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MINISTRY OF WATER IRRIGATION AND ENERGY

ETHIOPIAN ELECTRIC UTILITY

and

DEVELOPMENT BANK OF ETHIOPIA

**Access to Distributed Electricity and Lighting in
Ethiopia (ADELE) Project– P171742**

LABOR-MANAGEMENT PROCEDURE (LMP)

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ADELE (P171742) LABOR-MANAGEMENT PROCEDURE

1. PROJECT BACKGROUND

The proposed **Access to Distributed Electrification and Lighting in Ethiopia Project (ADELE)** provides financing for (i) grid strengthening for improved reliability and quality of supply in Addis Ababa and other key urban areas, (ii) off-grid solutions (mini-grids and solar home systems) in rural and remote rural areas, and (iii) standalone systems for electricity supply to education and health facilities. Also, the project provides a comprehensive account of priority technical assistance and capacity building activities for the effectiveness and efficiency of the program. It also contains a set of interventions to engage women in service delivery e.g. focusing on financing and business skills gaps in female enterprises and upskilling programs for solar engineers. At the beneficiary level, it provides information on affordability constraints and product preferences of women versus men. More specifically, the project aims at providing 1.45 million Tier 1 and above solar off-grid solutions, and isolated mini-grids, designed to handle grid-level loads, for 230,000 households and 11,500 enterprises. The project also provides a coordinated combination of these technology solutions as well as standalone solar systems for 2,000 social institutions.

The proposed operation will support the delivery of energy services with the potential to enable productive use in peri-urban, rural, and deep-rural areas thus contributing to post-COVID recovery. The delivery of energy services through off-grid solutions can support productive and income-generating activities in agriculture (i.e. irrigation, and processing) and commercial sectors, improving the livelihoods of fragile and vulnerable communities, and opening opportunities for women and youth, disproportionately affected by unemployment and lack of productive opportunities.

The Project Development Objective (PDO) is to increase access to reliable electricity for households, social institutions, and enterprises in Ethiopia.

2. PROJECT COMPONENTS

The project will increase access to new and improved electricity services for households, small-holder farmers, commercial and industrial users, and social institutions in urban, peri-urban, rural, and deep-rural areas through on-grid, off-grid, and mini-grid solutions by leveraging public and private delivery modalities.

Component 1 will ensure that grid-connected urban households are receiving electricity services with adequate reliability and quality, while Components 2 and 3 will ensure that remote and poor households, as well as farmers and small businesses in rural areas, can access electricity services, provided through off-grid solutions (mini-grids or stand-alone off-grid systems). Component 4 will expand the benefits of electrification in communities by supporting improved delivery of education and healthcare services.

EEU will play a key role in the implementation of ADELE as the implementing agency for Components 1 (on-grid reliable access), 2 (solar-hybrid mini-grids for rural economic development), and 4 (electrification of health and education facilities). MoWIE and DBE are the implementing agencies for sub-component 3.1 and 3.2. respectively. ADELE has 5 components that provide a synergetic package of investments to ensure that reliable electricity services are made available to all Ethiopians regardless of their location and economic status.

The project has five components: (1) Network strengthening for improved reliability of supply in urban areas; (2) solar-hybrid mini-grids for rural economic development; (3) Solar home systems for households, small-holder farmers, and small businesses; (4) Standalone solar systems for health and education facilities; and (5) Capacity building, technical assistance, and implementation support. These five components provide a synergetic package of investments to ensure that reliable electricity services are made available to all Ethiopians regardless of their location and economic status.

Component 1: Network strengthening for improved reliability of supply in urban areas (US\$100 million): This component will improve the reliability of supply in Addis Ababa and other key urban areas, where near-universal access to electricity has been achieved, but deficiencies in availability, quality, and reliability of supply remain a challenge. This component would address the network strengthening requirements to achieve higher reliability, quality, and duration of electricity supply, enabling electricity consumers to take full advantage of the benefits of electricity service. The network upgrade and rehabilitation will include infrastructure investments in EEU's jurisdiction, including medium voltage and low voltage equipment as well as support for the Revenue Protection Program (RPP). Activities will focus on rehabilitation and expansion of more than 600 km of medium voltage (MV) lines. It will also cover the rehabilitation of the distribution network of ten regional capitals and key zonal towns, while also supporting the implementation of EEU's RPP investments at the level of distribution transformers¹.

Component 2: Solar-hybrid Mini-Grids for Rural Economic Development (US\$265 million). This component will finance the roll-out of solar mini-grids along with battery storage and/or diesel backup. The mini-grids supported under the Project will be rolled out through a combination of public and private sector-led approaches based on a pipeline of prioritized sites pre-identified using geospatial planning. These are: (1) EEU operated mini-grids, and (2) Private sector-led demonstration projects operated by local and international private mini-grid developers, as well as cooperatives. In addition to greenfield sites, investments will be made to hybridize the existing EEU-operated diesel-based mini-grids. It is estimated that with an average investment of around US\$1,000 per connection, around 240,000 connections could be provided under this component, benefiting over a million people.

Sub-Component 2.1: EEU-led mini-grids (proposed IDA US\$215 million in financing). EEU will lead the EPC/Rollout of greenfield solar-hybrid mini-grids. New solar-hybrid mini-grids will be deployed by the EEU through Engineering, Procurement, and Construction (EPC) and short-term (e.g. 3 or 6 months) Operation and Maintenance (O&M) contracts. Upon conclusion of the short-term O&M period, the mini-grids would be operated either directly by EEU or under a follow-on long-term O&M contract. Besides, this sub-component will include the hybridization of existing diesel-fueled mini-grids currently operated by EEU across Ethiopia (primarily in the Somali region).

Sub-Component 2.2: Private sector-led mini-grid pilot (proposed IDA US\$50 million in financing). In line with the goals and ambition set out in the NEP 2.0, the component will support a demonstration of different private sector-led approaches to leverage local and international private sector financing for mini-grid scale-up. EEU will be the implementing entity for the two approaches in this sub-component. Private sector/cooperatives will be expected to procure, install, own, operate, monitor, and maintain the generation and distribution of assets, including meters and software. This component will finance through a competitive process for (i) Minimum Subsidy Tender (MST), and (ii) Performance-based Grants (PBG).

