




**PT PLN (PERSERO)**  
**ENERGY TRANSITION AND SUSTAINABILITY DIVISION**

**Labor and Working Condition**  
**MANAGEMENT GUIDELINE**

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LABOR AND WORKING CONDITION  
MANAGEMENT GUIDELINE

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## 1 Introduction

PLN is committed to promote a sound worker-management relationship, enhance welfare of its workers including those hired by the third party for PLN's projects or in the supply chain, and provide safe and healthy working conditions for all project workers. This document is developed to guide PLN to take management measure on labour and working conditions, that will apply differently for each category of project worker subject to their employment relationship with PLN. This guideline will ensure that relevant risks and impacts to labour and working conditions are managed proportionately and consistently with the environmental and social (E&S) principles described in the ESMS Manual, Indonesia legislation and regulations, PLN relevant E&S requirements, Good International Industry Practice (GIIP) and requirements of international financial institutions (IFI), including the World Bank's ESS2 (Environmental and Social Standard 2) and relevant WBG's Environmental Health and Safety (EHS) Guideline requirements. Some references used in this document are provided in **Chapter 8**. This document covers guideline to manage risk/impact related to Occupational Health and Safety (OHS) aspects in PLN's project activities. Elements of OHS risk/impact management are embedded in various sections of this document (respective to applicable stages in the generic process flow of the ESMS) along with other general aspects of Labour and Working Conditions. Certain OHS-related elements applicable for general Labour and Working Condition aspects, such as the corporate-level Emergency Preparedness and Response Plan, are provided in this document as a stand-alone section.

## 2 Disclaimer

This management guideline should not be taken as a standard, regulation, or manual, and it is not described to a detailed level of a work instruction. In settings where a more relevant or updated standard, regulation, manual, procedure, or framework is available, and demands for revision of this management guideline, then such revision is permitted. If any revision is made; references, rationales and amended parts should be clearly defined.

To be able to serve its purpose, this management guideline should be reviewed, implemented, and/or enforced by and to PLN staff with relevant authorities and competencies specified in the **Chapter 3 of the ESMS Manual**. Any changes to this management guideline may potentially trigger the need to revise the associated procedures and other guidelines that are relevant this guideline (e.g., Community Health, Safety, and Security Management Guideline, Stakeholder Engagement Management Guideline, etc.). Any update, deviation, or suggestion upon implementation of this guideline should be in alignment with the Management of Change (**Chapter 9 of the ESMS Manual**).

## 3 Legal and Other Requirements for Labour and Working Conditions

### 3.1 Indonesia Regulation

Indonesia legislative framework regarding labour and working conditions is governed by the principal legislation of Law 13/2003 on Employment, which has been modified several times by decisions of the Constitutional Court and was last amended by the Government Regulation in Lieu of Law 2/2022 on Job Creation and Law 6/2023. The Employment Law provides the requirements relating to labour terms and conditions, workers' protection of welfare, health and safety, fair treatment, non-discrimination, and equal opportunity, arrangement for workers

with disability, female workers and child workers, work handover to other company through work contracting agreement or provision of worker/labour services, labour union and collective working agreement, etc.

The other relevant laws and regulations that provide requirements for labour and working conditions, include (see also **Chapter 8** for the complete list of reference):

- Law 1/1970 that is the overarching law for the implementation of work safety;
- Law 4/1979 that provide requirements regarding children rights, regardless of gender, religion, political stance and social position, aimed to ensure the fulfillment of children's basic needs;
- Law 7/1984 that defines principles of human rights for women, norms and standards of obligations, and the responsibility of the state in eliminating discrimination against women;
- Law 21/2000 that provides requirement for labour union that aims to provide protection, defense to rights and interest as well as improving the welfare that is appropriate for the workers/unions and their respective families;
- Law 19/2011 that regulates requirement for protection, respect, and rights of people with disabilities;
- Government Regulation (GR) 50/2012 for the implementation of OHS management systems;
- GR 35/2021 that regulates on employment arrangement for a specified period of time, outsourcing, working time and rest time and termination of employment;
- Ministry of Manpower, or formerly known as Ministry of Manpower and Transmigration, (MOM) Regulations, Decrees and Circulars such as (1) MOM Regulation 3/1998 on Procedures to Report and Investigate Accidents, (2) MOM Regulation 5/2018 on Occupational Health and Safety in a Workplace Environment, (3) MOM Regulation 1/1980 on Occupational Health and Safety in the Construction of Buildings, (4) MOM Decree 224/2003 on Employer's Duties to Female Employees Working Between 11 pm and 7 am, (5) MOM Decree 235/2003 on the Types of Work that Jeopardize the Health, Safety and Moral of Children, (6) MOM Circulars 4/1988 on Implementation of Prohibition of Discrimination Towards Female Employees, (7) MOM Circulars 4/1996 on Prohibition on Discrimination Towards Female Employees in Company Regulations or Collective Labour Agreement;
- ILO conventions ratification: (1) Law 19/1999 (Convention 105) on Abolition of Forced Labour, (2) Law 20/1999 (Convention 138) on Minimum Age for Admission to Employment, (3) Law 21/1999 (Convention 111) on Discrimination and Respect of Employment and Occupation, (4) Law 1/2000 (Convention 182) on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, (5) Law 18/1956 (Convention 98) on the Right to Organize and Collective Bargaining, (6) Law 21/2003 (Convention 81) on Labour Inspection in Industry and Commerce, (7) President Decree 83/1998 (Convention 87) on Freedom of Association and Protection of the Right to Organize, (8) President Decree 34/2014 (Convention 187) on Promotional Framework for OHS.

### 3.2 World Bank Requirements

The World Bank ESS2 requirements on Labour and Working Conditions recognize the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. PLN (as the Borrower) can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

The objectives of ESS2 are to:

- Promote safety and health at work.
- Promote the fair treatment, nondiscrimination and equal opportunity of project workers including vulnerable workers such as women, persons with disabilities, children and migrant workers, contracted workers, community workers and primary supply workers.
- Protect workers hired for PLN's project or activities, including those hired by the third party for PLN's own projects or in the supply chain.
- Prevent the use of all forms of forced labour and child labour
- Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- Provide project workers with accessible means to raise workplace concerns.

The applicability of the ESS2 requirements is established during the environmental and social assessment, the scope of application depends on the type of employment relationship between PLN and the project workers that refers to the description in the following **Table 1**.

**Table 1 Category, Definition and Requirement of Workers According to ESS2**

Workers Category	Definition	Summary of ESS2 Requirements	Example of Workers within PLN
Direct Workers	<p>People directly employed or engaged by PLN to work specifically in relation to the project, in which PLN have a direct employment relationship and specific control over the work, working conditions, and treatment.</p> <p>Direct workers are paid directly by PLN, and subject to the PLN day-to-day instruction and control.</p>	<p>For Direct Workers:</p> <ul style="list-style-type: none"> <li>• Development and implementation of a written labour management procedures (LMPs);</li> <li>• Clear and understandable information and documentation on terms and conditions of employment that is provided at the beginning or the working relationship and when there are material changes to the terms and conditions of employment;</li> <li>• Employment that is based on the principle of equal opportunity, fair treatment, and no discrimination to any aspects of the employment relationship;</li> <li>• Workers' right to form and join workers' organizations of their choosing and to bargain collectively without interference, or</li> </ul>	<p>Direct workers may include permanent<sup>1</sup> or temporary<sup>2</sup> workers from the existing PLN worker assigned to project, directly hired by PLN to carry out design and supervision, monitoring and evaluation, or community engagement in relation to the project. For example:</p>

<sup>1</sup> Using Unspecified Time Work Agreement (*Perjanjian Kerja Waktu Tidak Tertentu, PKWTT*)

<sup>2</sup> Using Specific Time Work Agreement (*Perjanjian Kerja Waktu Tertentu, PKWT*)

PT PLN (Persero)

Workers Category	Definition	Summary of ESS2 Requirements	Example of Workers within PLN
		<p>to develop alternative mechanisms to express grievances and protect their rights regarding working conditions and terms of employment without influence or control;</p> <ul style="list-style-type: none"> <li>• Requirement for child labour and stipulation of workers' minimum age;</li> <li>• Prohibition of forced labour, including involuntary or compulsory labour;</li> <li>• Arrangement for grievance mechanism to raise workplace concerns;</li> <li>• Development and implementation of OHS measures as well as procedures to establish and maintain a safe working environment, including the provision of appropriate PPE as required.</li> <li>• Appropriate training for their role and level in the organization.</li> </ul>	<p>PLN staff; Individual as technical/ engineering consultant,</p> <p>E&amp;S specialist, and/or</p> <p>dedicated GRM officer directly hired by PLN with individual contract (not a contract with a firm).</p>
Contracted Workers	<p>People employed or engaged through third parties to perform work related to core functions<sup>3</sup> of the project, regardless of location.</p> <p>The third-party exercises control over the work, working conditions, and treatment of this worker classification, even if the project worker under this classification is working on an ongoing basis on project activities.</p>	<p>For Contracted Workers, PLN is required to:</p> <ul style="list-style-type: none"> <li>• Ascertain that third parties who engage contracted workers are legitimate and reliable entities and have LMPs in place applicable that are in accordance with the ESS2 (see the Direct Workers) requirements;</li> <li>• Establish procedures for managing and monitoring the third-party performance and incorporate the requirements into contractual agreement with the third parties, together with appropriate noncompliance remedies;</li> <li>• Require the third parties to include equivalent requirements and noncompliance remedies in their contractual agreements with subcontractors;</li> <li>• Access to worker's grievance mechanism, provided by the third party or by PLN.</li> </ul>	<p>Workers hired by the contractors, subcontractors, engineering consultants, consultancy agency, outsourcing agency or other intermediaries</p>

<sup>3</sup> Core functions of a project constitute those production and/or service processes essential for a specific project activity without which the project cannot continue.



Workers Category	Definition	Summary of ESS2 Requirements	Example of Workers within PLN
Primary Supply Workers	<p>People employed or engaged by PLN's primary suppliers or suppliers that on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project.</p> <p>The primary supplier exercises control for the work, working conditions, and treatment of this worker.</p>	<p>For Primary Supply Workers, PLN is required to identify potential risks of child labour, forced labour<sup>4</sup> and serious safety issues which may arise in relation to the primary suppliers. PLN (depending on the level of control or influence) to require the primary supplier to:</p> <ul style="list-style-type: none"> <li>Identify child/forced labour risks as relevant to ESS2 requirements on child labour and forced labour and take steps to remedy cases, particularly where there is a significant risk of child/forced labour within the primary supplier's practice/industry;</li> <li>Introduce procedures and mitigation measures to address such safety issues, particularly where there is significant risk of serious safety issues within the primary supplier's practice/industry.</li> </ul> <p>In the case where a remedy is not possible, within the reasonable period, PLN to requires the respective project's primary supplier to be shifted to another supplier that can demonstrate the capability of meeting the relevant ESS2 requirements.</p>	<p>Workers of the Tier 1 supplier or of the Contractor's primary suppliers*, that supplies for goods or materials of the project core functions on an ongoing basis; for example, the workers of major equipment vendor, workers of transmission or distribution material vendor, etc.</p> <p><i>*Note: Contractor has the responsibility to requires its primary suppliers compliance with the ESS2 requirements for primary supply workers</i></p>

<sup>4</sup> Forced labour practices may not be immediately apparent. Examples of conditions that may amount to forced labour include bonded labour (work in satisfaction of a debt of an amount that would be difficult or impossible to pay off), excessive limitations on freedom of movement, excessive notice periods, retaining the worker's identity and other government-issued documents (such as passports) or personal belongings, imposition of recruitment or employment fees payable by the worker at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work on a non-voluntary basis.

Workers Category	Definition	Summary of ESS2 Requirements	Example of Workers within PLN
Community Workers (if applicable)	Workers provided by the community as a contribution to the project, or where the projects are designed and conducted for the purpose of fostering community-driven development, providing a social safety net or providing targeted assistance in fragile and conflict-affected situations.	<p>The ESS2 requirement that will apply to this type of worker will be assessed and will be applied in a manner which reflects (a) the nature and scope of the project, (b) specific project activities in which the community workers</p> <p>are engaged, and (c) the nature of the potential risks and impacts to the community workers. In the LMPs, PLN is required to:</p> <ul style="list-style-type: none"> <li>• Identify the terms and conditions on which community workers will be engaged, including amount and method of payment (if applicable) and times of work;</li> <li>• Assess the potential risks and impacts of the activities that will be conducted and provide measures relating to OHS that will apply to community workers;</li> <li>• Specify the way in which community workers can raise grievances in relation to the project;</li> <li>• Assess the risk of potential child labour or forced labour within the community labour and set out roles and responsibilities for monitoring community workers.</li> <li>• Ensure that community workers are provided with appropriate PPE and appropriate tools and equipment to meet PLN OHS Standards.</li> </ul>	If applicable, for example volunteer workers from community in remote area that help in supporting the civil work (e.g., lifting and installation of electricity pole, in land clearing and installation of solar panel) so that their area is electrified, etc.

### 3.3 PLN Policy and Management System on Labour and Working Conditions

The overall PLN's corporate policies and procedures are developed in accordance with the Indonesian national laws and regulations. PLN's Code of Conduct and Business Ethics (December 2021) describes PLN's corporate values to fulfill its vision and mission, including its commitment and ethical values to PLN employees and other employees of PLN's business partners among the stakeholders. PLN is committed to provision of equal employment opportunities, employee career and skill development opportunities, and promotion. PLN also committed for its employee, as part of the citizen, for their right to assemble, associate, organize and channel their political and social aspirations in accordance with applicable legal requirements. Towards its business partners/suppliers, PLN employees are required to fulfill the rights and obligations of the business partners and to sanction any violations in accordance with the contractual agreement. PLN employees avoid subjective and discriminatory evaluations and other issues that may cause conflicts of interest with PLN business partners.

