REPUBLIC OF LEBANON
MINISTRY OF FINANCE

REPUBLIC OF LEBANON

Ministry of Finance (MOF)

Lebanon Fiscal Management Project

(P181155)

UPDATED LABOUR MANAGEMENT PROCEDURES (LMP)

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Table of Contents

Abbreviations and Acronyms 3

1. INTRODUCTION 5
2. OVERVIEW OF LABOR USE ON THE PROJECT 6
3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS 9
4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS 9
5. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY 13
6. RESPONSIBLE STAFF 14
7. POLICIES AND PROCEDURES 15
8. AGE OF EMPLOYMENT 17
9. TERMS AND CONDITIONS 18

9.1 Terms and Conditions for Direct Workers 19

9.2 Terms and Conditions for Contracted Workers 19

9.3 Terms and Conditions for Primary Supply Workers 20

10. GRIEVANCE MECHANISM 20
11. CONTRACTOR MANAGEMENT 21
12. COMMUNITY WORKERS 21
13. PRIMARY SUPPLY WORKERS 21
14. Annexes 21

Annex 1 – Code of Conduct in Arabic 22

Annex 2 – Code of Conduct in English 23

Abbreviations and Acronyms

AF	Additional Financing
ASYCUDA	Automated System for Customs Data
CoC	Code of Conduct
CERC	Contingent Emergency Response Component
COVID-19	Coronas Virus
DGGDLRC	General Directorate of Land Registry and Cadastre
EHSG	Environmental, Health and Safety Guidelines
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GM	Grievance Mechanism
IBRD	International Bank for Reconstruction and Development
ICT	Information and Communication Technologies
IFMIS	Integrated Financial Management Information System
ILO	International Labour Organization
IMF	International Monetary Fund
IT	Information Technology
ITAS	Integrated Tax Administration System
LC	Labor Code
LFF	Lebanon Financing Facility
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation

MOF	Ministry of Finance
NGO	Non-Governmental Organization
NSSF	National Social Security Fund
OHS	Occupational Health and Safety
PBC	Performance-Based Condition
PCU	Project Coordination Unit
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SIGTAS	Standard Integrated Government Tax Administration System
SSL	Social Security Law
WB	World Bank
WMP	Waste Management Plan

1. INTRODUCTION

For more than five years, Lebanon has been impacted by a devastating multi-pronged crisis. The unfolding economic and financial crisis that started in October 2019 has been further exacerbated by the economic impact of the COVID-19 outbreak, the Port of Beirut explosion in August 2020 and successive episodes of conflict and political instability. The economic contraction deepened again in 2024, when real GDP declined by 7.1 percent, bringing the cumulative contraction in real GDP since 2019 to nearly 40 percent[1].

Economic conditions showed signs of stabilization and modest recovery during 2025. According to the World Bank, real GDP expanded by 3.5 percent in 2025, supported by improved economic activity, a recovery in tourism and consumption, relative exchange-rate stability, and progress—although uneven—on the reform agenda. Inflation also moderated substantially compared with the levels observed during the earlier years of the crisis, reaching approximately 14.6 percent in 2025. Nevertheless, the recovery remains fragile, and the unresolved financial and banking crisis, high public debt, limited access to financing, and continuing institutional constraints continue to weigh on Lebanon's economic prospects[2].

The prolonged crisis has caused staff attrition and absenteeism in the public sector, severely impacting the government's ability to respond to the crisis, maintain core government operations and basic services for citizens, and to create the foundations for recovery. Currency devaluation has eroded the real value of public sector salaries contributing to staff attrition and difficulties in retaining qualified personnel. As a result, a significant number of staff have left the public sector, either for the private sector where salaries have been partially adjusted or for opportunities abroad, leaving a critical skills gap in the public sector. While a number of measures have been introduced to adjust public sector remuneration, compensation in real terms remains below pre-crisis levels, and staff retention continues to be a challenge[3].

The rehabilitation and restructuring of the banking sector remain key priorities for Lebanon's economic and financial recovery. This includes advancing banking sector restructuring and resolution measures, strengthening the financial safety net, and implementing the broader financial sector reforms needed to restore confidence and support the resumption of effective financial intermediation.

The Lebanon Fiscal Management Project (P181155) aims to mobilize and allocate public resources in an accountable manner to support the crisis response and recovery in Lebanon. The Project was restructured in June 2025 and subsequently received Additional Financing to support its revised activities and objectives, as described below.

The Project comprises the following components:

- Component 1 – Stabilizing Domestic Revenue Administration;
- Component 2 – Restoring Fiscal Controls;
- Component 3 – Revitalizing Oversight and Accountability Institutions and Procurement Capacity Building;

[1] World Bank, *Lebanon Economic Monitor, Spring 2025: Turning the Tide?*, 2025.
[2] World Bank, *Lebanon Economic Monitor*, January 2026 / World Bank economic update on Lebanon, 2026.
[3] International Monetary Fund (IMF), *Lebanon: Technical Assistance Report—Government Personnel Spending: Scoping a Medium-Term Spending Envelope*, Technical Assistance Report No. 2026/019, March 2026.

- Component 4 – Project Management; and
- Component 5 – Contingent Emergency Response Component (CERC).

As part of the restructuring, funds originally allocated for MoF staff allowances were reallocated to support the Integrated Financial Management Information System (IFMIS) and Integrated Tax Administration System (ITAS), and the Project closing date was extended to 31 December 2028.

The Project subsequently received Additional Financing through a US$7.2 million LFF Grant to scale up urgent ICT stabilization activities under Component 1. The Additional Financing supports: (i) stabilization and upgrading of SIGTAS; (ii) upgrading and consolidation of the General Directorate of Land Registry and Cadastre (DGGDLRC) information systems, including database infrastructure, backup and disaster-recovery arrangements; and (iii) continued support and targeted enhancements to ASYCUDA.

