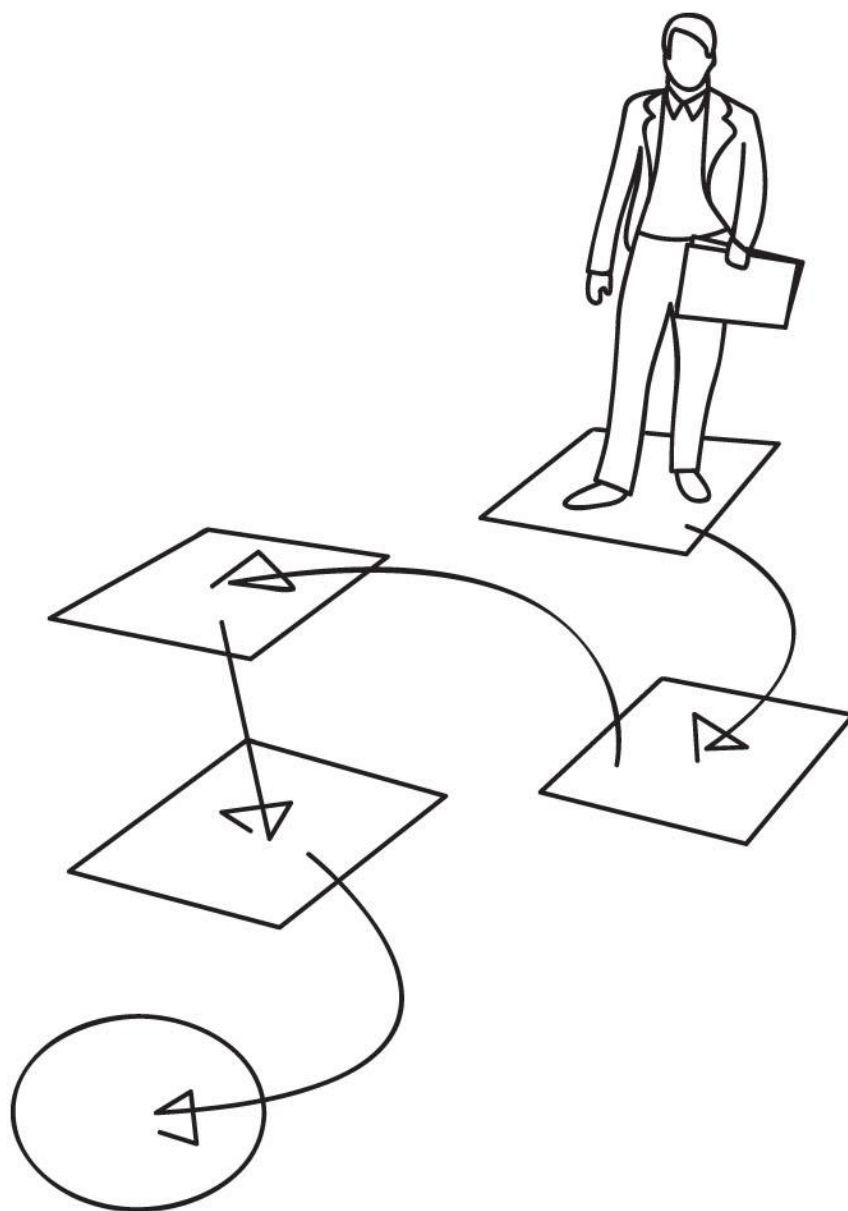


PLAN

SUST-PLAN-001 – “Recruitment Employment and Training Plan”



REFERENCE MSG:

Sustainability
stakeholders engagement
and community relations



TITLE:

Recruitment Employment and Training Plan

NOTES:

The document is applicable to eni Ghana exploration and production Ltd.

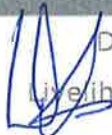
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1 Purpose

Eni Ghana has developed this Recruitment, Employment and Training Plan as part of its Environmental, Social and Health Management Plan (ESHMP).

This Plan aims to ensure the management and control of activities that may pose risks related to the selection, hiring and induction training of workers as well as maximising benefits for the community related to employment and skill enhancement. This Plan sets out potential impacts and consequences and describes how they will be mitigated. eni Ghana will use commercially reasonable efforts to require contractors, or other intermediaries procuring labour, to apply comparable standards. eni Ghana remains the ultimate responsible party for compliance with ESHIA commitments, and will establish means for monitoring/supervision of contractor's performance.