In PLN's commitment, awareness, and involvement in the management of workers health, safety, security and the environment, PLN believes that the protection of the health and safety

of all employees and business partners is the highest priority in all activities carried out by the company. Health and safety protection within PLN requires:

- Awareness of all employees, from the top management as a role model to the employees in the lower unit in the field and all employees of PLN's business partners, to be committed and responsible to ensure that OHS values and aspects become an inseparable part of the overall business process.
- All employees in PLN to comply with all applicable regulations, procedures and work instructions in accordance with the predetermined and approved work sequence.
- All employees in PLN to be proactive in OHS decision/policy making, in a prompt and responsive manner to unsafe acts and unsafe conditions based on OHS information (including root cause evaluation), hazard identification, risk assessment and control of work risks, and to actively conduct continuous improvement.

PLN is committed to implementing Stop Work Authority (SWA) in case of OHS violations at all works and to make OHS aspect a necessity in conducting work activities, not only to fulfill the regulatory requirement. Moreover, under the PLN Director Regulation No. 182.P/DIR/2022 on Strategic Policy of Occupational Health and Safety, Installation Safety and Public Safety, PLN Corporate Policy on OHS aims for zero accident through development, implementation, and evaluation of strategic safety programs. Moreover, the PLN OHS Management System Manual (PLN.PST-M.SMK3) state the Corporate OHS commitment to achieve the highest level of OHS performance through a continuous and systematic improvement process, by implementing the OHS Management System. In addition to the national regulations, the PLN OHS Management System is developed in accordance with the ISO 45001:2008 management system standard.

To meet this commitment, PLN sets the objectives of the OHS Management System implementation by:

- Creating a safe and healthy work environment, through acts to prevent and control or eliminate the possibility of occupational accidents and occupational diseases by eliminating or minimizing factors that are dangerous and high risk to occupational safety and health in the work environment; and
- Compliance with all applicable OHS laws and regulations.

OHS Management System implementation within PLN is under the responsibility of OHS Advisory Committee that consist of the Head, Secretary (the OHS expert) and Members appointed within the company and authorized by the government official. PLN Corporate arrangement for the organization, roles and responsibilities of the OHS Advisory Committee and other workers are described in the PLN Corporate OHS MS Manual (PLN.PST-M.SMK3). Other PLN policy and guidelines related to labour and working conditions include:

- PLN Collective Labour Agreement 2022-2024 and associated implementing regulations, i.e. Director Regulation No. 0030.P/DIR/2022 on Strategic Policy of Human Experience Management System; PLN Implementing Regulation No. 0036.E/DIR/2023 on Standard Procedure for Employee Official Travel; PLN Implementing Regulation No. 0040.E/DIR/2023 on Standard Procedure for Employee Award Management System; and PLN Implementing Regulation No. 0050.E/DIR/2023 on Standard Procedure for Talent and Employee Management System), as applicable;

- Director Regulation No. 0015P/DIR/2020 on Protection, Prevention and Mitigation of Sexual Harassment within PLN;
- Occupational Health and Safety Management System (OHSMS) Manual and Procedures;
- Relevant Integrated Management System of the Health, Safety and Environmental Division Manual and Procedures;
- Site training and induction plans;
- Security Management System Manual and Procedures.

### 3.4 Gap Analysis

Indonesia has a comprehensive legislative framework regarding labour and working conditions. However, there are opportunities for enhancements, such as the need to enhance the regulations on labour inspection, grievance mechanism, OHS practices, gender in the workplace, workplace harassment, and vulnerable workers, particularly those with disability and migrant workers, and provision of protective measures towards community workers and primary supply workers. Further, there is a need for capacity enhancement at provincial government level, particularly the regency and city government levels, as in the end these institutions are directly in charge of implementing the law and regulations. **Table 2** provides an objective level analysis of gaps between the Indonesia regulatory system and ESS2 of the World Bank ESF.

**Table 2 Summary of Gap Assessment between ESS2 Objectives with Indonesia Regulation**

ESS2 Objectives	Indonesia Regulations	Gap	Gap Filling Mechanism
<b>Objective 2.1</b> To promote <b>safety and health</b> at work	<p>Assessment of potential project impacts/risks on labour and working conditions (including OHS) is addressed by regulatory requirements, but not specifically required for development of EIA/AMDAL.</p> <p>The labour legal framework has generally addressed this element, but leaves the matter of providing and implementing labour and working conditions management procedures to the business and, where relevant, its employees/workers. PLN assumes that standard compliance is policed by the relevant government ministry/agency.</p>	<p>The ESMS suggest integration of OHS impacts/risks assessment to be conducted in alignment with other E&amp;S risks/impacts assessment and that the borrower (PLN) assumes primary responsibility that requirements are met.</p> <p>Labour and working conditions management plans/procedures is not specifically required. There will be challenges in coordination with sectoral government agencies and consistencies in</p>	<p>ESMS requires development of project-specific OHS plan and other safe working conditions management plans/procedures, in accordance with the ESMS requirements. ESMS requires Contractors and Subcontractors to comply with standards as a contract responsibility that flows through the whole contract chain.</p>

ESS2 Objectives	Indonesia Regulations	Gap	Gap Filling Mechanism
		implementation at the sub-project levels.	
<b>Objective 2.2</b> To promote the fair treatment, <b>non-discrimination</b> and equal opportunity of project workers	<p>All employers, across all sectors, are required to attach to working agreements, the company's policy or collective labour agreement, regulation/manual/procedure and to provide related information to their workers during contracting process.</p> <p>Issues of non-discrimination and equal opportunity, and setting up measures to prevent and address harassment and/or exploitation have been regulated. However, further regulatory elaboration, dissemination, implementation supervision, inspection, and procedures are required to address non-compliance.</p>	<p>Regulatory enhancement is required on non-discrimination against minority groups, gender, and prevention of harassment and/or exploitation in the workplace.</p> <p>Measures will need to be provided to ensure on the implementation effectiveness, through training, supervision, inspection and provision of relevant procedures.</p>	<p>The labour management plans/procedures for the project requires clear mechanism of promoting fair treatment, non-discrimination and equal opportunity of project workers, including for those recruited from local workforce.</p> <p>ESMS requires Contractors and Subcontractors to comply with standards as a contract responsibility that flows through the whole contract chain.</p>
<b>Objective 2.3</b> To protect project workers, especially <b>vulnerable workers</b> (women, persons with disabilities, children of working age, migrants, contracted workers, community workers and primary supply workers)	<p>The prevailing legal framework has addressed protection for vulnerable workers including an adequate sanction for noncompliance. However, significant improvement and enhancement are needed in respect of (i) non-discrimination for point of hiring (based on the capability of each individual, regardless of gender); (ii) class scaling, same career development for all gender; (iii) safety mitigation; (iv) participation in decision making; (v) child labour; and (vi) the right for women workers to voice their views, be heard and taken into consideration.</p> <p>The legislative framework also has not formally stipulated the requirement for community workers and primary supply workers.</p>	<p>The current legal framework already addresses much of this objective. Regulatory enhancement is required to ensure the non-discriminative to workers due to their gender, and protective measures to vulnerable workers including migrant workers, community workers and primary supply workers.</p> <p>There is an assumption that these matters will be policed by the relevant ministry/agency, whereas ESS2 requires the Borrower (PLN) assume responsibility for ensuring compliance.</p>	<p>The labour management plans/procedures for the project determine the minimum age of workers, preventing child workers from being recruited, identify and provide measures that are tailored to the needs of safety and welfare protection of vulnerable workers that applies to the project.</p> <p>ESMS requires Contractors and Subcontractors to comply with standards as a contract responsibility that flows through the whole contract chain.</p>
<b>Objective 2.4</b> To prevent the use of all forms of <b>forced</b>	The Employment Law prohibits the employment of children. However, there are	These objectives are covered under the current legal	The project sets the minimum age of workers, following the more

ESS2 Objectives	Indonesia Regulations	Gap	Gap Filling Mechanism
<b>labour and child labour</b>	exceptions as described in Article 69 of the Employment Law. A breach of the prohibition and exceptions are subject to heavy sanctions.  The legal framework also has contained a prohibition on forced labour. However, performing inspection and enforcement of this prohibition to forced and child labour continues to be a challenge.	framework. However, improvement needed in ensuring their absence within the workforce. In addition, there is a gap in the definition of child worker age, in which the national regulation requires minimum age of 13 while the international standard set the age of 14.	stringent requirement. Throughout the project preparation and implementation, the prevention measures for forced and/or child labour is required, including screening, verification, inspection and monitoring, and sanction for non-compliance.
<b>Objective 2.5</b> To support the principles of <b>freedom of association and collective bargaining</b> of project workers	The legal framework addresses this matter in sufficient detail.	These objectives are covered under the current legal framework.	-
<b>Objective 2.6</b> To provide project workers with accessible means to <b>raise workplace concerns</b>	The legal framework has addressed the general objective of this matter. However, there is gap of worker grievance mechanism. The national standard does not specifically stipulate the internal grievance mechanism, except for whistle-blowers. The regulatory framework also has not formally stipulates arrangement for raising workplace concerns by third parties, including contractor, primary supplier and community worker.  In addition, emphasis should be given to vulnerable workers including women workers to raise their grievance, and separated grievance for GBV, SEA/SH, as relevant.	These objectives are covered under the current legal framework. However, improvement to be made through project's provision of a formal workers grievance mechanism addressing the needs of all workers, including vulnerable workers, primary supplier workers and community workers as relevant. Separated grievance for GBV, SEA/SH will also need to be considered.	The project provides grievance redress mechanism to collect and mitigate grievances raised by the workers. Contractor is required to provide this mechanism, ensuring their workers and workers from their third parties (i.e., subcontractor, primary supplier) have access to the grievance channel.  If considered as relevant with the project risks, separated grievance for GBV, SEA/SH to be provided and supported by relevant expertise.

## 4 Process Overview

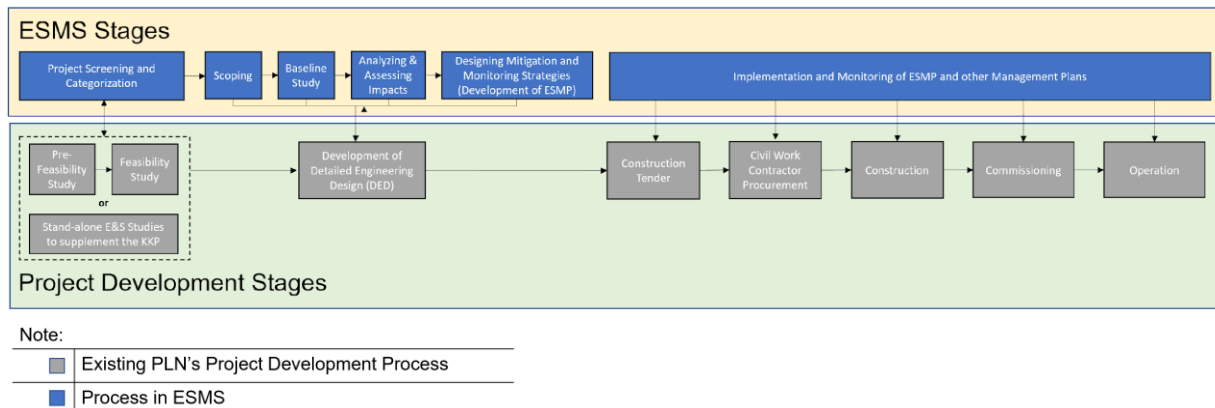
### 4.1 Overview of the Management Measures

The process in providing management measures for labour and working conditions during the project lifecycle will include steps of (1) risks and impacts screening and categorization, (2)



scoping, (3) baseline study, (4) analyzing and assessing impacts, (4) designing mitigation and monitoring strategies (ESMP development) and (5) implementation of mitigation measures and the monitoring.

**Figure 1** describes the process PLN will follow to define measures to protect the labour and working conditions that begins with Risk Screening and Categorization. Each successive stage in the project development process will then identify and use more refined information to improve the understanding of risks and impacts to labour and working conditions and allow effective measures to be identified to protect labour.



Source: ESMS Manual, Figure 5-2 **Figure 1 The Overall ESMS Process and PLN's Existing Project Development Process**

For the management measures of labour and working conditions, the roles and responsibility to manage the labour and working conditions within the PLN during the project development process are detailed in **Chapter 3-2 of the ESMS Manual**. It is to note that the health and safety risk characterization will cover different topics and may require different expertise to carry out the management measures than the general labour management risk characterization.

## 5 Labour and Working Conditions Impact Assessment

### 5.1 Screening and Categorization Stage

The screening for labour and working conditions will be initiated at the early stage of the project's lifecycle, can be conducted as part of the Pre-FS, FS, or stand-alone assessment supplementing the KKP<sup>5</sup>, or separately by the IA Team to complement information from those studies. The overall activity of screening and categorization that will be conducted by the IA Team, with advice from ES Team will consists of:

- Screening of Project's potential E&S risks and impacts, including through Site Screening (see **Chapter 5.3 of the ESMS Manual**);

<sup>5</sup> In existing PLN project development process, project that involves significant infrastructure development like a power plant or a transmission line, requires a Pre-Feasibility Study (Pre-FS) and Feasibility Study (FS); while for project that does not involve significant infrastructure development, such as distribution line establishment, a simpler assessment named Project Feasibility Assessments (*Kajian Kelayakan Proyek*, or "KKP") is conducted.

PT PLN (Persero)

- E&S risk and impact categorization (i.e., extreme, very high, high, moderate, or low), with definition of risk category described in **Table 5-3 of the ESMS Manual**; and
- Screening against exclusion criteria relevant to labour and working conditions (see **Section 5.3.2 of the ESMS Manual**).