The technical implementation arrangements for these activities differ. SIGTAS-related activities are coordinated with the MoF IT Directorate; Land Registry and Cadastre activities are coordinated with DGGDLRC; and ASYCUDA-related activities are coordinated with Customs, including coordination with UNCTAD. The MoF Project Coordination Unit (PCU) retains the Project-level coordination, fiduciary and environmental and social functions established under the Project.

The Project is implemented under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard (ESS2) on Labor and Working Conditions, the present Labor Management Procedures (LMP) prepared by the MOF and updated to reflect the June 2025 restructuring and Additional Financing, identify the main labor requirements and risks associated with the Project.

For the purposes of the labor arrangements addressed in this LMP, the provisions relating to Project workers focus on workers and personnel engaged through the MoF/PCU and DGGDLRC activities, including the relevant ICT, technical assistance, equipment installation and associated activities. Where activities involve other technical entities under the broader Project, the applicable labour and E&S requirements shall be addressed through the relevant Project implementation arrangements and in coordination with the concerned entity.

The MoF/PCU will oversee implementation of the LMP, in coordination with DGGDLRC for the activities falling within its area of responsibility. The LMP is a living document and will be reviewed and updated, as necessary, to reflect changes in Project activities, staffing, contracting arrangements and associated labor risks during implementation.

This updated LMP reflects the revised Project scope and implementation arrangements following the June 2025 restructuring and Additional Financing, including the involvement of DGGDLRC in the implementation of the relevant Land Registry and Cadastre activities. It also reflects the associated changes in Project staffing and contracting arrangements, including the engagement of specialized IT personnel and other workers supporting Project-financed ICT, technical assistance, equipment installation and related activities. The implications for the different categories of Project workers are addressed in the relevant sections of this LMP.

2. OVERVIEW OF LABOR USE ON THE PROJECT

This section describes the number of Project workers and their characteristics, based on available

information.

Number of Project Workers:

Based on the current Project scope and implementation arrangements, the total number of Project workers engaged at different stages over the Project implementation period is estimated to be approximately 25–40 workers. This indicative range is cumulative and does not represent the number of workers engaged at the same time. This indicative range covers workers engaged under activities financed through the original LFF grant, including ICT-related activities already implemented, as well as workers engaged or expected to be engaged under the IBRD loan and the Additional Financing. The number of workers engaged at any given time will vary according to the activities under implementation and the staffing requirements and duration of individual contracts.

The estimated Project workforce reflects the expanded labor requirements associated with the restructuring and Additional Financing. the four core MoF/PCU positions (Project Coordinator, E&S Specialist, Procurement Specialist and Financial Management Specialist), of which three are currently filled; six individually contracted IT personnel providing specialized technical support to the MoF IT team; relevant MoF and DGGDLRC civil servants supporting Project implementation within their institutional responsibilities; and a limited number of personnel of contractors, consultants, equipment suppliers or service providers directly involved in Project-financed activities.

Under the Additional Financing, specialized personnel may also be engaged, as required, to support the modernization and consolidation of the DGGDLRC information systems, including database infrastructure, backup and Disaster Recovery arrangements. The exact number of personnel required for these activities is not yet known and will depend on the relevant procurement and contractual arrangements. The existing MoF PCU arrangements continue to apply to the Additional Financing, with DGGDLRC coordinating the technical implementation of the Land Registry and Cadastre activities.

The LMP is a living document; thus, the indicative number and composition of Project workers will be reviewed and updated, as necessary, based on actual staffing and contractual arrangements during Project implementation.

Characteristics *of Project Workers*:

The anticipated workers to be employed are likely to be national experts, professional and technical personnel, IT specialists, consultants, and a limited number of skilled or semi-skilled workers. Given that the Project activities primarily comprise technical assistance, ICT systems and equipment procurement, upgrading and installation, a significant construction workforce is not anticipated. Limited associated electrical works, cabling or minor refurbishment/fitting-out activities may be required in connection with equipment installation. There should be no restriction on the employment of female workers and those would likely be technical (finance, procurement, planning, management, engineering). The project activities will be associated with Occupational Health and Safety (OHS) risks; hence the project must ensure through an age verification process that the minimum age of employment is 18 years.

a) ***Direct Workers***:

The Project implementation will be managed by the Project Coordination Unit (PCU) under the Ministry of Finance. The direct workers will be comprised of the members of the PCU who are public

servants, as well as consultants directly engaged by the MoF for Project implementation. The PCU comprises four core positions: Project Coordinator, E&S Specialist, Procurement Specialist and Financial Management Specialist. Three positions are currently filled, while recruitment of the Project Coordinator is pending.

Government civil servants assigned to the Project as members of the PCU, as well as relevant MoF and DGGDLRC civil servants supporting the technical implementation of Project activities within their respective institutional responsibilities, will remain subject to their existing public-sector employment terms and conditions. In accordance with ESS2, ESS2 will not apply to such government civil servants, except for the provisions of paragraphs 17 to 20 (Protecting the Work Force) and paragraphs 24 to 30 (Occupational Health and Safety).

b) Contracted Workers:

The anticipated or known contracting structures for the project are:

(i) contractors, consulting firms and service providers engaged to undertake technical assistance activities, Information and Communication Technologies (ICT) upgrading and related services, and minor civil works; and (ii) third-party monitoring/verification services engaged by the Project to independently verify Performance-Based Conditions (PBCs) and monitor Project expenditures, including spot checks as needed, in addition to the regular M&E function.

Six IT personnel are currently individually contracted to provide specialized technical support to the MoF IT team, including senior Oracle development and database administration services. Their assignments support the Project's ICT systems and are expected to include activities related to the enhancement of SIGTAS. Contracted workers may also include a limited number of personnel of equipment suppliers or service providers directly involved in Project-financed delivery, installation, configuration, cabling, electrical or other associated activities.

c) Primary Supply Workers

Based on the current Project activities and procurement arrangements, no primary supply workers are anticipated, as no suppliers provide, on an ongoing basis, goods or materials directly to the Project that are essential for its core functions.