The specific objectives of the Recruitment, Employment and Training Plan are to:

- Maximize benefits of employment and skills enhancement with priority for communities in the DAoI (Direct Area of Influence)¹, managing expectations in view of influx management. Communities outside of the DAoI will also be considered;
- Promote fair and equitable labour practices for the fair treatment, non-discrimination and equal opportunity of workers, both migrant and non-migrant;
- Establish, manage and promote a healthy management-worker relationship; and
- Protect workers' rights including migrant and third party workers.

In addition to Local Content requirements for employment set by the Ghanaian legislation (which sets objectives for employment of Ghanaian workforce) this plan is intended to maximise hiring in the DAoI of the project.

The Recruitment, Employment and Training Plan should be read in conjunction with other Company plans:

¹ The Direct Area of influence (DAoI) includes the four communities in a 3 km buffer zone around ORF, namely Sanzule (including Anowlakrom) , Bakanta, Eikwe and Krisan.

- External Recruitment Plan;
- Local Content Program.

The provisions established in this Recruitment, Employment and Training Plan are supplemented by commitments related to employment and training procedures within:

- Local Content Management Plan (ESHMP Annex C);
- Workers Management Plan (ESHMP Annex D);
- Cultural Heritage Management Plan (ESHMP Annex O);
- Community Health Management Plan (ESHMP Annex P); and
- Traffic Management Plan (ESHMP Annex Q).

Communications undertaken with the community within the DAoI and beyond and relevant for this plan will be managed through the Stakeholder Engagement Plan and its associated Action Plans.

On the other hand eni Ghana has prepared a Livelihood Restoration Plan which covers development initiatives and in-situ vocational training not related to eni activities, which are therefore not directly linked with the contents of this Plan. The Recruitment, Employment and Training Plan is also meant to contribute to the implementation of the Influx Management Plan, in that clear recruitment plans and procedures should help reduce the influx of job-seeking immigrants.