Component 3: Solar home systems for households, small-holder farmers, and small businesses (US\$50 million): This component will expand the availability and affordability of off-grid solar systems for households, small-holder farmers, and small businesses in rural areas, with a particular focus on deep rural

¹ Complementary RPP investments are being implemented at the MV level through ENREP.

and other underserved areas. This will be done by facilitating foreign currency to importers of quality-certified systems and providing local currency financing to off-grid solar companies, distributors, and consumers to increase the offering and adoption of quality off-grid solar products in underserved areas on affordable terms.

Sub-Component 3.1: Incentivizing Market Expansion into deep-rural areas and Innovation (IDA US\$10 million equivalent). This sub-component will set up a Results-Based Financing (RBF) facility, offering competitively awarded incentives to off-grid solar companies to accelerate off-grid solar expansion in Ethiopia, with a focus on deep-rural areas. The RBF is expected to contribute to faster and deeper penetration of off-grid energy solutions by supporting scale and expansion in areas that would otherwise be too hard and costly to reach. The RBF payments will partially offset the initial costs and risks associated with off-grid solar companies expanding their operations and setting up their sales and service infrastructure in new regions, thereby incentivizing the private sector to serve more rural and underserved areas.

Sub-Component 3.2: Access to Finance to Increase Off-grid Solar Penetration (IDA US\$40 million equivalent): Enterprises operating in the off-grid market require access to (a) foreign exchange funding for the importation of off-grid energy systems and (b) working capital financing for day-to-day operations like the establishment and expansion of the supply chains, funding of operations and logistics, and financing the value chain. Financing is also needed for consumers especially in rural and deep rural areas where consumers' purchasing capacity is a constraint. End-user financing can also drive the uptake of bigger systems that provide a wider range of electricity services and can power income-generating activities. Therefore, companies and MFIs also need (c) capital for the provision of consumer financing via supplier financing or PAYGo business models or micro-loans to households and businesses.

Component 4: Standalone solar systems for health and education facilities (IDA US\$50 million equivalent). This component will finance the supply and installation of standalone solar systems for health and education facilities identified under the NEP 2.0. The project will target health centers and secondary schools that are located in underserved and remote rural areas and are identified as a priority by MoWIE, in coordination with federal and local education, health, and energy agencies. Under this component, around 1,400 secondary schools and health centers will be electrified using standalone solar systems.

Component 5: Capacity building, technical assistance, and implementation support (US\$35 million). This component will finance various sector studies and technical assistance, capacity building and implementation support activities to ensure EEU, MoWIE, DBE, EEA, the local and international private sector, cooperatives, mobile network operators, financial institutions, and other sector stakeholders have adequate technical, planning, and operational capacity to implement the electrification program. The project will support general sector studies and technical assistance as they become relevant to the sector and the implementation of ADELE. Component 5 has an Environmental and Social Risk Management Technical Assistance and Capacity Building embedded in the respective sections of MoWIE, EEU, and DBE Capacity building, technical assistance.

3. RATIONALE OF THE LABOR-MANAGEMENT PROCEDURES

For successful implementation of the ADELE project, the use of government, private sector, and cooperatives human resources is anticipated at all levels from Federal to Region, Zone, and Kebele. The Government of Ethiopia recognizes that comprehensive management of human resources is important in

augmenting the positive outcomes of the project. The LMP identifies the labor requirements and risks associated with the project. It is expected that the LMP and the procurement documents will inform each other and key aspects of the LMP will be incorporated as contractual obligations of the private sector, cooperatives, contractors, and subcontractors. This Labor-Management procedure (LMP) is developed by EEU for the components responsible under the proposed ADELE project. The main objectives of ESS 2 are the following:

- (a) Promote safety and health at work;
- (b) Promote the fair treatment, non-discrimination, and equal opportunity of project workers;
- (c) Protect project workers, including vulnerable workers such as women, persons with disabilities, youth (of working age, under Ethiopian legal provisions and WB's ESF-ESS2) and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate.
- (d) Prevent the use of all forms of forced labor and child labor;
- (e) Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with federal law;
- (f) Provide project workers with accessible means to raise workplace concerns

This LMP is a living document, which is developed by Ethiopian Electric Utility (EEU) during ADELE project preparation and will be reviewed and updated throughout the development and implementation of the project.

Note. The project will ensure compliance with national law requirements as well as World Bank guidelines regarding the COVID-19 situation.

4. OVERVIEW OF LABOR USE IN ADELE

ADELE will be implemented per the Ethiopian Labor Proclamation No. 1156/2019² and the World Bank's ESS2. ADELE project implementing agencies (EEU, private sectors) are responsible to ensure compliance by their employees as well as potential contracted institutions. Labor and working conditions in the project are relevant to direct workers (including government civil servants seconded from their home agencies to work concerning the project) employed or engaged by the project implementing agencies, contracted workers, and primary supply workers. These will include construction workers hired for the projected civil works (as required) and trained technicians for the installation and maintenance and operation of the solar mini-grids, stand-alone solar systems as well as rehabilitation and expansion of electricity network rehabilitation and expansion works. ADELE project will not anticipate mobilization of community workers as defined in ESS2 - people engaged and employed in providing community labor. On the other hand, the private sectors/ companies (e.g. to be involved under ADELE Subcomponent 2.2.) will include adequate assessment and procedures for their human resource management.

This LMP will also include potential labor risks anticipated in the project; terms and conditions that will be applicable for workers, as per the Government of Ethiopia Labor Proclamation; GoE's legal frameworks on OHS; responsibility of staff management and Workers Grievance Mechanism.

As per paragraph 9 of ESS2, Labor Management Procedure should be developed and implemented for project-related workers. Thus, EEU has prepared this LMP which will be implemented defining the potential project workers, the risks, and impacts with issues of labor and working conditions. The

² Federal Negarit Gazette of the Federal Democratic Republic of Ethiopia, Labor Proclamation No.1156/2019, 5th September 2019.

procedures identified in this LMP apply to the direct, contracted, and primary supply workers. The project components' activities will involve workers which include both males and females.

4.1. Project Workers

According to ESS2, project workers can be defined into the following four areas:

- (1) Direct workers: people employed or engaged directly by the Borrower (including project proponent and project implementing agencies) to work specifically to the project.
- (2) Contracted workers: people employed or engaged through third parties to perform work related to core functions of the project regardless of the location
- (3) Primary supply workers: people employed or engaged by the borrower's primary suppliers.
- (4) Community labor: people engaged and employed in providing community labor.