***Timing of Labor Requirements*:**

The proposed project is expected to be implemented at a national level by government staff in the respective beneficiary departments and supported by consultants and a PCU.

Labor requirements will vary throughout Project implementation according to the activities and contracts included in the Project workplan. PCU personnel and certain technical support personnel will be required over relatively longer periods, while consultants and contracted personnel will be engaged for defined periods according to the activities and deliverables covered by their respective contracts.

Personnel associated with ICT equipment delivery and installation are expected to be required only for relatively short periods during delivery, installation, configuration and commissioning. Specialized IT personnel may be engaged for longer periods for system upgrading, database consolidation, data migration, stabilization, testing and technical support. The timing and number of personnel required for the DGGDLRC activities supported under the Additional Financing will depend on the relevant

procurement and implementation schedules.

The Project workplan provides the basis for planning the timing of activities and associated labor requirements. Workforce requirements will be reviewed and updated as implementation progresses and additional contracts are awarded. Following the Project restructuring, the Project closing date is 31 December 2028.

3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The key labor risks which may be associated with the project include:

- OHS risks associated with minor civil works and installation and upgrading of IT for Component 1.
- Unfair and/or unclear contract terms and conditions including wages, overtime, compensation, benefits and working hours.
- Potential tensions arising from (i) potential engagement with MoF staff not involved in the project leading to potential delays and tensions; (ii) the current circumstance of work in the public administration
- Discrimination and non-equal opportunities: The project will involve direct and contracted workers with different scopes of work. The varying nature of their work and contractual arrangements may give rise to risks of discrimination, unequal opportunities and unfair treatment, including in relation to recruitment, remuneration, working conditions and termination of employment.
- Gender-based violence (GBV), Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) as the project workers will include both men and women.
- Risk of inadequate awareness of or access to the workers' Grievance Mechanism (GM), or delays in the handling and resolution of worker grievances.

4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

This section sets out the ***key aspects*** of national labor legislation with regards to term and conditions of work, and how national legislation applies to different categories of workers identified in Section 2.

Work contracts are regulated by Title I of the Labor Code (LC) of Lebanon dated 1946. A worker is defined as a person who is at least 13 years old, and works with an employer according to an individual or collective agreement (art. 2).

- The Labor Code distinguishes between two classes of workers: employees and workmen. Employees are salary earners who perform a desk job or a non-manual job. Workmen are wage earners that are within the group of employees (art. 3).
- Work contracts are written (art. 12). Contracts have to be submitted to the Authority of Common Law (art. 12). Written contracts must be in Arabic, however, may be translated to a foreign language if the employer or wage-earner/salary-earner does not know Arabic (art. 12).

Wages:

- Minimum pay is fixed by a commission comprising representatives from the Ministry of National Economy, employers, and wage-earners/salary-earners (LC, art. 45).
- The statutory monthly minimum wage was set in 2012 and is equal to LBP 675,000 (this used to be equivalent to approximately USD 442.39 at the previous exchange rate of LBP 1,507.5), as determined by Decree 7426/2012. The minimum daily wage is LBP 30,000 (approximately, which used to be equivalent to USD 1.4 at the previous exchange rate of LBP 1,507.5). This applies to both the public and private sectors. These were updated in 2022 as a result of the currency's devaluation upon the financial crisis by raising the minimum monthly wage by LBP 600,000 (Decree 10598/2022) unless they are benefiting from social assistance. Decree 9129/2022 raised the wages as follows:
    - For salaries below LBP 4,000,000/month: an increase of LBP 1,325,000/month
    - For salaries exceeding LBP 4,000,000: the amount specified in agreements and collective negotiations in line with the ILO Convention number 131 as specified in Legislative Decree 70/1977.
    - For daily remunerations not exceeding LBP 182,000LBP: an increase of LBP 61,000/day
- On April 5, 2024, the Cabinet raised the minimum wage under Decree 13164 to LBP 18 million per month and the daily remuneration to LBP 820,000. These changes became effective on April 1, 2024. Subsequently, Decree No. 699 dated 24 July 2025 increased the statutory minimum monthly wage for private-sector workers to LBP 28,000,000 and the minimum daily wage to LBP 1,300,000, effective 1 August 2025. The applicable minimum wage shall be updated in accordance with any subsequent amendments to Lebanese legislation.
- According to the Labor Code, payment can be in kind or in official currency (art. 47).

Payment must be made at least once a month to employees and twice a month to workers (LC, art. 47). For piece-work of which the execution lasts more than 15 days, the date of payment may be fixed by mutual agreement, but the worker must receive down payments every 15 days and have received the full pay within two weeks following delivery of the piece of work (LC, art. 47).

Rest, Leave and Overtime:

- In principle, the working week may not exceed 48 hours (LC, art. 31). The May 2025 amendments to Articles 1, 2 and 12 of the Labor Code introduced additional forms of work organization, including part-time work (between one-third and two-thirds of full-time working hours), seasonal work (for periods not exceeding six months), remote work, and flexible arrangements for the distribution of working hours. These arrangements remain subject to the applicable statutory limits on working hours and rest periods.
- It is possible to derogate from the 48-hours maximum work week in cases of emergency. A definition of such an emergency is not given. In such cases, employers can raise daily working hours to 12 hours, provided that additional hours are compensated at 150%, notification is provided to the Social Affairs Service and provisions on adolescents' work are not contravened (LC, art. 33). There is no clear provision in the legislation for employees to refuse to work extended hours.