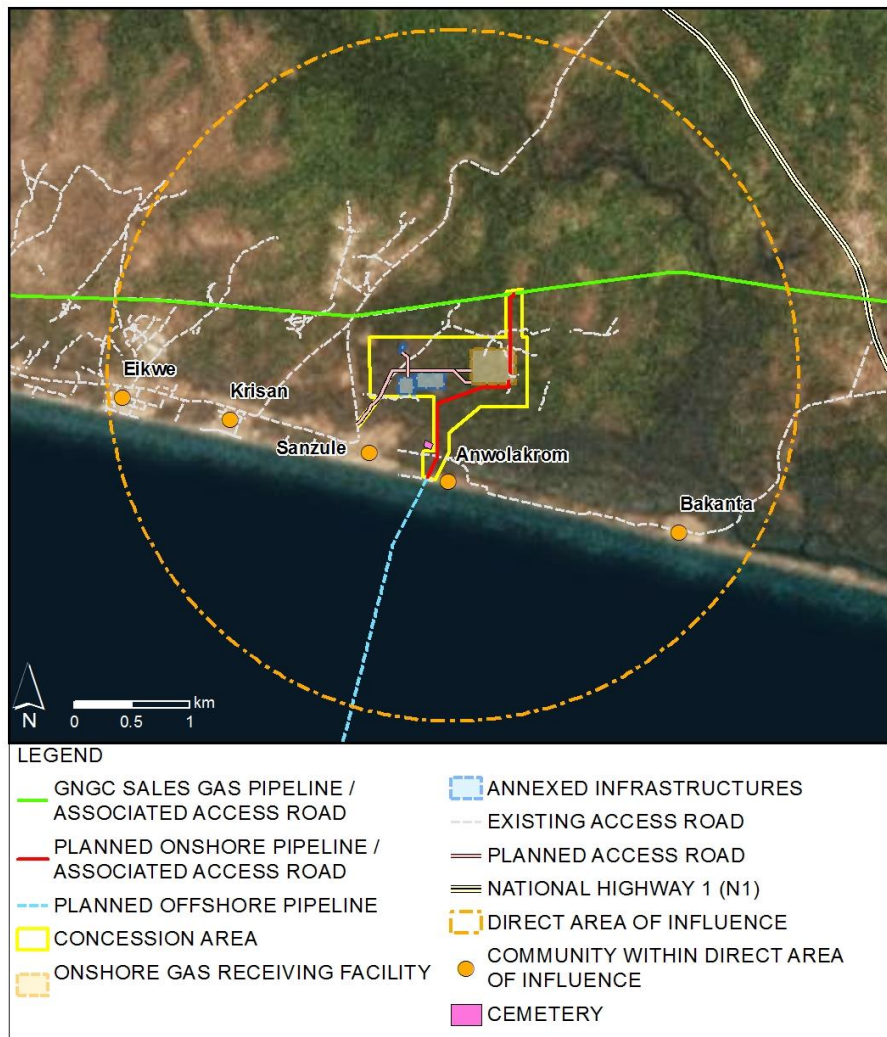


2 Applicability

This Plan describes the requirements for eni Ghana with regard to the processes connected to external recruitment (as opposed to mobilisation of eni internal staff), employment and induction training, applicable during the construction, development drilling and production phase of the Offshore Cape Three Points (OCTP) Project.

This Plan is intended to maximise hiring the Direct Area of Influence (DAoI) of the project. The DAoI is illustrated in:



Figure 2.1 Direct Area of Influence of the Project

Applicability of the plan includes Direct Workers (i.e. workers directly employed by eni) and Contracted Workers, for whose recruitment, employment and training requirements are converted into contractual agreements. This plan is also applied as a guide for the main suppliers.

Training activities covered by this plan are limited to induction training. Continued training throughout the whole period of workers activity within the project is included in the Workers Management Plan. Technical training aimed at skills enhancement in the Direct Area of Influence is covered by the Local Content Development Plan (ESHMP Annex C). The activities of the Local Content

Development Plan are defined to reflect the needs for recruitment and training as defined in application of this plan.

Health	Safety	Environment	Social / Sustainability
			X

3 References

3.1 Internal references

- Ghana OCTP Block Phase 1 Environmental, Social and Health Impact Assessment, ESL, June 2015. Doc. 000415_DV_CD.HSE.0208.000_00, Rev 04.
- Ghana OCTP Block Phase 2 Environmental, Social and Health Impact Assessment, ERM, Doc. 000415_DV_EX.HSE.0304.000_01, Rev 05.
- "Human Resources" Management System Guidelines.
- Pro hr 006 Human Resources Recruitment and Selection.
- Opi "Human Resources Recruitment and Selection".
- HSE-IMS Documents.
- SUST- PRO-003 Community Investment Management.
- SUST-PRO-005 Local Content Procedure.

The list reported above refers to the most updated version of the mentioned documents and also to all successive revisions and integrations.

3.2 External references

- WB/IFC Performance Standard 2: Labour and Working Conditions.
- WB/IFC "Guidance Note 2: Labour and Working Conditions.
- International Labour Organization (ILO) core conventions (all 8 signed by Ghana).
- Universal Declaration of Human Rights (United Nations, 1948).
- United Nations Human Rights Council: Report of the Special Representative of the Secretary General on the issue of human rights and transnational corporations and other business enterprises – Protect, Respect and Remedy: a Framework for Business and Human Rights (Ruggie, John, 2008).

The list reported above refers to the most updated version of the mentioned documents and also to all successive revisions and integrations.



4 Definitions, abbreviations, acronyms

For the purposes of this document, the following terms shall be defined as follows:

Term	Definition
CLO	Community Liaison Officer
DAoI	Direct Area of Influence
ESHIA	Environmental, Social and Health Impact Assessment
ESHMP	Environmental, Social and Health Management Plan
GNPC	Ghana National Petroleum Corporation
OCTP	Offshore Cape Three Points
Local Content	Added value brought to a host nation (or region or locality) through: • workforce development: employment of local workforce; and training of local workforce; and • investments in supplier development: developing supplies and services locally; and procuring supplies and services locally.
Supply Chain	Supply Chain refers to both labour and material inputs of a good or service. A supply chain of goods may include suppliers of raw material and suppliers of pieces or components for assembly and production. (IFC)
Vulnerable Group(s)	Potentially disadvantaged people who may be disproportionately affected by the Project. Usually the main sources of vulnerabilities are: age, gender, ethnicity, level of income, physical or mental disabilities.
Human Rights	Inalienable rights of all individuals, by virtue of belonging to humankind. They are based on the recognition of the inherent dignity, freedom and equality of all human beings. They include, at a minimum, the rights expressed in the International Bill of Human Rights (meaning the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work (addressing freedom of association and collective bargaining, forced labour, child labour and non-discrimination).