Direct Workers:

For ADELE, the direct workers are likely to include project manager, operators, supervisors who are current employees of EEU and who will be assigned to work on this project including 6 E&S as well as Health and Safety experts and 10 technical staffs to be recruited and included with EEU/PIU OGU level and 33 new employees would be hired at all regions to carry out work with environmental and social safeguard issues. The estimated number of direct workers would not likely exceed 50 to 60 staff.

It is expected that direct workers would also include independent consultants, who are specialized in certain disciplines (such as training, supervision, and environment and social safeguards, etc.). This kind of expertise is planned to be supported by ADELE Component 5, Capacity building, technical assistance, and implementation support). These consultants will be hired under individual contracts, on a part-time basis, with a specific definition of the assigned tasks and responsibilities (such as with defined Terms of Reference (ToR)).

Contracted Workers:

Contracted workers would be hired for design, supervision, supply, and installation of construction activities, supply, installation, construction, and commissioning contractor(s) for Components of 1,2, & 4. Given the construction sites are distributed over the country, several separate contracts would be awarded. Each contractor might need the engagement of subcontractors. The subcontractors' workforce will also be considered as contracted workers. At this time, it is difficult to estimate the number of contract workers that will be engaged in the ADELE components 1, 2, & 4, as the number of contractors and subcontractors required for the set of project activities. Data for this and other types of workers will be amended in the upcoming updates of this LMP.

Primary Supply Workers:

Primary supply workers would be engaged by EEU's primary suppliers to the project materials such as electric wires, power-poles, solar systems (generators, PV panels, batteries, inverters, and charge controllers) protection and control equipment, construction materials, etc. Given the project sites are distributed over the country, several separate contracts would be awarded.

Community Workers:

ADELE project will not anticipate mobilization of community workers as defined in ESS2 - people engaged and employed in providing community labor.

4.2. Number of Project Workers

The exact number of project workers who will be engaged concerning the ADELE Project (mainly for Components 1, 2, and 4) is currently not known. The bidding documents for the design Supply, Installation, and Commissioning, and Operation of the project (consisting of medium voltage electricity network rehabilitation and expansion, hybrid mini-grids (solar generation with battery storage, and diesel back-up generation), and stand-alone solar systems have not yet been prepared. The number of workers to be involved in the construction phase has been estimated based on EEU's prior experience gained from similar projects undertaken in Ethiopian major cities. EEU has already implemented medium and low voltage lines upgrading projects as well as mini-grid installation projects, financed by the World Bank and other investment sources. Such projects have roughly involved the construction of approximately 600 km long distribution medium voltage lines, solar mini-grids, stand-alone solar systems, and SHS across the country. At the beneficiary level, the project aims at providing solar off-grid solutions for 750,000 households, and mini-grids, designed to handle grid-level loads, for 240,000 households and 11,500 enterprises. The project also provides a coordinated combination of these technology solutions as well as standalone solar systems for 1,400 health and education facilities. The implementation framework and operational design are informed by experiences of the pilot program launched in ELEAP, best practices and established international experiences, as well as recent off-grid innovations that have taken place in Sub Saharan Africa and globally.

It is estimated that the approximate total number of workers for the construction of the medium voltage lines would be about 280 to 320 persons, about 15 to 23 for single mini-grids, and about 2 to 7 for a single solar system (stand-alone and SHS). It is also understood that the main construction crews for the proposed ADELE project works will be local workers from the project's sites and other parts of the country.

4.3. Timing of Labor Requirements

It is expected that the construction phase of the medium voltage lines, mini-grids and stand-alone as well as Solar Home Systems 4 to 5 years. For the whole construction activities of the project, about 65 percent of the workers will be unskilled laborers, and 35 percent of the workers will be semiskilled and skilled positions such as managers, engineers, forepersons, drivers and equipment operators, and electrical workers. Once the land is cleared and foundations are installed, more skilled labor will install the towers, electrical equipment, and accessories for the specified grid, mini-grid and solar systems. All semiskilled, skilled, and unskilled labor will come from local communities. It is expected that the project will engage the following categories of project workers as defined by ESS2.

5. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

By the proposed project, EEU, as an implementing agency, will play a key role in the implementation of ADELE Components 1 (on-grid reliable access), Component 2 (solar-hybrid mini-grids for rural economic development), as well as Component 4 (electrification through standalone solar systems for health and education facilities). Cognizant to this, the potential key labor risks for these ADELE Components would include (a) inadequate payment, (b) likely incidents of child labor or forced labor, (c) risks of Gender-Based Violence (GBV), (d) extended working hours without pay, (e) workplace

accidents/injuries/inappropriate use of personal protective equipment (PPE), (f) working at heights, (g) community health and safety issues, including community exposure to hazardous materials (production of wastes from used solar panels and batteries/ both lead-acid and lithium-ion); communicable diseases, including COVID-19, which may arise from the interaction of project workers with local communities and between project workers; (h) inadequate awareness and implementation of occupational health and safety requirements, (i) discriminatory labor recruitment.

In accordance to ESS2, due to the hazardous nature of project work involving the use of hazardous materials and the Ethiopian Labor Proclamation 1156/2019, Article 89, sub-article 3 defines that young workers should not be involved in any work that endangers their lives or health. Further, Article 89, (4) outlines the barred areas for young workers, one of which is related to work connected with electric power generation plants, transformers, or transmission lines. Hence, given the hazardous nature of the project work (mainly Component 1 of ADELE), the project will not recruit any labor under 18 years of age; while ADELE prohibits recruiting child labor in any of its activities. To manage the risk that child and/ or young worker (as relevant) under deployment/ engagement with works, the project will carry out important steps like documentation and verification of age to prevent employment or engagement of child labor. Hence, obtaining written confirmation from the applicant of their age; and where there is any reasonable doubt as to the age of the applicant, requesting and reviewing available documents to verify age (such as a birth certificate, national identification card, medical or school record, or other document or community verification demonstrating age, when available) will be undertaken before the employment or engagement of a project worker and kept on file.

Discrimination is the other potential risk under the proposed ADELE project and its subcomponents assigned for EEU. These include potential inappropriate treatment or harassment of project workers related, for example, to gender, age, disability, ethnicity, or religion; potential exclusion or preferences concerning recruitment, hiring, termination of employment, working conditions, or terms of employment made based on personal characteristics unrelated to inherent work requirements; in training and development provision. In the proposed ADELE project, all forms of discrimination are unacceptable as per the Ethiopian Labor Law and ESS2 and it supports equal opportunities for women and men, with emphasis on equal criteria for selection, remuneration, and promotion, and equal application of those criteria. Measures to prevent harassment of project workers, including sexual harassment, in the workplace are addressed with the GBV action plan. This will be addressed with the prepared GBV Action Plan. Project staff will sign Codes of Conduct (CoC) that can be mentioned in routine project protocol briefings and include a session on SEA/SH awareness training, in the training, and capacity building interventions. Moreover, the focus will be given to the sharing of key messages with project staff.

