupational safety and training of occupational safety and hygiene and working environment observation;
- Decree No. 219/2025/ND-CP dated August 7, 2025, regulating foreign workers working in Viet Nam;
- Decree No. 24/2023/ND-CP dated 14/5/2023 of the Government prescribing statutory pay rate for officials, public employees and armed forces.

4.2.3 *Circulars*

- Circular No. 10/2020/TT-BLDTBXH dated November 12, 2020, providing detailed guidance on certain provisions of the Labor Code concerning the contents of labor contracts, collective bargaining councils, and occupations and jobs adversely affecting reproductive and child-rearing function;
- Circular No. 09/2020/TT-BLDTBXH dated November 12, 2020, providing detailed guidance on the implementation of certain provisions of the Labor Code concerning minor workers, as amended and supplemented, where applicable;
- Circular No. 24/2022/TT-BLDTBXH dated November 30, 2022, prescribing in-kind allowances for employees working under hazardous and harmful working conditions;
- Circular No. 06/2020/TT-BLDTBXH dated August 20, 2020, promulgating the list of jobs subject to strict occupational safety and health requirements;
- Circular No. 36/2019/TT-BLDTBXH dated December 30, 2019, promulgating the list of machinery, equipment, materials and substances subject to strict occupational safety and health requirement;
- Circular No. 12/2025/TT-BNV dated June 30, 2025, providing detailed provisions on compulsory social insurance under the Law on Social Insurance and its implementing regulations.

54. The table below summarizes key provisions of the Viet Nam’s Labor Code, focusing on basic wages, wage structure and deductions, working hours, overtime, weekly rest, shift arrangements, and various types of leave, including annual leave, sick leave, maternity leave, and other personal leave/paid and unpaid leave. Although these regulations apply broadly to all categories of workers in Viet Nam, certain provisions are more relevant to specific types of works. For example, in practice, shift work arrangements may apply more to construction workers (contracted workers and primary supplier workers) than to office-based staff /SPMB personnel (direct workers).

Table 4. Key Provisions of Viet Nam’s Labor Legislation (Labor Code 2019)

Key Labor Provisions (Labor Code 2019)	Law/ Decree/ Circular	Applicable Worker Categories
Basic Wage: • The basic wage is defined as the minimum payment for workers performing the simplest tasks under normal working conditions. The basic wage is determined monthly, hourly, and by region, and is decided by the Prime Minister based on proposals from the Ministry of Labor, Invalids and Social Affairs and the National Wage Council.	Labor Code 2019; Decree No. 145/2020/ND-CP	Direct workers, contracted workers, primary supplier workers

Key Labor Provisions (Labor Code 2019)	Law/ Decree/ Circular	Applicable Worker Categories
The application of basic wages is based on the worker's residential area and may be adjusted upward based on qualifications.		
Payment & Deductions Payment: - Wages must be paid in a timely, full, and direct manner to workers. - Employers may not interfere with how workers use their wages. - Payment may be made monthly or bi-weekly. - Employers must provide monthly pay slips detailing wages, including overtime pay, nightshift pay, and any deductions. - Payments may be made in cash or by bank transfer. For bank transfers, employers shall pay all costs associated with opening accounts and transfer fees. - Overtime wages must be at least 150% for normal days, 200% for weekends, and 300% for public holidays, Tet, and other leave days. - No deductions other than those stipulated by the Labor Code or its implementing regulations, or any other labor legislation/collective agreement, are permitted, except for documented reimbursement of employer-provided advances. - Contractors must not request or accept any cash or gift payments from workers in exchange for employment or for any other reasons related to terms and conditions of recruitment.	Labor Code 2019; Decree No. 145/2020/ND-CP	Contracted workers, primary supplier workers
Working Hours: - Standard working hours shall not exceed 8 hours per day and 48 hours per week. - The law recommends a 40-hour work week, but employers may agree with workers on daily, hourly, or weekly arrangements, provided that working hours do not exceed 10 hours per day and 48 hours per week. - Overtime shall not exceed 50% of normal daily working hours, and the total of regular and overtime hours shall not exceed 12 hours per day and 40 hours per month. - Daily and weekly working hours must be stipulated in the employment contract.	Labor Code 2019; Decree No. 145/2020/ND-CP	Contracted workers, primary supplier workers
Overtime Work: - Overtime must be agreed upon by the worker. - Overtime should not exceed 50% of normal daily working hours and not more than 200 hours per year. Pregnant workers or those nursing children under 12 months shall not work at night, overtime, or on business trips.	Labor Code 2019	Contracted workers, primary supplier workers
Weekly Rest: Workers are entitled to at least one full day (24 consecutive hours) of rest per week. If weekly rest is not feasible due to the nature of work, employers must ensure at least four days of rest per month.	Labor Code 2019	Direct workers, contracted workers, primary supplier workers

Key Labor Provisions (Labor Code 2019)	Law/ Decree/ Circular	Applicable Worker Categories
Shift Work: - Night shifts are defined as periods from 22:00 to 06:00 the following day. - If night-shift work is anticipated, it must be specified in the employment contract. - When night shifts are necessary, employers must arrange related working and rest time, including required payments. Working hours may vary by season.	Labor Code 2019	Contracted workers, primary supplier workers
Annual Leave: - Workers who have worked for 12 full months are entitled to 12 days of paid annual leave per year. - Minors, people with disabilities, and workers in heavy or hazardous occupations are entitled to 14 days. Employers must consult with workers on how annual leave is taken and notify them in advance.	Labor Code 2019; Decree No. 145/2020/ND-CP	Direct workers, contracted workers, primary supplier workers
Sick Leave: - Workers in normal working conditions are entitled to 30 days/year (with <15 years of social insurance contributions); 40 days (15–30 years); 60 days (>30 years). - Heavy or hazardous working conditions allow an additional 10 days. For long-term illnesses, up to 180 days (including weekends and public holidays).	Labor Code 2019; Law on Social Insurance 2014; Circular 59/2015/TT-BLDTBXH	Direct workers, contracted workers, primary supplier workers (with contracts ≥1 month)
Leave to Take Care of Sick Children: - Up to 20 working days/year if the child is under 3 years old. - Up to 15 working days/year if the child is 3–7 years old.	Law on Social Insurance 2014; Circular 59/2015/TT-BLDTBXH	Direct workers, contracted workers, primary supplier workers
Maternity Leave: - Pregnant workers may take maternity leave (6 months) in accordance with the law and may request additional unpaid leave if needed. - Pre-delivery leave may not exceed 2 months. In the case of twins or more, mothers are entitled to an extra month for each child from the second child onward. - During maternity leave, workers receive maternity benefits as provided under the Social Insurance Law. Women workers must be supported to ensure equal employment and remuneration opportunities, including health protection.	Labor Code 2019; Decree No. 145/2020/ND-CP (14/12/2020)	Direct workers, contracted workers, primary supplier workers
Personal/Family Leave: Workers are entitled to paid leave for personal reasons, with prior notification to employers, including: 3 days for the worker's own marriage; 1 day for the marriage of their children; 3 days in the event of the death of parents or parents-in-law.	Labor Code 2019; Decree No. 145/2020/ND-CP (14/12/2020)	Direct workers, contracted workers, primary supplier workers

5. BRIEF OVERVIEW OF OCCUPATIONAL HEALTH AND SAFETY (OHS) LEGISLATION

55. Currently, the key law that is related to OHS in Viet Nam is the Law on OHS No. 84/2015/QH13, dated June 25, 2015. It includes provisions for OHS and applies to both direct and contracted workers, including foreign workers. It aims to ensure that employees work in a safe and healthy environment by establishing and enforcing standards and regulations, as well as defining the rights and responsibilities of employers, employees, and other relevant parties in terms of implementing OHS principles and measures to prevent occupational accidents and diseases.

56. It also specifies prohibited actions and preventative measures that must be taken to protect employees from hazards and risks that are harmful to them. Preventative measures include (a) the use of information, education, and communication, (b) the provision of training, (c) the promulgation of work regulations, (d) the control of workplace hazards, (e) technical solutions for problem-solving, (f) health care, (g) the use of PPE, (h) regular check of machinery, (i) health insurance and entitlements, and (j) some special regulations to ensure the safety of female employees, minor employees, and employees with disability, etc.

57. More specifically, employers are required to implement measures to ensure OHS at the workplace, and the employees must comply with them. The main measures are as follows:

- All types of machinery, equipment, and materials with strict requirements for labor safety, as detailed by the Government from time to time, must be tested and verified before being commissioned for use and must be periodically tested and verified by an organization conducting technical labor safety testing and verification.
- The employers must provide the employees engaged in hazardous work activities with sufficient personal protective equipment and facilities that meet quality standards as provided by the relevant laws, and the employees must use such equipment and facilities during work following the regulations of the Ministry of Home Affairs - MOHA (formerly MOLISA). Employers must hold training classes on OHS for employees, apprentices, and trainees when they are recruited and when work is assigned to them.
- The employers must arrange periodic health checks for the employees once per year or once per six months.
- The employers are also required to: (i) ensure that the workplaces meet the requirements on spaces, airiness, dust, steam, toxic gas and other harmful factors as prescribed in relevant technical regulations; (ii) ensure safe and hygienic working conditions for machines, equipment and workshops as required by the promulgated or applied national technical regulations or standards on OHS at the workplaces; (iii) check and evaluate dangerous and harmful factors at the workplaces in order to put forward measures to avert and minimize dangers and harm and improve working conditions and healthcare for the employees; (iv) examine and maintain machines, equipment, workshops and warehouses on a periodic basis; (v) display signboards of instructions regarding OHS covering the operation of machines, equipment and the workplaces at easy-to-read and visible locations at the workplaces; and (vi) obtain opinion from the organization representing the labor collective at the grassroots level (trade union or Labor union) when formulating and implementing plans on activities ensuring OHS.
- The employers' obligation to contribute to insurance covering labor accident and occupational disease insurance for the employees covered by the social insurance under the Law on Social

Insurance. Vietnamese employees who work under labor contracts with a total term of 03 months or more are entitled to social insurance.