Term	Definition
Direct workers	Workers directly engaged by eni with a clear employment relationship and complete control over the working conditions and treatment.
Contracted workers	Workers engaged through third parties (for example contractors, brokers, agents, or intermediaries) to perform work related to core business processes of the Project for a substantial duration.
Supply chain Workers	Workers engaged by the eni suppliers providing goods and materials.

5 Legal Requirements

Various laws, policies, systems, standards and international good practice codes are applicable to the implementation of this Plan. Such requirements are outlined in Section 7 of the ESHMP. Further detail is provided in Chapter 3 of the EIS document.

Ghana laws and regulations of particular relevance for managing and implementing this Plan include, but are not limited to:

- Local Content and Local Participation Regulations, 2013 (LI 2204);
- Labour Act, 2003 (Act 651);
- Children's Act, 1998 (Act 560);
- Commission on Human Rights and Administrative Justice Act, 1993 (Act 456); and
- National Vocational Training Act, 1970 (Act 451).

eni Ghana policies, guidelines and programs that are relevant to managing and implementing this Plan have been listed in Section 3.1, internal References.

The IFC PS 2 (see reference in Section 3.2) is the main external reference for this ESHMP and sets requirements about:

- Working Conditions and Management of Worker Relationship: Human Resources Policies and Procedures, Working Conditions and Terms of Employment, Workers' Organizations, *Non-Discrimination and Equal Opportunity, Retrenchment, Grievance Mechanism*;
- Protecting the Work Force: Child labour, Forced Labour;
- Occupational Health and Safety;
- Workers Engaged by Third Parties (Contracted Workers); and
- Supply Chain.



6 Management Plan

6.1 Management and Monitoring

Management and Monitoring measures are defined on the basis of the ESHIA outcomes, combined with applicable legal requirements and other relevant industry good practice and are detailed in *Table 6.1*. In particular the above mentioned information is organised within the table as follows:

- the column **ESH Commitment** reports the commitment of the ESHIA in terms of management, monitoring or avoidance measures
- the column **Compliance Monitoring** specifies further details on how the commitment should be implemented and that should be checked to assess compliance with the requirements of this plan.

eni Ghana and its contractors are required to implement and comply with the management and monitoring requirements described in the following *Table 6.1* as appropriate to their scope of work in order to avoid, minimize and control impacts and risks with regard to Recruitment, Employment and Training activities and to maximise benefits of employment for local communities.

The workers recruitment and management related commitments are organized in the ESHMP as follows:

- the **Recruitment, Employment and Training Management Plan** includes commitments related to the hiring process, workers contracting and induction training; and
- the **Workers Management Plan** includes commitments to be implemented throughout the duration and at termination of the work relationship, in order to guarantee workers' rights and ensuring fair and safe working conditions.

Commitments in the following *Table 6.1* are grouped into two macro categories:

- **Direct Workers:** includes indications for the application of commitments to direct eni workers (the responsibilities and monitoring indications in this part are not referred to contractors monitoring, but the same commitments need to be applied by them); and



- **Contracted Workers:** includes a specific commitment for eni to revert to their contractors the commitments of this Plan applicable internally (Direct Workers section).

6.2 Plan implementation

The commitments contained in *Table 6.1* will be implemented by:
Integrating the requirements into existing procedures and plans; or Defining new procedures and/or implementation tools in case no reference document is available.

The main existing relevant documents were mapped for eni Ghana and are referred to in the column "Ref. to other plans" in *Table 6.1*. This Plan has to be read in conjunction with the referred documents and complements them with additional requirements deriving from the adoption of WBG Performance Standards.

The same mapping and consistency analysis will have to be carried out by contractors to identify compliance of their management systems with the requirements of this plan and establish actions for integration.

