

Esso Highlands Limited



Papua New Guinea LNG Project

**Environmental and Social Management Plan
Appendix 19: Labour and Worker Conditions
Management Plan**

PGGP-EH-SPENV-000018-023

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ACRONYMS

Acronym	Definition
CP	Contractor Plan
EMP	Environmental Management Plan(s)
ESMP	Environmental and Social Management Plan
ID	Identification
IFC	International Finance Corporation
ILO	International Labour Organization
Lanco	Landowner Companies
OIMS	Operations Integrity Management Plan
PNG	Papua New Guinea
PPE	Personal Protective Equipment
SEP	Stakeholder Engagement Plan
SSHE	Safety, Security, Social, Health and Environment
UN	United Nations

KEY DEFINITIONS

Contractor Plan: A Plan to be prepared by Contractor. To be used by Contractor to describe how the mitigation measures outlined in this Plan will be implemented.

Lanco: A company registered in PNG that is typically owned by the people of the same clan, or of clan origin, who use and/or have title to land in a specific geographic area. It may also include a representative Lanco which is a Lanco or a group of Lancos under a single agreement that operates within the boundary of a specific Project Area, as identified in Appendix 22-1 to the Coordination Procedure or as subsequently identified by the Company.

Notification (refer Table 1): An action arising out of monitoring that is expected of Contractor when the Company needs to be notified immediately of a specific event or situation.

Trainee: individuals selected to attend Company training centres (Pomtech & Juni).

Verification (refer Table 1): The primary method of monitoring expected of Contractor to a) confirm that relevant mitigation measures have been applied and b) that the measure has been effective. Contractor will be responsible for developing appropriate verification methods and systems.

Worker: Individuals employed by the Company, Contractor, the Lanco or its sub-contractors.

1.0 OBJECTIVES

Esso Highlands Limited (Company) has developed this Labour and Worker Conditions Management Plan as part of its Environmental and Social Management Plan (ESMP) outlining a range of mitigation measures designed to avoid or reduce undesired labour and worker condition impacts during construction. This document establishes a basis and template for use by the Contractor to develop their own plans outlining not only mitigation measures but to also incorporate the roles and responsibilities described in the ESMP.

The objectives of the Labour and Worker Conditions Management Plan are:

- Maximise work opportunities of PNG citizens during construction of the Project;
- Recruit workers in accordance with the geographic priorities determined by the Project and in particular, give first priority for employment to PNG citizens originating from within the Project Impact Area;
- Implement an equitable and transparent recruitment process;
- Provide fair terms and conditions of employment and comply with relevant laws; and
- Enhance PNG citizens' skills base through training provided during employment.

This Plan is to be read in conjunction with other environmental and social management plans (EMPs and SMPs). Figure 1 outlines the relationship between EMPs and SMPs.