Screening of Project's potential E&S risks and impacts will consider the likely E&S effect, including from the main benefit and adverse risk/impact of labour and working conditions, that are likely to be associated with the Project activities, the contextual risks, the institutional capacity and complexity of risks and track record, and the reputational and political risks.

During this stage, the IA Team will make a rough estimate of the potential workforce required to support the project and will look for the following labour information along with the site screening activity to understand the local conditions and potential workforce, and historic patterns in the area relating to the use of labour (see **Appendix 3 of the ESMS Manual** for the Site Screening Guideline). The information that can be used for identifying the likelihood of forced labour, child labour, and/or human trafficking practice, are the information of local conditions and potential workforce, and historic patterns in the area relating to the use of labour such as:

- General working age of the of local workers and information of their skill or educational background;
- Presence of current similar work activities (land clearing, civil work, operation of same project type) within the same jurisdictional area or nearby location, and information of local workers/sub-contractor/local supplier they utilized, presence of child labour/forced labour/human trafficking practice; and
- Past issue on labour and working conditions associated with specialist contractors and suppliers typically utilized (e.g., international and national level companies), local level contractors and suppliers typically engaged in similar types of projects within the district and sub-district, with matters of concern including the use of child labour, use of forced labour, human trafficking practice, GBV incidents, OHS incidents, worker disputes, security issues and community protests.

At screening stage, the initial project design can give inputs to identify potential hazards of the project (including physical, biological, and psychological hazards - see **Annex 2**). Inputs from the initial project design may include the potential type of infrastructure, typical process, materials, equipment, and tools, as well as potential site location, required number and source of manpower, etc. Other type inputs such as historical or likelihood of an OHS related events in the vicinity of the site location may be collected from engagement with local stakeholders (e.g., Manpower Agency, local suppliers, etc.) during screening.

In consultation with the ES Team, the available information collected from the screening will be utilized by the IA Team to compile the potential labour and working conditions risks and impacts, which are then assessed for their level of risk or significance, by measuring the likelihood of the risk/impact occurring and the level of consequence should it occur. A simple evaluation process will be conducted to estimate whether the projects labour risks should be categorized as extreme, very high, high, moderate, or low (see **Appendix 4 of the ESMS Manual** for the likelihood and consequence of labour and working conditions aspect, contextual factors, institutional capacity, and reputational/political risk). The labour and



working conditions risk category will contribute to the overall project's E&S risk category. However, as noted in the ESMS Manual, this risk screening and categorization is not a one-time activity of which the result will remain throughout the project. It is to also note that at the early stage of the project's lifecycle, the existing information may not be sufficient to develop a comprehensive understanding of the potential hazards from the work environment and actual work processes. Therefore, the risk screening and categorization activity will be conducted from time to time throughout the project life, as new relevant E&S information become available, project designs and locations change or become clearer, new requirements, best practices or any other significant information becomes available.

Following the screening and categorization outcomes, the IA Team will review the result against applicable exclusion criteria, in which for labour this will be the 'likely involvement of forced labour, child labour, and/or human trafficking practice'. Currently there is no specific exclusion criteria defined in the ESMS Manual for health and safety aspect. In such cases, the IA Team will identify the likelihood of adverse impacts that are not acceptable or may violate the law, and the mitigation measures that would bring the project into compliance with the applicable laws and other requirements, as well as prevent or reduce any health and safety impact to acceptable levels for the project to be eligible for IFI's financing. Result from this comparison with exclusion criteria will be informed by the IA Team to the Project Planning Team for the follow up decision (see **Section 5.3.2 of the ESMS Manual**).

Once the screening and categorization stage is completed and has not been confirmed to meet the exclusion criteria, the IA Team and the ES Team will determine the depth of the following Assessment of potential impacts on Labour and Working Conditions that has to be conducted (see **Chapter 5.3.3 of the ESMS Manual**). The ES Team will provide confirmation for the depth of impact assessments to the IA Team. Note that in the following IA process, more detailed information is needed than what have been collected during Screening and Categorization.

## 5.2 Procurement Stage

To accomplish the IA, upon receipt of confirmation from the ES Team, the IA Team will develop the terms of reference (TOR) for contractor needed in construction and/or operation stage. The TOR will include requirements to assess and mitigate potential risks of labour and working conditions. The TOR will be included by the Procurement Team in the bidding document. Evaluation of bid proposals to select the appointed consultant will be conducted by the IA Team and the Procurement Team, in consultation with ES Team.

The TOR for IA will at least include the following components described in **Table 3** in order to give clear directions relevant to labour and working conditions for the consultant who will conduct the IA, including characterizing the labour that may be affected, assessing the adverse impacts, and defining mitigation measures to avoid or reduce the impacts to acceptable levels. These mitigation measures may include new management plans or implementation of existing programs. The TOR must also require the IA to identify the party responsible for implementing the measures.

**Table 3 Impact Assessment TOR's Components related with Labour and Working Conditions**

No.	TOR Component	Description
1	Background	<ul style="list-style-type: none"> <li>Brief description of the project and nature of the project's funding.</li> <li>Reference of International Standards for labour and working conditions that needs to be adopted for the project.</li> <li>Reference of Indonesian national standards pertaining labour and working conditions that needs to be adopted for the project.</li> <li>Reference of PLN's existing procedures or technical guidance that regulates about labour and working conditions that needs to be adopted for the project (if any).</li> <li>Brief summary on information regarding labour and working conditions that have been collected from the Screening and Categorization process.</li> <li>Goal that in general is expected to be achieved by conducting Impact Assessment and implementing management plan (such as, "to ensure that there will be minimum risk for inappropriately trained personnel to be exposed to hazardous work", "to ensure that there will be minimum risk for SEA/SH case within the project activities ", and so on).</li> </ul>
2	Objective	<ul style="list-style-type: none"> <li>List of items that is expected generated from Impact Assessment, e.g., a more detailed information on potential labour and working conditions issues from the Project, level of significance and priority of each identified labour and working conditions risks, etc.</li> <li>Description on form of deliverable expected from Impact Assessment as it pertains to labour and working conditions, such as current industry practices and impact assessment chapters for forced labour risks, etc.</li> <li>Description that says the Impact Assessment result is expected to also result in development of a management plan regarding labour and working conditions where such risks require a stand-alone plan to be developed.</li> </ul>
3	Impact Assessment Process	<ul style="list-style-type: none"> <li>Description of process that generally align with TOR example of Impact Assessment provided in <b>Chapter 4 and Appendix 2 of ESMS Manual</b>.</li> <li>List of aspects to be considered during Impact Assessment based on Screening and Categorization process, that may include the following: <ul style="list-style-type: none"> <li>Child labour</li> </ul> </li> </ul>

No.	TOR Component	Description
		<ul style="list-style-type: none"> <li>○ Forced labour and human trafficking</li> <li>○ Hazardous work</li> <li>○ Transportation risk</li> <li>○ Injury or death</li> <li>○ Disease – unsanitary conditions in accommodations and workplaces</li> <li>○ Uncertainty about pay, leave, other details of employment</li> <li>○ Task-specific risks</li> <li>○ Lack of training or accreditation in place for high-risk tasks</li> <li>○ Violence, discrimination, or intimidation in workplace</li> <li>○ SEA/SH/GBV</li> <li>○ Labour rights violation</li> <li>○ Infringement of workers' rights to form unions and collective bargaining</li> <li>○ etc.</li> <li>● List of items expected to be included in developed management plan, such as “detailed action plan”, “implementing timeline”, “monitoring and evaluation timeline”, “budget estimate and source”, “parties in charge”, “stakeholders to be dealt with”, etc.</li> </ul>
3	Expected Duration of the Impact Assessment	<ul style="list-style-type: none"> <li>● Length of period for the Impact Assessment, e.g., 90 days, 120 days, etc.</li> <li>● Explanatory condition to the period, such as “including/excluding weekend and public holiday”.</li> </ul>
4	Consultant Profile (Not applicable when Impact Assessment on Labour and Working Conditions is decided to be undertaken internally by IA Team or other PLN internal Team)	<ul style="list-style-type: none"> <li>● List of administrative requirements of Consultant and sub consultant Companies or personnel, such as permits, certifications, recommendation letters, etc., as applicable.</li> <li>● Statement of technical qualification of the Consultant or sub-consultant Company or personnel on labour and working conditions assessment, supported with documented evidence such as, educational background or list of experience.</li> <li>● If needed, list of educational background and professional expertise considered relevant for assessment on labour and working conditions.</li> <li>● Specific experience, if needed, such as “have experience working in power sector”, “familiar with PLN's project</li> </ul>

No.	TOR Component	Description
		<p>implementation process”, “have worked in Indonesian project”, etc.</p> <ul style="list-style-type: none"> <li>• Other qualification items, such as: <ul style="list-style-type: none"> <li>○ Strong writing and analytical skills.</li> <li>○ Ability to interact with PLN officials and Project stakeholders while maintaining integrity and anti-bribery and corruption principles.</li> <li>○ etc.</li> </ul> </li> </ul>
5	Communication/Reporting	<ul style="list-style-type: none"> <li>• Line of communication/reporting, e.g., “to update the IA Team for [Project Name] not less frequent than once every two weeks.”</li> <li>• Form of communication/reporting, e.g., via email, via certain reporting format, online meeting, etc.</li> </ul>
6	Question and Clarification	<ul style="list-style-type: none"> <li>• Method to seek a more detailed clarification on the TOR, the Project, of the assessment (for third-party Consultant, will be useful for preparing the proposal/offer), stating name of PLN person/team-in-charge, professional contact number or email address.</li> <li>• Acceptable deadline for sharing question and clarification.</li> </ul>
7	Submission and Closing Date (Applicable only if third-party consultant is involved)	<ul style="list-style-type: none"> <li>• Method for consultant to submit technical or commercial proposal (if separated).</li> <li>• Deadline for submission and schedule for bid opening.</li> <li>• Specific requirements (to be determined by Procurement Team), such as bid/performance bond, form of proposal (e.g., hardcopies, separate envelope, softcopies, etc.), etc.</li> </ul>

### 5.3 Scoping of Labour and Working Conditions Impacts

Scoping activity will deepen the understanding of the potential labour and working conditions impacts (in condition that they have been identified during Project Screening and Categorization), to clearly define the scope (activities, risks/impacts, project area), identify required expertise for team in charge of Labour and Working Conditions at project level, and develop a suitable methodology for the detailed impact assessment. The scoping for labour and working conditions impacts will include, but not limited to:

- a. Understanding project activities, project description and project alternatives

At this stage of the project, information regarding the project is available in a more comprehensive manner, such as the project’s phases, the technology to be applied, the site design including some alternatives of project components design, summary of planned activities as part of project development, project locations, etc. Understanding of the project activities and description will be needed to identify potential interaction between the project and receptors in the Area of Influence (see point d). Note that

further detailed project descriptions will be provided and updated, in coordination with the DED team/Consultant.

- b. Identify potential labour and working conditions impacts  
Identifying the impacts in the scoping stage will be a process of refining and deepening the information that was collected during screening and categorization stage. Issues relating to labour and working conditions that need to be considered include Occupational Health and Safety (OHS), labour management, worker accommodation strategy, worker grievance mechanism, prevention of gender-based violence (GBV), sexual exploitation and abuse/sexual harassment (SEA/SH), human right issue, child labour, forced labour, traffic and road safety, natural disaster and unprecedented events (emergency response), all to be captured in a manner that is project and context specific.
- c. Initial public consultation and stakeholder engagement  
From the beginning and throughout the scoping process (and beyond), stakeholder engagement will be conducted to inform the stakeholders on the project's plan and to collect input from the stakeholders on the proposed project design. Identification of stakeholders initially started since the pre-FS/FS or KKP stage, and data is continuously collected through the project's phases up to implementation. Stakeholder views and inputs will continue to be collected to inform the scoping and subsequent IA processes. Views and concerns of stakeholders will be collected to obtain more detailed input for the existing labour management practice within the area as well as information of labour-related cases in the past from the utilization of local workforce.
- d. Identify area of influence (AOI)  
The project activities would impact spatial (area) and temporal (time) dimension. These effects of the project activities may influence a particular aspect or receptors. The AOI for labour and working conditions will consider the extended area of impact due to the project's requirement of manpower supply/employment opportunities, increased mobilization of workers, accommodation of the workforce, utilization of supply chain and third-party workers, spread of potential impact from workers health conditions, workers behavior, etc.
- e. Identify social vulnerabilities and sensitive receptors  
In terms of labour, vulnerabilities of local population especially the potential workforce should be assessed to identify any groups of people that might require additional assistance in accessing employment opportunities given by the project. Vulnerable groups of labour may include women, people with disabilities, people with language barrier, or other marginalized sectors of the community. Sensitive receptors of the project may include children, young age workers and women that might be negatively affected by the presence and interaction with migrant workforce. The sensitive receptors of impact will likely require a more focused and in-depth analysis.
- f. Identify existing social issues that can be exacerbated by the project  
Existing social issues that can be exacerbated by the project will be identified, to understand the sensitivity of the potential impact receptors. For example, the case of GBV or SEA/SH that are present in the existing communities that need to be consider

when introducing migrant workers or when project mobilize a large number of workers into the area that may allow interaction with the communities.

- g. Define methodology for impact analysis and identify further specific study required  
The main objective of these further studies is to ensure reliable data will be collected during baseline stage to calculate the consequence, magnitude, and probability of impact to occur during the assessment of impact significance. Analyzing the impact of labour and working conditions may require qualitative methods through in-depth interviews and direct engagement with key stakeholders, including from the government agencies, local leaders, the local PLN officers, or the vulnerable communities to obtain a more detailed understanding and gain insight to the local context to complement the preliminary information obtained from desktop information.
- h. Identify baseline data to be collected  
Based on the above-mentioned activities, baseline data that are required to be collected will be identified. In general, the baseline data to be collected will be based on the potential receptors of the potential impact identified, supported with additional data from the specific study and from the input of the stakeholder engagement activities.