6.3 Cross-reference between Plans

Some of the commitments are relevant to more than one plan (e.g. commitment to non-discrimination pertaining both to the Recruitment, Employment and Training Plan and to the Workers Management Plan). In this case the commitment is mentioned in *Management and Monitoring* table (*Table 6.1*) of the different relevant plans. However only one of the plans reports the details about *Responsible Party* and *Impact Monitoring* (second part of *Table 6.1*). The other plans will only contain the *Impact Management* columns (*Category, Potential ESH Impact, ESH Commitment, Measure ID/Ref. to Other Plans*). The column "ref. to other plans" will cross-reference to the Plans where the rest of the information is provided (*Responsible Party for the Impact Management, Compliance Monitoring, Timing/Frequency, Responsible Party for the Compliance Monitoring, Key Performance Indicator*).



Table 6.1 Management and Monitoring

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
Direct Workers									
Recruitment	Employment opportunities and skills enhancement	In coordination with the Procurement plan, work with government and District Assemblies on regional scale, to manage expectations and detract work-seeking migration to the Project area through the communication of Project labour needs and clear Project policies and procedures for recruitment. Disclose information on the workforce requirements of the Project: number or personnel required, as well the specific professions and capabilities needed to fill roles. <i>Type: Avoidance</i>	<i>Influx Management Plan (Annex J) pro hr 006 eni Ghana r00 Recruitment and Selection and related External Recruitment Plan eni Ghana Organizational Chart</i>	ESHIA Phase 2 Annex G Section G.7.1.3, G.7.5.3	Human Resources and Training Function	Presence of a clear and accessible employment strategy that entails an external recruitment plan detailing: - number or personnel required as well as - the specific professions and capabilities needed to fill roles (skilled, semiskilled, unskilled workers) - number of positions to be assigned to workers from the DAoI and other areas and distribution of job opportunities among the communities. disclosure of: - Selection criteria of each position - Method of recruitment - Places of recruitment - Transparency clauses	Annually	Local Content and Sustainability Function	See par. 9

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
						Recording of selection process and outcomes.			
Recruitment	Employment opportunities and skills enhancement Social Infrastructure and Public Services	Formalise and centralise local recruitment procedures through the CLO and the local traditional authorities (Chiefs) and publicise procedures in the DAoI and surrounding communities in order to manage local expectations and deter casual enquiries for employment at the site. <i>Type: Management</i>	<i>pro hr 006 eni Ghana r00 Recruitment and Selection and related External Recruitment Plan</i>	ESHIA Phase 2 Annex G Section G.7.1.3, G.7.5.3	Local Content and Sustainability Function, CLO	Verify how recruitment is disclosed to the local communities (e.g. role of CLO and traditional authorities) in order to ensure transparency and manage expectations of job seekers.	Annually	Human Resources and Training Function	See par. 9
Recruitment	Employment opportunities and skills enhancement Social Infrastructure and Public Services	eni will ensure that recruitment procedures are transparent and monitored to ensure that those recruited present their actual experience, health status, and age. <i>Type: Management</i>	<i>pro hr 006 eni Ghana r00 Recruitment and Selection eni code of ethics Model 231</i>	ESHIA Phase 2 Annex G Section G.7.1.3, G.7.5.3	Human Resources and Training Function	At least the following elements are verified on recruited people: - Age (identity documents) to ensure that no children are employed; - Residency (with a minimum length) to monitor place of residence of applicants; - Education level (certificates); - Work experience;	Annually	Local Content and Sustainability Function	See par. 9

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
						Health status. This will include a mechanisms to select community members from all the communities in the DAoI and beyond equitably (this includes how community members within a community will be selected). This will require consultation and participation of community leadership and community members.			
Recruitment	Human Rights	No children (below the age of 18 years) will be employed. <i>Type: Avoidance</i>	<i>pro hr 006 eni Ghana r00 Recruitment and Selection eni code of ethics Model 231</i>	ESHIA Phase 2 Annex G Section G.7.1.3	Human Resources and Training Function	Assess that identity documents are verified (see above).	Annually	Local Content and Sustainability Function	See par. 9
Recruitment	Human Trafficking	Eni will not recruit and employ trafficked persons. Measures will be implemented to: avoid the risk for human trafficking, with particular	<i>pro hr 006 eni Ghana r00 Recruitment and Selection eni code of ethics</i>	ESAP requirements (OCTP IESC Q1 Audit	Human Resources and Training Function Contract and Procurement	Verify how recruitment is performed in order to ensure transparency in the Eni Ghana local labour recruitment process. At least the following	Annually	Local Content and Sustainability Function	See par. 9