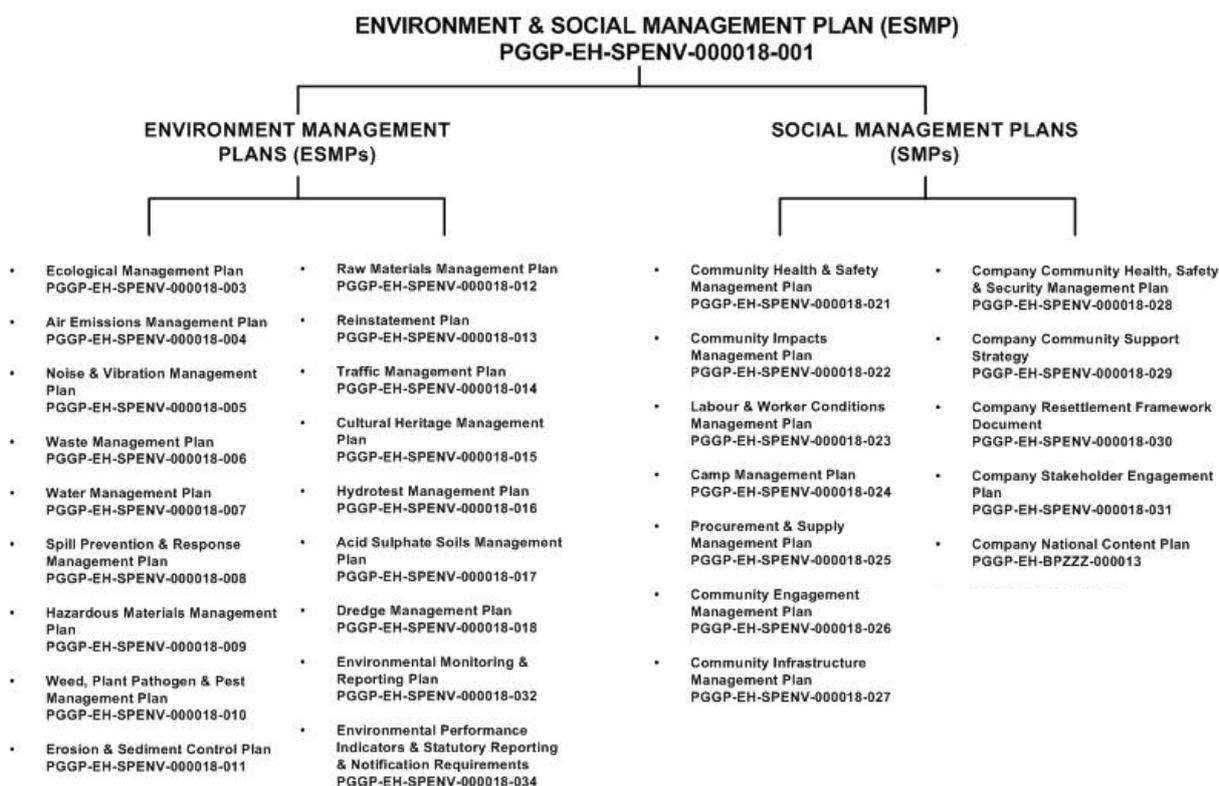


Figure 1: Environment and Social Management Framework

This Plan should also be read in conjunction with the following documents¹:

- Minimum Health Requirements for Project Execution (PG-PDS 71-99-03);

¹ These documents are also for use in managing Contractor obligations and Company may vary these to suit the needs of Company.

- Project Emergency Response Plan (PGGP-EH-SPSAF-000025); and
- Project Security Management Plan (PGGP-EH-SPSEC-000003).

2.0 LEGAL AND OTHER REQUIREMENTS

Legal and other requirements applicable to this Plan are identified in Attachment 1.

3.0 SURVEYS

No surveys are specifically required to be carried out by the Project in relation to implementation of this Plan.

Prior to the employment of workers, Contractor will agree with Company on the following checklist:

- National Workforce Development Plan;
- Location of recruitment points;
- Recruitment Procedure;
- Template Contracts of Employment;
- Human Resources Policy;
- Disciplinary Procedure;
- Retrenchment Procedure;
- Worker Grievance Procedure; and
- Non-discrimination / Equal-Employment Opportunity Policy.

4.0 MANAGEMENT AND MONITORING

Figure 2 presents a flow chart summarising key management steps associated with implementation and review of this Plan, including steps to allow for continued improvement.