Considering the small size of the proposed project activities, most of the project labor requirements could be fulfilled from local employment except few skilled laborers. Hence, the potential for an influx of immigrant labor to the proposed project areas is expected to be relatively low. However, the project needs specific requirements to manage risks associated with labor influx, related to the interaction between project workers and local communities. In such a way, the Gender-Based Violence Action Plan (GBV), will be managed through contractual requirements, code of conduct, and training programs. These procedures are guided by the ESS2 and Ethiopia Labor Law.

A Labor influx and Gender-Based Violence (GBV) risk assessment of the project was undertaken following the World Bank's Good Practice Note 2018. An initial screening of the labor influx profile of the project deemed to be substantial and based on different other factors, the project has been assessed to have a moderate risk of GBV/SEA/SH due to high levels of poverty, the rural context of the project, the low rates of help-seeking on SEA/SH, social acceptance of at least one reason for spousal abuse, etc.

EEU has developed an Environmental and Social Management Framework (ESMF) that includes measures to mitigate GBV risks, including the need for capacity enhancement of implementing agencies and codes of conduct for contractors and other implementers. The ESMF has further indicated that Contractor/s will be required to implement measures to manage GBV risks at the project level; among others, assigning a GBV specialist who will be responsible to manage the risks and that works in close contact with Woreda Women, Youth, and Children Affairs Offices, to put in place administrative measures to prevent and minimize GBV, to prepare administrative measures (for example through Code of Conduct) to Prevent Sexual Harassment in the workplace and acknowledging zero tolerance for GBV as well as strengthen GRM and other monitoring mechanisms to ensure safe and ethical reporting systems to alert cases of GBV and assure them to access adequate response. EEU shall ensure that an area/ site-specific assessment of GBV/SEA/SH risks is undertaken within subsequent project ESIA/ESMPs and that prevention and response measures are put in place. The detailed SEA/SH requirements, including training, COC, awareness is included in the complementary project SEA/SH plan, which will be implemented together with the LMP.

If ADELE project circumstances change concerning the labor influx situation, then, the PIU will produce and implement a Labor Influx Management Plan (LIMP) in line with this LMP and the provisions of ESS2 and ESS4. In such conditions, Contractors will be required to prepare, adopt and implement a written LIMP before employing any labor in the works.

Concerning community health and safety, construction/ installation companies will actively collaborate and consult with communities in promoting the understanding, and methods for, the implementation of community health and safety, including HIV/ AIDS and other communicable diseases prevention and informing communities about the requirements of workers' Codes of Conduct. Contractors will also provide project workers with training on respectful relations with communities, including on health and safety practices. While, the civil works to be financed are limited in scale and scope, to ensure the health and safety of communities during the construction and operation phases of the project, the project will develop and implement a Health, Safety and Environmental (HSE) Plan in line with World Bank Group Environment, Health, and Safety Guidelines (EHSG) for construction activities.

The project ESMF and ESCP prepared for the project revealed that EEU is committed to providing awareness/orientation sessions on OHS/ Community health and safety, STD/ HIV/AIDS, GBV/SEA/SH, GRM, etc. related aspects which aimed at staff from EEU, Woreda level relevant offices, Private sectors, Cooperatives, Contractors of civil works, etc.

Occupational Health and Safety (OHS) related risks might be expected during construction activities of the ADELE project components; thus, will be mitigated with the use of personal protective equipment (PPEs) and rigorous and regular occupational H&S training and awareness-raising activities, including training on the appropriate use of PPE at work sites.

There will be Workers' Grievance Redress Mechanism for labor issues, drawing from national law and procedures. Worker accommodation and influx will need to be managed in line with ESS2 and ESS4. To ensure the health and safety of workers during the construction and operational phases of the project, the Health, Safety, and Environmental (HSE) plan in line with Good International Industry Practice (GIIP) shall be prepared and tailored to each ESMP of the subprojects. Social service providing institutions, such as school and health center personnel, in which the solar panels are installed are not subject to the requirements of ESS2.

6. OVERVIEW OF ETHIOPIAN LABOR LEGISLATION: TERMS AND CONDITIONS

The following terms and conditions apply for workers as per the Government of Ethiopia Labor Laws (in addition to the provisions of ESS2):

- Labor Proclamation No. 377/2003
- Federal Civil Servants Proclamation 1064/2017
- Labor Proclamation No.1156/2019³ (does not replace, Labor Proclamation No. 377/2003, but complements).
- Proclamation No. 632/2009, Employment Exchange Service Proclamation
- Proclamation No. 568/2008, Right to Employment of Persons with Disability

In case of variations between the national legislation, regulations, and the World Bank Environment and Social Standards, the more stringent provision will prevail.

The government officials at the federal, zone, woreda, and kebele levels as well as the project officers who are employed and deployed to this project constitute the direct workers. The terms and conditions of civil servants are guided by the national civil service regulations and other labor and employment legislation. The project officers are guided by the terms and conditions of their contractual agreements.

The Government of Ethiopia Labor Proclamation No. 1156/2019 is enacted to secure durable industrial peace, sustainable productivity, and competitiveness that will contribute to the overall development of the country. The Proclamation has introduced new concepts. It has also modified some of the existing provisions which were unclear, and therefore, prone to various interpretations. GoE has reformulated the existing labor law (Proclamation 377/2003) to attain the below-stated objectives and under and in conformity with the international conventions and other legal commitments to which Ethiopia is a party.

The major objectives of the proclamation include the following:

- To ensure that worker-employer relations are governed by the basic principles of rights and obligations;
- To lay down a working system that guarantees the rights of workers and employers to freely establish their respective associations and to engage, through their duly authorized representatives, in social dialogue and collective bargaining, as well as to draw up procedures for the expeditious settlement of labor disputes, which arise between them;
- To create a favorable environment for investment and achievement of national economic goals without scarifying fundamental workplace rights by laying down well-considered labor administration; and determine the duties and responsibilities of governmental organs entrusted with the power to monitor labor conditions; occupational health and safety; and environmental protection together with bilateral and tripartite social dialogue mechanisms; political, economic and social policies of the Country.