- In addition, the Labor Code also provides obligations for the employers if an employee is victim of a Labor accident or of an occupational disease, as well as the rights and benefit regimes to which the concerned employees are entitled in these cases.
- The Law on Occupational Health and Safety (No. 84/2015/QH13), seeks to assure occupational health and safety and introduces policies for victims of labor accidents and occupational diseases. It also provides state management and rights and obligations of organizations and individuals in occupational safety and hygiene.
- The provisions of this law are applicable to all Vietnamese employers and to all Vietnamese employees (including Vietnamese employees working abroad under contracts) and foreign employees who are working in Viet Nam, and to all different sectors and industries.
- More particularly, this law regulates the employers' obligation to contribute to insurance covering Labor accident and occupational disease insurance for the employees covered by social insurance under the Social Security Law. Vietnamese employees who work under the Labor contracts with a total term of 03 months or more are entitled to social insurance.

58. In addition to compliance with national occupational health and safety legislation, the Project shall implement a comprehensive Occupational Health and Safety (OHS) management system consistent with the requirements of ESS2 and World Bank Group Environmental, Health and Safety (EHS) Guidelines.

59. All contractors and subcontractors shall be required to prepare, adopt, and implement a site-specific Occupational Health and Safety Management Plan (OHSMP) as part of their Contractor's Environmental and Social Management Plan (C-ESMP), prior to the commencement of any civil works. The OHSMP shall be subject to review and approval by SPMB, with support from the Construction Supervision Consultant (CSC), before site mobilization.

60. The OHSMP shall include, at a minimum:

- Systematic identification of hazards and task-based risk assessments (e.g. Job Safety Analysis (JSA) or Hazard Identification and Risk Assessment (HIRA)) for all construction activities, particularly high-risk activities such as excavation, working at height, lifting operations, traffic management, electrical works, and confined space works;
- Application of the hierarchy of controls (elimination, substitution, engineering controls, administrative controls, and personal protective equipment (PPE)) to manage identified risks;
- Development and implementation of method statements and permit-to-work systems for high-risk activities;
- Appointment of qualified and dedicated OHS officers by each contractor;
- Provision of OHS induction training, regular toolbox talks, and specialized training for workers engaged in high-risk tasks;
- Emergency preparedness and response procedures, including first aid, rescue, evacuation, and coordination with local emergency services;
- Procedures for incident and accident notification, recording, investigation, and implementation of corrective and preventive actions, including reporting to SPMB and World Bank in accordance with the ESCP;

- Regular OHS inspections, audits, and monitoring, with defined performance indicators such as accident rates, near-miss incidents, and training hours;
- Clear enforcement mechanisms, including the authority to suspend works in the event of serious or repeated non-compliance with OHS requirements.

61. The CSC shall carry out daily supervision of OHS performance at construction sites on behalf of SPMB, while the Independent Environmental and Social Monitoring Consultant (IESMC) shall conduct periodic independent monitoring and audits of OHS compliance. OHS performance shall be included in the Project's regular environmental and social monitoring reports submitted to SPMB and World Bank.

62. Thus, when a Vietnamese employee working in Viet Nam, who contributed to social insurance, is injured or becomes ill, or even dies during his or her employment, all related costs such as payment for being unable to work, retraining, and even lump-sum amounts for permanent impairments or death, are covered by the Social Insurance Fund of Viet Nam as regulated under the Labor Code, Law on Occupational Health and Safety, the Social Security Law, etc.

6. RESPONSIBLE STAFF

63. MOHA/DOHA (Ministry of Home Affairs/Department of Home Affairs). Enforcement of the Labor Code is the responsibility of the Ministry of Home Affairs (MOHA) and of Department of Home Affairs (DOHA) in the provinces/cities.

64. The specific mandates and enforcement authorities of these agencies under the Project include:

- MOHA (National Level): Responsible for promulgating and enacting national labor legislation, statutory labor standards, and OSH technical regulations; directing national labor inspection regimes; issuing operating permits for specialized OSH training and testing entities; and establishing policies on labor relations and working conditions.
- DOHA (Provincial/City Level): Responsible for directly supervising labor law compliance within the province/city; conducting OSH and environmental safety site inspections at construction projects; receiving immediate notifications of serious workplace accidents and fatalities; providing state mediation/arbitration for collective labor disputes; and issuing administrative sanctions/penalties for Labor Code violations within its jurisdiction.
- District-Level Home Affairs Divisions/Commune People's Committees: Responsible for managing grassroots labor recruitment registrations, supporting local labor dispute mediation, and tracking local workforce mobilization.

65. EVNNPT/SPMB will be responsible for overall Project management and coordination of the Project, including compliance with environmental and social (E&S) requirements including on labor and working conditions. EVNNPT is the Project Owner and has delegated authority to SPMB as the Project Management Unit to handle daily operational management, contract supervision, and compliance with World Bank E&S standards. EVNNPT/SPMB will assign staff with expertise in environmental, social, occupational health and safety issues of the overall Project and will be responsible for the following tasks relevant to labor and working conditions:

- Undertake the overall implementation of Project LMP
- Engage and manage contractors/subcontractors in accordance with Project LMP and the applicable Procurement Documents

- Ensure that contractors prepare their labor management procedures (Contractor's LMP) that comply with this LMP and Contractor's ESMP (including OHS provisions) for approval before site mobilization
- Monitor that contractors/subcontractors are meeting obligations towards contracted workers as included in the Contractor's LMP and ESMP and the applicable Procurement Documents
- Monitor the potential risks of child labor, forced labor and serious safety issues in relation to primary supply workers
- Monitor training of relevant Project workers
- Ensure that the grievance mechanism for Project workers is established and implemented and that workers are informed of it
- Monitoring the implementation of the Worker Code of Conduct and any other measures to address risks of sexual exploitation and abuse (SEA)/sexual harassment (SH)
- Report to World Bank on labor and occupational health and safety performance

66. The Construction Supervision Consultant (CSC). SPMB will be supported by the CSC who will be responsible for monitoring the contractors of the civil works as well as monitoring adherence to the ESF instruments. They will oversee the performance on labor and working conditions daily on behalf of SPMB, which will be explicitly set out in their contract. The CSC will conduct technical appraisal of the Contractor's LMP and OHS plans prior to submitting them to SPMB for approval and recommend stop-work orders to SPMB when serious safety violations occur. The CSC will employ qualified expert(s) for such oversight and report on performance to SPMB.

67. 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 labor management procedure (Contractor's LMP) and Contractor's ESMP (including OHS provisions) which will apply to the contracted workers who work on the Projects. These procedures and plans will be submitted to the CSC for appraisal and SPMB for final approval before site mobilization
- Supervise their subcontractors' adherence to the LMP and ESMP
- Maintain records of recruitment and employment of contracted workers (including subcontractors) with age verification to avoid child labor
- Provide induction and regular training to contracted workers on environmental, social and occupational health and safety issues
- Require the primary supplier to identify and address risks of child labor, forced labor and serious safety issues, and risks of equity and discrimination against primary supply workers
- Develop and implement the grievance mechanism for contracted workers, including ensuring that grievances received from their contracted workers are resolved promptly, and reporting the status of grievances and resolutions
- Ensure that all contractor and subcontractor workers understand and sign the Code of Conduct prior to the commencement of works, take all other measures to address risks of sexual exploitation and abuse (SEA)/sexual harassment (SH) as specified in the contractor's LMP/C-ESMP and supervise compliance with such measures
- Report to SPMB on labor and occupational health and safety performance

7. POLICIES AND PROCEDURES

68. The Project will apply the policies and procedures, including those are appointed for the policy implementation to solve major labor risks.

- **For OHS risks:** Pursuant to the relevant provisions of the Labor Code (Chapter IX on Labor Safety, Labor Sanitation Articles 95-108); ESS2 (including WBG General Environmental, Health and Safety Guidelines (EHSGs²)), the Project's ESMP and WB standard procurement documents, the contractor shall manage all construction sites in such a way that the workers and the community are properly protected against possible OHS risks. Key elements of OHS measures should include (a) identification of potential hazards to workers; (b) provision of preventive and protective measures; (c) training of workers and maintenance of training records; (d) documentation and reporting of occupational accidents and incidents; (e) emergency preparedness; and (f) remedies for occupational injuries and fatalities and (g) prevention and control of transmissible disease.
- **For child labor risks:** The minimum working age for Project workers engaged in hazardous work, including all civil works and construction activities under the Project, is strictly set at 18 years old. In accordance with ESS2 and Vietnamese labor law, the engagement of young workers between the age of 15 and under 18 years old is strictly prohibited for any hazardous or heavy construction work, but may be permitted solely for non-hazardous work (such as light administrative or auxiliary tasks), provided that a prior risk assessment is conducted and regular monitoring of health, safety, working hours, and educational requirements is maintained. To prevent engagement of under-aged labor, all contracts shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance. The contractor is required to maintain labor registry of all contracted workers with age verification.
- **Forced labor:** The Project adopts a zero-tolerance approach to forced labor. Contractors, subcontractors, labor intermediaries and primary suppliers shall not engage in any form of forced labor, bonded labor, debt bondage, involuntary prison labor, human trafficking, retention of identity documents, delayed wage payment used as coercion, or any restriction on workers' freedom of movement.
- **For labor influx risks:** To minimize the labor influx, the (Project) REACH will contractually require the contractor to preferentially recruit unskilled labor from the local communities for simple works such as excavation, leveling, cleaning, loading/unloading materials, watering sites. All contracted workers will be required to sign the code of conduct (see Annex 1 on the Guideline on Code of Conduct) prior to the commencement of work, which includes a provision to address the risk of Gender Based Violence (GBV). The code of conduct governs both on-site behavior (with colleagues) and conduct in the community. Relevant training will be provided for workers, such as induction and daily toolbox talks outlining expected conduct and local community values.
- **For risks on labor disputes over terms and conditions of employment.** To avoid labor disputes, fair terms and conditions will be applied for Project workers. The Project will also have grievance mechanisms for Project workers (direct workers and contracted workers) in

² The WBG General EHSGs are technical reference documents with general statements of Good International Industry Practice, which provide guidance to users on general EHS issues. The applicability of the ESHGs should be tailored to the hazards and risks established for each Project.

place to promptly address their workplace grievances. Further, the Project will respect the workers' rights of labor unions and freedom of association, as set out in the national Labor Code (Chapter XIII, Trade Union). Workers shall be free to join and participate in workers' organizations and collective bargaining arrangements consistent with national law, without interference, discrimination, retaliation or intimidation.

