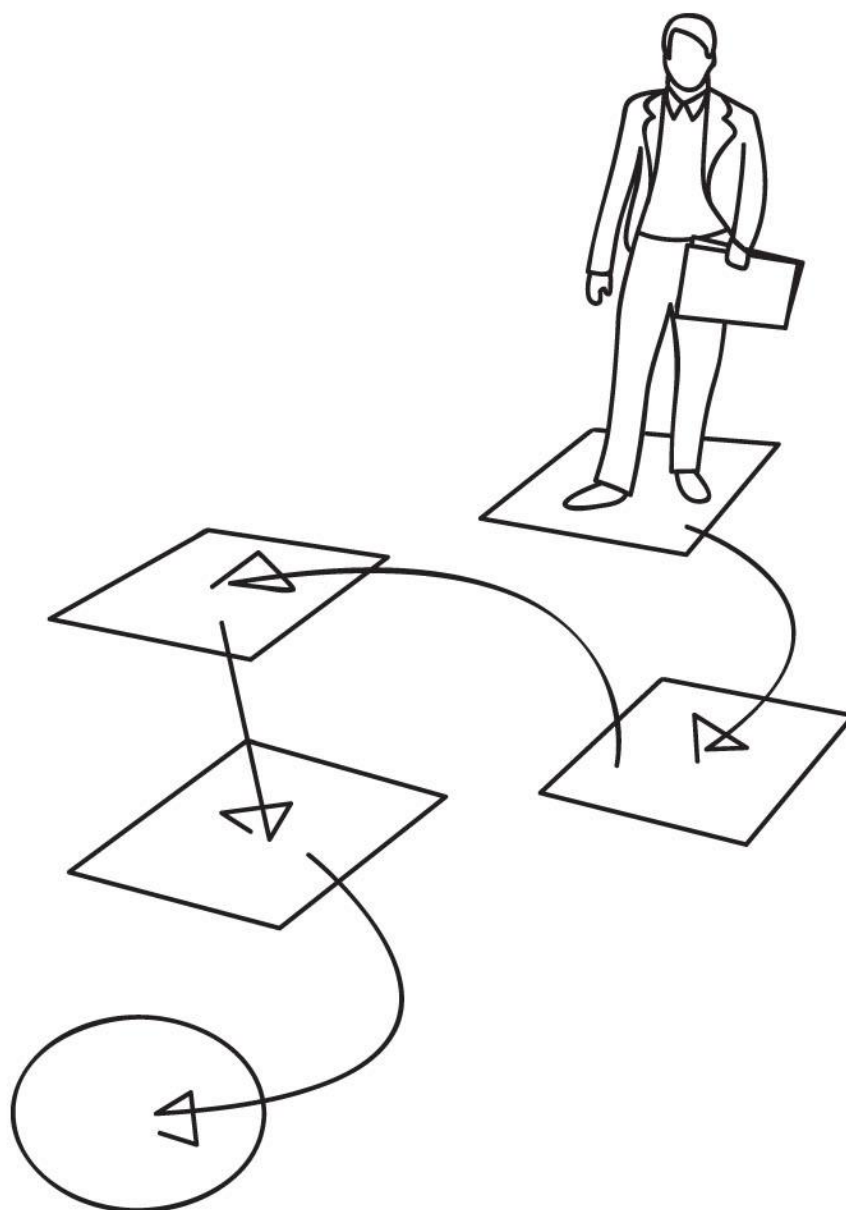


PLAN

SUST-PLAN-003 – “Workers Management Plan”



REFERENCE MSG:

Sustainability
stakeholders engagement
and community relations



TITLE:

Workers Management Plan

NOTES:

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

DATE OF ISSUE:

May 2016

EFFECTIVE DATE:

May 2016


PREPARED BY:


 Domenico D'Ippolito
 Livelihood Restoration Advisor
 Ann Dorcas Taki Local
 Content & Social Investment




CHECKED BY:

Baluri Kassim Bukari
 Local Content &
 Sustainability Manager



APPROVED BY:

Fabio Cavanna
 Managing Director





eni

1	Purpose.....	4
2	Applicability	6
3	References	7
3.1	Internal references	7
3.2	External references	7
4	Definitions, abbreviations, acronyms.....	8
5	Legal Requirements and Internal Regulations.....	9
6	Management Plan	11
6.1	Management and Monitoring	11
6.2	Plan implementation	12
6.3	Cross-reference between plans.....	12
7	Roles and Responsibilities.....	27
8	Training Awareness and Competency	28
9	Performance Indicators	29
10	Reporting	31



1 Purpose

Eni Ghana Exploration & Production Ltd. (eni Ghana) has developed this Workers Management Plan (Workers MP) 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 workers’ rights and health and safety-related risks. 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 Workers Management Plan are to:

- promote the fair treatment, non-discrimination, and equal opportunity of worker;
- establish, maintain, and improve the worker-management relationship;
- promote compliance with national employment and labour laws;
- protect workers, including vulnerable categories of workers such as migrant workers, workers engaged by third parties, and workers in the client’s supply chain;
- promote safe and healthy working conditions, and the health of workers; and
- avoid the use of child labour and forced labour.

The Workers Management Plan should be read in conjunction with other Company plans:

- Organizational Management and Control MODEL (includes eni Code of Ethics);
- HSE IMS set of documents (specific references provided in *Table 6.1*); and
- Sustainability Management System (specific references provided in *Table 6.1*).

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



In fact the workers related commitments are organized in the ESHMP as follows:

- the **Recruitment, Employment and Training Management Plan (ESHMP Annex B)** includes commitments related to the hiring process, workers contracting and induction training; and
- this **Workers Management Plan** (this plan) includes commitments to be implemented throughout the duration and at termination of the work relationship.

The provisions established in this Workers Management Plan are supplemented by commitments related workers management (mainly workers training and awareness raising) contained in the following plans:

- Influx Management Plan (ESHMP Annex K);
- Community Health Management Plan (ESHMP Annex P);
- Traffic Management Plan (ESHMP Annex Q); and
- Cultural Heritage Management Plan (ESHMP Annex O).



2 Applicability

This Plan describes the requirements for eni Ghana with regard to Workers Management, applicable during the construction and development drilling phase of the Offshore Cape Three Points (OCTP) Project.

Applicability of the plan includes the following different extents (as defined in Section 5):

- Direct workers;
- Contracted workers;
- Suppliers workers; and
- Accommodation of workers.

Health	Safety	Environment	Social / Sustainability
			X



3 References

3.1 Internal references

- eni Code of Ethics;
- eni Ghana Organizational Management and Control MODEL
- eni Ghana Sustainability Guidelines;
- eni Ghana HSE Guidelines;
- eni Guidelines on the Protection and Promotion of Human Rights, Circular No. 257 of 17.4.2007;
- msg-hr-eni spa r01- MSG “Human Resources”;
- eni Ghana HSE–MAN-001 HSE Manual, and related documents; and
- eni Ghana Sustainability Management System.

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

- WBG¹ “Performance Standards on Environmental and Social Sustainability”, 2012 (with particular reference to Performance Standard [PS] 2 and Guidance Note 2 “Labour and Working Conditions”).
- IFC and EBRD “Workers' Accommodation: Processes and Standards”, 2009.

¹ IFC, WB and MIGA PSs

4 Definitions, abbreviations, acronyms

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

Term	Definition
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.
Direct workers	Workers directly engaged by eni with a clear employment relationship and complete control over the working conditions and treatment.
ESHMP	Environmental, Social and Health Management Plan
ESHIA	Environmental, Social and Health Impact Assessment
HSE-IMS	Health Safety Environment – Integrated Management System
Supply chain Workers	Workers engaged by the eni suppliers providing goods and materials.



5 Legal Requirements and Internal Regulations

The Ghana legal framework for the Health and Safety component of this plan is recorded and regularly updated according to the Procedure HSE Legal Requirements (HSE-PRO-002) through the Legal Register (HSE-REG-002).

The main Health and Safety Acts include:

- Factories, Offices and Shops Act, 1970 (Act 651);
- Labour Act, 2003 (Act 651); and
- Labour Regulations, LI 1833, 2007.

In terms of other Workers and Human Rights, Ghana Laws and Regulations of particular relevance for managing and implementing this Plan include, but are not limited to:

- Labour Act, 2003 (Act 651);
- Children’s Act, 1998 (Act 560); and
- Commission on Human Rights and Administrative Justice Act, 1993 (Act 456).