6.1. Minimum Age for Employment and Prohibition of Child and Forced Labor

A worker who has attained a minimum age of 15 years is capable of being employed under the new labor law of Ethiopia; while the minimum age for Hazardous Work is set as 18 years. Moreover, the definition

³ A new Labor Proclamation 1156/2019 has been issued in September 2019 by the House of People's Representatives of Ethiopia replacing Proclamation no 377/2003, which was in force for the previous 16 years.

of young workers⁴ has been amended to include workers between 15 and 18 years of age. It is prohibited to assign young workers to work, which on account of its nature or due to the condition in which it is carried out endangers their lives or health. The Ministry of Labor and Social Affairs may prescribe the list of activities prohibited for young workers which shall include in particular:

- Work in the transport of passengers and goods by road, railway, air, and internal waterways, docksides and warehouses involving heavy weightlifting, pulling or pushing, or any other related type of labor;
- Work connected with electric power generation plants, transformers, or transmission lines;
- Underground work such as mines and quarries;
- Work in sewers and tunnel excavation.

The above-stated prohibition shall not apply to work performed by young workers in fulfillment of course requirements in vocational schools that are approved and inspected by the Competent Authority.

Forced Labor is prohibited under the Constitution of Ethiopia and is a punishable offense under the Criminal Code⁵. If a person compels another by intimidation, violence, fraud, or any other unlawful means to accept particular employment or particular conditions of employment is punishable, upon complaint, with simple imprisonment at least three (3) months, or fine.

The anti-trafficking legislation⁶ also prohibits trafficking in persons for exploitation at the pretext of domestic or overseas employment. The definition for exploitation includes labor exploitation, forced labor, or servitude. It is a punishable offense with rigorous imprisonment ranging from 15 to 25 years and with a fine from 150,000 to 300,000 Eth. Birr.

Due to the hazardous nature of the project activities under ADELE (mainly component 1) Work connected with electric power generation plants, transformers, or transmission lines, the project will not employ/engage any person under the age of 18 years of age.

EEU PIU will undertake monitoring, at a minimum every six months, of all project workers, to ensure that there are no workers under 18 years of age and that all contractors and subcontractors involved, private sectors and cooperatives, etc. in the project are not employing/engaging anyone less than 18 years of age for work with the project.

The project will use the following process, before the employment or engagement of an applicant for work on the project, to verify the person's age. The EEU PIU will ensure that each contractor/subcontractor also uses this process and provides the PIU with written confirmation that each worker they employ or engage with the project is at least the minimum age of 18 years. The following information will be kept on file in the PIU administrative offices:

- Written confirmation from the applicant of their age; and

⁴ "Young worker" means a natural person who has attained the age of 15 but is not over the age of 18 years, Proclamation 1156/2019, article 89, sub-article 1.

⁵ Criminal Code Proclamation No. 414/2004

⁶ Prevention and Suppression of Trafficking in Persons and Smuggling of Migrants Proclamation No. 909/2015.

- Where there is reasonable doubt as to the age of the applicant, requesting and reviewing available documents to verify age (such as a birth certificate, national identification card, medical or school record, or other document or community verification demonstrating age).

If a person under the minimum age of 18 years is discovered working concerning the project, the EEU will take measures to terminate the employment or engagement of that person in a responsible manner, considering the best interest of that person.

To ensure that the best interests of the child under 18 years are considered, the PIU will undertake, and ensure that all contractors/ subcontractors, private sector, cooperative also undertake, remediation within a reasonable period agreeable to the World Bank. The remediation activities could include, among other options:

- Enrolling the child in a vocational training/apprenticeship program, but which does not interfere with the child's completion of compulsory school attendance under national law.
- Employment of a member of the child's family, who is at least 18 years of age, by the primary supplier, contractor, or subcontractor for project-related or other work.

6.2. Provisions Related to Women

The new proclamation recognizes further benefits addressing the special needs of women including provisions related to maternity leave, sexual harassment, and violence. A provision acknowledging affirmative action to women is also included. Accordingly, women candidates who score equal points with men will have the right to priority in competitions for employment, promotion, and related opportunities.

The new labor Proclamation of Ethiopia, 1156/2019, articles 87 and 88 state provisions on the working conditions of women.

- Women shall not be discriminated against in all respects based on their sex. Without prejudice to the generality of this provision, priority shall be given to women if they get equal results with men when competing for employment, promotion, or any other benefit.
- It is prohibited to assign women to works that may be listed by the Ministry of Labor and Social Affairs to be particularly dangerous to women or hazardous to their health.
- No pregnant woman shall be assigned to night work between 10 p.m. and 6 a.m. or be assigned overtime work.
- She shall be transferred to another place of work if her job is hazardous to her health or the fetus as ascertained by a physician.

6.2.1. Maternity Leave

A pregnant woman is granted a total of 120 days of maternity leave; 30 consecutive days of prenatal and 90 consecutive days of post-natal leave. It also granted leave for medical examination connected with her pregnancy, as confirmed with a medical certificate. Besides, in the case where a woman encounters miscarriage of pregnancy and it is confirmed by a medical certificate, the provisions for reduction of wage upon sickness will not apply. Despite the reduction of wage applicable to a worker who has been sick for more than a month, a woman who encounters miscarriage will be entitled to 6 months sick leave with payment of 100% of her salary.

6.2.2. Sexual Harassment and Violence

The new law obviates the need for interpretation of sexual harassment and sexual violence by providing definitions. It also provides prohibitions and punishments specific to the acts. The commission of either or both of the two acts at workplaces either by the employee or employer may be used as grounds of termination of an employment contract without notice by the employer or the employee respectively. Additionally, an employee who resigns on the ground of sexual harassment or violence is entitled to severance pay as well as compensation amounting to 90 times the daily rate of the last week of service of the employee. As per the definition of the new proclamation:

- *Sexual Harassment* means to persuade or convince another through utterances, signs, or any other manner, to submit for sexual favor without his/her consent.
- *Sexual Violence* means sexual harassment accompanied by force or an attempt thereof.

6.3. Wages

Per the Labor Proclamation, wages mean the regular payment to which the worker is entitled in return for the performance of the work that he/she performs under a contract of employment. Wages are independent of overtime premium, allowances, bonuses, commissions, service charges received from the customers, and other incentives paid for additional work. Wages are only paid for the work done by the worker except in case of interruption on the employer's behalf which makes it impossible to work (i.e. interruption in the supply of tools and raw materials).