- Regulation No. 30 of 1956 states that working time can be increased to 54 hours per week in "commercial establishments" (ILO CEACR, 2015). The circumstances under which working time can be increased to 54 hours are not specified in the decree, an omission which has attracted ILO commentary (ILO CEACR, 2015).
- Employees/Workmen must be granted a weekly rest which is not under 36 hours (LC, art. 36). Employees are also entitled to an unbroken rest of 9 hours every 24 hours, except in cases where work circumstances require otherwise (LC, art. 34). Where work exceeds 6 non-stop hours for men, and 5 non-stop hours for women, employees are entitled to a rest-time of at least 1 hour (LC, art. 34).
- Under-18s cannot work more than 6 hours a day and must receive a break of at least 1 hour if the working period exceeds 4 consecutive hours (LC, art. 23).
- An employee is entitled to 15 days' annual leave on full pay after completing one year of employment. The employer may determine the timing of such annual leave based on work requirements (LC, art. 39).
- Regulations on sickness contracted by the employee as a result of his or her job or any occupational accident are detailed in the sections on OHS below. The Labor Code grants the employee the right to a yearly sick leave for sicknesses and accidents not related to the job, the duration of which is based on the employment duration, with a minimum of half a month on full pay and half a month on half pay (LC, art. 40).

Maternity and Family Leave:

- Women are entitled to 10 weeks of maternity leave at 100% pay (Laws Nos. 226 and 267 of 2014; LC, Arts 28 and 29).
- There is no statutory paternity leave. A draft law providing for three days' paternity leave was introduced and approved by the Council of Ministers in January 2018 but has not yet entered into force pending its enactment by the Lebanese Parliament.[4]
- There are no laws that guarantee childcare leave in Lebanon or the right to breastfeed, nor does the law provide for nursery or childcare facilities.

Severance Pay:

- The employer is required to provide a written notice of termination at least one month in advance (LC, art. 50.c).
- For those groups covered by the Labor Code, severance pay is equal to one month per year of service, and half a month for those with less than one year of service. Severance is limited to a maximum of ten months for certain groups of wage-earners, such as those employed in the professions (e.g. medicine or law) or by master-craftsmen (LC, art. 54).
- A female employee is also granted severance pay in the event of marriage, provided that she has served the employer with due termination notice, she has been employed with the same

[4] Mondaq Digital Platform, 2020; The Daily Star, 2019b

employer for over a year, and she provides the employer with a marriage certificate (LC, art. 59; ILO CEACR, 2020a).

Social Security, Pension and Family Benefits:

- Law No. 319 of 22 December 2023 amended provisions of the Social Security Law and established a new retirement and social protection system under the National Social Security Fund (NSSF), providing for a transition from the existing end-of-service indemnity system to a pension-based system for eligible insured workers. Implementation of the new system is being progressively prepared and remains subject to the issuance and application of the relevant implementing decrees and arrangements.
- Decree No. 2923 dated 24 April 2026, published in the Official Gazette on 30 April 2026 and applicable from 1 May 2026, revised the family allowances administered by the NSSF and increased the maximum monthly earnings subject to contributions under the Family and Educational Benefits Branch to LBP 28,000,000. The monthly family allowance is capped at LBP 7,875,000, comprising LBP 2,100,000 for a spouse and LBP 1,155,000 per child for up to five children.
- Project workers who are subject to the NSSF shall be provided with the applicable social security, retirement/end-of-service, family and other statutory benefits in accordance with the Social Security Law, Law No. 319/2023, Decree No. 2923/2026 and any applicable implementing regulations, as amended from time to time.

Gender and Disability:

- The Labor Code prohibits discrimination between "working men and women" with respect to type of work, amount of wage or salary, employment, promotion, professional qualification, and apparel (LC, art. 26). Recruitment is not expressly covered.
- The principle of equal pay for work of equal value is not expressly provided for in Lebanese law (ILO CEACR, 2020b).
- Women are prohibited from working in a number of industries and jobs, including mining, production and use of explosives and production of alcohol (LC, art. 27 and Annex 1).
- Labor law contains a general prohibition against the employment of women in the industrial sector during the night (ILO CEACR, 2013).
- It is expressly prohibited to dismiss a pregnant worker or a woman on maternity leave (LC, arts 29 and 52).
- Men are granted welfare benefits that do not apply to women (LC, art.3 and Social Security Law (SSL), art. 46). For example, article 14 of the SSL guarantees insurance cover for a non-employed wife of a husband who contributes. However, a wife contributing can provide insurance cover for her husband and children.
- Act No. 220 (2000) provides that a certain number of jobs in the public sector are allocated to persons with disabilities (Act No. 220 of 2000, art. 73). Quotas are also applicable to private sector employers, depending on their size (Act No. 220 of 2000, art. 74).

Sexual Harassment:

- A standalone Law no. 205 criminalizing sexual harassment was passed in December 2020. This law targets all types of sexual harassment, in any setting, and especially in the workplace.
- Per the law, perpetrators can be sentenced to up to two years in prison and fined up to 20 times the value of the minimum wage, which stands at 28,000,000 Lebanese pounds, according to Lebanese rights group Legal Agenda.
- The punishment increases to between six months and two years in prison and a fine of between 10 and 20 times the minimum wage if there is a "relationship of dependency" or work between the perpetrator and the victim; if the perpetrator uses their position of power over a colleague; or if the harassment occurs at a range of state institutions, universities, schools or on transport services.
- Maximum penalties are reserved for harassment in the workplace, public institutions, or educational facilities.

Grievance Mechanism:

Law 28 of 2017 and its Implementation Decree No. 6940 of 2020 on the Right to Access to Information confirmed the right of any person, natural or legal, Lebanese or non-Lebanese, to access information and documents available within the public administration. Pursuant to Decree 6940 of 2020 all public institutions were instructed to activate administrative self-monitoring and to enhance transparency and positivity in the communication between the administration and the citizens, within one month from the date of the circular. Each public institution is required to receive complaints at the complaints office, register them and send a copy to the head of the institution, provided that the office of complaints studies the complaints and submits a report to the head of the institution for their action, including referral to the competent regulatory body or to the public prosecution when and if necessary, and in the absence of a complaints office, the institution shall establish one in accordance with the laws in force. Each institution is also required to create a database of the complaints received with the dates of their receipt and the dates of their referral to the above-mentioned references and the result associated with each of them[5].