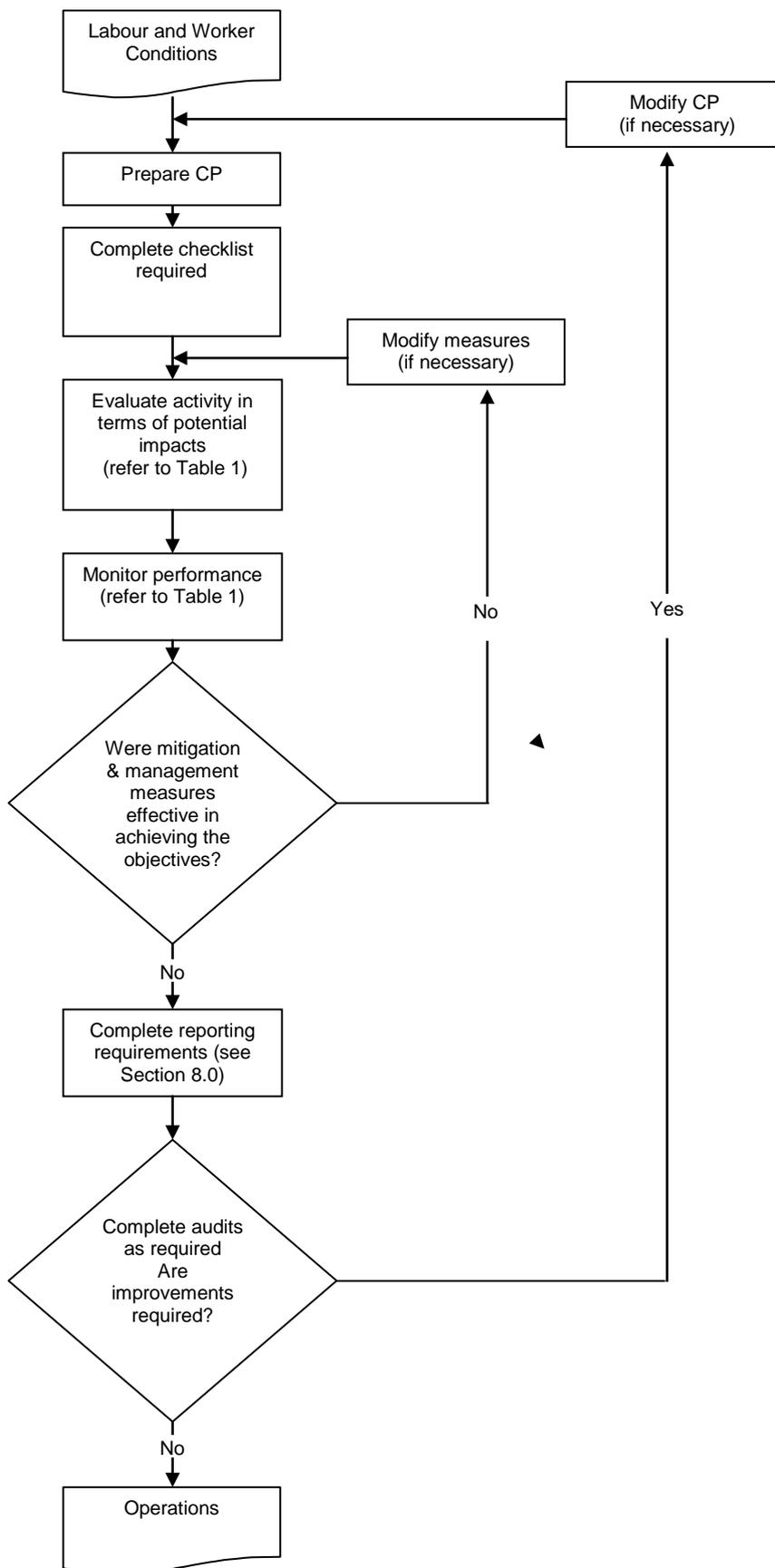


Figure 2: Labour and Worker Conditions Process

Table 1 presents a summary of the potential impacts related to labour and worker conditions, together with mitigation and management measures to avoid or reduce associated impacts, and the monitoring required to determine the performance of these measures.

The Contractor shall develop a Contractor Plan which shall, as a minimum, incorporate the labour and worker conditions measures described in Table 1. The Contractor shall not be limited to these measures.

Monitoring to be undertaken as part of this Plan is described in Table 1. Contractor is responsible for developing area or site-specific procedures for the monitoring program (where necessary) based upon the final design details of the infrastructure.