Ghana has ratified the eight core ILO conventions:

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87).
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
- Forced Labour Convention, 1930 (No. 29);
- Abolition of Forced Labour Convention, 1957 (No. 105);
- Minimum Age Convention, 1973 (No. 138);
- Worst Forms of Child Labour Convention, 1999 (No. 182);
- Equal Remuneration Convention, 1951 (No. 100);
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111);

as well as the UN Conventions:

- on the Rights of the Child (1989)
- on the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (1990).



The WBG PS 2 (see reference in Section 3.2) is the external reference standard 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.

Commitments connected to Workers Health and Safety, which are already detailed in the eni Ghana HSE IMS documents are not further detailed in the compliance monitoring column.

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 workers management.

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

- **Direct Workers:** include 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);
- **Contracted Workers:** include specific commitments for eni to revert to their contractors the commitments applicable to Direct Workers;
- **Supply Chain Workers:** commitments related to suppliers workforce conditions; and
- **Accommodation:** commitments related to Workers Camp construction and management.



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*. The consistency of these documents with the requirements of this Plan will be reviewed periodically.

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, Compliance Monitoring, Timing/ Frequency, Responsible Party, 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									
Management of workers relation	Worker 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>	Recruitment Employment and Training Plan (Annex B) eni Code of Ethics	ESHIA Phase 2 Annex G Section G.7.6.2	See Recruitment Employment and Training Plan (Annex B)				
Management of workers relation	Worker Rights	Review and monitor the outcomes of workforce grievance mechanism. <i>Type: Monitoring</i>	Organizational Management and Control MODEL eni Code of Ethics Whistleblowing procedure Company Handbook for national Staff	ESHIA Phase 2 Annex G Section G.7.6.2	Guarantor of the Code of Ethics Code Promotion Team	: Workers can submit their grievances through the workers grievance mechanism and directly to the Guarantor of the Code of Ethics (even in anonymous form) as specified in the Organizational Management and Control MODEL which is provided to employees together with the Company Handbook for national Staff.	continuous	Human Resources and Training Function	See. Section 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
						<p>Compliance monitoring will include verification of the following:</p> <ul style="list-style-type: none"> ▪ Tools for receiving and Documenting all grievances and the resulting actions are appropriate and actually used. ▪ Workers’ representatives are included as a key part of the process. ▪ Female grievance officers (‘confidants’) are made available to female members of the workforce. ▪ No retaliation or discrimination against those that express grievances. ▪ Management treats the grievances seriously and takes appropriate action. 			



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
						<ul style="list-style-type: none"> ▪ Workers are trained on the use of the grievance procedure. ▪ Grievance mechanism is accessible for contracted workers. 			
Management of workers relation	Worker Rights	eni will, as part of its Environmental and Social Management System and Human Resources Management System, undertake socioeconomic compliance monitoring to inform its internal auditing and monitoring process. As such, KPIs will be developed around worker rights, discrimination and management, workforce grievance mechanism and monitoring of outcomes. <i>Type: Monitoring</i>		ESHIA Phase 2 Annex G Section G.7.6.2	QHSE Function Contractors	The internal auditing and monitoring process shall cover verification that workers’ rights are respected including: <ul style="list-style-type: none"> ▪ equal opportunity; ▪ freedom of association; ▪ welfare and labour standards and working conditions; ▪ avoidance of child and forced labour. 	bi- annual		See. Section 9
Health and safety management	Workers Health and Safety Community health, safety	Implement procedures to identify specific prophylaxis needs for Project personnel. Provide specific prophylaxis	<i>HSE – IMS Vector Borne Disease Management Plan eni Ghana (HR PRO 004)</i>	ESHIA Phase 2 Annex G Section	See Community Health Management Plan (ESHMP Annex O)				