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

This section sets out the ***key aspects*** of the national labor legislation with regards to OHS, and how national legislation applies to the different categories of workers identified in Section 2.

OHS is regulated mainly by Decree No. 11802 of 2004 pursuant to the International Labor Organization (ILO) conventions. Decree No. 136 of 1983 also covers work-related injuries and emergencies and Decree 11958 of 2004 tackles safety and protection in construction.

Decree No. 11802 comprises the following chapters:

i. Chapter 1: Prevention and safety

ii. Chapter 2: Health

[5] "World Bank. 2022. Implementing the Environmental and Social Framework in Lebanon. Analysis of Environmental Risks, Capacities and Challenges. World Bank."

iii. Chapter 3: Safe use of chemicals at work

iv. Chapter 4: Prevention from the dangers of working with benzene

v. Chapter 5: General provisions

The said decree sets that the employer should:

• Install safety provisions and measures to prevent any risks to the health and safety of the workers and limits the maximum time allowed to workers' exposure to disturbance, noise and vibrations and limit the period of exposure as per the limits set in the said Decree. The employer shall also resort to possible scientific means for eliminating or reducing noise.

• The employer shall provide the workers with the appropriate personal prevention and protection uniforms and gears, ensure their maintenance and preserve them in good conditions for later use, without the workers being liable to pay any costs.

• The employer shall take the general measures of health protection in the workplace, especially in relation to safety, lighting, ventilation, aeration, drinking water, lavatories, evacuation of dust and smoke, and hygiene measures to protect workers from pollution by pathological biological factors.

• Workers shall be given sufficient and appropriate information on the risks related to their work.

6. RESPONSIBLE STAFF

This section identifies the functions and/or individuals within the project responsible for (as relevant):

- Engagement and management of project workers
- Engagement and management of contractors/subcontractors
- OHS
- Environmental and social risks and mitigation measures
- Training of workers
- Addressing worker grievances

The PCU will ensure that the project is implemented in accordance with the relevant project documents and commensurate with relevant component scope and activities. The PCU will organize consultations and workshops, conduct priority awareness and communication activities, and oversee the implementation of the Labor Management Procedures (LMP).

The PCU is established and will be maintained throughout Project implementation. The PCU includes an Environmental and Social (E&S) Specialist, who is responsible for updating, disclosing, implementing and monitoring the LMP in accordance with ESS2 and the ESCP, including coordination with DGGDLRC for the relevant Land Registry and Cadastre activities.

Consultants and Contractors will have to comply with the requirements of ESS2 which will be incorporated into contractual agreements. Contractors must follow the stand-alone OHS plan that was prepared under the Project based on risk assessment. Contractors shall ensure the day-to-day compliance with specified safety measures and records of any incidents. Minor incidents are reported to PCU on a monthly basis, serious incidents are reported immediately. Minor incidents are reflected in the quarterly reports to the

WB, major issues are flagged to the WB immediately.

Contractors must pass the requirements to all subcontractors as relevant. The following represents a non-exhaustive list of their responsibilities under these LMP:

- Ensure GM referral pathways in the event of any SEA/SH related complaints;
- Reporting on incidents/fatalities as per the ESCP within 48 hours;
- Execute any sanctions as a result of possible non-compliance with E&S provisions;
- Hiring / Management of contracted workers;
- Enforcement of code of conduct;
- Ensuring workers are familiar with GM;
- Facilitate periodic audits, inspections, and/or spot checks by Consultants, PCU and E&S specialist;
- Facilitate and accept sharing and disclosure of information;
- Implement the OHS measures;
- Report to PCU on labor OHS.

Contractor will be fully responsible to ensure that their workers know and are trained on their obligations with respect to avoidance of any form of GBV, SEA/SH, safe disposal of wastes and community Health and safety Continuous motivation, monitoring and reporting on the same is the responsibility of the Contractor. The PCU will ensure implementation of these requirements by monitoring and supervising contractors.

Contractors are required to ensure that the assigned workers are adequately trained and briefed with overall safety arrangement, use of equipment, GM procedure, working conditions of the project. Training on GBV and preparation and obtaining signed code of conduct are also the Contractor's responsibility. No worker shall commence work under the Project until they have received the required induction and training and have signed the applicable CoC.

7. POLICIES AND PROCEDURES

This section outlines how risks identified under section 3 will be addressed.

Occupational Health and Safety (OHS) Risks:

To mitigate OHS risks that may emerge from the implementation of the proposed project, the PCU will ensure that national legislation relevant to OHS (especially Decree No. 11802 of 2004) is implemented. Moreover, OHS requirements stipulated in the World Bank Group "General Environmental, Health and Safety Guidelines" (EHSG) shall be followed and correspondent mitigation measures shall be carried out for identified activities of OHS significance. In accordance with the ESCP, a separate OHS Plan has been developed and is implemented and updated, as necessary, throughout Project implementation, setting out the measures and procedures for managing OHS risks and protecting Project workers.

The monitoring and evaluation for the implementation of good practices for OHS shall be carried out at project level by the E&S specialist who will conduct inspection visits and report them to the World Bank.

Unfair and/or unclear contract terms and conditions including wages, overtime, compensation, benefits and working hours:

All direct workers will be provided with clear and understandable terms and conditions of employment in a culturally appropriate language. For the Contracted workers, clauses will be included in all project procurement documents to ensure that terms and conditions of employment are being provided according to the requirements of ESS2 and/or national law. This includes providing them with signed contracts stating clearly the duration of the contract, leave entitlements, conditions of contract termination including receiving written notices of termination, disciplinary procedures that are applicable, housing and accommodation provisions and allowance where applicable, payment, their rights related to hours of work, fair wages, overtime, compensation, benefits as stated in the national law as well as those arising from the requirements of ESS2. All Project workers, as applicable, will also be required to comply with the Project Code of Conduct (CoC), including provisions relating to appropriate workplace and community conduct and the prevention of GBV/SEA/SH. Workers will be informed of the CoC requirements and shall sign the applicable CoC prior to commencing work. Workers will be presented with details of grievance procedures, including the different channels they can resort to and the processes for escalation where necessary (refer to section 10 for details about the workers' GM). Where necessary, the project will ensure that working conditions and terms of employment are orally communicated and explained.