- **For risks of discrimination and exclusion of vulnerable/disadvantaged groups.** The employment of Project workers under the REACH will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, terms of employment (including wages and benefits), termination and access to training. To address the risk of exclusion of vulnerable groups (such as women and persons with disabilities) from employment opportunities, the Project will require the contractor to employ such groups as part of their unskilled workforce. The contractor will be also required to comply with the national Labor Code on gender equality in the workplace, which will include provision of maternity leave and nursing breaks and sufficient and suitable toilet and washing facilities, separate from men and women workers. The contractor will be also required to enable safety in the workplace to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers supported, and potential discrimination along ethnic lines under the Project.

69. **Monitoring and reporting.** The contractor shall report to SPMB and to the CSC on the status of implementation of the above policies and procedures monthly. SPMB and the CSC will closely monitor the contractor/subcontractor on labor and occupational health and safety performance and report to SPMB monthly so that SPMB, with support from IESMC; will report it to Bank on a semiannual basis.

70. **Fatality and serious incidents.** In the event of an occupational fatality or serious incident/accident (including severe injuries, structural collapses, or major environmental/social events), SPMB shall formally notify Bank within 48 hours of becoming aware of the incident, in compliance with World Bank Environmental and Social Incident Response Toolkit (ESIRT) procedures and the ESCP. SPMB shall also inform relevant national government authorities in accordance with statutory reporting timelines.

71. **Incident Investigation and Corrective Actions:** Following any major incident, SPMB and the contractor shall submit a preliminary incident report within 48 hours, followed by a comprehensive Root Cause Analysis (RCA) and a time-bound Corrective Action Plan (CAP) within 10 to 14 business days. SPMB and the CSC will monitor the full implementation of approved corrective measures to prevent recurrence.

Table 5. Overview of Project policies and indicative procedures to address key labor risks

Key labor risks	Policies to address risks	Procedures to back up the policy
1. OHS risks	- In conformity with OHS requirements as set out in Labor Code (Chapter IX Articles 133-152), ESS2 (including WBG EHSGs), the Project ESMP and WB standard procurement documents.	- Select legitimate and reliable contractor through screening OHS records. - Address adequately OHS risks with non-compliance remedies in procurement documents. - Require the contractor to engage qualified OHS staffing - Enhance workplace OHS awareness and training.

Key labor risks	Policies to address risks	Procedures to back up the policy
		- Conduct routine monitoring and reporting.
2. Child labor	- Set the minimum age for Project employment at 15 years, subject to the restrictions set out in national law and ESS2. - Prohibit persons under 18 years of age from construction, electrical work, work at height, UXO-related work, quarry work, operation of dangerous machinery, and any other hazardous activity.	- Include minimum age in procurement documents. - Raise awareness on child protection with contractors and in the communities. - Maintain labor registry of all contracted workers with age verification. - Develop remedial procedures to deal with child labor incidents.
3. Labor influx	- Minimize the labor influx by prioritizing local workforce. - Minimize labor-related risks on the community through the code of conduct, including GBV.	- Require the contractor to preferentially engage unskilled local workforce from the local communities. - Make all contracted workers sign code of conduct, including prevention of GBV. - Make all contracted workers follow the rules for on-site behavior (with colleagues) and conduct in the community. - Conduct induction and toolbox talks outlining expected conduct and local community values. - Introduce disciplinary measures for violations and misbehaviors.
4. Labor disputes	- Respect the national Labor Code and promptly address workplace grievances to minimize the risk of labor disputes	- Provide workers with contracts with fair terms and conditions. - Have grievance mechanisms in place to promptly address workplace concerns. - Respect the national Labor Code on workers' rights of labor unions and freedom of association.
5. Discrimination and exclusion of vulnerable or disadvantaged groups	- Promote no discrimination and equal opportunity with respect to any aspects of the employment relationship.	- Require the contractor to employ vulnerable groups as part of unskilled workforce. - Provide maternity leave and nursing breaks where relevant. - Arrange sufficient and suitable toilet and washing facilities, separate for men and women workers. - Require the contractor to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers. - Require non-discrimination and harassment and should be socialized/basis for training and cover potential ethnic discrimination.
6. Security risks	- Take appropriate and proportionate security measures to minimize the potential risk to the workers.	- Arrange security protection to be determined by security authorities to address external security risks (such as conflict between workers and local communities). - Restrict work hours to minimize security threat. - Maintain low profile of the site and workers.

Key labor risks	Policies to address risks	Procedures to back up the policy
		- Address internal security risks associated with the deployment of security personnel on the community and Project workers in line with the WB Good Practice Note “Assessing and Managing the Risks and Impacts of the Use of Security Personnel” (such as the training of security officers on the principles of proportionality in the use of force).

8. AGE OF EMPLOYMENT

72. **Age limitation for hazardous work.** No person under 18 years of age will be employed or engaged in construction or any hazardous activity under the REACH Project, including work at height, electrical work, operation of dangerous machinery, handling or transport of heavy loads, UXO-related work, quarry work, or other activities prohibited for young workers under applicable law.

73. **Minimum age for Project workers.** The minimum age for Project employment is 15 years, provided that persons aged 15 to under 18 are engaged only in non-hazardous work permitted by law and ESS2. Before engagement, the employer will complete a documented risk assessment and confirm that the work will not interfere with education or adversely affect health, safety or development. All construction and hazardous work is restricted to persons aged 18 or older.

74. **The process of age verification and remediation.** Contractors and subcontractors will verify age before engagement using reliable official documentation and will maintain records securely, with access limited to authorized personnel. Where documentation appears inconsistent or unreliable, additional verification will be undertaken through lawful and proportionate means. Periodic checks will be conducted. If an under-age worker is identified, the employer will immediately remove the person from prohibited or hazardous work and implement a responsible remediation plan that protects wages already earned, education, health and the best interests of the child, rather than relying solely on abrupt termination. The case and preventive corrective actions will be documented confidentially.

9. TERMS AND CONDITIONS OF EMPLOYMENT

75. **Direct workers.** The terms and conditions of SPMB officers and staff will be governed by their applicable public-sector or employment arrangements and national law. Individual consultants directly engaged for the Project will be governed by their respective consultancy contracts and the applicable requirements of ESS2. These categories will not be treated as subject to one common consultancy contract. **Provision of written employment terms.** Each worker will receive written terms of employment containing the information required by applicable law, including the parties, job, place and duration of work, working hours, remuneration, benefits, and procedures for suspension or termination. Personal data will be collected only where necessary and legally justified. Employment terms, the Code of Conduct, OHS instructions and Worker GRM information will be communicated in a language and format the worker understands, with oral explanation or interpretation where literacy or language barriers exist.

76. **Notice for termination of employment contract.** In accordance with the Labor Code 2019, either party may unilaterally terminate an employment contract by providing advance notice as follows: (a) At least 45 days for an indefinite-term labor contract; (b) At least 30 days for a fixed-term labor contract with a term of 12 to 36 months; (c) At least 03 working days for a labor contract with a term of less than 12 months, unless otherwise specified by law. The above notice periods shall

be applied in compliance with applicable provisions of the Labor Code 2019 and relevant guiding decrees.

77. **Minimum Wages.** Minimum wages in Viet Nam are determined by the National Wage Council and promulgated by the Government through relevant decrees, and are mandatory for all employers. Minimum wage levels are periodically reviewed and adjusted to reflect socio-economic conditions and cost of living. All Project workers shall be paid wages that are not lower than the applicable statutory minimum wages, in accordance with prevailing government regulations (e.g. Decree 293/2025/ND-CP, Decree No. 38/2022/ND-CP and subsequent amendments, as applicable), and consistent with the terms of their employment contracts.

78. **Hours of Work.** Normal working hours, overtime limits, rest periods and overtime remuneration will comply with the Labor Code and applicable implementing regulations. The LMP will use one consistent set of daily, monthly and annual limits, and contractors will record hours worked and obtain worker agreement for overtime as required by law.

79. **Night shifts.** For contracted workers, they may be required to work overtime, including night shifts, depending on the nature of the Project and the progress of construction. Night shift (from 10:00 PM to 6:00 AM the following day) is allowed under Labor Code 2019, but it will not be encouraged under the Project. If a night shift is required, for example, to meet Project timelines, it should be discussed and agreed upon in advance with the workers. If a night shift is envisaged as a possibility, it should be specified in the contract for acceptance by the workers.

80. **Arrangement for night shifts.** When the night shift is required, work time and relevant rest arrangements, including related payment, must be under the Code of Labor 2019, and relevant applicable Decrees and Circulars. Their work time arrangement may be varied by season (wet season versus dry season) to meet the quality and progress of the works.

81. **Rest per week.** Every worker shall be entitled to one day's rest each week, which should normally fall on Sunday (Article 111). The rest shall consist of at least 24 consecutive hours each week. Workers shall also be entitled to rest on public holidays recognized as such by the State.

82. **Annual leave.** Workers shall be entitled to 12 to 16 days' leave with pay for every year of continuous service (Art. 113). An entitlement to leave with pay shall normally be acquired after a full year of continuous service.

83. **Maternity leave.** A female worker shall be entitled, on presentation of a medical certificate indicating the expected date of her confinement, to 6 months maternity leave and is entitled to maternity benefits as regulated in the Law on Social Insurance (Art 101).