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
		attention to women and children, during the recruitment process for offshore/onshore activities; • verify the integrity of the Eni Ghana local labour recruitment process, to limit the risk of human trafficking and keep Eni Ghana’s good reputation. Eni will implement a Grievance Mechanism to address stakeholder concerns, including human trafficking. Project security systems will comply with Ghana laws and regulations as well as the requirements of the Voluntary Principles for Security and Human Rights. The security system will include, among other things, selection or personnel based on a careful background screening, training with regards to human rights requirements, and monitoring of performance.	<i>Model 231 Security Management Plan (Annex X)</i>	2017) WBG PS 2 - Labour and Working conditions	Function	elements are verified on recruited people: • Age (identity documents) to ensure that no children are employed; • Education level (certificates); • Work experience; • Health status. Use of the workers grievance mechanism.			

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
		<i>Type: Avoidance</i>							
Recruitment and employment	Workers' rights	No eni employee or job applicant will be discriminated against on the basis of his or her gender, marital status, nationality, age, religion or sexual orientation. <i>Type: Avoidance</i>	<i>eni code of ethics Model 231</i>	ESHIA Phase 2 Annex G Section G.7.6.3	Human Resources and Training Function	In order to ensure non discrimination and equal opportunities the following needs to be assessed: • Contract arrangements and content • Equal pay for equal work • How wage surveys are conducted to assess local conditions and industry averages • Process for pay increases • Work bands and parallel pay scales.	Annually	Local Content and Sustainability Function	See par. 9
Recruitment – local content	Employment opportunities and Skills Enhancement	eni will comply with or exceed the minimum local content requirements outlined in the Ghana Local Content Policy Framework (2010). Implement the actions defined in the Local Content Program to address the local content requirements for what concerns employment	Local Content procedure SUST-PRO-005 <i>Local Content Plan (Annex C)</i>	ESHIA Phase 2 Annex G Section G.7.1.3 Ghana Regulations on local content (2013)	Human Resources and Training Function	The Local Content Program will specify actions/timeline to be undertaken to ensure the fulfilment of the Local Content Minimum Requirements (or Levels) in terms of percentage of employed personnel as specified by the Petroleum (Local Content & Local Participation) Regulations 2013 and detailed by:	Quarterly	Local Content and Sustainability Function	See par. 9

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
		of local workforce. <i>Type: Management</i>				- Professional level: - Management, - Technical, - Other staff) - Timeline: - at start of the activity - after 5 years - after 10 years.			
Recruitment – local content	Employment opportunities and Skills Enhancement	Prioritize development, promotions and fast tracking opportunities for employees who are Ghanaian nationals and who display sufficient capacity to develop their skills and deliver high performance. Such opportunities will have a priority focus on the youth and women. Formalise this policy in eni HR guidelines and contractors' agreements. Where possible, priority will be given to vulnerable groups such as women, and fishing communities most directly impacted by the Project, and to ensuring that youth (18 to 36 years) are	<i>eni Ghana Organizational chart and recruitment forecast</i>	ESHIA Phase 2 Annex G Section G.7.1.3 <i>Ghana "Petroleum (Local Content & Local Participation) Regulations 2013 (LI 2204)</i>	Human Resources and Training Function	Presence of a procedures for decision-making on development and fast-tracking opportunities that includes the following elements as positive factors for the evaluation: - Ghanaian nationality; - Residents of affected communities; - Vulnerability (women, fishing community, young - 18-36 of age).	Annually	Local Content and Sustainability Function	See par. 9

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
		empowered to maximise employment opportunities. <i>Type: Management</i>							
Employment	Workers' rights	All workers (including those of contractors and subcontractors) will have contracts which clearly state the terms and conditions of their employment (which will be in line with national legislation, international standards and eni policies) and their legal rights. Contracts will be verbally explained to all workers where this is necessary to ensure that workers understand their rights. Contracts for workers coming from outside Ghana must be in place prior to workers leaving their home location. <i>Type: Management</i>	<i>eni Ghana handbook for national staff</i>	ESHIA Phase 2 Annex G Section G.7.6.3	Human Resources and Training Function Contract and Procurement Function	Presence of written contracts which are: - signed by both parties - each party holds an original copy of the contract Contracts indicate terms and conditions of employment that are: - in compliance with Ghanaian law - equal to, or better than, similar work in similar industries in the region. Terms and conditions include: - wages and benefits, wage deductions, - hours of work, breaks, rest days, - overtime arrangements, overtime compensation,	Annually	Local Content and Sustainability Function	See par. 9