Potential rising tensions due to the potential engagement with MoF staff not involved in the project

Workers will be familiarized with GM and will have the possibility to ask for clarifications or raise a grievance through the GM if they want to. Potential tensions or coordination challenges may arise among staff involved and not involved in Project activities, as well as among staff of the different institutions/entities participating in Project implementation, including the MoF and DGGDLRC. Such issues may relate, inter alia, to differences in roles and responsibilities, coordination arrangements, workloads or access to Project-related resources and support. These risks will be addressed through clear definition and communication of roles and responsibilities, coordination among the concerned entities, consultations, and access to the workers' GM.

GBV/Sexual Exploitation and Abuse (SEA):

The Project Code of Conduct (CoC), as included in the Project Grievance Mechanism (GM), includes provisions addressing appropriate conduct and the prevention of GBV and SEA/SH. The CoC commits all contracted workers to acceptable standards of behavior. All applicable workers will be required to sign the CoC prior to commencing work. The CoC will be developed before the workers are hired. The CoC will include sanctions for non-compliance, including non-compliance with specific policies related to GBV, SEA/SH (e.g., termination). The CoC will be written in plain and culturally appropriate language and signed by each worker to indicate that they have:

- Received a copy of the CoC as part of their contract;
- CoC has been explained to them as part of the induction process;
- Acknowledged that adherence to CoC is a mandatory condition of employment;
- Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

Induction trainings and refresher training will be provided for all workers on the purpose of the CoC and the importance of adhering to it. CoC is to be signed by all categories of recruited workers to acknowledge that all the terms thereof have been understood. Workers will be presented with details of grievance procedures, including the referral pathways in the event of SEA/SH related complaints. Project workers will also be made aware of the serious consequences in the event that the CoCs are violated, up to and including dismissal, or referral to legal authorities.

The risk of a weak functioning grievance mechanism

The GM may not be adequately and widely disseminated to reach all stakeholders and grievances and complaints raised by GM channels may remain unresolved. This risk may arise if workers are not sufficiently informed of the available GM channels or if grievances are not handled and resolved in accordance with the established procedures and timelines.

A Project GM has been prepared, disclosed and is operational. The GM includes dedicated procedures and channels through which Project workers can raise workplace-related concerns and grievances. The available GM channels and procedures will continue to be communicated to Project workers to ensure that they are aware of and can readily access the mechanism. Grievances will be registered, handled, monitored and resolved in accordance with the procedures and timelines established in the Project GM.

Further details on the GM system are described in section 10 and in the Project GM, which is publicly available at: https://www.finance.gov.lb/en-us/Finance/FiscalManagementProject/Pages/default.aspx.

General: Training and Capacity Building:

Training will be provided to all workers before the commencement of work on general OHS and SEA/SH prevention and CoC during induction and on a regular basis to ensure all workers are well capacitated with the project's requirements. The Environment and Social (E&S) Specialist will provide training to Direct Workers and Contracted Workers. The risk of a weak functioning grievance mechanism which has not been adequately and widely disseminated to reach all stakeholders and risk of unresolved complaints: This risk could be as a result of the lack or absence of a GM, or the presence of an inefficient and not properly designed GM for project workers. Training shall be delivered by experienced trainers/specialists, based on the competency requirements. Records of the training will be kept including training evaluation.

Training will include but will not be limited to:

- Awareness of the requirements of this LMP and associated plans/procedures;
- CoC, GBV, SH and SEA;
- Grievance mechanism, including roles, responsibilities and accountabilities, and contact persons/communication channels;
- Environmental & Social requirements including the Waste Management Plan (WMP) and OHS requirements and mitigation measures;

8. AGE OF EMPLOYMENT

This section sets out details regarding:

- The minimum age for employment on the project

- The process that will be followed to verify the age of project workers
- The procedure that will be followed if underage workers are found working on the project
- The procedure for conducting risk assessments for workers aged between the minimum age and 18

In Lebanon, the minimum age for employment is 13 years of age (LC, art. 22). Decree 8987 of 2012 forbids the employment of adolescents and children under 18 years of age in jobs that pose a risk to their health, safety and behavior. Those below the age of 13 are not allowed to work. Child labor is a significant issue in Lebanon and reported in construction and civil works (US DoL, 2019; AUB/MoL, 2019). After the age of 13, specific medical examinations that guarantee the medical fitness of the workers are required. Also, those below the age of 15 are prohibited from working in specific industrial and business projects that are burdensome or harmful to health. Those below sixteen are prohibited from work that is inherently dangerous or that poses a threat to life, health, or morals. Therefore, proper requirements and measures shall be implemented to ensure that the project will not employ any children under the age of 18. All workers will have written contracts compliant with the national labor law and receive pre-job briefing of their rights under the national law, including wages, pay, overtime, etc. The minimum age of employment in the project is 18 years of age.

Process of age verification:

In order to prevent engagement of under-aged labor, all contracts shall have contractual provisions to comply with the minimum age requirements. Appropriate records shall be maintained for all direct, and contracted workers including age information. Verification of the age shall be undertaken prior to the engagement of Project workers and be documented. Additionally, contracts with contracted workers shall include provisions about age verification. Those provisions are to be monitored and followed-up by the PCU E&S Specialist. As indicative age verification means, the birth date on official documents such as birth certificate, national ID or other credible records can be checked.