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
	and security	for project personnel. Provide access to free condoms at all worker sites and accommodation. <i>Type: Avoidance</i>	<i>eni Guidelines on HIV/AIDS 1.3.2.9</i> Community Health Management Plan (ESHMP Annex O)	G.7.7.2					
Health and safety management	Worker Health and Safety	eni will develop a health and safety management system in line with applicable national laws and regulations. This management system will be enforced throughout the Project including all contractors and sub-contractors (see section Contracted Workers below). It will include aspects such as worker Code of Ethics, identification and provision of Personal Protective Equipment (PPE), training and monitoring as well as ongoing safety checks and safety audits. The	eni Ghana HSE – IMS	ESHIA Phase 2 Annex G Section G.7.5.3	QHSE Function	Presence and implementation of an HSE IMS that includes procedures and instructions for: <ul style="list-style-type: none"> ▪ HSE Risks and aspects Assessment and management ▪ HSE Planning and management review ▪ Contract HSE Requirements ▪ Legal requirements identification and implementation ▪ Training and communication ▪ Monitoring auditing 	annual	QHSE Function	ref. to HSE-IMS



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
		management system will be communicated to all Project employees. <i>Type: Management</i>				<ul style="list-style-type: none"> ▪ Emergency management ▪ Incidents and non conformities recording and analysis. 			
Health and Safety Management	Unplanned events Worker Health and Safety	Detailed assessments to identify Project risks (e.g., HAZID, ENVID) and methods to assess and mitigate risks (e.g., HAZOP, QRA) were carried out and will be updated along the project lifecycle. These studies are aimed at refining the design and identifying additional prevention and mitigation measures (if relevant) to minimize risks to ALARP (as low as reasonable practical) according to internationally accepted good practice. <i>Type: Management</i>	HSE-PRO-007.01 - Risk Management opi-sg-hse-009-ep- Hazid-methodology opi-sg-hse-010-ep- Hazop-methodology	ESHIA Phase 2 Annex G Section G.9	QHSE Function Contractors	Audit	annual	QHSE Function	ref. to HSE-IMS.



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 and safety management	Worker Health and Safety	Workers will be provided with primary health care and basic first aid at construction camps /worksites. This will be done in line with the IFC/ EBRD guidelines on worker accommodation. <i>Type: Reduction on/off site</i>	HSE – IMS	ESHIA Phase 2 Annex G Section G.7.5.3, G.7.6.2 and G.7.7.2	QHSE Function	H&S Audit Program	annual	QHSE Function	ref. to HSE-IMS
Health and safety management	Worker Health and Safety	Surveillance programs for health status of workers shall be established and implemented. <i>Type: Management</i>	HSE – IMS HSE-INSTR-007 Fitness to Work	ESHIA Phase 2 Annex G Section G.7.6.2	Health Function	H&S Monitoring of surveillance program	annual	QHSE Function	ref. to HSE-IMS
Health and safety management	Worker Health and Safety	In line with eni Code of Ethics, employees should not be under the influence of intoxicants, which could adversely affect the ability of that employee to perform the work or adversely affect the health and safety of other employees, other persons, or the environment. <i>Type: Management</i>	HSE – IMS HSE-PRT-002 Drugs and Alcohol Protocol	ESHIA Phase 2 Annex G Section G.7.6.2	QHSE Function	Monitoring	quarterly	Health Function	ref. to HSE-IMS



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 and safety management	Worker Health and Safety	Facilities and operations will be developed, planned and maintained such that robust barriers are in place to prevent accidents. All employees have the duty to stop any works if adequate systems to control risks are not in place. <i>Type: Management</i>	HSE – IMS	ESHIA Phase 2 Annex G Section G.7.6.2	QHSE Function	H&S Audit Program	annual	QHSE Function	ref. to HSE-IMS
Capacity Building	Employment opportunities and Skills Enhancement	Build the capacity of employees through development plans, technical, health and safety training, specially to Ghana nationals so that they can eventually assume positions/functions in the OCTP Block project initially or currently undertaken by employees of other nationalities. Provide them with relevant training certificates <i>Type: Management</i>	OCTP Framework ESHMP (Chapter 14) pro-hr-007 eni Ghana Training Local Content Development Plan (ESHMP Annex C)	ESHIA Phase 2 Annex G Section G.7.1.3	Human Resources and Training Function	Presence and implementation of a procedure that includes: <ul style="list-style-type: none"> ▪ Identification of training needs ▪ Definition of Training plan and budget ▪ Recording of training activities. 	annual	Human Resources and Training Function	See Section 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
Retrenchment & Demobilisation	Workforce Demobilisation on Economic Vulnerability	<p>eni will establish retrenchment processes for implementation.</p> <p>Retrenchment Demobilisation of workers will be undertaken in line with national law, international standards and eni policies.</p> <p><i>Type: Management</i></p>		<p>ESHIA Phase 2 Annex G Section G.7.1.3</p> <p>ESHIA Phase 2 Annex G Section G.7.6.2</p>	<p>Human Resources and Training Function</p> <p>Local Content and Sustainability Function</p>	<p>An awareness program on individual financial management is carried out with employees to ensure that they maximise saving from their earnings, considering the short-term duration of their contract.</p> <p>Provide recommendation letters to workers at the end of their contract.</p> <p>Presence and implementation of a comprehensive retrenchment and demobilization procedure and strategy, which includes:</p> <ul style="list-style-type: none"> ▪ Timing and number of workers to be retrenched ▪ A communications strategy to minimise misinformation and rumours ▪ Alignment with community development activities 	annual	Human Resources and Training Function	To be defined