Table 1: Management and Monitoring

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Mitigation and Management (Design Feature/Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
Sub-contractors Workers	Sub-contractor workers that are dissatisfied with their labour and worker conditions could negatively impact the Contractor's performance and success of the Project. (Objective 4)	Contractor shall ensure Sub-contractors (including Lancos) working on Project sites, comply with the management and mitigation measures outlined in this Plan.	23.001	Verification	Ongoing	Contractor
Employment & Training Opportunities	There will be substantial employment and training opportunities during the construction phase of the Project . This will have a positive impact on workers, their families and communities. However the scale and distribution of this positive impact will depend on the geographical spread of employment and the period of employment. The recruitment process will therefore largely determine this impact. (Objectives 1 & 2)	Contractor shall maximise the employment of PNG citizens in all job categories where appropriate and in accordance with PNG law.	23.002	Verification	Ongoing	Contractor and/or Company
		Contractor shall submit a National Workforce Development Plan for Company review and agreement. This plan shall include but not be limited to histograms of the monthly planned number of workers and trainees for the duration of the work broken down by: <ul style="list-style-type: none"> • Occupation (as identified in PNG Work Permit Guideline); • Geographic area; • PNG citizens versus non-PNG citizens; and • Major Sub-contractors where applicable. 	23.003	Reporting	Prior to recruitment of workers and Monthly	Contractor
		Contractor shall select workers in accordance with the geographic priorities determined by Company, which are as follows: <ol style="list-style-type: none"> 1st: PNG citizens originating from within the Lanco area; 2nd: PNG citizens from the overall Project Impact Area; 3rd: PNG citizens from the 4 impacted provinces and the National Capital District; 4th: PNG citizens from elsewhere in PNG; and 5th: Non-PNG citizens– only for positions open to foreigners. 	23.004	Verification	Ongoing	Contractor and/or Company

Source of Impact	Potential Impact and Relevant Management Plan Objective [†]	Mitigation and Management (Design Feature/Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
Recruitment Process	When employment and training opportunities are available there is the potential for undue influence and/or bias in the recruitment process. This can lead to an unfair distribution of employment opportunities and resentment among local communities. (Objectives 2 & 3)	Contractor (in conjunction with Lanco) shall advise the Company the location of recruitment points. Recruitment will take place at these locations only. Contractor shall take safety and accessibility for applicants into account when determining the location of these recruitment points.	23.005	Verification	Prior to recruitment of workers	Contractor
		The Project (in conjunction with Lanco) shall ensure a Recruitment Procedure is established that is transparent and open to all regardless of race, political opinion, colour, creed or sex. The recruitment procedure shall take into account social and cultural sensitivities e.g. clan relationships in PNG. This procedure is subject to Company review and agreement.	23.006	Approval	Prior to recruitment of workers	Contractor and/or Company
		The Project shall recruit trainees using the same open and transparent Recruitment Procedure as workers.	23.007	Verification	Ongoing	Contractor and/or Company
		The Project workers' recruitment shall involve pre-screening and where appropriate, testing and interviewing of applicants. Where appropriate, Contractor shall provide capacity building to Lancos to manage this recruitment process.	23.008	Verification	Ongoing	Contractor and/or Company
Medical Testing	There is potential for frustration if applicants are unsuccessful in the recruitment process as a result of a failed medical test. (Objective 3)	If applicants reach the medical testing stage, the Project shall highlight to applicants the reason for such testing (i.e. important for applicants' own health and safety). Refer to hiring practices and fitness for duty exams in the Community Health & Safety Management Plan for mitigation measures and the Minimum Health Requirements for Project Execution.	23.009	Verification	Ongoing	Contractor and/or Company
Managing Employment Expectations	Given the high levels of local unemployment, the number of PNG citizens applying for unskilled jobs is likely to be greater than the number of jobs available. As a result the potential	The Project shall develop and implement a public awareness program to communicate employment and training opportunities. This procedure is subject to Company review and agreement.	23.010	Verification	Prior to recruitment of workers	Contractor and/or Company

Source of Impact	Potential Impact and Relevant Management Plan Objective [†]	Mitigation and Management (Design Feature/Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
	for resentment is likely amongst unsuccessful applicants and in communities where none or very few workers are employed by the Project. The levels of resentment will depend on the final distribution of positions and how well the expectations of applicants are managed. (Objective 1)	Prior to recruitment, Project shall use appropriate methods to communicate to communities in the Project Impact Area. At a minimum Project shall communicate: <ul style="list-style-type: none"> • The location of recruitment points; • The recruitment procedure; and • Sufficiently specific job descriptions By doing this, potential applicants will be made aware that a consistent recruitment process will be used involving pre-screening and where appropriate testing and interviewing. Accordingly, wholly unsuitable applicants who do not have the skills required by the job description are less likely to apply for jobs and then be rejected.	23.011	Verification	Prior to recruitment of workers	Contractor and/or Company
		The Company and Contractor shall participate in periodic meetings with the PNG Government and present National Workforce Development plans and results.	23.012	Verification	Ongoing	Contractor and Company
		Contractor shall provide the Company with monthly reports on national workforce employment and national workforce training.	23.013	Reporting	Monthly	Contractor