The Labor Proclamation requires employers to pay wages in cash on a working day at the workplace unless otherwise agreed. In case, date of payment (where already decided) falls on a weekly rest day or public holiday, the wages are paid on the preceding working day. Wages are paid directly to the worker or the person authorized by the worker. Wages may be paid in kind but may not exceed the market value in the area of the payment in kind and no case may exceed 30% of the wages paid in cash.

An employer is under the obligation to pay the worker wages and other emoluments per this law or the collective agreement. Wages are to be paid at such intervals as required under the national law, collective agreement, or employment contract.

As per Proc. No. 1156/ 2019, a Regulation of the Council of Ministers shall determine the powers and responsibilities of a Wage Board which shall comprise representatives of the Government, employees, and trade unions together with other stakeholders that will periodically revise minimum wages based on studies which take into account the country's economic development, labor market, and other considerations.

Generally, the employer is not allowed to make deductions from wages except where it is provided by the law or collective agreement or work rules or per court order or a written agreement with the worker. The amount of deduction must not exceed one-third of the monthly wages of the worker.

An employer must keep a record of payment in a register specifying the gross pay and method of calculation of wages; other variable remunerations; the amount and type of deduction; and the net pay unless there is a special arrangement on which the signature of the worker is affixed. This register must be easily accessible to all the workers and the entries are explained to the worker on request.

Workers who are paid monthly shall incur no reduction, in their wages on account of having not worked on public holiday. A worker shall be paid his hourly wages multiplied by two for each hour of work on a public holiday.

6.4. Rest

Workers are entitled to a weekly rest period consisting of not less than twenty-four non-interrupted hours in the course of each period of seven days. The weekly rest period shall be calculated to include the period from 6 a.m. to the next 6 a.m. Where the nature of the work or the service performed by the employee is such that the weekly rest cannot fall on a Sunday another day maybe made a weekly rest day as a substitute.

6.5. Leave (Annual, Sick, and Paternity Leave)

According to Labor Proclamation, a worker is entitled to uninterrupted *annual leave* with pay which shall in no case be less than:

- a) sixteen (16) working days for the first one year of service;
- b) sixteen (16) working days plus one (1) working day for every additional two years of service.

The wage a worker receives during his annual leave shall be equal to what he would have received if he had continued to work. A worker whose contract of employment is terminated under this Proclamation is entitled to his pay for the leave he has not taken. Where the length of service of a worker does not qualify for an annual leave provided for in this Article, the worker shall be entitled to an annual leave proportionate to the length of his service. A worker shall be granted his first period of leave after one year of service and his next and subsequent period of leave in each calendar year.

The new labor law of Ethiopia also grants a male worker a *paternity leave* for 3 working days with pay.

The Labor Proclamation provides for the paid *sick leave* for up to 6 months on completion of probation period if the sickness is certified by a qualified doctor. A worker is entitled to sick leave if he/she is incapable of working due to sickness other than resulting from an occupational injury. A worker must inform the employer about his/her absence due to sickness and provide a medical certificate issued by a medical organization recognized by the Government. The employer will provide paid sick leave as follows:

- a) 100% of wages during the first month of sick leave;
- b) 50% of wages during the second & third months of sick leave; and
- c) unpaid leave from four to sixth months.

6.6. Hours of Work

Arrangement of Weekly Hours of Work: Hours of work shall spread equally over the working days of a week, provided, however, where the nature of the work so requires, hours of work in any one of the working days may be shortened and the difference be distributed over the remaining days of the week without extending the daily limits of eight hours by more than two hours.

Averaging of Normal Hours of Work: Where the circumstances in which the work has to be carried out are such that normal hours of work cannot be distributed evenly over the individual week, normal hours of work may be calculated as an average over a period longer than one week, provided, however, that the average number of hours over a period shall not exceed eight hours per day or forty-eight hours per week

The labor law defined that *normal hours of work for young workers* shall not exceed seven hours a day and it also prohibited to employ young workers on night work between 10 pm and 6 am and overtime work, weekly rest day or on public holidays.

7. BRIEF OVERVIEW OF LABOR LEGISLATION: OHS

Ethiopia has legal frameworks on OHS. The Constitution (1995) under Article 42/2 stated the Rights of Labor as "workers right for healthy and safe work environment" Proclamation No. 4/1995. There are also different legal frameworks on OHS which include: the National Occupational Health Policy and Strategy, Occupational Health and Safety Directive (2008), Occupational Health and Safety Policy and Procedures Manual, and On Work Occupational Health and Safety Control Manual for Inspectors (2017/18) which will apply to the ADELE project. OHS promotion is also included as a priority in the National Health Policy Statement (1993). Ministry of Labor and Social Affairs (MOLSA) and its regional counterparts are responsible for OHS at Federal and Regional levels. MOLSA has OHS & Working Environment Department responsible for OHS responsibilities. Each administrative region has an OHS department within the Labor and Social Affairs Bureau with the responsibilities of inspection service.

In the new Proclamation of Ethiopia, Occupational Safety, Health, and Working Environment the following are indicated under Obligations of an Employer and an employee respectively.

An employer shall take the necessary measure to safeguard adequately the health and safety of the workers; it shall in particular:

- Comply with the occupational health and safety requirements provided for in this Proclamation;
- Take appropriate steps to ensure that workers are properly instructed and notified concerning the hazards of their respective occupations, and assign safety officer; and establish an occupational health and safety committee;
- Provide workers with protective equipment, clothing, and other materials and instruct them of their use;
- Register employment accidents and occupational diseases and report same to the labor inspection service;
- Arrange, according to the nature of the work, at his own expense for the medical examination of newly employed workers and those workers engaged in hazardous work, as may be necessary except HIV/AIDS Unless and otherwise, the country has the obligation of an international treaty to do so;
- Ensure that the workplace and premises of the undertaking do not pose threats to the health and safety of workers;
- Take appropriate precautions to ensure that all the processes of work in the undertaking shall not be a source or cause of physical, chemical, biological, ergonomic, and psychological hazards to the health and safety of the workers.
- Implement the instructions given by the Competent Authority following this Proclamation.