#### 5.4 Baseline Study

Baseline study will be conducted to give an up to date, to verify or to add accuracy to the previously collected information. For the activity, the project will utilize information as available from the Detailed Engineering Design (DED) to predict potential labour and working conditions from the design and work activities point of view, including from information of potential equipment and materials that will be utilized for the construction and operation of the facility, its potential route of mobilization and access, etc. Related to Labour and Working Conditions, the information to be collected will include, but not limited to:

- Potential local workforce absorption by the project, including the number and characteristic of vulnerable individual (e.g., women, persons with disabilities, young workers) which may elevate labour and working conditions concerns;
- Demobilization stages, such as the end of construction;
- Identification of local custom, law, practice, requirements or expectations from local government agency or local community leader to utilize local manpower and material supplies which may elevate labour and working conditions risks;
- Baseline conditions that may elevate risk and impacts to workers safety and wellbeing, such as natural disaster, dangerous terrain, level of security and potential stakeholders that may bring impacts to workers arrangement of working conditions (e.g., security, safety, access, use of resources, etc.), health status and spread of certain communicable diseases within the nearest community, presence of dangerous animals and noxious plants, availability and condition of access to location and available means of transportation, available health facilities, local service providers, police station, fire responders, etc. For this, there must be a good understanding of the specific activities that will be involved in order to assess the OHS risks.



## 5.5 Analyze and Assess Impact

Analysis and assessment of impact will be conducted to all available data collected during the scoping process and the baseline data study to determine the potential project impacts that may occur to the receptors, identify the impact significance and identify the impact mitigation measures. It is important to note that impact assessment is not a linear process, as there may be additional information from the updates of project activities and footprint that may require additional assessment.

**Table 4** provides example of indicative potential impacts related with labour and working conditions and the examples of aspects to be considered and assessed to the obtained information.

***Table 4 Potential Impacts related with Labour and Working Conditions and Aspects to be Assessed***

Potential Impacts related with Labour and Working Conditions	Examples of Aspects to be Considered and Assessed
Child labour	<ul style="list-style-type: none"> <li>Does the current practice with subcontractor and local supplier workers within the project area or type of project involve child labour?</li> <li>Does the local government and local leaders prohibits/allows the utilization of child labour to support the subcontractor and/or local supplier?</li> <li>How is the project arrangement for the minimum age of workers, especially for (i) workers recruited by contractor, or (ii) required through the contractor to their subcontractor and supplier?</li> <li>Will non-hazardous work or internship for school purpose allowed for certain age of workers by the project (i.e., 13-15), or enforced by the local government/leader for workers supporting the contractor or supporting the subcontractor and/or primary supplier?</li> <li>Will the potential subcontractor and local supplier of projects have this risk of child labour?</li> </ul>
Forced labour	<ul style="list-style-type: none"> <li>Does the current practice with subcontractor and local supplier workers within the project area or type of project involve forced labour? To note that forced labour practices may not be immediately apparent (<i>see footnote 4</i>).</li> <li>What type of forced labour identified in the existing practice from subcontractor and local supplier within the project area, and how is this being treated by the local government/ leader and local community? Will the potential subcontractor and local supplier of projects have this risk of forced labour?</li> </ul>
Dangerous animals and noxious plants	<ul style="list-style-type: none"> <li>Where are the risks identified and how far from the project's potential location?</li> </ul>

Potential Impacts related with Labour and Working Conditions	Examples of Aspects to be Considered and Assessed
	<ul style="list-style-type: none"> <li>• What type of risks from these dangerous animals/noxious plants would there be (e.g., snake bite, rabies, etc.)?</li> <li>• What kind of treatment is required for this risk, where is the location of the treatment facility, and does the accessibility of this treatment facility pose concerns in attaining timely access to treatment?</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>• What kinds of access arrangements are necessary at the potential project location (e.g., land, sea/river)?</li> <li>• What is the volume of materials/equipment and number of people requiring transportation and are there any factors that would elevate risk to workers?</li> <li>• How safe is the current access and transportation route to potential project location for the project workers (e.g., narrow road access, potential landslides, theft or security issue threatening the safety and security of workers during the journey)?</li> </ul>
Incidents or accidents	<ul style="list-style-type: none"> <li>• What kind of typical working conditions that can expose workers to health and safety risk during project preparation, construction, operation, and closure stage (e.g., working at height, long-term or short-term exposure to loud noise, vibration, hazardous substances, etc.)</li> <li>• What kind of provision of preventive and protective measures that are known in good international industrial practices for modification, substitution, or elimination of hazardous conditions or substances that was previously used in the past similar project activities?</li> <li>• What kind of site or context specific hazards may lead to incidents/accidents?</li> <li>• What kind of treatment or immediate response is available within reach of the potential project location?</li> <li>• What kind of impact that the incidents/accidents may lead to (e.g., first aid, hospitalization, death)?</li> </ul>
Disease or unsanitary conditions in accommodations and workplaces	<ul style="list-style-type: none"> <li>• Will the project utilize local services for provision of meals, sanitation, accommodation and health facility services?</li> <li>• What kind of diseases are common within the nearby project location and what kind of hygiene measures required by the project to protect the workers' health?</li> <li>• How and where will workers be accommodated and what arrangements will be made for kitchens, showers, toilets, etc.?</li> </ul>



Potential Impacts related with Labour and Working Conditions	Examples of Aspects to be Considered and Assessed
Uncertainty about recruitment, pay, leave, other details of employment	<ul style="list-style-type: none"> <li>How is the current practice of employment within the potential project area (e.g., direct recruitment by the contractor or utilizing agents/middlemen)?</li> <li>Are there any local requirements regarding pay, leave and other details of employment?</li> <li>At what level is the unemployment rate within the potential project locations and what kind of jobs are available?</li> <li>Is there any enforcement from the local government regarding employment requirement (i.e., from local manpower agency)?</li> <li>What is the typical duration of employment, for example employment opportunities may be relatively short-lived, workers expectations may need to be managed.</li> </ul>
Task-specific risks	<ul style="list-style-type: none"> <li>What kind of tasks will the project conduct during construction and operation stages?</li> <li>Will there be any utilization of hazardous materials, heavy equipment or tools?</li> <li>Will there need to be relevant trade, skill/expertise, training, permit or competency certification for the potential working activities/processes? Are those qualifications available in the local community?</li> <li>Will there be an introduction to new technology implemented by the project (e.g., with unknown or limited information of potential risks)?</li> <li>What kind of risks would each worker generate?</li> </ul>
Task-specific training	<ul style="list-style-type: none"> <li>What kind of potential works to be conducted, equipment/tools to be utilized?</li> <li>What kind of education/skill level is found in the local community?</li> <li>What kind of existing industries/work activities are found in the potential project area and how many of local workforce being utilized?</li> <li>What kind of work required specific training and what kind of training required?</li> <li>How accessible are the providers for the required training?</li> </ul>
Gender Based Violence (GBV), including Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH)	<ul style="list-style-type: none"> <li>What kind of historic GBV and SEA/SH are present in the vicinity of the project, have underlying factors been addressed and what is the likelihood of this to be repeated in the future?</li> <li>How will the arrangement for workers' working area, accommodation and sanitation facility, in relation with prevention of GBV, SEA/SH? Will there be any separation</li> </ul>

Potential Impacts related with Labour and Working Conditions	Examples of Aspects to be Considered and Assessed
	<p>for female workers, youth workers or vulnerable workers with the remaining of workers in provision of accommodation and sanitation facilities?</p> <ul style="list-style-type: none"> <li>• How many vulnerable workers may be hired by the project (e.g., women workers, young age workers) and are they at increased risk of GBV and SEA/SH?</li> <li>• How adequate is the existing channel for grievance to be used in project and does it include grievance due to GBV, SEA/SH?</li> </ul>

Following the assessment, the IA activity to confirm and map impacts, identify the timing and (depending on the data availability) duration, and assess the impacts significance using the risk rating matrix tool that was previously used in the screening and categorization process, to be then identified for the impact's mitigation measures (see **Chapter 5.7 of the ESMS Manual**). The impact analysis and assessment to capture aspects such as:

- Estimate on timing for labour recruitment, mobilization, peak of workforce numbers, retrenchment or potential risks associated with each of these events;
- Potential child and forced labour risks based on project type, key suppliers and contractors, local context and protection measures in place; and
- Potential OHS risks from the available information of the project design. Estimate on the type of works, materials, tools and equipment required to construct the design, taking into account discussion with the DED consultant team and available information from other similar type of project/activities.

The IA must be completed prior to the implementation of construction and/or operation activities. It is to note that for OHS aspect, a hazard identification and risk assessment (HIRA) exercise should be reiterated and updated prior to the initiation of work activities in each project stage (particularly by contractor that about to implement the activities, with approval of PLN Main Unit or PC/PO Team as applicable) as the information of planned equipment, work process, working conditions, etc., have become clearer, thus enabling a more detailed understanding of the hazards, risks and mitigation measures. The HIRA exercise will follow the existing PLN Corporate Procedures No.PLN.PST-SMK3.PR.MR-07 (2015) on Hazard Identification and PLN PT-HSSE-01 (2020) on Risk and Opportunity Assessment and Action Plan Procedures. The HIRA under PLN Procedures will require the steps as described below. It is to be noted that all steps are taken when the project is well understood and usually underway, and only a few of the listed steps will be applicable at the earlier project stage.

- Every new and modification to equipment and work process should be identified for its hazard and assessed for its potential risk.
- Any additional information (i.e., from report and suggestion) of potential hazards, due to work procedures, work behavior, equipment, OHS facilities or work environment, must be followed by verification to confirm the presence of the hazard.
- All identified hazards to be recorded into the Hazard Identification Form (i.e., using PLN FRM-U-007-01, see **Annex 3**).

- Potential risks, with its likelihood and magnitude to be identified for each potential source of potential hazards, using the project risk matrix (see **Table 5-3, the Risk Rating Matrix Tool in the ESMS Manual**).
- Action plan for management strategy of each potential risk to be developed and discussed with the ES Team for finalization.
- The responsible parties for implementing the action plan will be appointed and recorded in the Hazard Identification Form.

Hazard Identification and Risk Assessment to be revisited at least once a year, in the event of an occupational incident or accident, or in the event of changes to the work, facility, or infrastructure.

## 6 Mitigation Measures

The impact assessment process will provide recommendations of (high-level) mitigation measures to be implemented during construction and operation, as well as specific plans to be developed or to be improved from the existing PLN management plans. Among others, the mitigation measures recommendations include:

- Labour Management, such as project's requirement on minimum age of workers, recommended composition of local hiring, recommended applicability and definition of community workers, measures to identify forced labour within the project area, recommendation for appropriate grievance mechanism, GBV prevention including provision of code of conduct (See example in **Annex 1**), etc.;
- Working conditions management, such as recommendation on OHS plans and procedures (OHS and work specific), recommendation on provision of accommodation, sanitation facility, recommendation for travel safety, recommendation for the number and capacity of OHS personnel and the needs for security personnel, medical facility recommendation, projects' Key Performance Indicator (incident, fatality, medical case, etc.);
- Human resources management, such as arrangement of working hours and leaves, recommended training, etc.
- The requirements of the OHS management plan to meet the potential project specific risks that have been identified through the risk assessment.

Depending on the availability and level of impacts, the management plans (MP) developed by the E&S consultant may include Labour MP, OHS MP, Security MP, HR MP, etc.

### 6.1 Procurement Stage

The following description of the procurement stage will apply to both Construction stage and Operation (if utilizing Contractor for Operation and Maintenance) stage. PLN Corporate Procedure PLN.PST-SMK3.PR.MR-18 on Procedure for Design and Modification, requires any work activities requiring contractor support in the PLN to be carried out in accordance with the procurement procedure. It will be the responsibility of PLN (under PP team, PC Team, or PO Team – subject to the stage of Project) to ensure that the safe working methods of the contractor are mentioned in the contract. This to include supervision, work permits, Job Safety Analysis, use of PPE, etc. in accordance with the Hazard Identification, Risk Assessment and Control that have been carried out for the respective work; or in a comprehensive way the

contractor shall develop OHS and emergency response program in accordance with PLN's procedures and system and national laws, and that PLN and/or its consultant will approve the programs and supervise their implementation.

The integration of E&S MPs into the procurement process follows the description in **Section 5.9** and the required actions in **Table 6-2 of the ESMS Manual**.

#### 6.1.1 Contractor

PC Team (Construction) or PO Team (Operation) in coordination with the ES Team and the Regional Unit will develop TOR that will require the contractor to develop Contractor E&S Management Plans (C-ESMPs), which describe in a comprehensive and structured manner the various E&S considerations, controls and commitments related to the main activities that the Contractor will be required to implement as part of its scope of work. These MPs will refer to relevant requirements from the PLN Labor Management Plans/procedures that need to be conducted/handed over to the Contractor, and will describe E&S requirements for Contractor to proactively manage risks and impacts in their activities including clear definitions of responsibilities, training needs, performance measurement tools, and reporting requirements. Among others, and commensurate with the level of risks and impacts identified, the MPs will include management plans for: (i) work activities; (ii) labour and human resource management (LMP and HR MP); and (iii) occupational health and safety management (OHS Plan), relevant to its scope of service. For the tender purpose, the submitted MPs can be in the form of a list and overview of the proposed E&S management strategies and implementation plan, attached with examples of MPs from relevant past project experience and past E&S performance. Full MPs to be developed and submitted by the selected Contractor prior to any workforce recruitment and mobilization is occurs.