Source of Impact	Potential Impact and Relevant Management Plan Objective [†]	Mitigation and Management (Design Feature/Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
	Contractor may be constrained in its ability to employ PNG citizen workers by the availability of appropriate skills. There is potential for resentment if communities perceive expatriates are being employed to perform jobs that could be filled by PNG citizens. PNG has a history of conflict between foreign and local workers, sometimes resulting in violent clashes. (Objective 1)	Contractor shall follow PNG law which reserves some occupations for PNG citizens and requires employers to advertise other positions in PNG, before filling them with expatriates. If Contractor is unable to locate enough PNG citizens to fulfil those occupations reserved for PNG citizens, then Contractor shall consult with the Company and seek an exemption from the Government. At a minimum Contractor shall effectively communicate this to its workforce to avoid resentment. In addition, Project must ensure that adequate measures are in place to ensure the safety and security of foreign workers, including but not limited to: <ul style="list-style-type: none"> • Transparent recruitment in accordance with PNG law as outlined above; • Worker codes of conduct; • Attention to work team composition and worker accommodation layouts; and • Security and evacuation arrangements for workers in the event of violent conflict in accordance with the Project Emergency Response Plan and the Project Security Management Plan. 	23.014	Verification	Ongoing	Contractor and/or Company
	There is potential for frustration if communities are unable to raise complaints/ concerns about employment opportunities and the recruitment process. (Objective 3)	Contractor shall refer to the Community Grievance Procedure in the Company Stakeholder Engagement Plan (SEP) for management of these complaints/ concerns. Once employment has commenced, any complaints/ concerns shall be managed through the Worker Grievance Procedure (referred to below).	23.015	Verification	Ongoing	Contractor
Pay & Conditions	The pay and conditions of work (e.g., hours of work, overtime, wages, leave entitlements etc.) will have an important effect on the quality of life of workers. (Objective 4)	Contractor shall ensure all workers receive written contracts of employment that contain terms required by PNG law and are paid at least the minimum wage as defined in PNG law. The Template Contracts of Employment are subject to Company review and agreement.	23.016	Approval	Prior to recruitment of workers	Contractor and/or Company

Source of Impact	Potential Impact and Relevant Management Plan Objective [†]	Mitigation and Management (Design Feature/Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
		Contractor shall establish a Human Resources Policy that complies with all relevant laws including national employment laws and core International Labour Organisation (ILO) conventions covering: <ul style="list-style-type: none"> • Forced Labour • Freedom of Association and Right to Organise • Right to Organise & Collective Bargaining • Discrimination (Employment & Occupation) • Equal Remuneration • Minimum Age The Human Resources Policy is subject to Company review and agreement.	23.017	Approval	Prior to recruitment of workers	Contractor and/or Company
Different terms and conditions between workers performing the same job	There is potential for resentment if PNG citizens working for one contractor perceive that PNG citizens working for another contractor are receiving better pay or conditions for the same job. (Objective 4)	The Company has provided Contractors with indicative wage rates.	23.018	Verification	Ongoing	Contractor
		The Project must be aware of the potential impact of driving up rates.	23.019	Verification	Ongoing	Contractor and/or Company
Different working and living conditions for workers	There is potential for resentment if working (eg rotation schedules) and living conditions (eg canteens) of other country nationals are of a lesser standard than expatriates. (Objective 4)	The Project must be aware of this potential impact and manage it in an open and transparent manner. Refer also to worker welfare in the Camp Management Plan.	23.020	Verification	Ongoing	Contractor and/or Company
Worker Welfare & Living Conditions	Worker productivity may be negatively impacted by dissatisfaction with camp living conditions. (Objective 4)	Refer to worker welfare and living conditions in the Camp Management Plan.	23.021	Verification	Ongoing	Contractor and/or Company
Travel	There is potential for misunderstanding over travel entitlements. (Objective 4)	The Project shall explain to workers prior to employment whether travel time is paid for and what travel if any is provided (e.g. to and from work and on completion of rotations).	23.022	Verification	Prior to recruitment of workers	Contractor and/or Company

