



ZAYTRO GLOBAL LTD

EMPOWERING COMMUNITIES WITH SUSTAINABLE ENERGY INNOVATION

Labour Management Plan and Policies

1.1 Policies

Labour Management Policy Statement – Zaytro Global Ltd

Zaytro Global Ltd is committed to managing labour and working conditions in a manner that protects workers' rights, promotes safe and healthy workplaces, and prevents exploitation and abuse. Labour management for Zaytro Global Ltd projects shall be governed by applicable national laws and regulations and, where relevant, by the requirements of international lenders and development partners, including:

- **World Bank Environmental and Social Standard 2 (ESS2): Labour and Working Conditions;**
- **International Labour Organisation (ILO) core conventions and principles;**
- **ISO 45001 Occupational Health and Safety Management Systems;** and
- the **Labour Act** and other relevant Nigerian regulations and guidance (and equivalent legal frameworks in any other country of operation).

The guiding policies for Zaytro Global Ltd include the following:

- **Non-discrimination and equal opportunity**
 - Zaytro Global Ltd shall provide equal opportunity for all workers and shall not discriminate in recruitment or employment on the basis of gender, disability, age, ethnicity, religion, nationality, marital status, sexuality, political affiliation, migration status, or any other protected characteristic.
- **Fair and transparent terms of employment**
 - Employment terms and conditions shall be clear, fair, and communicated in a manner workers can understand, consistent with applicable national requirements and prevailing standards.
- **Deployment of government personnel (where applicable)**
 - Where government staff are deployed to support project implementation, they shall receive formal deployment letters from their parent organisations outlining role, reporting line, and duration, where possible.
- **Safe and healthy working conditions**
 - Zaytro Global Ltd and its contractors/subcontractors shall provide safe and healthy working conditions, free of exploitation, and shall ensure the availability of standard welfare facilities appropriate to the worksite.
- **Hazard and risk assessment**
 - Employers shall undertake job hazard and risk assessments and implement effective measures to prevent harm.
- **Provision of tools and PPE**
 - Adequate tools, equipment, and appropriate personal protective equipment (PPE) shall be provided to workers at no cost to the worker where required for their role.
- **Occupational health and safety training**
 - Workers shall receive timely induction and ongoing training on OHS/HSE appropriate to their tasks and exposure risks.
- **Prohibition of child labour and forced labour**
 - Zaytro Global Ltd shall not employ or tolerate child labour or forced labour in any form, including bonded labour, trafficking, or compulsory labour.

- **Zero tolerance for SEA/SH/GBV**
 - Workplaces and project sites shall be free of Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), and Gender-Based Violence (GBV). Zaytro Global Ltd enforces a zero-tolerance policy.
- **Worker grievance mechanism**
 - A worker grievance redress mechanism shall be established at all levels, in consultation with relevant worker groups, to enable safe, confidential reporting and timely resolution.
- **Freedom of association and collective bargaining**
 - Workers shall have the right to associate freely and bargain collectively, consistent with national laws.
- **Contractor/supplier labour and OHS compliance**
 - Contractors and suppliers shall be required to maintain proper labour documentation and meet OHS requirements, including compliance with Code of Conduct obligations.
- **Fair and lawful termination**
 - Termination decisions shall be valid, reasonable, clear, and procedurally fair, without prejudice, and workers shall be informed of reasons and processes consistent with law and contract terms.
- **Continuous worker consultation and improvement**
 - Zaytro Global Ltd shall consult workers periodically on the effectiveness of these labour management procedures and implement improvements as needed.

1.2 Procedures

1.2.1 Non-Discrimination and Equal Opportunity

Employment of project workers shall be based on non-discrimination and equal opportunity. No worker shall be discriminated against in any aspect of the employment relationship, including recruitment, remuneration, working conditions, training access, promotion, discipline, or termination.

Zaytro Global Ltd and its contractors shall implement the following measures, monitored by the relevant E&S/OHS/HSE personnel:

- Recruitment processes shall be transparent and fair, and shall not exclude candidates on the basis of gender, disability, ethnicity, religion, nationality, sexuality, or other protected status.
- Job descriptions shall be prepared and communicated in advance, including required qualifications and skills.
- All workers shall have written contracts describing terms and conditions of work; these shall be explained to workers before signing.
- Employment terms shall be communicated in a language understandable to both parties.
- Where literacy or comprehension is a constraint, an oral explanation of key terms shall be provided, and the worker shall be given an opportunity to ask questions.

- Where government workers are deployed to a project management unit or similar structure, their deployment letters shall specify role/designation, reporting obligations, start date, end date (where possible), and entitlements.

1.2.2. Age of Employment and Child Labour

- Zaytro Global Ltd shall engage only individuals aged **18 years and above** for project activities.
- Contractors shall verify the identity and age of all workers through official documentation such as a birth certificate, national ID card, passport, or medical/school record.
- If any person under the minimum working age is identified on the project, the engagement shall be ended immediately and handled responsibly, prioritising the best interests and safety of the child, including referral to appropriate services where needed.

1.2.3. Terms and Conditions of Employment

- All workers shall receive clearly defined terms and conditions of employment prior to commencement of work.
- Terms shall comply with national labour laws and any applicable collective agreements.
- Contracts shall include, as a minimum: job title, supervisor, workplace location, working hours, wages, overtime, benefits, contract duration, leave entitlements, discipline procedures, rules and regulations, grievance mechanism, and termination procedures.
- Workers shall be paid regularly, on time, and in line with legal requirements.
- Wage deductions shall be permitted only as allowed by law and/or written contract, and workers shall be informed in advance of the basis for any deductions.
- Any material changes to terms and conditions shall be communicated promptly and documented.