9. TERMS AND CONDITIONS

This section sets out the general terms and conditions of all workers hired under the Lebanese Labor law:

- Work can be carried out from the office or remotely;
- Schedule of work will be Monday to Friday from 9:00 a.m. till 5:00 p.m.;
- The employee will read the work contract prior to employment to get informed about the working conditions which will be as follows:
    - The remuneration for each post will be determined based on the candidate's experience and the Terms of Reference;
    - Full-time employees will be working for 5 days per week and 8 hours per day with a maximum number of 40 hours per week;
    - Flexible working arrangements;
    - Payment in USD or LBP will be made on monthly basis;
    - 15 days of yearly paid vacation will be provided;

- Public Holidays will be as per the Lebanese Labor Law;

The project will have Direct Workers and Contracted Workers. The Terms and Conditions for each of them are described below.

9.1 Terms and Conditions for Direct Workers

Maximum number of hours that can be worked on the project:

Working hours for Project workers shall be governed by their applicable employment or contractual arrangements and relevant Lebanese legislation. Government civil servants assigned to or supporting the Project will remain subject to their existing public-sector employment terms and conditions. For consultants directly engaged by MoF, the applicable working hours shall be specified in their respective contracts or Terms of Reference.

Provisions on termination:

Project workers will receive written notice of termination of employment and details of severance payments at least one month in advance. All wages that have been earned, social security benefits, pension contributions and any other entitlements will be paid on or before termination of the working relationship, either directly to the project workers or where appropriate, for the benefit of the project workers. For those groups covered by the Labor Code, severance pay is equal to one month per year of service, and half a month for those with less than one year of service.

Annual leave:

An employee is entitled to 15 days' annual leave on full pay after completing one year of employment. The employer may determine the timing of such annual leave based on work requirements.

Maternity leave:

Female employees covered by social insurance are entitled to 10 weeks of maternity leave at 100% pay.

Rest per week:

Employees must be granted a weekly rest which is not under 36 hours. Employees are also entitled to an unbroken rest of 9 hours every 24 hours, except in cases where work circumstances require otherwise. Where work exceeds 6 non-stop hours for men, and 5 non-stop hours for women, employees are entitled to a rest-time of at least 1 hour.

Sick leave, injuries, and death:

The employee is entitled to a sick leave based on a report from concerned medical authority. The Labor Code grants the employee the right to a yearly sick leave for sicknesses and accidents not related to the job, the duration of which is based on the employment duration, with a minimum of half a month on full pay and half a month on half pay.

9.2 Terms and Conditions for Contracted Workers

Contracted workers will mainly include consultants, individuals, and firms working under MOF, as well as contractors that will implement works, and their teams.

Specific wages:

Regarding wages, the provisions of the labor code as detailed in Section 4 will be implemented as a

minimum reference.

Maximum number of hours that can be worked on the project:

The project will commit to the provisions of the Labor Code and accordingly allow a maximum of 8 working hours per day or 48 hours per week.

Provisions on termination:

Workers will receive written notice of termination of employment and details of severance payments in a timely manner. All wages that have been earned, social security benefits, pension contributions and any other entitlements will be paid on or before termination of the working relationship directly to the project workers.

Annual leave:

An employee is entitled to 15 days' annual leave on full pay after completing one year of employment. The employer may determine the timing of such annual leave based on work requirements.

Maternity leave:

Female employees covered by social insurance are entitled to 10 weeks of maternity leave at 100% pay.

Rest per week:

Employees must be granted a weekly rest which is not under 36 hours. Employees are also entitled to an unbroken rest of 9 hours every 24 hours, except in cases where work circumstances require otherwise. Where work exceeds 6 non-stop hours for men, and 5 non-stop hours for women, employees are entitled to a rest-time of at least 1 hour.

Sick leave, injuries, and death:

The employee is entitled to a sick leave based on a report from concerned medical authority. The Labor Code grants the employee the right to a yearly sick leave for sicknesses and accidents not related to the job, the duration of which is based on the employment duration, with a minimum of half a month on full pay and half a month on half pay.

9.3 Terms and Conditions for Primary Supply Workers

This category of workers is not defined in the Lebanese Labor Law and falls under the category of contracted workers. Thus, it follows the same terms and conditions as contracted workers.

10. GRIEVANCE MECHANISM

A separate Project Grievance Mechanism (GM) has been developed, disclosed and is operational. The Project GM is publicly available on the Ministry of Finance website at: https://www.finance.gov.lb/en-us/Finance/FiscalManagementProject/Pages/default.aspx. It includes dedicated procedures and channels for Project workers and is available to all Direct and Contracted Workers to raise workplace-related concerns and grievances. Workers shall be informed of the available channels and procedures and shall be protected against retaliation for using the GM.

The PCU E&S Specialist serves as the Workers' GM Focal Point and is responsible for receiving and registering grievances and coordinating their review, follow-up and monitoring. The mechanism allows

grievances to be submitted anonymously and confidentially and includes specific procedures for handling SEA/SH-related grievances in a confidential and survivor-centered manner.

The institutional arrangements, submission channels, grievance handling procedures, applicable timeframes, escalation and appeal procedures, SEA/SH-specific arrangements, and monitoring and reporting requirements are set out in the separate Project GM and shall apply throughout Project implementation.

11. CONTRACTOR MANAGEMENT

The contractors will be selected based on both minimum technical specifications and financial offers. The technical specifications will ensure that applicable labor, working conditions and OHS requirements are included, proportionate to the nature and risks of the contracted activities, and consistent with ESS2, this LMP and the Project OHS Plan.

Requirements of ESS2 will be incorporated into contractual agreements with all contractors and sub-contractors and procedures will be put in place to manage and monitor the performance of contractors. The contractual agreements will include non-compliance remedies (i.e., sanction clause) for possible non-compliance with E&S provisions by the contractor. Contractors and subcontractors shall be responsible for compliance with the applicable labor and OHS requirements in relation to their workers, including requirements concerning terms and conditions of employment, non-discrimination, minimum age, OHS, the Code of Conduct and access to the Workers' GM. The PCU E&S Specialist shall monitor compliance with the applicable E&S requirements and follow up on any necessary corrective actions.