84. **Personal leave.** Personal leaves are allowed with full pay but with prior notice to employers, including 3 days for their marriage, 1 day for their children's marriage, and 3 days in case of death of their parent(s) and parent(s)-in-law.

85. **Female workers.** The 2019 Labor Code includes provisions to encourage women's participation in the labor force while also protecting them at work. Employers are required to consult with female employees on issues concerning their rights and benefits, such as appropriate bathroom and toilet facilities at the workplace. Pregnant workers can take maternal leave (6 months) as stipulated by the law and can request extra leave without pay if they need it. Decree 85/2015/ND-CP includes provisions to support female workers, such as equal job opportunities, pay, and health care. Female workers will be paid the same as male workers for the same work, without any discrimination.

86. **Payment arrangement.** The wage should be paid timely, sufficiently, and directly to the labor. Employers are not allowed to intervene in how the wage is spent. Payment can be made

monthly or fortnightly. The wage for overtime should be a minimum of 150% of the rate for a normal day, a minimum of 200% of the rate for weekends, and 300% for national, Lunar New Year holidays. Employers must issue monthly pay statements with details on salary, including pay for overtime, night shift, and deductions. Payment can be made in cash or by bank transfer. In the case of bank transfer, costs related to the opening of a bank account for employees and transfer fees must be borne by employers.

87. **Deductions from remuneration.** No deductions other than those prescribed by the Code (Article 102) or regulations made hereunder, or any other law or collective Labor agreement shall be made from a worker's remuneration, except for repayment of advances received from the employer and evidenced in writing. The contractor shall not demand or accept from workers any cash payments or presents of any kind in return for admitting them to employment or for any other reasons connected with the terms and conditions of employment.

88. **Death benefit.** In the event of a Project worker's death, the employer will facilitate access by eligible relatives to statutory funeral, survivorship, occupational accident and occupational disease benefits in accordance with the applicable and current Vietnamese legislation. The LMP will not restate detailed statutory formulas unless they have been legally verified and will be updated when the governing legislation changes.

89. **Medical treatment of injured and sick workers.** Employers will meet all obligations for first aid, emergency treatment, medical expenses, compensation, insurance and return-to-work support in accordance with applicable law, employment arrangements and the Project OHS procedures.

90. **Collective Agreements.** A collective agreement is an agreement relating to terms and conditions of work concluded between the representatives of one or more trade unions, on the one hand, and the representatives of one or more employers, on the other hand. Where collective agreements exist between the employer and Project workers, such agreements will be applied, where relevant.

10. GRIEVANCE REDRESS MECHANISM

10.1 General Principles

91. The provinces/cities will have in place a grievance mechanism to address concerns of Project-affected parties, the nature of workplace concerns of workers is usually different. For example, typical workplace grievances include employment opportunities; labor wages rates and delays of payment; disagreement over working conditions; and health and safety concerns in work environment. To meet the ESS2 requirement, a separate grievance mechanism will be established for Project workers (direct workers and contracted workers) as required in ESS2.

92. Handling of grievances should be objective, prompt and responsive to the needs and concerns of the aggrieved workers. Different ways in which workers can submit their grievances should be allowed, such as submissions in person, by phone, text message, mail and email. The grievance raised should be recorded and acknowledged within one day. While the timeframe for redress will depend on the nature of grievance, health and safety concerns in work environment or any other urgent issues should be addressed immediately. Where the grievance cannot be addressed within a reasonable timeframe, the aggrieved worker should be informed in writing, so that the worker can consider proceeding to the State inspection on labor. The mechanism will also allow for anonymous complaints to be raised and addressed. Individuals who submit their comments or grievances may request that their name be kept confidential.

93. **Direct workers.** Each unit engaging direct workers (SPMB) will hold periodic team meetings to discuss any workplace concerns. The grievance raised by workers will be recorded with the actions taken by each unit. The summary of grievance cases will be reported to World Bank as part of the regular report. Where the aggrieved direct worker wishes to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor/hiring unit, the worker may raise the issue with responsible municipal authorities (e.g. DOHA), where relevant. Where the construction and supervision consultants have an existing grievance system, their direct workers should use such mechanism.

94. **Contracted workers.** Contractors will establish confidential and accessible Worker GRM channels before mobilization. These will include, as appropriate, a locked complaint box, dedicated telephone or hotline, email, anonymous submission and private access to trained HR, social or OHS personnel. Team meetings may be used to provide general information or discuss non-sensitive issues, but will not be the primary channel for grievances. Workers may escalate concerns to the CSC and/or SPMB and may access competent authorities or judicial remedies as permitted by law.

95. **State Inspection on Labor, Sanctions Against Violations of Labor Legislation.** As per the Labor Code (Articles 214-217), the labor inspector is mandated to settle complaints and denunciations of employees of violations of the labor legislation and to receive and settle complaints and denunciations about violations of the labor legislation, as prescribed by law.

96. **Grievance Handling Procedure.** The table provides steps with responsibilities of grievances relating to the complaint handling linked to labor issues. The key purpose of this exercise is to present GRM process in an effective and user-friendly manner.

97. **Grievances related to SEA/SH and other sensitive matters.** The Worker GRM will allow confidential and anonymous reporting, prohibit retaliation, and apply defined acknowledgement and response timeframes. Trained focal points will receive only the minimum information necessary, protect confidentiality, seek the survivor's informed consent and activate the referral pathway to appropriate medical, psychosocial, legal or protection services. Project personnel will not conduct criminal investigations or detailed survivor interviews beyond their mandate.

98. **GRM Procedures for Complaint Handling Process.** The Grievance Redress Mechanism (GRM) is established with two distinct structures to address specific grievance types effectively: (i) Community GRM for project-affected people and local communities; and (ii) Dedicated Worker GRM for all categories of project workers (direct workers and contracted workers), adhering to national labor laws and World Bank ESS2 standards. For project-affected people (PAPs) seeking detailed information on compensation, land acquisition, site clearance, and resettlement grievance mechanisms, please refer directly to the Project's Resettlement Plan (RP):

Table 6. GRM procedures for complaint handling process

Steps	Channel / Level	Grievance Handling Actions & GRM Function	Timeframe
Step 1	Site / Contractor Level (Construction Team Leader / Site Manager / Contractor OHS Officer)	• Register grievance in the Site Labor Grievance Logbook. • Directly review, investigate, and resolve workplace concerns (terms of employment, working conditions, OHS, wages, payment delays).	Within 7 calendar days

		• Provide written response or resolution to the worker.	
Step 2	Project Management Level (SPMB/Construction Supervision Consultant - CSC)	• If unresolved at Step 1 or if the complaint directly involves contractor management, submit to SPMB/CSC. • Investigate, conduct dialogue/coordination meetings with worker representatives and the contractor. • Issue binding written determination and corrective actions to contractor.	Within 15 calendar days
Step 3	State Authority / Labor Inspectorate / Court Level (Competent State Labor Management Agencies at District/Provincial level, Labor Inspectorate, Labor Arbitration Council, or People's Court)	• If consensus is not reached at Step 2, workers or labor unions may submit the grievance to competent state labor management authorities, labor inspectors, or courts for resolution under national legal procedures.	As per statutory timelines under the Labor Code

10.2 Grievance Mechanism

99. The following procedures shall be followed while filing and processing complaints through the above-mentioned GRM structures:

- **Case Receipt and Acknowledgment:** Within 24 to 48 hours of receiving a labor grievance, the designated GRM focal point (contractor at site level or SPMB at project level) shall formally acknowledge receipt of the complaint, register it in the Project Grievance Logbook, and inform the complainant in writing of the expected review timeline and next steps (in accordance with the timeframe specified in Table 6).
- **Confidentiality and Restricted Access to Grievance Records**
 - The Worker Grievance Register and individual case files shall strictly remain confidential and restricted from public access to protect workers' privacy and safeguard complainants against any form of retaliation, intimidation, or discrimination. Access to the register shall be limited exclusively to designated GRM Focal Points of the Contractor, CSC, and SPMB on a strict need-to-know basis.
 - Identifying personal details (such as names, contact details, or job positions) shall not be disclosed, shared with third parties, or discussed in open forums without the explicit, written consent of the aggrieved worker. Summarized reports shared with the World Bank or used for regular monitoring shall contain only anonymized and aggregated statistical data (e.g., grievance category, resolution status, response timeframe). Any grievance related to SEA/SH shall be handled through dedicated, separate, and survivor-centered referral channels and shall never be recorded in the general worker grievance register.
- **SEA/SH grievances shall not be recorded in the general Worker Grievance Register or any publicly accessible log.** Consistent with the Project's Moderate SEA/SH Risk rating, proportionate prevention, reporting, referral, and response measures shall be integrated into the Project's E&S management instruments, including the C-ESMP, Code of Conduct, Worker GRM, SEP, and relevant ethnic minority planning instruments. SEA/SH complaints shall be handled through confidential, survivor-centered channels as further described in Section 10.3.