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
						• medical insurance, pension, and • leave for illness, vacation, maternity, or holiday			
Employment	Workers' rights	All migrant workers will be employed under equivalent contractual terms and conditions terms of non-migrant workers carrying out similar work. <i>Type: Management</i>	<i>eni code of ethics Model 231</i>	ESAP requirements (OCTP IESC Q1 Audit 2017)	Human Resources and Training Function Contract and Procurement Function	In order to ensure non-discrimination and equal opportunities for both migrant and non-migrant the following needs to be assessed: • Contract arrangements and content • Equal pay for equal work • How wage surveys are conducted to assess local conditions and industry averages • Hours of work, breaks, rest days, • Wages and benefits, wage deductions, • Overtime arrangements, overtime compensation, • Medical insurance, pension, and leave for	Annually	Local Content and Sustainability Function	See par. 9

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
						illness, vacation, maternity, or holiday • Process for pay increases • Work bands and parallel pay scales.			
Induction training	Workers' Rights	All workers will, as part of their induction, receive training on national legislation around worker rights and international standards to ensure that positive benefits around understanding labour rights are enhanced. This will include information on the use of the workers grievance mechanism. <i>Type: Management</i>	<i>eni Ghana induction training materials</i>	ESHIA Phase 2 Annex G Section G.7.6.2, G.7.6.3	Human Resources and Training Function	The induction training of workers includes: • clear information on terms and conditions of employment (see above) • workers' association and collective bargaining • company policy about non-discrimination • use of the workers grievance mechanism.	Annual	Local Content & Sustainability Function	See par. 9
Induction training	Socio cultural changes	All Project Personnel will be provided with induction training that will include communication of the Code of Ethics, associated disciplinary procedures, and awareness raising on cultural sensitivities relevant to worker activities in and	<i>eni Ghana induction training materials</i>	ESHIA Phase 2 Annex G Section G.7.3.3 and Section G.7.4.3	Human Resources and Training Function	The induction training of workers includes: • Respect for different cultures • Acknowledgement of cultural differences in respect to diet, religious ceremonies and so forth	Annually	Local Content & Sustainability Function	See par. 9

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
		interactions with local communities to minimize the risk of anti-social behaviors. This along with the Project Code of Ethics will enforce respectful and considerate behaviours in the DAOI, including when operating machinery and vehicles, managing noise levels and anti-social behaviours, littering, and defacement or misuse of natural areas and resources which may have cultural or religious significance such as trees, water bodies, and beaches. <i>Type: Avoidance</i>				- Non-discrimination and equal opportunity - Harassment, types and consequences - Community “do’s and don’ts”.			
Induction training	Workers Health and Safety Community health, safety and security	Employees (onshore and offshore) contractors and subcontractors will be trained and educated to improve awareness of transmission routes and methods of prevention of sexually transmitted infections, communicable diseases (such as TB) and vector borne diseases, notably	<i>Community Health and Safety Plan (Annex O)</i> <i>HSE - IMS</i> <i>Vector Borne Disease Management Plan eni Ghana (HR PRO 004)</i>	ESHIA Phase 2 Annex G Section G.7.7.2	QHSE Function	-	-	QHSE Function	-

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
		malaria, as part of induction. Other diseases will be covered as appropriate. <i>Type: Avoidance</i>							
Induction training	Cultural heritage	Developing training and awareness material to educate Project staff and contractors in the identification of archaeological material. <i>Type: Management</i>	<i>Cultural Heritage Management Plan (Annex N)</i>	ESHIA Phase 2 Annex G Section G.7.4.3	QHSE Function	-	-	Local Content & Sustainability Function	-
Contracted Workers									
Contractors management	Workers' Rights	All contractors (national and international) will be required to provide details of their own national employment and training plans. <i>Type: Management</i>	<i>Bridging documents Contract clauses Contractors evaluation process at the tender stage</i>	ESHIA Phase 2 Annex G Section G.7.1.3 and G.7.6.2	Contract and Procurement Function	Contractors contracts include ESH Commitments and Compliance monitoring requirements of this Plan in terms of: - Fair transparent clear and accessible recruitment procedures - Local content of employment - Fair, clear and communicated workers contracts	Annual	Human Resources and Training Function Local Content and Sustainability Function And/or procurement management	See. Par. 9.