Contents of the Contractor's LMP and past E&S practices may include, but not limited to:

- Project proposed labour composition (number and classification, including relationship status, required skill level, source, vulnerability);
- Fair terms and conditions, and implementation of non-discrimination and equal opportunity;
- Strategy to meet the project requirement of minimum age of workers applied to the project, and prohibition of child and forced labour;
- Provision of grievance mechanism;
- Requirement for contractor's direct and contracted workers, subcontractor workers, and supply chain workers;
- Copy of company regulation (as approved by the Manpower Agency)<sup>6</sup>;

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<sup>6</sup> In the case where the IA identifies high risk of labour and working conditions, additional information on project human resources arrangement can be added to the LMP requirement, such as project's arrangement for roles and responsibilities that will manage human resources; details steps on how contractor would manage recruitment screening, selection, hiring and retrenchment; and working terms and conditions for their workers and workers from subcontractor and/or primary suppliers

- OHS risk assessment and detailed outline of an OHS plan and/or an OHS plan that the Contractor used on a similar project<sup>7</sup>;
- Provision of Code of Conduct that includes prevention of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH);
- Past project experience, such as labour training (including training for GBV, SEA/SH prevention), labour inspection reports, summaries of material incidents involving worker-management relations (e.g., strikes, demonstrations, security incidents), records of OHS statistics, any GBV, SEA/SH-driven contract cancellations, suspensions, etc., and material sanctions or fines from government labour agencies/authorities;
- Other specifics, as regulated by the project (e.g., requirement from local regulation, from accepted local customary requirement, specific requirement on local workforce utilization, arrangement for women workers, migrant workers, vulnerable workers, etc.).

In the case of utilizing multiple Contractors, the TOR will consider the following, but not limited to:

- E&S additional risks from the presence of other contractors and primary suppliers, number of workforce and type of work activities that will be conducted simultaneously within the project area. In this case, PC/PO Team may decide and assign responsibilities in supervising all E&S implementation as well as detailing the site controls to one Contractor that will conduct bigger portion of work onsite (Main Contractor). Small Contractors with tasks and services that do not pose significant risks, will only be required to develop a general E&S Plan describing controls and monitoring mechanism to be coordinated with the Main Contractor, they will be required to comply with the project OHS management system (PLN or contractor, whichever applies);
- Potential Contractor's capacity in managing risk, such as in providing mechanism and resources for grievance handling, E&S supervisors and/or inspection officer, or others required to implementing E&S MPs and managing expectations of involved IFIs. In this case, PC/PO Team may consider hiring a separate E&S consultant for specific E&S MP implementation and conduct supervision. The E&S consultant will be contracted via the Main Unit executing the project;
- Contractor's capacity in providing facilitation, such as accommodation, camps, sanitation facilities, E&S training, health facilities, security and protection measures. In this case, PC/PO Team may arrange for support of the onsite facilitation.

Following the TOR development, PC/PO Team and Procurement Team will determine robust evaluation criteria for selection and hiring of the Contractor, as well as conduct the evaluation

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<sup>7</sup> For work activities with potentially moderate to high level of risks, the Contractor will be required to provide the OHS Plan and information on past practices in managing the workers OHS that may include: clear definitions of contractor's responsibilities and personnel/team that will be in charge for OHS management implementation and monitoring; detailed steps on how the contractor will control the OHS risks; and training needs, performance measurement tools and reporting requirements. Where the contractor's OHS management plan differs from the PLN OHS management plan, the more stringent provision shall prevail.

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and approval (see the qualification requirements stated in Section 6.4 of the ESMS Manual). If necessary, in the case of specific labor and working conditions risks, the PC/PO Team may recommend or require that an additional HR and/or OHS expert be added to the evaluation panel to participate in the review of Contractors' proposals and/or to brief the evaluation panelists on what to evaluate in the proposals in regard to labor and working conditions.

In the case of PLN hiring E&S consultant, the TOR will be adjusted to separate the E&S management implementation between Contractor(s) and the E&S consultant. The E&S consultant can be the same consultant that conducts or is involved in the IA process.

#### 6.1.2 Primary Suppliers

During the procurement phase, the PC Team (Construction) or PO Team (Operation) in coordination with the ES Team and the Regional Unit will require the Contractor(s) to identify their potential suppliers, including those that would be their primary suppliers. For their suppliers, the Contractor(s) is required to define on how they will verify their supplier's compliance with the relevant project E&S requirements, including to the following commitments:

- Prohibit utilization of child or forced labour, especially within the production lines of material/equipment that will support the project, and take immediate steps to remedy cases of child or forced labour;
- Identify the potential serious safety risks within the production of material/equipment that will support the project and provide relevant procedures and mitigation measures to prevent the risks to their workers, and immediate steps for any incidents or accidents that occur.

### 6.2 Construction Stage

The construction stage will typically consist of (1) Mobilization, (2) Construction, and (3) Demobilization and Site handover. For the overall construction process, the PC Team will develop a project construction plan considering the project design and E&S MPs. The Regional Unit will supervise the implementation, with support from E&S consultant for the E&S implementation (if hired). E&S implementation will be reported to the Social SC Team for review.

Construction phase impacts to labour will vary depending on the composition of workforce that may include PLN staff, E&S Consultant, Contractor workers, Primary Supply workers, and if applicable community workers. The following are typical labour and working conditions management strategy guidelines to be implemented throughout project construction stage (referring to potential impacts/risks identified in **Chapter 5** of this Labour and Working Conditions Management Guideline).

#### 6.2.1 Labour Mobilization Process

Following the contract signing and prior to mobilization, a kickoff meeting will be conducted between the PC Team/PO Team, ES Team and the Procurement Team with all parties' management representatives. This meeting aims to develop the same understanding between all parties on the overall project's work description, coordinate E&S risk and impacts management approach, Project Key Performance Indicators, and re-emphasize the specific



requirements set by PLN and the involved IFIs into the project (described in the TOR). Discussion on the potential bridging into the project's TOR requirements, relevant PLN Corporate policies, plans and procedures will be discussed during this meeting, taking into account the more stringent requirement that the project Construction should implement.

The contractor will be requested to finalize and submit the full C-ESMPs (if not developed by the E&S Consultant) and specific labour and working conditions management plan/procedure, if requested by the TOR. After PC Team approves the C-ESMPs and all parties agree on the arrangements, the PC Team will issue the work permit to conduct the mobilization. While each of the parties will be responsible for their own workers mobilization activities, PLN holds the ultimate responsibility for all workers and the implementation of labour and working conditions management at the project site.

### 6.2.2 E&S Induction and Training

#### E&S Induction

A general E&S Site Induction will be delivered by the PLN Staff, IPP Staff, or the Contractor, whichever is applicable, and is mandatory for all workers prior to conducting works onsite, and for others (including visitors) prior to their initial entry to the construction site or the operating facility. For workers, the contents of the induction material will be based on the project's E&S risks, site-specific conditions and precautions (i.e., natural hazards/disaster, emergency procedures, evacuation), overview of tasks that will be performed, the code of conduct, GBV and SEA/SH prevention, security management, grievance mechanism, emergency preparedness and response, sanctions for violation of E&S requirements, and other general E&S provisions that are applicable for all workers. For visitors and others, the induction training will include information about the activities to be performed on the day of the visit, and general site and safety rules. This includes information on restricted/off-limit areas, emergency notification and muster areas, accessible emergency channels, requirements to follow instructions while on site, etc. Visitor will always be escorted while being on site.

#### E&S Training

Specialized technical E&S training will be the responsibility of each party to their workers. Each party is responsible to ensure that their workers have sufficient knowledge and capacity to implement E&S management that is relevant to their works and conducting their works in compliance with the E&S requirements of the project. The training plan and records (i.e., material, attendance list, etc.) of the implementation will be submitted to authorized PLN Staff/HR for verification.

OHS training needs of the project workers, will be developed in accordance with the topics identified from Hazard Identification and Risk Assessment result. For PLN staff, this will follow the process described in the PLN.PST-SMK3.PR.MR-24 on Human Resources Training and identified using the Competence Matrix (Form FRM-U-024-01) that is developed by the HRD team for all job titles and roles within the company. While for contractor workers, the training needs and its implementation arrangement under the contractor's responsibility will be included in the contract between PLN and the respective contractor.

### 6.2.3 Construction Works

#### Labour Management

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Early works of construction will typically require a larger number of non-skilled workers recruited from the local workforce, with the common practice of utilizing short-term contracts to support specific task activities. The number of workers will be reduced following the completion of these early works, transitioned into skilled workers to conduct technical works from the Contractor.

As described in the PLN and the Contractor Labor Management Procedures, labor management measures during this construction stage will include:

- Management for employment opportunities and recruitment process, including arrangement for local recruitment and utilization of local suppliers, that is transparent, non-discriminative and fair, and arrangements for screening of workers competency, age and health;
- Working agreements and the terms and conditions of work, referring to requirements from the PLN Corporate HR Policy and the PLN Collective Labour Agreement, as well as relevant IA recommendations (e.g., code of conduct, issues of non-compliance, etc.);
- Provision of personnel for labour management monitoring, including for requirement of minimum working age, child/forced labour prevention and violation to code of conduct, including from contractor to the primary supplier workers;
- Provision of workers individual grievance mechanism and acknowledgement on the rights of the workers to participate in labour union of their respective companies;
- Arrangement and support for vulnerable workers, including women and workers with disabilities, through terms and conditions of works that considers their specific needs (e.g., leaves, working hours, etc.), support on raising their opinions and grievances in the workplace and to obtain the same opportunity in work, including for training and promotion.

In the present of Community Workers to support the early construction works, careful attention will be given by the PLN Staff (or assigned E&S Consultant) to ensure that the participated workers are working in a voluntary basis with no threat or forces from other parties or from internal community authority:

- Work to be assigned shall be in accordance with their capacity and skill;
- PLN Staff or IPP staff will conduct screening and monitoring to prevent forced and child labour found within the workforce, and ensure that terms and conditions of work is understood and agreed by the community worker/their representative prior to the work commencement;
- A worker's grievance mechanism will be provided that addresses the specific needs of facilitation (e.g., language, tradition, means of communication etc.).

#### Occupational Health and Safety (OHS)

OHS risks during construction will arise from the hazard of working activities, utilization of materials and equipment, unsafe working conditions and workers behavior in conducting the works. Potential OHS hazards to workers may include electrical hazards, work at heights, confined spaces, lifting and manual handling, exposure to environmental elements, chemical



hazards, noise, dust, heat, dangerous animals/plants, communicable disease, etc. (see **Annex 2**).

Mitigation of OHS risks and impacts should start with creation of a safe working conditions through elimination, substitution and isolation of the hazard from the workplace and work process; then, by guiding for safe acts, which includes provision of administrative controls to manage the way the workers conduct the work activity and provision of Personal Protective Equipment (PPE) as a last resort (least effective measures) to protect the workers.

For primary suppliers, the Contractor shall require and verify suppliers' commitments and declarations to prevent forced and child labour and to address OHS issues, particularly where there is considered to be a significant risk (i.e., if there have been related issues in the past).

If there are Community Workers to support the early construction works, careful attention will be given by the PLN Staff (or assigned E&S Consultant) to ensure that those workers are working in a safe manner (e.g., provision of training, PPE, dedicated supervisor/inspector, etc.), and within a safe working environment.

OHS Mitigation measures in the Contractor's plans/procedures will, among others, include the following:

- Development of working program and control of the work program implementation (refer to PLN.PST-SMK3.PR.MR-16 on Work Program Development and PLN.PST-SMK3.PR.MR-17 on Control of Work Program Implementation);
- Works hazard identification and risk assessment, recommendation and mitigation measures to reduce the risk level (refer to PLN.PST-SMK3.PR.MR-07 on Hazard Identification);
- Work Permit for hazardous or high-risk works, such as working at height, work in confined space, work in prohibited area, work with electrical sources, heat sources, radiation sources and within highly polluted areas (refer to PLN.PST-SMK3.PR.MR-21 on Work Permit);
- Traffic Management Plans, where relevant;
- Inspection of hazard source control, such as from work activity, material and equipment, unsafe working conditions/act/behavior (refer to PLN.PST-SMK3.PR.MR-08 on Workplace Inspection and FRM-U-008-01 on Inspection Report Form-see Annex 3);
- Provision of tools and programs to protect workers health and safety, such as safety briefings, prestart toolbox talks, OHS procedures/plans socialization and training, personal protective equipment, supervision, health checkup and facilitation to access first aid/medical service (refer to PLN.PST-SMK3.PR.MR-23 on Health Checking and other relevant PLN plans/procedures).

#### *Personal Protective Equipment (PPE)*

Provision of PPE will follow the recommendations from the risk and hazard assessment of the work activities that will include, at minimum, mandatory PPE such as helmet, safety boots, high-visibility vest, and other PPE(s) relevant to the specific hazards. Provision of PPE is regulated under PLN Corporate Procedure PLN.PST-SMK3.PR.MR-22 on Procurement of Goods/Services. PPE to be procured must be analyzed for its compliance with relevant OHS requirements and criteria, including with PLN specification standard and SNI and/or other

relevant OHS requirements. For replacement of inadequate or damaged PPE, the basis is the PLN Corporate Procedure PLN.PST-SMK3.PR.MR-20 on Maintenance. This procedure requires for maintenance inspection and repair/procurement to replace the damaged/inadequate OHS protection facility/equipment including PPE. Annual budget will be allocated for routine and non-routine maintenance activity in accordance with the hazard identification, risk assessment and control process. Followed by inventory of availability and conditions of protection facility/equipment and inspection of its utilization by workers, using Form FRM-U-020-01 on Maintenance/Repair Request for PPE, Fire Extinguisher, Equipment and Official Journey Vehicle. PPE is specifically regulated under the Ministry of Manpower (MOM) Regulation No. 8/2010 on PPE, which requires provision of PPE that meets the Indonesian National Standards (SNI) by the employers free of charge. Management of PPE required by this regulation are as follow:

- Identify the needs and requirements for PPE;
- Select PPE that is in accordance with the type of hazard and the needs and comfort of the workers;
- Provide training;
- Provide use, maintenance and storage procedure;
- Provide disposal or destruction management;
- Provide supervision;
- Provide inspection; and
- Evaluation and reporting

In addition, the regulation provides description of workplace where the PPE is mandatory to be used, requirement for written notification and signage of PPE mandatory utilization, workers obligation to use PPE while entering the workplace (and to object if provided PPE is not relevant/not comply with the requirement), and attachment for the details of PPE types and functions. Summary of this PPE types and functions is available in **Table 5**.