- **Project-affected persons.** Complaints concerning land acquisition, compensation, assistance or resettlement are outside the scope of the Worker GRM and will be addressed through the grievance mechanism established under the RP and SEP. Worker grievances will be handled separately under this LMP.
- Mediation meetings and outcomes will be recorded and kept by the GRM person-in-charge

100. The grievance process chart is displayed below:

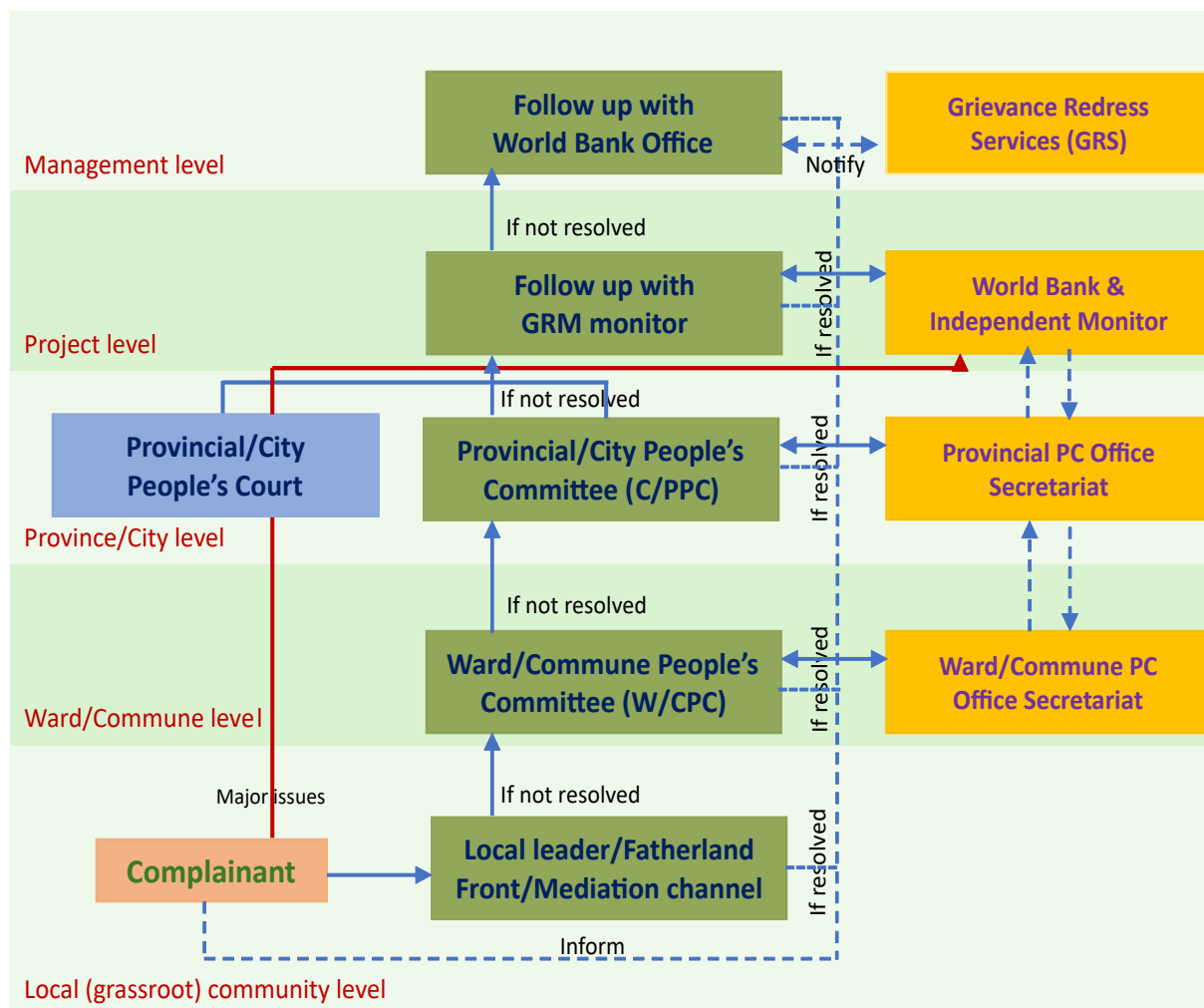


Figure 2: Grievance Redress Mechanism for the Project

10.3 Grievances Related to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

101. The Project recognizes that labor influx, interaction between workers and local communities, and the presence of vulnerable groups in the Project area may increase the risk of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) during Project implementation. Vulnerable groups may include women, adolescent girls, ethnic minority communities, women from ethnic minority groups, persons with disabilities, and other individuals who may face heightened barriers to reporting incidents or accessing support services. Accordingly, proportionate SEA/SH risk mitigation measures consistent with the Project's Moderate SEA/SH Risk rating shall be implemented throughout the Project.

10.3.1 Prevention Measures

102. SEA/SH prevention measures shall be integrated into the Contractor's Labor Management Procedures (LMP), Contractor Environmental and Social Management Plan (C-ESMP), Code of

Conduct (CoC), Stakeholder Engagement Plan (SEP), and Worker Grievance Redress Mechanism (GRM). All Project workers shall sign and comply with the Code of Conduct, which prohibits all forms of SEA/SH and inappropriate conduct towards community members.

103. SEA/SH awareness shall be incorporated into worker inductions, refresher training, toolbox meetings, and community engagement activities. Training shall include appropriate behavior standards, prohibited conduct, reporting channels, disciplinary consequences, and awareness of the specific vulnerabilities that may affect women, girls, and ethnic minority communities within the Project area.

10.3.2 Confidential Reporting and Referral

104. The Worker GRM shall include confidential and survivor-centered procedures for receiving and handling SEA/SH complaints. Complaints may be submitted through designated focal points, confidential telephone numbers, email, grievance boxes, or other appropriate channels.

105. SEA/SH complaints shall be handled separately from ordinary grievances to ensure confidentiality, protect survivors from retaliation or stigmatization, and minimize the risk of re-traumatization. Only information strictly necessary for referral and case management shall be documented.

106. Where appropriate and subject to the survivor's informed consent, survivors shall be referred to available health, psychosocial, legal, social welfare, Women's Union, child protection, or other relevant support services available in the Project area. Particular attention shall be given to ensuring that women and girls from ethnic minority communities can access reporting and support services in a culturally appropriate and understandable manner.

10.3.3 Access to Culturally Appropriate Support Services for Ethnic Minority Women and Girls

107. The Project recognizes that women and adolescent girls from ethnic minority communities may face additional barriers in reporting SEA/SH incidents and accessing available support services due to language differences, literacy limitations, cultural norms, geographic isolation, social stigma, concerns regarding confidentiality, and limited familiarity with formal grievance and service systems. Accordingly, SEA/SH prevention, awareness raising, reporting, referral, and response arrangements shall be implemented in a culturally appropriate, inclusive, and accessible manner.

108. Information on SEA/SH risks, survivor rights, available reporting channels, and support services shall be communicated through culturally appropriate methods and, where needed, in languages understandable to affected ethnic minority communities. Community engagement activities conducted under the SEP and EMDP shall promote safe and confidential access to SEA/SH reporting channels while respecting local cultural practices and avoiding stigmatization of survivors.

109. Where a SEA/SH incident involves an ethnic minority woman or girl, the designated SEA/SH focal point shall, subject to the survivor's informed consent, facilitate access to appropriate health, psychosocial, legal, child protection, social welfare, Women's Union, or other relevant support services. Reasonable measures shall be taken to address language, communication, transportation, accessibility, and confidentiality barriers that may prevent survivors from accessing available services. Where necessary, interpretation, trusted community-based support persons, or other culturally appropriate support arrangements may be provided with the survivor's informed consent.

110. Referral and response arrangements shall be survivor-centered, culturally appropriate, gender-sensitive, and consistent with the principles of safety, confidentiality, respect, non-discrimination, and informed consent.

10.3.4 Institutional Responsibilities

111. SPMB, CSC, and Contractors shall designate trained SEA/SH focal points responsible for receiving and managing SEA/SH complaints, maintaining confidentiality, facilitating referrals, and monitoring implementation of SEA/SH prevention measures.

112. Where necessary, the designated focal points shall coordinate with local authorities, Women's Unions, health facilities, ethnic minority representatives, and other relevant service providers to facilitate survivor support while respecting confidentiality and informed consent. Any involvement of ethnic minority representatives, interpreters, or trusted community-based support persons shall take place only with the survivor's informed consent and shall not result in disclosure of identifying information beyond what is strictly necessary.

113. Particular attention shall be given to ensuring that women, adolescent girls, ethnic minority women and girls, persons with disabilities, and other individuals who may face heightened barriers to reporting or accessing services are able to access SEA/SH information, reporting channels, grievance mechanisms, and support services without discrimination or barriers related to language, literacy, culture, disability, geography, confidentiality concerns, or social status. Contractors, CSC, and SPMB shall take reasonable measures to ensure that SEA/SH communication and referral arrangements are accessible and culturally appropriate for ethnic minority communities.

10.3.5 Response and Monitoring

114. Any worker found to have violated the Code of Conduct or engaged in SEA/SH-related misconduct shall be subject to disciplinary measures in accordance with applicable labor legislation, contractual arrangements, and Project procedures.

115. SEA/SH awareness activities, complaints received, referrals made, and corrective actions taken shall be reported in aggregated and non-identifiable form through the Project's regular environmental and social monitoring reports. Personal information relating to complainants, survivors, or alleged perpetrators shall not be disclosed.

10.4 Publicizing the Worker GRM

116. SPMB, CSC, and Contractors shall ensure that the Worker Grievance Redress Mechanism (GRM) is communicated effectively to all Project workers, including direct workers and contracted workers, including subcontractor workers. Information on available grievance or reporting channels shall also be communicated to relevant primary supplier workers, where proportionate and practicable, prior to commencement of work and throughout Project implementation. Particular attention shall be given to ensuring that workers deployed across dispersed construction sites along the transmission line corridor are aware of available grievance channels and procedures.

117. Information on the Worker GRM, including grievance submission channels, contact details of designated focal points, confidential telephone numbers and hotlines, email addresses, and grievance box locations, shall be clearly displayed at construction sites, temporary work areas, site offices, worker accommodation facilities, material storage yards, and other locations accessible to Project workers. Information shall be provided in a language and format that workers can easily understand.

118. The Worker GRM shall be explained during worker induction training, periodic refresher training, toolbox meetings, and other workforce communication activities. Contractors shall ensure that all workers are informed of their right to raise workplace concerns without fear of retaliation and that grievances may be submitted confidentially or anonymously where appropriate.

119. Posters, leaflets, and other awareness materials describing worker rights, the Code of Conduct (CoC), available grievance channels, confidentiality provisions, and anti-retaliation measures shall be distributed and displayed throughout the Project. Records of GRM awareness activities shall be maintained by contractors and made available to SPMB and CSC for monitoring purposes.