1.2.4. Working Conditions and Welfare

Zaytro Global Ltd and its contractors shall provide facilities appropriate to the nature and location of work, including:

- access to potable drinking water, sanitation, hygiene facilities, and rest areas;
- appropriate arrangements for meals/canteens where relevant;
- fair and safe accommodation standards where worker camps are established.

Worker accommodation (where applicable):

Where worker camps or accommodation are provided, a camp management approach shall be implemented to ensure adequate safety, security, water and sanitation, waste management, and respectful community relations.

Inclusion and accessibility:

- Facilities, resources, and communications shall be accessible to workers with disabilities, including ramps, suitable access routes, and alternative communication formats where needed (e.g. large print or accessible digital formats).

Protection for pregnant workers:

- Pregnant workers shall be protected from discrimination, physical harm, and unfair dismissal, and shall receive maternity protections consistent with applicable laws.

Workplace ergonomics:

- Adequate lighting and safe workstation arrangements;
- supportive seating where required;
- good housekeeping practices;
- safe layout of electrical wiring and appliances;
- fire extinguishers and basic fire safety measures.

1.2.5. Occupational Health and Safety (OHS)

Zaytro Global Ltd and contractors shall implement OHS measures proportionate to project risks, including:

- conducting hazard identification and risk assessment for all job types;
- applying preventive and protective measures, including elimination, substitution, engineering controls, administrative controls, and PPE;
- providing adequate tools, first aid kits, PPE, and implementing work controls such as permit-to-work systems and standard operating procedures (SOPs);
- providing OHS/HSE induction and refresher training and maintaining training records;
- integrating OHS obligations into contractor contracts to make compliance mandatory;
- preparing emergency prevention, preparedness, and response plans, assigning responsibilities, training relevant persons, and testing and updating plans;
- establishing and maintaining an E&S and OHS management system aligned with legal requirements and lender standards.

Worker participation:

Workers shall be consulted on OHS matters and may participate through toolbox talks, worker representatives, or OHS committees. Where practicable, women's representation shall be encouraged to ensure measures address risks faced by female workers.

High-noise areas:

Workers exposed to high noise shall be provided with hearing protection such as earplugs or earmuffs.

Right to remove from danger:

Workers have the right to report unsafe conditions and to remove themselves from work situations presenting imminent and serious danger without retaliation.

Fatality and Serious Incident Handling

- Serious incidents (including fatalities) shall be reported internally immediately and escalated to relevant authorities and financiers as required by contractual obligations and lender standards.
- Where a World Bank-financed activity applies, severe incidents shall be notified to the Bank within **24–48 hours** using the applicable incident reporting template (e.g. ESIRT), followed by a detailed report within **15 days**.
- A root cause analysis shall be conducted and corrective actions implemented promptly.

- Relevant government authorities shall be informed as required by law.

1.2.6. Forced Labour

- Zaytro Global Ltd prohibits forced labour in all forms, including labour obtained through threat, penalty, coercion, abduction, fraud, deception, trafficking, debt bondage, or involuntary prison labour.
- Workers shall provide free and informed consent to the work they undertake.
- If forced labour is suspected or identified, immediate action shall be taken to protect affected workers, discontinue the practice, and report to relevant authorities/clients as appropriate, consistent with national law.

1.2.7. Labour Influx

Where project activities may result in labour influx, Zaytro Global Ltd and contractors shall mitigate associated environmental and social risks, including pressure on local services, communicable diseases, increased traffic incidents, social conflict, crime, and GBV/SEA risks.

Measures shall include:

- reserving non-technical roles, where feasible, for local workers and local entrepreneurs, verified through community leadership and transparent processes;
- early communication of recruitment opportunities during stakeholder engagement to reduce misinformation and perceptions of nepotism;
- where camps are required, implementing camp management measures covering security, waste management, water and sanitation, worker conduct, and demobilisation;
- enforcing worker Codes of Conduct governing behaviour in communities, respectful language, time restrictions where appropriate, and prohibitions on SEA/SH/GBV;
- ensuring contractors manage supply chains to avoid reducing local access to essential goods and prohibiting sourcing of local wildlife;
- ensuring a fully equipped first aid kit is available on site;
- mainstreaming HIV and communicable disease prevention through induction and ongoing toolbox talks;
- ensuring all workers know how to access the Workers' Grievance Mechanism.

1.2.8. Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), and Gender-Based Violence (GBV)

Zaytro Global Ltd enforces **zero tolerance** for SEA/SH/GBV. The following measures shall apply:

- All workers (including contractors and subcontractors) shall receive induction and refresher awareness training on SEA/SH/GBV risks, prohibited behaviour, and reporting channels.
- All contractors and workers shall sign and comply with the project Code of Conduct.
- Confidential reporting mechanisms shall be established and communicated to workers and communities, including referral pathways to survivor support services.

- Any applicable GBV Action Plan required by the client, financier, or the project shall be implemented, including supplier and subcontractor controls.
- All reports shall be handled using a survivor-centred approach, respecting confidentiality and applicable mandatory reporting requirements.

Approved by Management Committee

A handwritten signature in black ink, appearing to be the initials 'fm' followed by a horizontal line.

Dr Fauziya Ado Yakasai
Chief Executive Officer
Zaytro Global Ltd