12. COMMUNITY WORKERS

There will be no community workers involved in the project.

13. PRIMARY SUPPLY WORKERS

Based on the current Project activities and procurement arrangements, no primary supply workers are anticipated, as no suppliers provide, on an ongoing basis, goods or materials directly to the Project that are essential for its core functions. Accordingly, the provisions of ESS2 relating specifically to primary supply workers are not currently applicable to the Project. This will be reassessed if the Project's procurement or supply arrangements change during implementation.

14. Annexes

Annex 1: Code of Conduct in Arabic
Annex 2: Code of Conduct in English

Annex 1 – Code of Conduct in Arabic

مدونة سلوك

Lebanon Fiscal Management Project (P181155)

مشروع الإدارة المالية في لبنا ن - الممول من البنك الدولي والمنفذ من قبل وزارة المالية – وحدة تنسيق المشروع

تعتبر مدونة السلوك هذه وثيقة أساسية لحماية جميع العاملين في مشروع الإدارة المالية، ولضمان بيئة عمل آمنة ومحترمة وخالية من جميع أشكال العنف أو التمييز أو التحرش أو الاستغلال أو الإساءة، وبما يتوافق مع القوانين اللبنانية ومعايير البنك الدولي، ولا سيما المعيار البيئي والاجتماعي ESS2.

1- الالتزام بالاحترام والآداب العامة

- الالتزام بمعاملة جميع العاملين وأصحاب المصلحة باحترام وكرامة بغض النظر عن الجنس أو العمر أو الدين أو الطائفة أو الأصل أو الإعاقة أو أي وضع آخر.
- احترام بيئة العمل والمكاتب والمعدات والأجهزة والأنظمة والممتلكات وعدم إساءة استخدامها.

2- عدم استعمال العنف بأي شكل من أشكاله

- الامتناع عن جميع أشكال العنف الجسدي أو النفسي أو اللفظي أو الاقتصادي.
- عدم استخدام التهديد أو الترهيب أو التنمر أو أي سلوك عدائي داخل بيئة العمل.

3- منع التحرش والاستغلال والاعتداء الجنسي(SEA/SH)

- حظر جميع أشكال التحرش الجنسي أو الاستغلال أو الاعتداء الجنسي أو أي سلوك غير لائق ذي طبيعة جنسية.
- الإبلاغ الفوري عن أي حادثة من خلال آلية الشكاوى الخاصة بالمشروع.
- احترام السرية وعدم اتخاذ أي إجراءات انتقامية بحق مقدمي الشكاوى.

4- الصحة والسلامة المهنية

- اتباع جميع تعليمات الصحة والسلامة المهنية واستخدام معدات الوقاية الشخصية عند الحاجة.
- الإبلاغ عن أي مخاطر أو حوادث أو ظروف عمل غير آمنة فوراً.

5- الإقرار

- أقر بأنني قرأت وفهمت هذه المدونة وتلقيت شرحاً حولها، وأتعهد بالالتزام بجميع أحكامها، وأدرك أن أي مخالفة قد تؤدي إلى اتخاذ إجراءات تأديبية أو تعاقدية وفقاً لإجراءات المشروع والقوانين النافذة.

اسم وتوقيع ممثل المشروع(PCU)	اسم وتوقيع مسؤول الموقع/المشرف	اسم وتوقيع العامل
التاريخ_____ :	التاريخ_____ :	التاريخ_____ :

Annex 2 – Code of Conduct in English

Lebanon Fiscal Management Project (P181155)

Funded by the World Bank

Implemented by the Ministry of Finance (MoF), through the Project Coordination Unit (PCU).

This Code of Conduct is a necessary document to protect all workers involved in in the Lebanon Fiscal Management Project (P181155) and to promote a safe, respectful, inclusive, and professional working environment free from discrimination, violence, harassment, sexual exploitation and abuse (SEA), and sexual harassment (SH), in accordance with Lebanese legislation, the World Bank Environmental and Social Framework (ESF), and Environmental and Social Standard 2 (ESS2).

1-Commitment to Respect and Public Decency	• Respect the dignity of both women and men, and youth, regardless of their religious, racial, or gender differences. • Respect the worksite, common work tools, cleanliness of the area, and not infringe on public property or interfere in the work of others.
2-No Use of Verbal or Physical Violence	• Gender-based violence: Any harmful act committed against a person's will, based on differences between males and females that are attributed to social reasons…. • Sexual violence: Rape, sexual assault, sexual harassment…. • Physical violence: Beating, slapping, repeated beating or using a tool…. • Emotional violence: Psychological exploitation and blackmail…. • Economic violence: Deprivation of resources, denial of access to work tools, failure to comply with the agreed-upon wages….
3-Harassment, Abuse, and Sexual Exploitation	Commit to refraining from any form of harassment, discrimination, intimidation, or sexual assault, including offensive comments related to sexual orientation, name- calling or using phrases with sexual connotations, staring in a sexually suggestive manner, unwanted touching, making inappropriate sexual gestures, sharing sexual stories or jokes, sending sexually suggestive messages in any form, and attempting or committing sexual assault, including rape

I, the undersigned, acknowledge that I have read, had it read to me, understood, and received the necessary clarification and training regarding the content of the Code of Conduct for the Lebanon Fiscal Management Project (P181155). I commit to adhering to the standards outlined above and acknowledge that any action violating this Code may result in disciplinary measures and could negatively affect the continuation of my work within the project.

Name & Signature Employee's Date	Name & Signature of Site Manager (Contractor) Date	Name & Signature of Supervisor (Consultant) Date

( ) The worker is literate and will disclose their name and signature.

( ) The worker is illiterate, and their name and signature will be disclosed by the Social Specialist