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
						<ul style="list-style-type: none"> ▪ Complaints/grievance process to facilitate employee and contractor dispute resolution relating to retrenchment ▪ Personal viability training ▪ Engagement and consultation of relevant stakeholders, including families of retrenched workers ▪ Consistent application of retrenchment packages to minimise the risk of inequitable treatment ▪ KPIs to evaluate performance of retrenchment process. 			
Contracted Workers									
Contractors management	Worker Health and Safety Worker Rights	As part of the contractor and supplier selection process eni will take into consideration performance with regard to worker management, worker	HSE-STD-001-Contract HSE Requirements	ESHIA Phase 2 Annex G Section G.7.6.2	Contract and Procurement Function	Pre-qualification and tendering documents to include: <ul style="list-style-type: none"> ▪ HSE MS procedures and plans 	annual	Contract and Procurement Function QHSE Function	Ref. to HSE IMS



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
		rights, health and safety as outlined in Ghanaian law, international standards and eni’s policies. <i>Type: Management</i>				<ul style="list-style-type: none"> ▪ Recruitment and employment procedures and plans ▪ HSE and workers management KPIs. 			
Contractors management	Worker Rights	In all contractors’ contracts, the Project will make explicit reference to the need to abide by Ghanaian law, international standards and eni’s policies in relation to health and safety, labour and welfare standards including child and forced labour and retrenchment. <i>Type: Management</i>	HSE-STD-001-Contract HSE Requirements	ESHIA Phase 2 Annex G Section G.7.6.2	Contract and Procurement Function	Contracts contain requirement to comply with: <ul style="list-style-type: none"> ▪ Ghanaian HSE and labour and welfare legislation ▪ eni ESHMP commitments related to workers management (see above) ▪ reference eni IMS procedures/instruction related to workers management. 	annual	Contract and Procurement Function QHSE Function	See. Section 9
Contractors management	Worker Rights	Contractor agreements will specify monitoring to be undertaken by the contractor regarding worker rights. <i>Type: Management</i>	HSE-STD-001-Contract HSE Requirements	ESHIA Phase 2 Annex G Section G.7.6.2	Contract and Procurement Function	The contractor agreement will require a monitoring and audit program to be defined and implemented and include KPIs to be measured. The contractor should aim	Annual	Contract and Procurement Function QHSE Function	See. Section 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
						<p>to contract directly with their workers and not use third party agencies. This means that workers will be paid by the contractor directly and not through an agency. However, where this is not possible, the contractor is to provide evidence of:</p> <ul style="list-style-type: none"> ▪ audits performed on agencies. ▪ complete transparency on all fees paid to the agencies. 			
Contractors auditing	Worker Rights	eni will establish the right to audit on site contractors to ensure they are abiding with national legal requirements, international standards, eni policies or clauses in the contract through all contracts and subcontracts. Failure to meet these standards will result in consequences up to and including termination of contract, to	HSE-STD-001-Contract HSE Requirements	ESHIA Phase 2 Annex G Section G.7.6.2	Contract and Procurement Function	<p>The contractor agreement will include:</p> <ul style="list-style-type: none"> ▪ the right for eni to audit on site contractors ▪ escalation procedure in case of non-compliances. 	Annual	Contract and Procurement Function QHSE Function	See. Section 9