As obligations any worker shall:

- Co-operate in the formulation of work rules to safeguard the workers' health and safety, and implement same;
- Inform forthwith to the employer any defect related to the appliances used and incidents of injury to health and safety of workers that he is aware of in the undertaking;

- Report to the employer any situation which he may have reason to believe could present a hazard and which he cannot prevent on his own, and any incident of injury to health which arises in the course of or in connection with work;
- Make proper use of all safety devices and other appliances furnished for the protection of his health and safety or the protection of the health and safety of others;
- Observe all health and safety instructions issued by the employer or by the Competent Authority.

It is prohibited that no worker shall:

- Interfere with, remove, displace, damage, or destroy any safety devices or other appliances furnished for his protection or the protection of others; or
- Obstruct any method or process adopted to minimize occupational hazards.

The Labor proclamation gives the power for Regional Bureaus to determine standards and measures for the safety and health of workers and follow up on their implementation. It is also indicated that regional bureaus must collect, compile and disseminate information on the safety and health of workers.

It is unlawful for an employer to (a) impede the worker in any manner in the exercise of his rights or take any measure against him because he exercises his right; (b) discriminate against female workers, in matters of remuneration, on the ground of their sex; (c) terminate a contract of employment contrary to the provisions of the Labor Proclamation No. 1156/2019; (d) coerce any worker by force or in any other manner to join or not to join or to cease to be a member of a trade union or to vote for or against any given candidate in elections for trade union offices; (e) require any worker to execute any work which is hazardous to his life; (f) discriminate between workers based on nationality, sex, religion, political outlook or any other conditions.

Therefore, during project activities implementation, the following activities need to be performed: (i) identification of OHS risks at the project design stage; (ii) provision of PPEs and health, safety, and security arrangements; (iii) arrangement of temporary residence and clean drinking water; and make available food at an affordable cost for workers in areas where there are no hotel/restaurants around the project sites; (iv) training at regular intervals to workers to enhance their skills.

7.1. Benefits in the Case of Employment Injuries

Where a worker sustains employment injury, the employer shall cover the following expenses, among others, include:

- 1) General and specialized medical and surgical care;
- 2) Hospital and pharmaceutical care;
- 3) Any necessary prosthetic or orthopedic appliances

A worker who has sustained employment injury shall be entitled to:

- a) Periodical payment while he is temporarily disabled;
- b) Disablement pension or gratuity or compensation where he sustains permanent disablement;
- c) Survivors' pension or compensation to his dependent when he dies.

8. RESPONSIBILITY OF STAFF MANAGEMENT

The responsible body for workers' management varies depending on the type of workers. The direct workers will be managed by EEU - PIU that will be established at federal and regional levels whereas the contract and primary supply workers will be managed by their respective Companies, Contractors/ Subcontractors, etc. engaged to conduct the implementation of the activities under ADELE subcomponents 1, 2 & 4. The management of government civil servants working on the project will be the responsibility of the implementing agencies (MoH, MoE, etc.). However, the child labor and forced labor, as well as OHS requirements, apply to all categories of workers in ADELE project activities, including seconded civil servants.

EEU and its implementing entities (including the Off-Grid Unit-OGU) at different levels will provide the required, workers training and occupation health and safety equipment and address worker grievances. This responsibility of managing staff will also pass to contractors and sub-contractors. The Contractors and sub-contractors need to assure the necessary safeguards in terms of employment security, minimum wages, and amenities. The company code of conduct would be followed to ensure harmonious personnel relations at the site with a focus on safe working conditions and access to basic facilities for the workforce deployed at the site and the workers. Contractors must engage a minimum of one health & safety representative. The health and safety representative is responsible for monitoring the day-to-day compliance to safety precautionary measures indicated in ESMF, ESIA, SA, LMP, etc., and records of any incidents and reports to the EEU-PIU. Whereas the PIU is responsible to promptly notify the World Bank of any incident or accident related to the project within 48 hours, which will be followed by formal investigation towards a root-cause analysis within 14 days and identification of a set of corrective actions. Besides, the EEU Corporate and Regional Offices shall regularly monitor labor and working conditions. The monitoring will be carried out Quarterly and annually throughout the project implementation period. Any identified non-compliance will be included in these monitoring reports accompanied by relevant corrective actions.

9. Terms and Conditions

The project will depend on the various laws; such as, (i) Labor Proclamation No. 42/1993 (replaced by Labor Proclamation No. 377/2003), (ii) Labor Proclamation No. 377/2003, (iii) labor Proclamation No.1156/2019 (complements (do not replace, Labor Proclamation No. 377/2003), (iv) Proclamation No. 632/2009, Employment Exchange Service Proclamation, (v) Proclamation No. 568/2008, Right to Employment of Persons with Disability. Further, Ethiopia is a signatory to the international UN conventions and has ratified the major international human rights instruments. Ethiopia has also ratified the following ILO conventions:

- Forced Labor Convention No. 29/1930;
- Freedom of Association and Protection of the Right to Organize Convention, No. 87/1948;
- Employment Service Convention, No. 88/1948;
- Right to Organize and Collective Bargaining Convention, No. 98/1949;
- Abolition of Forced Labor Convention, No.105/1957;
- Minimum Age Convention No. 138/1973;
- Occupational Safety and Health Convention, No. 156/1981;
- Termination of Employment Convention, No. 158/1982;
- The Rights of the Child Convention, 1989; and
- The Worst Forms of Child Labor Convention No. 182/1999.

Hence, the terms of condition follow stringent international requirements where the gaps of the national law are filled by WB requirements and ILO convention. Hence, the terms of the condition include the name and legal domicile of the employer; the worker's name; the worker's job title; the date employment began; where the employment is not permanent, the anticipated duration of the contract; the place of work or, where the work is mobile, the main location; benefit packages; hours of work, rest breaks, leave entitlements and other related matters; rules relating to overtime and overtime compensation; the pension and other welfare arrangements applicable to the worker; the length of notice that the worker can expect to give and receive on termination of employment; the disciplinary procedures that apply to the worker, including details of representation available to the worker and any appeals mechanism; and details of grievance procedures, including the person to whom grievances should be addressed.

Given the nature of the workforce involved, the project will not recruit children for project related works and project monitoring will include this aspect.