11. CONTRACTOR MANAGEMENT

120. **Contractor selection and management.** The Project will use applicable World Bank procurement documents and will include labor and working-condition requirements in bidding and contract documents. Due diligence will cover prospective contractors, subcontractors and labor intermediaries, including legal status, labor and OHS systems, relevant violations and incidents, staffing capacity and prior performance. Equivalent ESS2 requirements and remedies will be flowed down to subcontracts.

- Business licenses, registrations, permits and approvals.
- Public records, such as company registers and public documents related to violations of the applicable Labor Code; historical occupational accident and fatality records (within the past 3–5 years and notifications to authorities; labor-related litigation.
- Documents relating to the contractor's labor management system and OHS system (e.g., HR manuals, safety program); ESHS personnel and their qualification.
- Previous contracts with contractors and suppliers (showing inclusion of provisions and terms reflecting requirements on labor and working conditions).
- Timeline and submission requirements: all supporting E&S and OHS capacity documents must be submitted as part of the technical bid proposal. Bidders shall provide any clarifications or supplementary proofs within 5–7 working days upon receiving official requests from SPMB.

121. **Contractual Provisions and Non-Compliance Remedies.** SPMB shall incorporate the agreed labor management requirements as specified in the bidding documents into contractual agreements with the contractor, together with appropriate non-compliance remedies (such as the provision on withholding 10 % of monthly payment to the contractor in case of non-compliance with relevant environmental, social, health and safety requirements; removal of personnel from the works; or lack in the OHS performance security). In the case of subcontracting, SPMB will require the contractor to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.

122. **Performance Monitoring.** SPMB and CSC will use risk-based inspections, document reviews, confidential worker interviews and spot checks to monitor contractors and subcontractors. Reviews will include representative employment contracts, payroll and payment records, working hours, recruitment practices and fees, retention of identity documents, Worker GRM records, accommodation arrangements where applicable, training and corrective actions. Monitoring data will be limited to what is necessary, securely maintained and reported in aggregate form:

- Representative samples of employment contracts and signed code of conduct
- Grievances received from the community and workers and their resolution
- Reports relating to fatalities and incidents and implementation of corrective actions
- Records relating to incidents of non-compliance with national Labor Code and the provisions of the LMP

- Records of training provided for contracted workers to explain occupational health and safety risks and preventive measures

123. The Project requires that contractors monitor, keep records and report on terms and conditions related to Labor management. The contractor must provide workers with evidence of all payments made, including social security benefits, pension contributions or other entitlements regardless of the worker being engaged on a fixed term contract, full-time, part-time or temporary. The application of this requirement will be proportionate to the activities and to the size of the contract, in a manner acceptable to SPMB and World Bank:

- **Labor conditions:** records of workers engaged under the Project, including contracts registry of induction/training of workers including Code of Conduct, hours worked, remuneration and deductions (including overtime), collective bargaining agreements.
- **Safety:** recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
- **Workers:** aggregate workforce data by sex, local/non-local status and skill category, together with age-verification compliance. Reports will not include unnecessary sensitive personal data or information that could identify individual complainants or SEA/SH survivors.
- **Training/induction:** dates, number of trainees, and topics.
- **Details of any security risks:** details of risks the contractor may be exposed to while performing its work- the threats may come from third parties external to the Project.
- **Worker grievances:** details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

12. PRIMARY SUPPLIER WORKERS

124. The Project will require a range of materials, equipment, and components that are essential to the construction and operation of the 500 kV Krong Buk – Tay Ninh 1 Transmission Line Project. These may include, among others, structural steel for transmission towers, conductors, optical ground wires (OPGW), insulators, fittings, reinforcement steel, cement, ready-mix concrete, aggregates (stone and sand), electrical equipment, and other materials necessary for the construction of transmission lines, feeder bays, optical repeater stations, and associated facilities.

125. In accordance with ESS2, primary supplier workers are workers employed by Primary Suppliers that provide such essential materials or equipment directly and on an ongoing basis to the Project. Suppliers providing off-the-shelf products, routine commercial goods, or one-time purchases are not considered Primary Suppliers for the purpose of this LMP.

126. Potential risks associated with primary supplier workers may include child labor, forced labor, and serious occupational health and safety (OHS) risks in certain sectors involved in the production, extraction, manufacturing, transportation, or supply of Project materials and equipment. These risks may arise, for example, in quarry operations supplying aggregates, cement and steel manufacturing facilities, electrical equipment production, or other sectors involving hazardous industrial processes. To address these risks, the following measures will be applied.

127. **Selection and Due Diligence of Primary Suppliers.** Contractors shall identify Primary Suppliers and assess potential risks related to child labor, forced labor, and serious OHS issues associated with the supply of essential Project materials and equipment. Due diligence shall be conducted proportionate to the nature and scale of the supply and may include review of business and operating licenses, quarry or mining permits (where applicable), labor and OHS compliance records, audit or inspection reports, certifications, and other relevant documentation demonstrating compliance with applicable legal requirements.

128. Contractors shall incorporate relevant labor and OHS requirements into procurement documents, purchase orders, and supply contracts with Primary Suppliers. Such requirements shall include compliance with applicable labor legislation, prohibition of child labor and forced labor, implementation of appropriate OHS measures, and cooperation with Project monitoring and verification activities.

129. Where significant risks of child labor, forced labor, or serious OHS issues are identified, the contractor shall require the Primary Supplier to implement appropriate mitigation and corrective measures and shall monitor their implementation throughout the supply period. SPMB, with support from the CSC, shall review the adequacy of due diligence and monitor implementation of corrective actions as part of Project supervision.

130. **Remedial Measures.** If child labor, forced labor, or serious OHS incidents are identified in relation to Primary Supplier workers, SPMB and the CSC shall require the relevant Primary Supplier to take appropriate corrective actions within an agreed timeframe. The implementation and effectiveness of such measures shall be monitored periodically. Where corrective actions are not effectively implemented, or where the identified risks cannot be adequately addressed, SPMB shall require the contractor, within a reasonable period, to transition to alternative suppliers that can demonstrate compliance with applicable labor, OHS, and ESS2 requirements.

13. IMPLEMENTATION AND MONITORING OF THE LMP

13.1 Organizational Structure for LMP Implementation

131. The labor monitoring system comprises three levels:

1. Contractors and Subcontractors - direct management of workers.
2. Construction Supervision Consultant (CSC) - daily supervision at construction sites.
3. Southern Vietnam Power Projects Management Board (SPMB) - overall supervision and reporting to World Bank.

Monitoring flow: Contractor/Subcontractor → CSC → SPMB → World Bank

13.2 LMP Monitoring Procedures

Regular Monitoring

- CSC checks OHS, PPE, working conditions, and accommodation.
- Contractors record daily labor and safety logs.

Periodic Monitoring

- SPMB conducts monthly inspections as needed.
- Review of worker records, contracts, and insurance compliance.

13.3 LMP Monitoring Indicators

- % of workers with valid labor contracts, disaggregated by contractor and worker category.

- % of workers who have signed the CoC before starting work
- % of workers completing induction before work and required refresher or task-specific training.
- Number of toolbox meetings per month.
- Number of accidents and near-miss incidents.
- Number of inspections of worker accommodation.
- Number of worker grievances received by type; percentage acknowledged and resolved within the defined timeframe; number pending; and number of substantiated retaliation cases. Reporting will be aggregated and non-identifying.
- % of subcontractors assessed for LMP compliance; number of corrective actions issued; and percentage closed by the agreed deadline.
- Number of equipment inspections.

13.4 Reporting Mechanism

Detailed design consultants → SPMB

- Periodic /As required by contract: Report on the integration of LMP/environmental and social safety considerations into technical designs and bidding documents.
- In case of specific contractual obligations: Consolidated reporting on design-phase labor and working conditions as specified in the contract.

Contractor → CSC → SPMB

- Weekly: Operational LMP & OHS metrics (workforce count, PPE compliance, safety induction records, site violations/corrective actions).
- Monthly: Consolidated LMP compliance report (OHS performance indicators, labor contract status, worker accommodation standards, GRM summary).
- Immediate: **(within 24 hours)**: Initial report on serious incidents (fatalities, severe injuries, environmental spills, SEA/SH complaints).

CSC → SPMB

- Weekly and Monthly: Consolidated supervision and compliance verification reports on Contractor's LMP performance.
- Immediate (within 24 hours): Incident verification and escalation reports upon notification of major site non-compliances or serious incidents

SPMB → World Bank

- Periodic: Semi-annual / Annual Environmental and Social (E&S) Monitoring Reports (consolidating overall LMP compliance).
- Incident Notification (ESIRT framework):

13.5 Capacity Building

- ESS2 training for SPMB, CSC, and contractors.
- Advanced OHS and SEA/SH training.
- Guidance for contractors in preparing their Contractor's LMP.

13.6 Updating the LMP

- The LMP will be updated when changes in workforce, construction methods, or risks arise.
- Updated LMP versions must be publicly disclosed, consulted on as necessary, and submitted to World Bank for review and approval prior to implementing any required changes.

ANNEXES

ANNEX 1 – CODE OF CONDUCT (COC) – FULL VERSION

1. PURPOSE

The Code of Conduct (CoC) applies to all staff, workers, contractors, subcontractors, and primary suppliers participating in the REACH Project with the purpose of:

- ❖ Ensure proper behavior, respect for local communities and cultural norms;
- ❖ Prevent, detect, and address acts of Sexual Exploitation, Abuse, Harassment and Gender-Based Violence (SEA/SH);
- ❖ Strengthen safety, discipline, and professional ethics;
- ❖ Comply with ESS2 and relevant Vietnamese legislation.

2. SCOPE OF APPLICATION

The CoC applies to:

- ❖ SPMB staff;
- ❖ Supervision consultants and technical consultants;
- ❖ Main contractors, subcontractors, and workers;
- ❖ Primary suppliers.