**Table 5 Summary of regulated PPE types and functions**

<b>PPE</b>	<b>Hazard Protection Function</b>	<b>Types of PPE</b>
Head protection equipment	Protect the head from impact, collision, fall or hit by sharp objects or hard objects that float or slide in the air, exposed to heat radiation, fire, chemical splashes, microorganisms and extreme temperatures.	Safety helmets (safety helmets), hats or hoods, head coverings or hair restraints, and others.
Eye and face protective equipment	Protect the eyes and face from exposure to hazardous chemicals, exposure to particles floating in the air and in bodies of water, splashes of small objects, heat, or hot steam, ionizing and non-ionizing electromagnetic wave radiation, light beams, collisions or blows from hard objects or sharp objects	Safety glasses (spectacles), goggles, face shields, diving masks, face shields and safety glasses in unity (full face masks)
Ear protection device	Protect the hearing device against noise or pressure	Ear plugs and ear muffs
Respiratory protective	Protect the respiratory organs by channeling clean and healthy air and / or filtering contamination of chemicals, micro-	Masks, respirators, catheters, canisters, Re-breathers, Airline respirators, Continues Air

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<b>PPE</b>	<b>Hazard Protection Function</b>	<b>Types of PPE</b>
equipment and supplies	organisms, particles in the form of dust, fog (aerosols, steam, smoke, gas / fume, etc.)	Supply Machine, Air Hose Mask Respirators, diving tanks and regulators (Self-Contained Underwater Breathing Apparatus/ SCUBA), Self-Contained Breathing Apparatus (SCBA), and emergency breathing apparatus
Hand protective equipment	Protect hands and fingers from exposure to fire, hot temperatures, cold temperatures, electromagnetic radiation, ionizing radiation, electric current, chemicals, collisions, blows and scratches, infected with pathogenic substances (viruses, bacteria) and microorganisms	Gloves made of metal, leather, canvas fabric, coated fabric or cloth, rubber, and chemical resistant gloves
Foot protection device	Protect the feet from being hit or collided with heavy objects, punctured by sharp objects, exposed to hot or cold liquids, hot steam, exposed to extreme temperatures, exposed to hazardous chemicals and microorganisms, slipping	Safety shoes in smelting, foundry work, industry, building construction, work with potential blasting hazards, electrical hazards, wet or slippery workplaces, chemicals and microorganisms, and/or animal hazards and others
Protective clothing	Protect the body in part or all parts of the body from the dangers of extreme hot or cold temperatures, exposure to fire and hot objects, splashing chemicals, hot liquids and metals, hot steam, impact with machinery, equipment and materials, scratches, radiation, animals, pathogenic micro-organisms from humans, animals, plants and the environment such as viruses, bacteria and fungi, increase person's visibility to prevent accidents (from not being seen)	Vests, Aprons/Coveralls, Jackets, protective clothing that covers part or all of the body, high-visibility reflective vests/clothing
Personal fall protection equipment	Limit the movement of workers so as not to enter places that have the potential to fall or keep workers in the desired work position in a tilted or hanging state and hold and limit workers from falling so that they do not hit the ground floor	Body harnesses, carabiners, lanyards, safety ropes, rope clamps, descenders, mobile fall arresters, and others
Buoy	Protect users who work on water or on the surface of the water in order to avoid the danger of drowning and or regulate the buoyancy of users so that they can be in a position to sink (negative buoyant) or float (neutral buoyant) in the water	Life jackets, life vests, and buoyancy control devices

### Accommodation Arrangements

PLN, IPP, or Contractor will ensure that their workers are located in an appropriate accommodation that maintain and protect the workers' health and welfare. Temporary rest

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shelter, drinking water, and adequate sanitation facilities will be provided for all workers onsite. Requirements in providing project worker accommodation will be based on result and recommendation of the hazard identification and risk assessment (HIRA), in respective to the stage and type of the project. The HIRA's mitigation action, in relation with project worker accommodation, will be undertaken as reasonably practicable in accordance with project's working conditions (time and location); considering the criteria regulated in the existing applicable PLN procedures, national regulation (Ministry of Manpower Regulation No. 14/2017 on Building Amenity Requirements), and the international standards from IFC/EBRD on Guidance on Workers Accommodation, as applicable<sup>8</sup>. Among others, accommodation for workers consider appropriateness of the location, be clean, safe, provide adequate space with good ventilation (to prevent heat buildup within the space) and, at minimum, meet the basic needs of workers, and other appropriate requirements.

For this purpose, PLN, IPP or the Contractor can directly provide these accommodation (e.g., lodging, meals) and other facilities for workers; or PLN, IPP or Contractor can provide guidance for workers on their selection of accommodation to ensure on their health and welfare. Among others, mitigation measures that will apply for provision of accommodation will include:

- Provision for gender (i.e., discrete facilities for female workers) if necessary;
- Routine cleaning, laundry, housekeeping and provision of clean sanitary facilities;
- Diseases prevention strategy through provision of healthy meals, health socialization program;
- Periodic inspection to check the sanitary and hygiene conditions.

Provision of accommodation will also consider measures to prevent any risks of GBV, SEA/SH between workers and security issues through provision of clear code of conduct, sanction for noncompliance and provision of facilities that are separated for vulnerable workers (e.g., women, workers with disabilities, etc.), as necessary. Monitoring and inspection to the onsite workers accommodation will be conducted periodically, to ensure on its compliance with the applicable requirements (see Table 6 for monitoring consideration of workers' accommodation).

### Security

Security risks assessment will be conducted for the boundary of project construction activities and boundary of workers' accommodation and will analyze contextual factors that may cause or exacerbate human security risks. Depending on the security level of the construction area and vulnerability of the surrounding communities, PC Team (directly or through the Contractor) may provide security arrangements to protect workers and the construction facilities. The responsible party in provision and management of security, will develop the project Security Management Plan (SMP)<sup>9</sup> and requires the following steps:

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<sup>8</sup> Workers' accommodation: processes and standards. A guidance notes by IFC and the EBRD, August 2009 version (available at: <https://www.ifc.org/content/dam/ifc/doc/mgrt/workers-accomodation.pdf>)

<sup>9</sup> See Annex 2 of the World Bank Good Practice Note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel, for example of a SMP outline

- Conduct initial and periodic assessment of security risks and relevant security arrangement needs;
- Conduct screening and verification of the direct or contracted security workers confirming that they have not been implicated in past abuses;
- Verify and/or provide training for all security personnel, in the relevant labor and working conditions management, in appropriate conduct toward workers and affected communities, also in the use of force, and where applicable, in the use of firearms. Training for security personnel will be coordinated with the responsible Police Unit or other government security services;
- Include clear instructions on limited circumstances in which force may be used to protect the project personnel or property, under the contract with the security service personnel. The contract will ensure that force is used only for preventive and defensive purposes and in proportion to the threat;
- In the use of security services from government entities, the responsible party will initiate discussion on the basics of the relationship and collaboration, on the project approach for protection of project personnel and property, as well as on project policy to prevent risks to community. During the discussion, the project will communicate their policy of preventive and proportional responses in a manner that respects human rights and have a mutual understanding on what forces will be deployed and how will the public security will respond to an incident;
- Conduct review to security performance through document review, audits, training, and evaluation of incident reports or complaints. External reviewers from government security services may assist as needed;
- Provide documentation and records of all security issues, feedbacks and/or concerns, involving workers and community. If unlawful or abusive acts of security personnel occur, the project will take action (or urge appropriate parties to take action) to prevent recurrence, and where necessary, report unlawful and abusive acts to the relevant authorities.

By default, the project security personnel will be equipped with non-lethal force. Security personnel will be armed only when warranted by the results of the security risk assessment. Any security personnel who are armed must have the appropriate training and legal authorization to carry a firearm. In this case, the project will require this practice to be used in defined and very specific roles, with the weapon that is licensed in accordance with the national laws and appropriate to the level of risk, with clear rules for the use of force, and with the requirement to first seek non-lethal methods of protection before resorting to the use of lethal force. No security personnel should be required to put themselves in harm's way. If necessary, the local police will be called in if the escalation of a situation warrants it.

#### 6.2.4 Workers Retrenchment and Demobilization

Contractor demobilization will be conducted after the construction is complete. Then, Contractor will hand over the site to the PLN Staff and to the PC Team. For this stage, the Contractor is required to plan for their workforce retirement in advance, including the

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<https://documents1.worldbank.org/curated/en/692931540325377520/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Security-Personnel-English.pdf>

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retrenchment plan, which does not violate the contract agreement with each worker. PLN will verify that contract and community workers (if any) has receive their final payments in accordance with their contract, before they are demobilized.

### 6.3 Commissioning, Operation and Maintenance Stage

During the operation stage, the number of workers will be less than construction stage, the composition will most likely consist of PLN staff and/or E&S Consultant and Contractor if hired to support the commissioning, operation and maintenance (O&M) activities. Prior to operation stage, the following mitigation measures will be conducted to protect labour and working conditions. Among others, this will include:

- Development of Project Operation Plan by the PO Team, based on the applicable Policies and Standard of the PLN and the involved IFIs, developed project SOPs and information from the construction Contractor, and the Project's E&S MPs that are made based on IA recommendation. This Project Operation Plan should always include an OHS Plan and terms and conditions of employment in accordance with the PLN's and/or the respective Contractor's human resources policies;
- Kick off meeting between PO Team with PLN Staff and/or the Contractor assigned for O&M for agreement of E&S roles and responsibilities, E&S mitigation measures and program implementations (e.g., induction, training, briefing), mechanism for inspection, monitoring, audit and reporting, arrangement for emergency response and grievance mechanism;
- Identification of the primary suppliers and the relevant labor and working conditions requirements to be added to their contracts at the beginning of the operations;
- Provision of travel management plans, covering risks/impacts identification and mitigation measures for (i) routine travel to and from the workers accommodation locations to project site area and (ii) potential non-routine travel of visitors (e.g., from PLN corporate office, IFIs, etc.) to project site area. The travel arrangements include consideration of approved transportation modes, speed limit, travel routes, safety driving and vehicle checklist (if transportation is provided), and information of rest areas and the nearest or contact of emergency responder (e.g., police station, ambulance, car crane, etc.);
- E&S Induction that will be mandatory for every worker or visitor accessing the site for the first time and when there are changes to Operation E&S hazards.

#### Labour management

PLN Staff will follow the applicable arrangement of the PLN Corporate (e.g., HR Policy, PLN Collective Labour Agreement) relevant to labour management practice and requirement from the Project Operation Plan. Contractor, if hired to support, will follow the labour management agreed during the procurement kickoff meeting. Mitigation measures for labour will essentially similar to provision during the construction stage, with additional consideration of (among others):

- In utilization of migrant and foreign workers, identification and assessment of potential risks from introducing these workers into the project site area and their interaction with the local workers. Mitigation measures may include transparent recruitment criteria and

remuneration structure, and provision of other labour terms and conditions that are not substantially different from other workers (e.g., working hours, leaves, health insurance, etc.);

- Emphasize the equal access to project's worker's grievance mechanism, to raise complaints regarding E&S Implementation and project support to participate in labour union of their hiring company or made specifically for the project
- Emphasize the prohibition to employ and utilize service (e.g., cleaning service, housekeeping, etc.) from child and forced labour and provision of monitoring to ensure its compliance during the O&M.

### Occupational Health and Safety

Typical OHS risks from the O&M activities will include risks from (a) routine operation activities, such as from heat, noise and vibration produced by the equipment, from (b) maintenance activities, such as chemical hazards, electrical hazards, confined spaces and from (c) emergency situation of the facility, such as fire and explosion hazards. Mitigation measures that will be provided for OHS in the O&M stage will refer to the existing PLN OHS plans/procedures and available SOPs of the work activities that covers, but not limited to, the following:

- Identification of work hazards, impact assessment and provision of control mechanism to reduce the risks, as well as pre-assessment for non-routine and/or high-risk work activities and approval of work permit prior to the work commencement;
- Development of Key Performance Indicators for OHS management in O&M stage, that among others will include parameters of safety hours, number of incidents/accidents, E&S trainings, etc.;
- Provision of resources (i.e., personnel, expertise and budget), for prevention and mitigation measures for OHS, including OHS inspectors, first aiders, OHS training, protective equipment, barriers, signage, etc.;
- Inspection, monitoring and reporting, investigation and reporting for cases of incidents, accidents and emergencies, provision and verification of corrective action implementation;
- Annual health checkups to all workers, and medical facility (or liaison with nearest facility) for response to any case of occupational related illness, first aid, injury or accident;
- Provision of emergency preparedness and response, addressing plans for potential emergency risks from natural disaster, facility operations, etc.

### Accommodation

PLN, IPP or Contractor will ensure that their workers are located in an appropriate accommodation, and have access to appropriate services (e.g., meals/catering services, laundry, cleaning), and appropriate sanitation facilities; especially in site locations that are not easily reachable and to workers that are not hired from the local workforce (see requirements from IFC/EBRD for Guidance on Workers' Accommodation and Ministry of Manpower Regulation No. 14/2017 on Building Amenity Requirements). To protect the workers' health and welfare, the accommodation can be directly provided by the PLN, IPP or the Contractor

to their workers; or PLN, IPP, or Contractor can provide guidance and/or provide list of approved accommodation for workers selection, to ensure on their health, safety and hygiene. The project code of conducts, including prevention of GBV, SEA/SH remain applies within the accommodation.