The WB ESS2 states that the minimum age of employment is 14 years while the newly revised Ethiopian Labor Law has extended the minimum year of employment to 15 years. However, both WB and Ethiopian law prohibits the engagement of children under 18 years of age in works that have hazardous nature. The other gap between the WB and Ethiopian law is the fact that the national law does not indicate that it prohibits an employer to retaliate against a worker or reporting a dangerous work situation or removing himself/herself from a dangerous work situation. ESS2 of the World Bank ESF provides that project workers will not be retaliated against or otherwise subject to reprisal or negative action for reporting a dangerous work situation or removing/themselves from a dangerous work situation. The EEU PIU will ensure that all project workers, including those engaged by contractors, will have the right to report and remove themselves from dangerous work situations without being subject to reprisal or negative action.⁷ This and other provisions of the LMP will be part of the awareness-raising and training sessions of the project.

In such case of differences between the international conventions, national legislation, regulation, and the World Bank Environment and Social Standards, the more rigorous provision will be applied.

10. WORKERS GRIEVANCE MECHANISM

According to Ethiopian Labor Proclamation No. 1156/ 2019, Workers' GRM for addressing and managing workers and employment-related conflicts or a complaint as well as Gender-Based Violence (GBV) is very crucial. Grievance redressing mechanisms for Workers and GBV related cases are handled through distinct channels. The GBV-SEA related grievance redress mechanism is different from the GRM dealing with project workers. A worker or any person who has any complaint or grievance has the right to present it and get a proper response.

The grievance redress mechanism for addressing and managing workplace and employment-related conflicts or complaints as well as gender-based violence (GBV), SEA/SH are crucial for the Access to Distributed Electricity and Lighting in Ethiopia (ADELE) project. A project worker who has a complaint or grievance has the right to present it and obtain proper redress through the Worker Grievance Mechanism (WGM) established by the project for this purpose. In this project, a grievance mechanism will be provided for all direct, contracted, and primary supply workers. The grievance mechanism which will be proportionate to nature and scale and the potential risks and impacts of the project will be put in place. Designed in such a way that to address concerns promptly, using an understandable and

⁷ ESS2, paragraphs 26 and 27.

transparent process that provides timely feedback to those concerned in a language they understand, without any retribution, and will operate independently and objectively. The workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. The measure will be put in place to make the grievance mechanism easily accessible to all such project workers.

Labor Proclamation No. 1156/ 2019, Chapter 3, Article 141, has also introduced that employers and workers or their respective associations may use social dialogue to prevent and resolve labor disputes amicably. Article 141, chapter 3.

The EEU, EHS Directorate will establish an accessible and functional Workers Grievance Redress Mechanism (WGRM) for all categories of workers described in this LMP. Labor Proclamation No. 1156/ 2019, Chapter 3, Article 141, has also introduced that employers and workers or their respective associations may use social dialogue to prevent and resolve labor disputes amicably. Article 141, chapter 3. Besides the government, civil servants seconded to this project have access to grievance procedures under Ethiopian government public service laws⁸.

The project-specific GRM for the workers will be at three levels: 1) at the national level (EEU, EHS Directorate), and 2) in each of the respective EEU regional offices and ADELE implementation Woreda. It should be emphasized that this GRM is not a substitution for the legal system for receiving and handling grievances. However, this is formed to mediate and seek appropriate solutions to labor-related grievances, without escalating to higher stages. At the national level (EEU, EHS Directorate) the member of the GRC includes (i) EEU HR head, (ii) Grievance focal officer and (iii) Project Management Unit (iv) EEU Women and Children Directorate Director. In each region, regional and woreda level community representatives, grievance focal officer, Employee representatives, Women representatives, and other members, as relevant.

Principles and Procedures of the GM

- These workers' GRM is not the same as the grievance mechanism to be established for project-affected stakeholders.
- All forms of workers involved in the ADELE project will be informed of the WGRM at the time of recruitment and the measures put in place to protect them against any reprisal for its use.
- The WGM will be easily accessible via the disclosure of a hotline and/or office hours and transparently disclosed to all employees to raise workplace concerns.
- The WGRM shall be transparent in using clear procedures.
- There will be no discrimination against those who express grievances, and all grievances will be treated confidentially.
- Anonymous grievances will also be accepted and treated equally as other grievances whose origins are known.
- The PIU and other responsible project management will treat grievances seriously and take timely and appropriate action in response.
- The aggrieved parties shall be informed within 10 days of their grievance application, either with a respective solution or with a request for an extension in cases where more information is needed.
- The aggrieved party shall have the option to refer to a grievance log with key information that will be established by the regional bureau of agriculture and pastoral development office.
- The grievance logbook will be maintained in the project office.

⁸ Labor Proclamation No. 1156/ 2019.

- The WGRM, however, does not replace or override the requirement that the PIU provide for workplace processes for project workers to report work situations that they believe are not safe or healthy, such as reporting requirements regarding workplace injuries and accidents.
- The WGRM will not prevent workers to use judicial proceedings or administrative remedies that might be available under the law or existing arbitration procedures or substitute for collective agreements grievance mechanisms if preferred.
- The quarterly environment and social implementation will include reports on grievances related to project labor and working conditions issues. If not satisfied with the outcome of the regional level, the aggrieved party shall be able to access a second level committee at the EEU Corporate level.

ADELE project WGRM is oriented toward providing solutions and incorporates the principles of transparency, accessibility, due diligence, and responsiveness. The project will recognize customary and/or traditional conflict resolution mechanisms. The project will provide resources to ensure the functioning of the GRM system. Grievance information will be recorded and reported in the regular implementation progress reports. The project will equally ensure that grievances related to GBV are recognized and referred to respective service providers based on a survivor-centered approach (that is always based on the demands of survivors and ensuring confidentiality as outlined in SA). Such grievances shall not be handled according to standard GRM procedures but by the Woreda Women and Children Affairs Office who will be trained to provide basic referrals.

If an effective and functional grievance redress committee exists at Woreda or region level, the existing GRM will serve as a location for addressing grievances related to the ADELE project (components 1, 2, & 4) with the provision of appropriate training for the committee members regarding the requirement in the project.

- Step 1: Grievance discussed with the respective Woreda focal person or development agent
- Step 2: Grievance raised with the Woreda Grievance Office
- Step 3: Appeal to the Regional Grievance Office
- Step 4: Appeal to the Ethiopia Independent Ombudsman and/or EEU.
- Step 5: Once all possible redress has been exhausted and if the complainant is still not satisfied then they should be advised their right to take their case to the formal legal recourse.

11. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project-affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred or could occur, as a result of WB's non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been allowed to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit, <https://www.worldbank.org/en/projects->

[operations/products-and-services/grievance-redress-service](#). For information on how to submit complaints to the World Bank Inspection Panel, please visit, www.inspectionpanel.org.