IMPACT MANAGEMENT						IMPACT MONITORING			
Category	Potential ESH Impact	ESH Commitment	Measure ID / Ref. to Other plans	Source	Responsible Party	Compliance Monitoring	Timing/ Frequency	Responsible Party	Key Performance Indicator
						Contents of induction training.			

7 Roles and Responsibilities

The ESHMP Section 13 provides an overview of the organization, roles and responsibilities of eni Ghana and Contractors associated with the ESHMP and includes eni Ghana Organigram.

eni Ghana responsibilities for implementation and monitoring of activities indicated in this plan are indicated in *Table 6.1* and in the documents referenced therein. The documents referred to in the table provide more detailed distribution of roles and responsibilities, therefore the indication of responsibilities provided in this plan shall only be taken as indication of the function mostly involved in the processes. The Management Plans are not intended to substitute or integrate Job Descriptions of the different functions, but rather to provide input for a further distribution of tasks related to the application of the plans.

eni Ghana shall ensure sufficient resources are allocated on an ongoing basis to achieve effective implementation of Company’s responsibilities in this Plan.

Contractors shall ensure sufficient resources are allocated on an ongoing basis to achieve effective implementation of this Plan.

The Contractor’s Plans shall describe the resources allocated to the execution of each task and requirement contained therein, and shall describe how roles and responsibilities are communicated to relevant personnel.



8 Training Awareness and Competency

Project shall ensure that personnel responsible for the execution of tasks and requirements in the Recruitment, Employment and Training Plan are competent on the basis of education, training and experience. The Contractor Plan shall describe the training and awareness requirements necessary for its effective implementation.

Section 14 of the ESHMP provides details on the training, awareness and competency procedures for the project. Minimum environmental, social and health training requirements per role within the Project are presented in section 14.3 of the ESHMP.

Project training activity associated with the implementation of the Recruitment, Employment and Training Plan shall be appropriately documented by means of a training needs assessment, training matrix/plan and records of training undertaken.

Table 8.1 Specific training requirements

Position (from all companies involved)	Training Topic	Frequency
All workers	Workers induction including: • Contracts terms and conditions • Disciplinary and grievance procedure • Cultural awareness • Code of Ethics	Once with refreshers and updates as needed
Camp residents	Camp induction including: • Rules and regulations • Code of conduct • Camp committee system • Camp food complaints system • Interaction with communities • Health, safety and security	Once with refreshers and updates as needed

9 Performance Indicators

Performance indicators are used to measure and track performance against the effectiveness of mitigation and control measures described in this Plan. General performance indicators may also be relevant, such as training and awareness numbers.

Performance indicators must be measurable against a specified target. The performance indicators outlined in *Table 6.1* apply to this Plan. Details regarding how they will be measured, target/benchmark and frequency of control are described in *Table 9.1*.

However Contractors may, subject to agreement with Company, modify or add to these indicators to enhance the Contractor’s plan, based on lessons from the performance indicators.

Table 9.1 Performance Indicators

Performance Indicator	Measurement	Target/ Benchmark	Frequency Of Monitoring
Percentage of employment positions to be filled by local residents	HR records	Management staff: at least 50 percent Ghanaian from start of Project activities, increasing to a target of 80 percent in the first five years. Core technical staff: 30 percent at commencement increasing to 80 percent in five years and further to 90 percent in ten years. Other staff: a target of 100 percent Ghanaians.	Quarterly
Number of employment positions to be filled by local residents from the	HR records	100 during construction 50 during operation	Quarterly



Performance Indicator	Measurement	Target/ Benchmark	Frequency Of Monitoring
DAoI and from other areas			
Number of employees from each village in the DAoI and from other areas	HR records	<i>Refer to the Local hirigh Procedure</i>	Quarterly
Non compliances against this plan	Number and type of non-compliances identified through Assessments and Audits	Zero major non compliances	Annual

10 Reporting

The Reporting activities are described in the ESHMP.

Reports of monitoring activities are made available internally among eni Ghana relevant functions based on the monitoring frequency.