3. GENERAL PRINCIPLES

All workers must:

- ❖ Comply with Vietnamese law, ESS2, and the Project's LMP;
- ❖ Respect the local community, culture, and the property of local people;
- ❖ Strictly comply with OHS safety regulations;
- ❖ Not commit any SEA/SH violations;
- ❖ Behave respectfully, without violence or discrimination.

4. DETAILED RULES OF CONDUCT

4.1. Occupational Health and Safety (OHS)

Workers must:

- ❖ Wear PPE at all times when working;
- ❖ Follow instructions of the safety officer;
- ❖ Not consume alcohol or use drugs before or during working hours;
- ❖ Not operate machinery without proper training;
- ❖ Immediately report any risks or accidents.

4.2. Respect for Community and Environment

Workers must not:

- ❖ Create disorder, shout, or engage in fighting;
- ❖ Cause nighttime disturbances or threaten local residents;
- ❖ Insult or discriminate against others;
- ❖ Litter, damage property, or harm the environment.

4.3. Prohibited SEA/SH Behaviors

Workers are strictly prohibited from:

- ❖ Any act of sexual exploitation, abuse, or harassment;
- ❖ Unwanted sexual comments, gestures, or actions;
- ❖ Establishing relationships with minors (<18 years old), regardless of consent;
- ❖ Exchanging money, jobs, or benefits for sexual favors;
- ❖ Using force, threats, or coercion in any form of sexual activity.

4.4. Workplace Discipline and Ethics

Workers must:

- ❖ Maintain discipline and comply with work assignments;
- ❖ Not steal, gamble, or engage in violent behavior;
- ❖ Protect Project assets and equipment;
- ❖ Maintain cleanliness in worker camps and worksites.

4.5. Alcohol, Drugs, and Weapons

Workers must not:

- ❖ Possess or consume alcohol or drugs at camps or worksites;
- ❖ Carry weapons of any kind.

4.6. Protection of Children

Workers must not:

- ❖ Employ or exploit children in any form;
- ❖ Invite children into worker camps;
- ❖ Engage in behavior that may harm children physically or emotionally.

5. REPORTING MECHANISM

Workers must report:

- ❖ Unsafe working conditions;
- ❖ Any SEA/SH indicators or violations;
- ❖ Violent or discriminatory behavior;
- ❖ Any suspected breach of the CoC.

Reports may be made through:

- ❖ Direct supervisor;
- ❖ Safety officer or OHS focal point;
- ❖ Worker GRM hotline or complaint box.

Retaliation against complainants is strictly prohibited.

6. SANCTIONS FOR VIOLATIONS

Depending on severity, sanctions may include:

- ❖ Verbal or written warnings;
- ❖ Mandatory training or reassignment;

- ❖ Suspension or termination of employment;
- ❖ Reporting to police authorities for criminal acts (including SEA/SH).

7. WORKER DECLARATION (STANDARDIZED ENGLISH VERSION)

I hereby acknowledge that:

- ❖ I have received, read, and understood the Code of Conduct (CoC) of the 500 kV Krong Buk – Tay Ninh 1 Transmission Line Project (REACH);
- ❖ I commit to fully complying with all rules, obligations, and required behaviors;
- ❖ I understand that violation of the CoC may result in disciplinary measures, termination, or legal consequences.

Name: _____

Signature: _____

Date: _____

**ANNEX 2 – WORKER GRIEVANCE FORM (WORKER GRM FORM) – FULL
VERSION**

1. PURPOSE

This form is used by all workers participating in the REACH Project to submit grievances related to employment rights, working conditions, occupational health and safety (OHS), violations of the Code of Conduct (CoC), SEA/SH concerns, or any other issues. All grievances will be handled confidentially, fairly, and without retaliation.

2. COMPLAINANT INFORMATION (OPTIONAL)

() Remain anonymous

If not anonymous:

- Full name:.....
- Age:
- Gender:
- Work unit / Team:
- Phone number (if any):

3. TYPE OF GRIEVANCE

(Please tick the appropriate box)

- ☐ Wages / Labor contract
- ☐ Working conditions / OHS / PPE
- ☐ Worker accommodation
- ☐ Contractor / supervisor behavior
- ☐ Violation of CoC
- ☐ SEA/SH (strict confidentiality)
- ☐ Retaliation / pressure
- ☐ Other (specify): _____

4. DETAILED DESCRIPTION OF THE GRIEVANCE

- Date of incident: _____
- Location: _____
- Person(s) involved: _____
- Description of the incident (detailed):

5. ACTIONS TAKEN (IF ANY)

- Did you raise the issue with your supervisor?
☐ Yes ☐ No

If yes, what was the response?

○ Did you attempt to resolve the issue in another way?

☐ Yes ☐ No

If yes, please describe:

6. EXPECTED RESOLUTION

Please specify the outcome you expect:

7. DECLARATION

I confirm that the information provided above is accurate to the best of my knowledge. I understand that my grievance will be handled confidentially and without any form of retaliation.

Complainant signature (optional): _____

Date: _____

ANNEX 3 – ESIRT PROCEDURE (ENVIRONMENTAL AND SOCIAL INCIDENT RESPONSE TOOLKIT) – FULL VERSION

1. PURPOSE

The ESIRT procedure (Environmental and Social Incident Response Toolkit) applies to all serious environmental and social incidents under the REACH Project to ensure:

- ❖ Timely, appropriate, and effective response;
- ❖ Reporting to World Bank (WB) within 48 hours in accordance with ESS2/ESIRT requirements;
- ❖ Minimization of damage, losses, and risk of recurrence.

2. SCOPE OF APPLICATION

The ESIRT procedure applies to:

- ❖ Labor-related incidents (serious accidents, fatalities);
- ❖ SEA/SH incidents;
- ❖ Incidents causing significant impacts on the community;
- ❖ Major damage to assets, equipment, or infrastructure;
- ❖ Any incident classified by WB as “Severe” or “Substantial.”

3. ESIRT INCIDENT CLASSIFICATION

3.1 Category 1 – Severe Incidents

Includes:

- ❖ Worker or community fatality;
- ❖ Severe SEA/SH cases;
- ❖ Accidents causing permanent disability;
- ❖ Collapse of structures/excavations causing major losses;
- ❖ Incidents with large-scale community impact.

Requirement: Report to the WB within 48 hours.

3.2 Category 2 – Substantial Incidents

Includes:

- ❖ Serious injuries requiring hospitalization;
- ❖ SEA/SH cases without severe physical harm;
- ❖ Major equipment failure with high risk of escalation;
- ❖ Environmental impacts requiring urgent mitigation.

Requirement: Preliminary notification to SPMB within 24 hours; WB notification within 48 hours if escalated.

3.3 Category 3 – Moderate/Minor Incidents

Includes:

- ❖ Injuries requiring first aid only;
- ❖ Minor environmental or community disturbances;
- ❖ Near-miss events.

Requirement: Record in incident log and report in monthly summaries.

4. ESIRT REPORTING PROCESS

Step 1 – Immediate notification

- ❖ Contractor informs CSC and SPMB within 2 hours for any Severe/Substantial incident.

Step 2 – Initial reporting (within 24–48 hours)

- ❖ SPMB submits initial ESIRT report to WB within 48 hours for Severe/Substantial incidents.

Step 3 – Investigation

- ❖ Contractor and CSC conduct root-cause analysis;
- ❖ SEA/SH cases follow survivor-centered procedures.

Step 4 – Corrective Action Plan (CAP)

- ❖ Contractor prepares short-term and long-term corrective actions;
- ❖ SPMB reviews and monitors implementation.

Step 5 – Final report

- ❖ Submitted to SPMB and WB once corrective actions are completed.

5. INCIDENT INVESTIGATION AND ROOT-CAUSE ANALYSIS

- ❖ Interview involved persons and witnesses;
- ❖ Review safety procedures, training records, and equipment condition;
- ❖ Identify contributing factors: technical, human error, management, or environmental conditions.

6. INCIDENT SEVERITY ASSESSMENT

Severity level:

☐ High ☐ Medium ☐ Low

Likelihood of recurrence:

☐ High ☐ Medium ☐ Low

7. CORRECTIVE ACTION PLAN (CAP)

Short-term corrective measures:

Long-term corrective measures:

Person responsible:

Completion deadline:

8. ESIRT REPORTING INFORMATION (IF APPLICABLE)

- ❖ Does the incident fall under Severe/Substantial?

[] Yes – WB must be notified within 48 hours

[] No

❖ Date SPMB submitted initial report to WB:

❖ Notes:

9. CONFIRMATION

Report prepared by:

Signature: _____ Date: _____

Contractor's Safety Officer:

Signature: _____ Date: _____

CSC Representative:

Signature: _____ Date: _____

SPMB Representative (if required):

Signature: _____ Date: _____

**ANNEX 4 – INCIDENT/ACCIDENT/NEAR-MISS REPORT FORM – FULL
VERSION**

1. GENERAL INFORMATION

- ❖ Date of incident: _____
- ❖ Time of incident: _____
- ❖ Location: _____
- ❖ Package / Subcomponent: _____
- ❖ Contractor: _____

2. INFORMATION OF PERSON(S) INVOLVED

- ❖ Full name: _____
- ❖ Age: _____
- ❖ Gender: _____
- ❖ Position / Job title: _____
- ❖ Unit / Team: _____
- ❖ Employment type: ☐ Contract ☐ Seasonal ☐ Other

3. TYPE OF INCIDENT

(Please tick one or more boxes)

- ☐ Fatality
- ☐ Serious injury
- ☐ Minor injury
- ☐ Safety incident (no injury)
- ☐ Near-miss
- ☐ Equipment damage
- ☐ Community-related incident
- ☐ Environmental incident
- ☐ Other: _____

4. DETAILED DESCRIPTION OF INCIDENT

- ❖ Background of the incident:

- ❖ Description of sequence of events:

- ❖ Weather conditions:

- ❖ Activity being performed:

5. INJURY / DAMAGE

a) For people:

- ❖ Injured person(s): _____
- ❖ Injury severity: _____
- ❖ Provided first aid by: _____
- ❖ Transported to medical facility: _____
- ❖ Current condition: _____

b) For assets / equipment:

- ❖ Description of damage: _____

6. PRELIMINARY CAUSES

Direct cause:

Root causes:

Contributing factors:

7. IMMEDIATE RESPONSE MEASURES

- ❖ Actions taken:
- _____

- ❖ Person responsible:
- _____

8. EVIDENCE ATTACHED

- ☐ Photos
- ☐ Video
- ☐ Witness statements
- ☐ Site diagram
- ☐ None

List of attached documents:

9. RECURRENCE POTENTIAL AND SEVERITY LEVEL

- ❖ Severity level: ☐ High ☐ Medium ☐ Low
- ❖ Likelihood of recurrence: ☐ High ☐ Medium ☐ Low

10. CORRECTIVE ACTION PLAN (CAP)

Short-term corrective actions:

Long-term corrective actions:

Responsible person:

Deadline for completion:

11. ESIRT REPORTING INFORMATION (IF APPLICABLE)

❖ Is the incident classified as Severe/Substantial?