Source of Impact	Potential Impact and Relevant Management Plan Objective [†]	Mitigation and Management (Design Feature/Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
Disciplinary Action	There is potential for resentment, if workers of one Contractor perceive that workers of another Contractor are treated differently on disciplinary matters. (Objective 4)	The Project shall establish a Disciplinary Procedure which outlines the process for disciplining workers up to and including termination and what may constitute gross misconduct. The procedure shall be unbiased in its application to PNG and expatriate workers. This procedure is subject to Company review and agreement.	23.023	Approval	Prior to recruitment of workers	Contractor and/or Company
Retrenchment	When demobilisation commences there is the potential for undue influence and/or bias in the retrenchment process. This can lead to an unfair distribution in loss of jobs and resentment among local communities. (Objective 4)	The Project shall establish a Retrenchment Procedure based on the principle of non-discrimination and PNG law. This procedure is subject to Company review. In addition, Contractor may issue all retrenched workers with statements of service on termination of their employment.	23.024	Approval	Prior to recruitment of workers	Contractor and/or Company
Worker Grievances	There is potential for frustration and resentment, if workers are unable to raise complaints/ concerns about work activities and conditions and to have them dealt with in an appropriate manner. (Objective 4)	The Project shall establish a Worker Grievance Procedure so workplace grievances can be raised without fear of retribution.	23.025	Approval	Prior to recruitment of workers	Contractor and/or Company
Non-Discrimination and Equal Employment Opportunity	Women and minority groups may be discriminated against in the recruitment process and during employment. (Objective 4)	Contractor shall establish an Equal Employment Opportunity Policy. This policy is subject to Company review and agreement.	23.026	Approval	Prior to recruitment of workers	Contractor and/or Company

Source of Impact	Potential Impact and Relevant Management Plan Objective [†]	Mitigation and Management (Design Feature/Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
In-Migration	Experience shows that in developing countries it is likely people will be attracted to areas around construction activities seeking employment. This in-migration could cause tension with local communities, and lead to the establishment of informal settlements in the vicinity of the Project area. In addition demand for public services and resources will increase, as will the potential for the spread of diseases and illegal activities including use of drugs. (Objective 2)	<p>The Project shall discourage in-migration of persons in search of employment opportunities. As a minimum:</p> <ul style="list-style-type: none"> • Implement and publicise the recruitment procedure which gives preference to local applicants; • Recruit through Lancos who know all the persons living in their local area; • Communicate to the community the recruitment procedure which requires applicant's place of origin to be identified; • Communicate to the community sufficiently specific job descriptions so those without the necessary skills are less likely to apply; and • Actively assess, via monitoring or other means, in-migration to determine extent and relationships with workforce. If a positive relationship is evident, review hiring arrangements (e.g., worker rotations) or other measures that may act as disincentives to worker families who might otherwise move to the work location. <p>For further mitigation measures refer to in-migration in the Camp Management Plan and Procurement and Supply Management Plan.</p>	23.027	Verification	Prior to recruitment of workers	Contractor and/or Company
Skills Training	There will be a positive impact on local skills through the training received and experience gained by workers. The scale of the impact will depend upon the quality of the training programme, the work experience, and the individuals themselves. (Objective 5)	EPC 3 and EPC 4 Contractors shall assume responsibility for operation of training centres at Pomtech and Juni respectively to produce trained PNG citizen workers. Contractors shall return training facilities in good condition to Company upon completion of Work. All other Contractors shall be responsible for their own training to meet job qualification standards.	23.028	Verification	Ongoing	Contractor