### Security

The security risk assessment will determine the level of security in the project area, the vulnerability of the surrounding communities, and the project need for security services, as well as the level of the required security arrangements. PO Team or the Contractor (if hired for O&M activities) will take charge in provision of security services to protect workers and the operational facilities.

The requirement for security arrangement will essentially be similar with the requirements described in the construction stage (see Security under **Section 6.2.3**). For the operation stage, the PO Team will be responsible for developing the project Security Management Plan and will have overall responsibility for monitoring security performance of the direct or contracted security personnel. If necessary, particularly in the case of armed security, the PO Team may request for assistance from the appropriate government security services in monitoring and reviewing the project security performances.

## 6.4 Emergency Preparedness and Response Plan

PLN Corporate Procedures No. PT-HSSE-13 on Emergency Preparedness and Response Procedure and No. PLN.PST-SMK3.PR.MR-09 on Emergency Conditions Procedure, guided the implementation of the Emergency Preparedness and Response Plan (EPRP) for the corporate level activities. Project-level EPRP will be established in a separate project-level E&S document, adjusted to cover relevant potential emergency risk for each project activities, potential emergency magnitude, potential impacted parties (e.g., nearby communities, ecological receptors, workers, etc.), existing emergency response system in the project location (e.g., regional PLN's/city/regency emergency call center), and emergency response contacts (e.g., police, army, navy, regional Disaster Mitigation Board (BPBD), etc.). Emergency case may include but not limited to natural disaster, fire, bomb threat, riot, OHS incident, chemical/hazardous material/hazardous waste spill, etc. Contracts will require that contractors to develop their own EPRP, consistent and/or inline with PLN's Plan (PLN's EPRP if any and applicable and/or potential hazard and emergency situation identified and managed in project's ESMP)

### 6.4.1 Preparation of Emergency Preparedness and Response

Contractors for construction phase will develop EPRP based on potential hazard and emergency situation identified from Hazard Identification and Risk Assessment process and Impact Assessment process as a whole, added by any additional specific hazard and emergency situation that may identified from contractors detailed working plan. The EPRP shall be inline and consistent with applicable PLN's plan(s), if any. The EPRP will be reviewed and shall have clearance from authorized PLN's personnel in charge of Health and Safety aspect of the project. The same process will be applied for operation stage. If contractor is contracted to runs the PLN's facilities, then the contractors shall develop the EPRP, or if the



facilities operated by PLN, the head of facilities should responsible of the development of EPRP.

Emergency identification and response form (FR-HSSE-13-01 – see **Annex 3**) that include initial possible mitigation action, and initial possible recovery action, can be use as tools in developing EPRP.

#### 6.4.2 Development of the Emergency Response Team

Following the development of EPRP, emergency response team will be formed. The emergency response team will be formed by contractor (for construction stage) and the head of PLN's facility (for operational stage) with number and roles that are in accordance with the identified emergency scenarios, such as fire-responders, first aiders, evacuation vehicle drivers, and lead/chief of the emergency response team. Within this Emergency Response organization structure, external parties for coordination and assistance to emergencies will also be identified along with the communication lines and their roles in the case of emergency. The established Emergency Response Team to be socialized to all project workers.

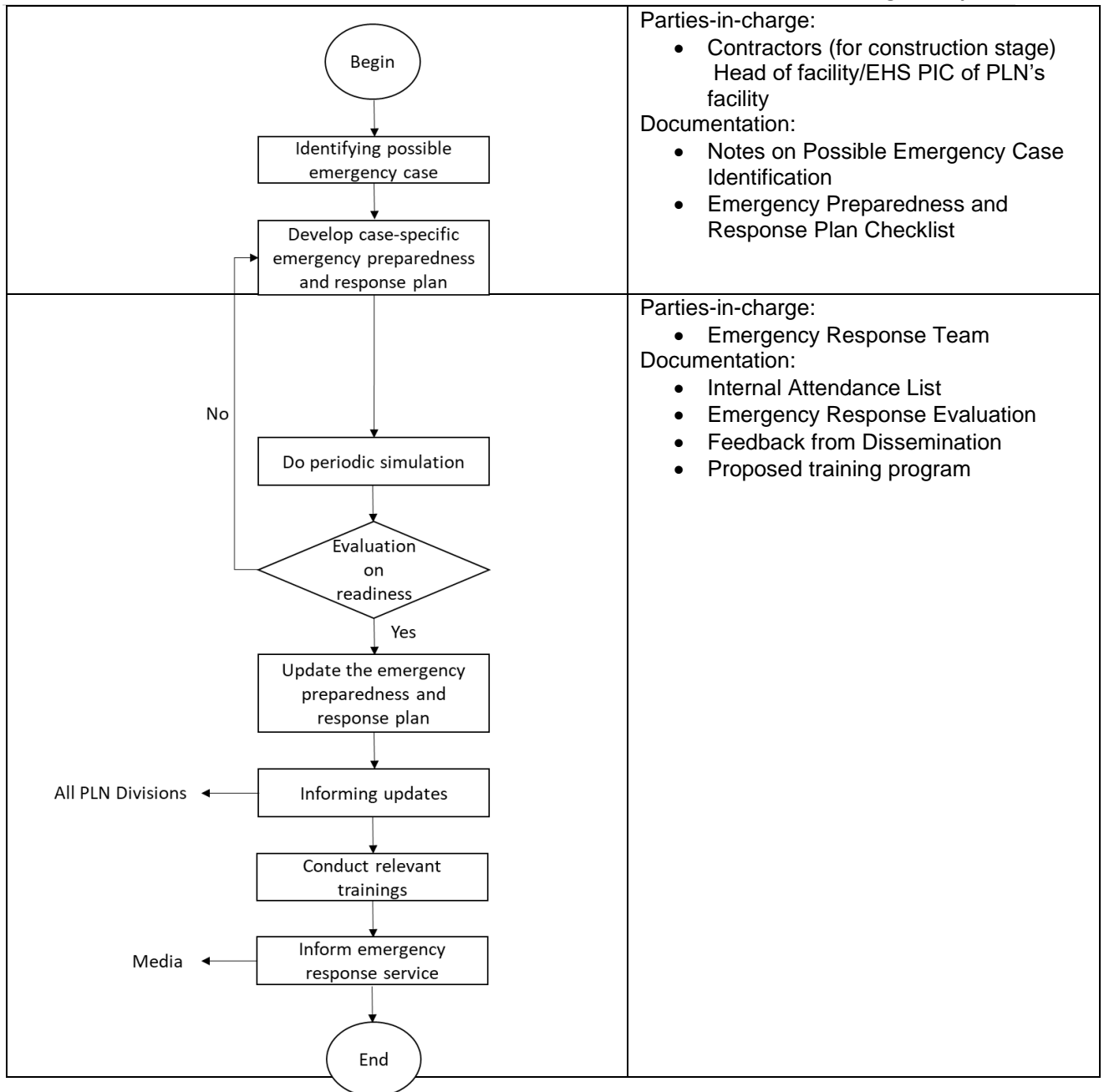
#### 6.4.3 Periodic Drill and Emergency Equipment Maintenance

Chief of Emergency Response Team will initiate a periodic simulation and evaluation to the established emergency preparedness and response programs. In this process, emergency contact point for the site will be determined. Emergency contact points for PLN headquarter in Jakarta is available in the PT-HSSE-12-03. Based on the evaluation result, the emergency preparedness and response will be updated, then communicated to all relevant PLN Corporate Divisions and to all project workers through project notification media and PLN internal media. Emergency drill will be conducted once every year.

Every emergency response equipment will be inspected regularly (depend on the type of equipment) and documented in the inspection form (FR-HSSE-13-02). The form will capture the type of equipment, quantity, and their conditions. Flowchart of the Emergency Response Plan development is as presented in **Table 6**.

**Table 6 Process Flowchart of Emergency Preparedness and Response Plan Development (Construction and Operation Stage)**

Stage 1	
Flowchart	Notes



## 7 Monitoring and Review

### 7.1 Labour and Working Conditions Monitoring

The Contractor's monitoring program for labour and working conditions management implementation will be set in the C-ESMP for the construction stage and in the Project Operation Plan for the operation stage (if utilizing the Contractor). The plan will provide details of monitoring location, methods, frequency, indicators, responsibilities, documentation and reporting requirements. Monitoring and review will be conducted to ensure that actual conditions are acknowledged, to identify implementation challenges that suggest mitigation

measures are not successful in avoiding or reducing impacts to labour and working conditions, and to identify changes to management measures to make it more effective in protecting the labour.

The Contractor responsibilities in monitoring its direct and indirect workers (i.e., its subcontractor and primary supplier workers) will be written in the Contracts, including the responsibility to provide resources (i.e., personnel, expertise, and budget) that are sufficient to allow for the required implementation of labour and working conditions management and for the monitoring and reporting activities. The Contractor's Monitoring Plan, , will describes the arrangement for monitoring the contractor's implementation performance. As stated in sub-section 7.1.2 of the ESMS Manual, this plan includes the contractor's arrangement for personnel appointed for monitoring, along with its detailed approach, location, time, and the specific outcome that is to be achieved or standards to be achieved. A set of project Key Performance Indicators (KPIs) will be established and agreed upon between PLN and the contractor prior to mobilization.

In addition, PC/PO Team will also assign personnel from the PLN Main Unit and/or the E&S Consultant (if hired) to monitor and evaluate the overall implementation of project's labour and working conditions measures, including the implementation of the monitoring program by the Contractor(s). The assigned PLN personnel will ensure that the overall project implementation is in compliance with the specific project labor and working conditions requirements (i.e., C-ESMP, Project Operation Plans, other relevant project E&S MPs), results of OHS Hazard Identification and Risk Assessment, as well as with the relevant PLN labor and working conditions management procedures (i.e., PLN.PST-SMK3.PR.MR-04 on Workplace Monitoring), the applicable regulatory and IFI labour and working conditions requirements.

Contractor should prepare a monthly report of overall implementation of project's labour and working condition measures (including OHS aspect) based on the format and style provided in the C-ESMP. Contractor may expand the standard reporting used by the PLN to cover all E&S risks required in the project ESMP, or expand the Contractor's own reporting format with additional report requirements provided in the project ESMP. In any case, monitoring requirements in the project ESMP should be fulfilled. The report shall be submitted to assigned PLN personnel (from PLN Main Unit and/or the E&S Consultant). PLN reserves the right to share the contractor's performance report with the IFI and the government as detailed in the contract.

Monitoring of labour and working conditions, among others, include the considerations as described in **Table 7**.

***Table 7 Monitoring Considerations for Labour and Working Conditions***

<b>Labour and Working Conditions Impacts</b>	<b>Monitoring considerations</b>
Labour Management	<ul style="list-style-type: none"> <li>• Monitoring to the number and composition of workers and inspection of their presence onsite (e.g., direct, contracted, primary supplier, etc.);</li> <li>• Inspection on the presence of child and/or forced labour practice;</li> </ul>

Labour and Working Conditions Impacts	Monitoring considerations
	<ul style="list-style-type: none"> <li>• Inspection to the records of workers screening, selection and recruitment process conducted by the contractor, and the contractor mechanisms to check their subcontractor and primary supplier compliance with the project's labour and working conditions management;</li> <li>• The availability and status of the workers contract agreement, the written terms and conditions, and the workers acknowledgement on project's E&amp;S requirements including the code of conduct;</li> <li>• The status and records of workers E&amp;S induction and other relevant E&amp;S training (plan, actual and review);</li> <li>• Records of noncompliance to project E&amp;S requirements, including information on type of noncompliance, fines/sanctions received, remedies or actions taken;</li> <li>• Worker grievances, including information on type of grievance, date of occurrence, actions taken/resolution, status of resolution;</li> <li>• Careful monitoring of GBV, SEA/SH related grievance from workers, actions taken/resolution and status of resolution.</li> </ul>
OHS impacts	<ul style="list-style-type: none"> <li>• Safety records, including total working hours, recordable incidents (lost time incidents, medical treatment cases), first aid cases, accidents, fatality, etc.;</li> <li>• Monitoring and inspection for near-misses, incidents, unsafe conditions/acts/behavior of workers;</li> <li>• Type of hazardous works performed, number of work permits issued, noncompliance or identified best practice, etc.;</li> <li>• Certification and competency of workers (i.e., operator, inspector), calibration status of tools and equipment; appropriateness of OHS protective equipment (i.e., PPE, barriers, signage, leak prevention, etc.);</li> <li>• Implementation of OHS awareness socialization, briefings, training and drills, the implementation records and evaluation;</li> <li>• Reports of routine OHS program implementation and investigation reports of any incidents, near misses, accidents, or noncompliance of OHS management;</li> <li>• Preparedness of the emergency response system.</li> </ul>
Risks associated with provision of accommodation	<ul style="list-style-type: none"> <li>• Adequacy and cleanliness of sanitation facility, including separated facilities for vulnerable workers as relevant (i.e., women workers, workers with disability);</li> <li>• Sufficient provision of drinking water, hygiene meals/catering service, temporary shelter for rest between works;</li> </ul>

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Labour and Working Conditions Impacts	Monitoring considerations
	<ul style="list-style-type: none"> <li>• Cleanliness and hygiene of provided accommodation (lodging, camp) and provision of E&amp;S relevant requirements;</li> <li>• Careful monitoring of GBV related grievance that occurs within the area of accommodation services;</li> <li>• Spread of diseases or other degrading health conditions of workers utilizing the accommodation.</li> </ul>
Risks associated with Security arrangement	<ul style="list-style-type: none"> <li>• Documentation and records of assessment on the needs of security arrangement and the level of security required;</li> <li>• Documentation and records for past abuse or other issues checking of security employer and personnel;</li> <li>• Documentation and records of security personnel training;</li> <li>• Number of security related issues, mitigation measures conducted and preventive measures to be taken;</li> <li>• Number of grievances from workers related to utilization of security services.</li> </ul>

#### 7.1.1 OHS Monitoring and Inspection

In accordance with PLN.PST-SMK3.PR.MR-08 on Workplace Inspection, inspection activity will be conducted to ensure on the commitment of all management and workers towards the control of potential hazard. Inspection is conducted through observation (incl. interview with workers) of work methods, workers behavior, equipment, OHS facility and working conditions utilizing the Inspection Checklist (FRM-U-008-02).