[] Yes – WB must be notified within 48 hours

[] No

❖ Date SPMB submitted the initial report to WB:

❖ Notes:

12. CONFIRMATION

Prepared by:

Signature: _____ Date: _____

Contractor's Safety Officer:

Signature: _____ Date: _____

CSC Representative:

Signature: _____ Date: _____

SPMB Representative (if required):

Signature: _____ Date: _____

ANNEX 5 – TRAINING ATTENDANCE FORM – FULL VERSION

1. GENERAL INFORMATION ABOUT THE TRAINING COURSE

- ❖ Training course title: _____
- ❖ Training date: _____
- ❖ Training venue: _____
- ❖ Trainer / Training institution: _____
- ❖ Training contents: _____
- ❖ Participants (target group): _____

2. LIST OF WORKERS ATTENDING THE TRAINING (WITH SIGNATURES)

| No. | Full Name | Position / Job | Unit / Team | Signature |

|-----|-----|-----|-----|-----|

(Additional rows may be added as required.)

3. CONFIRMATION BY CONTRACTOR / TRAINER

- ❖ Prepared by: _____
Signature: _____ Date: _____
- ❖ Contractor representative / Trainer: _____
Signature: _____ Date: _____

4. NOTES

- ❖ This form shall be kept by the contractor and CSC for training monitoring purposes.
- ❖ SPMB shall retain the form for a minimum of 5 years after Project completion.

ANNEX 6 – WORKER ACCOMMODATION INSPECTION CHECKLIST

(According to IFC Worker Accommodation Guidelines & ESS2) – FULL VERSION

Purpose: This checklist is used by the Contractor, CSC, and SPMB to inspect living conditions, safety, hygiene, and management of worker accommodation in accordance with IFC standards and ESS2 requirements.

1. GENERAL INFORMATION

- ❖ Location of accommodation area: _____
- ❖ Managing contractor: _____
- ❖ Number of workers residing: _____
- ❖ Inspection date: _____
- ❖ Inspector(s): _____

2. STRUCTURE AND BUILDING SAFETY

- ☐ Accommodation is structurally solid and safe
- ☐ No signs of cracking, collapse, or deterioration
- ☐ Emergency exits are clear and unobstructed
- ☐ Electrical system installed correctly, equipped with RCD/ELCB
- ☐ No unsafe temporary electrical connections

Notes: _____

3. SPACE AND OCCUPANCY DENSITY

- ☐ Minimum area $\geq 3.5\text{--}4.0 \text{ m}^2/\text{person}$
- ☐ No overcrowding of beds/rooms
- ☐ Beds are stable and clean
- ☐ Each worker has a personal locker

Notes: _____

4. VENTILATION, LIGHTING, AND TEMPERATURE

- ☐ Windows/fans/air conditioning or adequate cooling provided
- ☐ Lighting is sufficient and safe
- ☐ No bad odors, mold, or dampness

Notes: _____

5. SANITATION – WASHING AND TOILET FACILITIES

- ☐ Adequate number of toilets ($\geq 1/20$ persons)
- ☐ Clean water available per QCVN 01:2009/BYT
- ☐ Toilets clean and not clogged
- ☐ Separate male/female bathing areas (if needed)
- ☐ Sanitary facilities cleaned daily

Notes: _____

6. WATER SUPPLY AND FOOD SAFETY

- ☐ Safe drinking water available in designated areas
- ☐ Kitchen area clean and free from contamination
- ☐ Food stored on clean, dry, elevated shelves
- ☐ Food sourced from verified suppliers
- ☐ Cooks have valid health certificates

Notes: _____

7. WASTE MANAGEMENT AND ENVIRONMENTAL HYGIENE

- ☐ Covered trash bins available
- ☐ Waste collected daily
- ☐ Wastewater properly channeled/disposed
- ☐ No stagnant water breeding mosquitoes

Notes: _____

8. ACCOMMODATION SECURITY

- ☐ Security guards on duty 24/7
- ☐ Visitor access controlled
- ☐ Adequate lighting at night
- ☐ Perimeter fencing in place

Notes: _____

9. RULES, REGULATIONS, AND SIGNAGE

- ☐ Accommodation rules clearly posted
- ☐ Safety signs and emergency exit signs available
- ☐ CoC and SEA/SH posters displayed prominently

Notes: _____

10. FIRE SAFETY (FIRE PREVENTION & FIGHTING)

- ☐ Fire extinguishers provided and meet standards
- ☐ Fire exits unobstructed
- ☐ Personnel trained in fire extinguisher use
- ☐ No unsafe cooking practices in sleeping areas

Notes: _____

11. WELFARE AND HEALTH SUPPORT

- ☐ First-aid kit adequately stocked
- ☐ Medical/first-aid personnel available
- ☐ Support provided for persons with disabilities or female workers (if needed)

Notes: _____

12. BEHAVIOR AND SOCIAL SECURITY

- ☐ No disturbances or violence
- ☐ No alcohol/drug use

☐ No SEA/SH indicators present

☐ No forced labor

Notes: _____

13. OVERALL ASSESSMENT

Compliance level:

☐ Good

☐ Acceptable

☐ Needs improvement

☐ Not compliant

Recommendations:

14. CONFIRMATION

– Inspector: _____ Date: _____

– Contractor Representative: _____ Date: _____

– CSC Representative: _____ Date: _____

**ANNEX 7 – LMP COMPLIANCE MONITORING CHECKLIST
(FOR CSC & SPMB) – FULL VERSION**

Purpose: This checklist is used during periodic and ad-hoc monitoring to evaluate compliance with the Labor Management Procedures (LMP), ESS2, CoC, OHS, and Worker GRM at REACH construction packages.

1. GENERAL INFORMATION

- ❖ Package / Subcomponent: _____
- ❖ Contractor: _____
- ❖ Inspection location: _____
- ❖ Inspection date: _____
- ❖ Inspector(s) (CSC/SPMB): _____

2. LABOR MANAGEMENT

- ☐ Daily updated labor list
- ☐ Workers have valid labor contracts
- ☐ Full age verification records available; no workers under 18 engaged in hazardous work or construction activities
- ☐ No retention of worker identity documents
- ☐ No forced labor

Notes: _____

3. RECRUITMENT & ASSIGNMENT

- ☐ Transparent recruitment procedures
- ☐ No discrimination
- ☐ Priority given to local workers
- ☐ Job assignments match worker capacity

Notes: _____

4. LABOR CONTRACTS & WAGES

- ☐ All workers have signed labor contracts
- ☐ Contracts specify wage, working hours, and benefits
- ☐ No illegal wage deductions
- ☐ Wages paid on time
- ☐ Workers are informed of rights before signing

Notes: _____

5. TRAINING & CAPACITY BUILDING

- ☐ Workers receive induction training before work
- ☐ Monthly OHS training conducted
- ☐ CoC and SEA/SH training provided
- ☐ Full training records available
- ☐ Weekly toolbox meetings conducted

Notes: _____

6. CODE OF CONDUCT (CoC)

- ☐ 100% of workers have signed the CoC
- ☐ CoC communicated in a language workers understand
- ☐ CoC posters displayed at site and accommodation
- ☐ No CoC violations observed
- ☐ No SEA/SH indicators

Notes: _____

7. OCCUPATIONAL HEALTH & SAFETY (OHS)

- ☐ Approved OHS Plan in place
- ☐ Adequate PPE available and properly used
- ☐ Equipment inspected as required
- ☐ Safety signs at hazardous areas
- ☐ Safety officer(s) present at site
- ☐ No serious safety risks identified

Notes: _____

8. WORKER ACCOMMODATION

- ☐ Accommodation clean and safe
- ☐ Space $\geq 3.5\text{--}4.0\text{ m}^2/\text{person}$
- ☐ Toilets and clean water meet standards
- ☐ Kitchen and dining areas hygienic
- ☐ No alcohol consumption or disorderly behavior

Notes: _____

9. SUBCONTRACTOR & SUPPLIER MANAGEMENT

- ☐ Main contractor supervises subcontractors
- ☐ Subcontractors have proper labor contracts
- ☐ No use of child labor
- ☐ No labor risks in supply chains

Notes: _____

10. WORKER GRM

- ☐ Worker GRM communicated to workers
- ☐ Suggestion box placed in visible location
- ☐ Hotline operational
- ☐ Grievance records complete
- ☐ No retaliation against complainants
- ☐ SEA/SH grievances follow special handling procedures

Notes: _____

11. REPORTING & RECORD KEEPING

☐ Weekly/monthly reports from contractor complete

☐ Incident reporting on time

☐ Training and labor contract records maintained

☐ ESIRT documentation (if any) complete

Notes: _____

12. OVERALL ASSESSMENT

LMP compliance level:

☐ Good

☐ Acceptable

☐ Needs improvement

☐ Not compliant

Improvement recommendations:

13. CONFIRMATION

– Inspector (CSC): _____ Date: _____

– Contractor Representative: _____ Date: _____

– SPMB Representative: _____ Date: _____