Source of Impact	Potential Impact and Relevant Management Plan Objective [†]	Mitigation and Management (Design Feature/Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
		Contractor shall provide compulsory induction and refresher training so that all recruits have the necessary understanding and knowledge levels for each job, in particular with regard to applicable SSHE issues.	23.029	Verification	Ongoing	Contractor
		Contractor shall establish and maintain a database with the details of all PNG and expatriate workers and the level of training provided.	23.030	Verification	Ongoing	Contractor and/or Company
Health and Safety	There is likely to be concern if workers believe they are not provided a safe and healthy workplace. (Objective 4)	Contractor shall provide workers with a safe and healthy work environment, taking into account inherent risks in its particular workplace. Contractor shall take steps to prevent accidents, injury, and disease arising from, associated with, or occurring in the course of work by minimising, so far as reasonably practicable, the causes of hazards. Contractor shall comply with relevant project Safety and Health Plans.	23.031	Verification	Ongoing	Contractor and/or Company
		Contractor shall meet or exceed the Company requirements in relation to drug and alcohol testing of workers. Contractor shall refer to the Company Alcohol and Drug Policy.	23.032	Verification	Ongoing	Contractor and/or Company
Code of Conduct	There is potential for conflict if workers behave inappropriately in their relations with the community and other workers. (Objectives 4 & 5)	Company shall establish a Project- wide Code of Conduct, in conjunction with Contractor. The Code of Conduct will outline worker behaviour and interaction with the community. Contractor shall require workers to sign that they understand and accept the Code of Conduct during compulsory induction.	23.033	Verification	Ongoing	Contractor and/or Company
		Contractor shall conduct compulsory induction training (and regular refresher training) which covers at a minimum cultural awareness and anti-discrimination. The content of the induction training is subject to Company review and approval.	23.034	Verification	Ongoing	Contractor and/or Company

[†] See Section 1.2

5.0 ROLES AND RESPONSIBILITIES

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

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

Project shall ensure sufficient resources are allocated on an ongoing basis to achieve effective implementation of Company's responsibilities in the Labour and Worker Conditions Management Plan.

6.0 TRAINING, AWARENESS AND COMPETENCY

Contractor shall ensure that all personnel responsible for the execution of the tasks and requirements contained within this 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.

Contractor's training activity associated with the Contractor Plan shall be appropriately documented by means of a training needs assessment, training matrix/plan and records of training undertaken.

Project shall ensure that personnel responsible for the execution of tasks and requirements in the Labour and Worker Conditions Management Plan are competent on the basis of education, training and experience.

Project training activity associated with the Labour and Worker Conditions Management Plan shall be appropriately documented by means of a training needs assessment, training matrix/plan and records of training undertaken.

7.0 PERFORMANCE INDICATORS

Table 2 outlines the indicators for measuring and verifying performance in relation to labour and worker conditions. However Contractor may, subject to agreement with Company, modify or add to these indicators to enhance the Contractor's Contractor Plan based on lessons from the performance indicators.

Table 2: Performance Indicators

ID #	Performance Indicator	Measurement	Internal Assessment Frequency *	Relevant Management Plan Objective†
1	Local recruitment.	% of PNG workers from the Lanco areas (of total PNG workforce).	Monthly	1
2	Recruitment of PNG citizens.	% of PNG citizens employed (of total workforce).	Monthly	2
3	Timely resolution of worker grievances.	% of worker grievances resolved (from the Project perspective) with 30 days.	Monthly	3 & 4
4	Training completed.	% of workers who have received worksite induction training (of total workforce).	Monthly	5

* Frequency is determined by the Company and may vary subject to Contractor's performance

† See Section 1.0.

8.0 REPORTING AND NOTIFICATION

Contractor shall submit to Company a monthly report addressing the performance indicators. (See Table 2).

In accordance with the National Content Co-Ordination Procedure, Contractor will conduct National Workforce Development Reporting. In addition, Contractor shall provide Company with monthly reports containing at least the following information:

- List of all worker grievances lodged, how they were resolved and/or status;
- Breaches of discipline and action taken;
- Lost hours due to industrial action; and
- Grounds for termination, resignation, disciplinary action and retrenchment.

Other reporting or notifications required as part of the implementation of the Plan are summarised in Table 1.