eni

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
		be decided on a case by case basis. <i>Type: Monitoring</i>							
Support to Contractors	Worker Health and Safety	eni will provide support to contractors and subcontractors to ensure that labour and working conditions are in line with Ghanaian law through gap analysis and capacity building. <i>Type: Management</i>	HSE-STD-001-Contract HSE Requirements	ESHIA Phase 2 Annex G Section G.7.6.2	Contract and Procurement	Audit	Annual	Contract and Procurement Function QHSE Function	See. Section 9
Contractors Workers Grievance	Worker Rights	eni will require all contractors and sub-contractors to put in place a worker grievance mechanism that will be accessible to all workers, whether permanent or temporary, directly or indirectly employed. The eni worker grievance mechanism shall be open to the contractor and subcontractor workforce in the event that their grievance is not adequately resolved by their direct	eni Code of Ethics Whistleblowing procedure Workers Handbook Grievance mechanism	ESHIA Phase 2 Annex G Section G.7.6.2	Contract and Procurement Function	Audit	Annual	Contract and Procurement Function QHSE Function	See. Section 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
		employer. eni will then have the authority to act to resolve this grievance. <i>Type: Management</i>							
Supply Chain Workers									
Supply Chain management	Worker Rights	Evaluate the risks related to human rights, health, and safety, labour and welfare standards including child and forced labour within the primary supply chain. If these exist, take appropriate steps to remedy them or shift to suppliers where the risk is not present. <i>Type: Management</i>		WBG PS 2	Contract and Procurement Function	Identify the types of suppliers where risks related to human rights and health and safety, labour and welfare standards are higher. Establish in those cases criteria for risk minimisation that include: <ul style="list-style-type: none"> ▪ evaluating workers related performance at supplier selection ▪ Including worker related clauses in purchasing documents (auditing program and escalation procedure). 	Tbd based on risk assessment	Contract and Procurement Function	See. Section 9
Accommodation									
Camp Management	Workers Right	Camps will be designed, constructed and managed in line with the eni General Design Criteria for	EPC Contracts Annex E General Design Criteria for	ESHIA Phase 2 Annex G	.Contractor	Monitoring	Quarterly	QHSE Function	See. Section 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
		Accommodation (INFR-DG-791-10) and the standards outlined in the IFC/ EBRD Guidelines on Worker Accommodation (August 2009). <i>Type: Management</i>	Accommodation (INFR-DG-791-10)	Section G.7.7.2					



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 of this plan are indicated in *Table 6.1*. 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 Workers Management 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.

Specific induction training contents related to the commitments of the ESHMP are mentioned in the Recruitment, Employment and Training Plan (ESHMP Annex B). Additional training requirements for this specific management plan are presented in *Table 8.1* below.

Project training activity associated with the implementation of the Workers Management 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
Human Resources and Training Function	Human Rights Worker grievance mechanism	Once with refreshers and updates as needed
QHSE Function	Risks associated with supply chain workers and related management	Once with refreshers and updates as needed
Contract and Procurement Function	Risks associated with contractors workers and supply chain workers, and related management	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 9.1* apply to this Plan in addition to HSE KPIs already defined in the eni Ghana HSE-IMS. The table also provides details regarding how they will be measured, target/benchmark and how frequently they will be calculated.

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
Worker grievances lodged	Type and number	Closed or adequately responded to within 30 days	Bi-annually
Worker Rights non compliances	Type and number	Zero major non compliances related to worker rights identified during audits (e.g. child labour, forced labour)	Bi-annually
Worker Rights non compliances	Type and %	100% of non-compliances related to worker rights identified during previous audit: closed	Bi-annually
Disciplinary cases	Type and number	Reduction in disciplinary breaches	Bi-annually
Payslip queries	Type and number	Downward trend	Bi-annually
Lost hours due to industrial action	Lost hours	Zero	Bi-annually
Camp committee issues raised	Type and number	Closed before next meeting	Bi-annually
Food or lodging complaints	Type and number	Reduction and/or downward trend	Bi-annually
Suppliers social audits	Number	Increasing number of audited suppliers	Annually

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.

Annual reporting about the implementation of this Workers Management Plan will include, in conjunction with reporting on the Recruitment, Employment and Training Plan:

- KPIs values and trends;
- Summary of outcomes of audits on direct workers management;
- Summary of outcomes of audits on contracted workers management; and
- Summary of audits on suppliers.