ATTACHMENT 1

LEGAL AND OTHER REQUIREMENTS

Contractor shall comply with applicable Papua New Guinea (PNG) Laws and Regulations, applicable International Finance Institution requirements and applicable International Treaties and Conventions. In addition, Contractor shall comply with certain other requirements defined by the Company.

The following requirements form the basis of this Plan, however Contractor should not rely upon them as an exhaustive list of legal and other requirements.

PNG Laws & Regulations

PNG laws relevant to labour and working conditions include:

- The PNG Constitution;
- Child Welfare Act 1961;
- Discriminatory Practices Act 1963;
- Employment Act 1978;
- Employment of Non-Citizens Act 1978;
- HIV/AIDS Management and Prevention Act 2003;
- Industrial Organisations Act 1962;
- Industrial Relations Act 1962;
- Industrial Safety, Health and Welfare Act 1961; and
- Workers Compensation Act 1978.

International Treaties and Conventions¹

Typically, international conventions and treaties mandate actions that the signatory countries must undertake and they do not require direct action by private companies, however some treaties and conventions may require direct action by private companies.

Project will follow:

- UN Covenant on Economic, Social and Cultural Rights;
- UN Covenant on Civil and Political Rights;
- UN Convention on the Elimination of All Forms of Discrimination against Women;
- UN Convention on the Elimination of All Forms of Racial Discrimination;
- UN Convention on the Rights of the Child; and
- Core ILO Conventions:
 - Forced Labour (C29, 1970 & C105, 1957);
 - Freedom of Association and Right to Organise (C87, 1948);
 - Right to Organise & Collective Bargaining (C98, 1949);
 - Discrimination (Employment & Occupation) (C111, 1958);
 - Equal Re-numeration (C100, 1951); and
 - Child Labour & Minimum Age (C 182, 1999 & C138, 1973).

¹ This list of International Treaties and Conventions is subject to legal review and may be amended following this legal review.

International Finance Institution Requirements

International Finance Corporation (IFC) Performance Standard 2 covers labour and working conditions and its objectives are to:

- Establish, maintain and improve the worker-management relationship;
- Promote the fair treatment, non-discrimination and equal opportunity of workers;
- Promote compliance with national labour and employment laws;
- Protect the workforce by addressing child labour and forced labour; and
- Promote safe and health working conditions and to protect and promote the health of worker.

Other Requirements

Company will follow Company's Operations Integrity Management System (OIMS). The following OIMS element applies to labour and worker conditions:

Element 5: Personnel & Training

5.1 A process is in place for screening, selection, placement and ongoing assessment of the qualifications and abilities of employees to meet specified job requirements.

5.2 Criteria are in place to ensure that necessary levels of individual and collective experience and knowledge are maintained and are carefully considered when personnel changes are made.

5.3 Initial, ongoing and periodic refresher training is provided to meet job and legal requirements and to ensure understanding of the proper protective measures to mitigate potential Operations Integrity hazards.

- A process for the management of personnel safety, including security-related considerations, is in place; and
- A process for the management of occupational health is in place.

Company will also follow the Employment Policies in the Standards of Business Conduct and be managed consistent with the Company's Statement of Labour in the Workplace. *"The Company's Standards of Business Conduct provide a worldwide framework for responsible operations and are consistent with the spirit and intent of the Fundamental Principles and Rights at Work of the 1998 ILO Declaration. The ILO Declaration sets an obligation on Member States to promote and realise the following principles:*

- *Freedom of Association and effective recognition of the right to collective bargaining;*
- *Elimination of all forms of forced or compulsory labour;*
- *Effective abolition of child labour; and*
- *Elimination of discrimination in respect of employment and occupation."*

International standards that will be followed by Project, relevant to labour and worker conditions include:

- Fundamental Principles and Rights at Work of the 1998 ILO Declaration; and
- UN Global Compact.²

² Company supports the ideals of the United Nations Global Compact in the areas of human rights, labour standards, the environment, and anti-corruption. While Company is not a signatory of the Global Compact, those basic values are embedded in Standards of Business Conduct, which govern its operations around the world.