As required in the PLN CSMS (SPLN U1.006\_2021), authorized PLN personnel (under PP Team, PC Team, or PO Team – subject to the stage of project) will conduct inspections to the contractor's work location at the frequency determined by the KPIs. The frequency of the inspection will be proportionate to the project overall timeline, risks, potential hazards, complexity of the works, and involvement of subcontractors. Unannounced inspections may be conducted by the PLN authorized personnel in case needed. When non-compliance events are found, PLN may issue a verbal warning and proceed through written warning, written notice of compliance removal of personnel, or even contract termination. In the event that present an imminent hazard to workers, other people, or the environment, the PLN authorized personnel will have the right to conduct a Stop Work Authority (SWA). Individual workplaces/activities or the entire project can be issued a stop work order, which would be lifted when the hazard is no longer present.

For routine monitoring and inspection onsite, the provision of manpower resources (by PLN, E&S Consultant, and/or the Contractor) during the construction activity will, at a minimum, comply with applicable regulatory requirements, such as:

- MOM Regulation No. 1/1980 on Occupational Health and Safety of Building Construction, which requires development of an OHS unit at the initiation of construction work, with responsibility of conducting measures to prevent accident, fire, explosion, occupational illness, first aid and other rescuing activities;
- Directorate General of Labour Inspection Decree No. 20/2004 on Competence Certification for OHS Construction Expert, which specifies the number of OHS expert(s) in accordance with the number of workers and construction durations; and
- MOM Regulation No. 12/2015 on Electrical Occupational Health and Safety in the Workplace, which requires an Electrical OHS expert for electrical power generation activity of more than 200 kVA).

Among others, the OHS expert will need to have good understanding of the potential hazards of the construction activity; preventive measures for occupational accident; OHS regulatory requirements; OHS on excavation, foundation, concrete construction, steel construction, mechanical and electrical working activities; as well as health and working environment. The OHS expert is expected to have the skillset to identify potential occupational accidents; conduct OHS management; control the hazardous conditions and acts; provide training, consultation and communication; implement OHS inspection procedures; and report on any occupational accidents.

## 7.2 Labour and Working Conditions Review

As written in project Management Plans (i.e., C-ESMP and/or Project Operation Plan) and agreed in the contract document, the Contractor shall ensure that its direct workers have terms and conditions of employment and management of working conditions that comply with the regulatory requirements and, at a minimum, meet the requirements of the project Management Plans requirement in addition to its own company's standard on labor and working conditions (if not more stringent). For its indirect workers (i.e., workers of subcontractors and primary suppliers), the Contractor shall ensure and provide compliance verification measures (i.e., inspection, audit) to ensure that the indirect workers have mechanism and/or management system in place to meet the project's labor and working conditions management requirements. The Contractor is responsible for reviewing and ensuring the compliance of its direct and indirect workers, and for taking the necessary follow-up action for non-compliance identified through the Contractor's own monitoring or as a result of PLN monitoring and review.

The appointed PLN Regional Unit and the E&S Consultant (if hired) will review and verify the overall labor and working conditions performance of the Contractor(s) and the PLN direct workers at the project site, and report the review result to the PC/PO Team, the ES Team, Site Manager, and other relevant parties for further review. Any non-compliance found in the performance of direct PLN workers will be responded in accordance with PLN's corporate policies on labor management and working conditions (i.e., PLN Collective Labor Agreement, contract agreement between the respective PLN workers and the company) and reported to the relevant HR personnel of the company for appropriate follow-up action. While for non-compliance found within the Contractor, Subcontractor and Primary Supplier workers, PLN will follow the arrangement in the contract with the Contractor for the remedies, which may include verbal warnings, written notices of non-compliance, removal of personnel, stop work orders, or even termination of contract. For non-compliance or violation with the law, PLN will enforce the contracts and/or report the violation to the relevant government authorities.



The PC/PO Team and ES team will require that the parties conducting the monitoring (e.g., safety officers, HR personnel, supervisors, site manager, etc.) have the appropriate competencies and have received appropriate training to conduct performance monitoring and to provide recommendations for non-compliance, in accordance with the project's labor and working conditions requirements.

### 7.3 Incident Reporting

#### 7.3.1 OHS Incident Reporting

OHS incident reporting will be conducted to any workplace incident, including occupational illness and occupational accidents. In accordance with the PLN Corporate Procedure PLN.PST-SMK3.PR.MR-10 on Incident, Accident and Occupational Illness Reporting, all workers including employee, outsourcing and contractor will be required to promptly report to its supervisor, if witnessing or experiencing an incident, occupational accident or occupational illness. The initial report can be submitted verbally, in order to be able to immediately respond to the incident. Contractors should report incidents to Main Unit in charge or its supervision consultant at the construction stage, while the head of facility should report incidents to PO team or its supervision consultant.

Initial report of incident, using FRM-U-010-01 form for Incident and Illness Notification Report, consist of brief summary describing name of incident reporter (name, title, company name); time, date and place of incident; potential incident subjects (people, property, plant) and brief information of the subject; potential severity of incident (fatal-medium, low, or non-conformance); and the sign of incident reporter. This initial report is to be developed in accordance with the following requirements:

- Incident or occupational illness to be reported in writing within 12 hours of the incident or after receiving a doctor's diagnosis;
- Minor incidents (with total loss value less than one million Rupiahs) must be reported in writing to the Secretary of OHS Advisory Committee within 6 hours after the incident;
- Moderate to fatal incidents (with total loss value higher than one million Rupiahs) must be reported in writing to the Secretary of OHS Advisory Committee within 3 hours after the incident;
- Written report can be developed by the worker themselves or with the help of their respective supervisors, to be then submitted to the Secretary of OHS Advisory Committee for evaluation and review;
- Initial incident report must be immediately forwarded by the Secretary of OHS Advisory Committee to the head of General Division and Management of PLN Corporate for immediate follow-up;
- Moderate to fatal incidents must be reported to the local Manpower Agency at no later than 2x24 hours after the incident.

Following the incident report, immediate action will be determined by the relevant Senior Manager, by prioritizing the speed of dealing with human casualties (if any), securing equipment and localizing the scene of the incident. To prevent recurrence of the incident, investigation and follow up actions shall be conducted with the Procedure to mitigate the OHS issues (see PLN.PST-SMK3.PR.MR-03).

All incidents, accidents and occupational illness shall be investigated to understand the root cause. Investigation or Root Cause Analysis (RCA) may be conducted by involving a composition of teams responsible with ESMS implementation for the project (ES, PP, PC, PO, Finance, Procurement, Main Unit, HRD) as considered adequate. Investigations to be conducted utilizing FRM-U-010-02 Incident, Accident and Occupational Illness Investigation form that requires identification of information, evaluation of risks, its severity and likelihood of re-occurrence, description of incidents, root cause analysis, and corrective actions. Copy (translated version) of this investigation form is attached in this OHS guideline.

### 7.3.2 Contractor Incident Reporting

In accordance with the international standards for bidding document (i.e., the World Bank Standard Procurement Document), the contractor is required to provide immediate notification for fatality or serious injury, damage to property, significant adverse effects or damage to private property, or any allegation of sexual misbehavior (SEA/SH). In case of SEA and/or SH, while maintaining confidentiality as appropriate, the type of allegation (sexual exploitation, sexual abuse or sexual harassment), gender and age of the person who experienced the alleged incident should be included in the information.

The Contractor, upon becoming aware of the allegation, incident or accident, shall also immediately inform the authorized personnel of PLN's management at project level (the relevant Main Unit) of any such incident or accident. The notification shall provide sufficient detail regarding such incidents or accidents. The Contractor shall provide full details of such incidents or accidents to the project within the agreed timeframe.

The Contractor shall require its Subcontractors and suppliers (other than Subcontractors) to immediately notify the Contractor of any incidents or accidents. Following the immediate notification from the Contractor, the project authority will take timely action in accordance with the PLN incident reporting procedure.

## 8 References

Listed below are references that may assist the project in implementing the requirements of this Labor and Working Conditions Management Guideline.

### Regulations:

- Law 1/1970 on Occupational Health and Safety Management;
- Law 4/1979 on Children Welfare
- Law 7/1984 on The Elimination of All Forms of Discrimination Against Women
- Law 21/2000 on Labour Union
- Law 13/2003 on Employment (as amended by Government Regulation in Lieu of Law 2/2022 and Law 6/2023 on Job Creation)
- Law 19/2011 on The Rights of Persons with Disabilities
- GR 50/2012 on The Implementation of Occupational Health and Safety Management System
- Ministry of Manpower Regulation No. 1/1980 on Occupational Health and Safety of Building Construction

- Ministry of Manpower Regulation No. 2/1992 on Procedure for the Appointment of OHS Obligations and Authority
- Ministry of Manpower Regulation No. 15/2008 on First Aid for Workplace Accidents
- Ministry of Manpower Regulation No. 8/2010 on Personal Protective Equipment
- Ministry of Manpower Regulation No. 12/2015 on Electrical Occupational Health and Safety in the Workplace
- Ministry of Manpower Regulation No. 9/2016 on Occupational Health and Safety in Working at Height
- Ministry of Manpower Regulation No. 14/2017 on Building Amenity Requirements
- Ministry of Manpower Regulation No. 5/2018 on Occupational Health and Safety in the Workplace
- Directorate General of Labour Inspection Decree No. 20/2004 on Competence Certification for OHS Construction Expert

International Standards:

- Asian Development Bank (ADB), Safeguard Policy Statement (SPS), Safeguard Requirements 1: Environment, June 2009
- ADB and the International Labour Organization (ILO), Core Labor Standards Handbook, October 2006
- Asian Infrastructure Investment Bank (AIIB), Environmental and Social Framework (ESF), Environmental and Social Standard 1: Environmental and Social Assessment and Management, November 2022 Revision
- International Finance Corporation (IFC), Performance Standard 2 for Labour and Working Conditions, January 2012
- IFC and the EBRD Guidance Note. Workers' accommodation: processes and standards, August 2009
- IFC Good Practice Handbook. Use of Security Forces: Assessing and Managing Risks and Impacts. Guidance for the Private Sector in Emerging Markets, February, 2017
- ILO (ratified) Conventions on labour and working conditions (Convention 105, Convention 138, Convention 111, Convention 182, Convention 98, Convention 81, Convention 87, Convention 187)
- World Bank (WB), Environmental and Social Framework (ESF), Environmental and Social Standard (ESS) 1 on Assessment and Management of Environmental and Social Risks and Impacts (2017) and the ESS1 Guidance Note (June, 2018)
- WB ESF, ESS 2 on Labor and Working Conditions (2017) and the ESS2 Guidance Note (June, 2018)
- WB Good Practice Note, Assessing and Managing the Risks and Impacts of the Use of Security Personnel, October 2018
- WB Good Practice Note, Non-Discrimination and Disability, June 2018
- WB Good Practice Note, Road Safety, October 2019
- WB Standard Procurement Document and Procurement Guidance - Environment, Social, Health and Safety in Procurement, September 2018
- World Bank Group (WBG) Environmental, Health, and Safety (EHS) General Guidelines, April 2007

- WBG EHS Guidelines for Electric Power Transmission and Distribution, April 2007
- WBG EHS Guidelines for Wind Energy, August 2015

PLN Documents:

- PLN Code of Conduct and Business Ethic 2022;
- PLN Collective Labour Agreement 2022-2024 and associated implementing regulations, i.e. Director Regulation No. 0030.P/DIR/2022 on Strategic Policy of Human Experience Management System; PLN Implementing Regulation No. 0036.E/DIR/2023 on Standard Procedure for Employee Official Travel; PLN Implementing Regulation No. 0040.E/DIR/2023 on Standard Procedure for Employee Award Management System; and PLN Implementing Regulation No. 0050.E/DIR/2023 on Standard Procedure for Talent and Employee Management System), as applicable;
- PLN Director Regulation No. 0015P/DIR/2020 on Protection, Prevention and Mitigation of Sexual Harassment within PLN;
- PLN Director Regulation No. 0182.P/DIR/2022 on Strategic Policy of Occupational Health and Safety, Installation Safety, and Public Safety;
- PLN Occupational Health and Safety Management System (OHSMS) Manual and Procedures, including:
  - PLN.PST-M.SMK3 on PLN Corporate OHS Management System Manual
  - PLN.PST-SMK3.PR.MR-03 on Mitigation of OHS Issues
  - PLN.PST-SMK3.PR.MR-04 on Workplace Monitoring
  - PLN.PST-SMK3.PR.MR-07 on Hazard Identification and the FRM-U-007-01 on Hazard Identification Form
  - PLN.PST-SMK3.PR.MR-08 on Workplace Inspection, FRM-U-008-01 Inspection Report Form and FRM-U-008-02 Inspection Checklist
  - PLN.PST-SMK3.PR.MR-09 on Emergency Conditions Procedure
  - PLN.PST-SMK3.PR.MR-10 on Incident, Accident and Occupational Illness Reporting, FRM-U-010-01 form for Incident and Illness Notification Report, and FRM-U-010-02 Incident, Accident and Occupational Illness Investigation
  - PLN.PST-SMK3.PR.MR-17 on Control of Work Program Implementation
  - PLN.PST-SMK3.PR.MR-18 on Procedure for Design and Modification
  - PLN.PST-SMK3.PR.MR-19 on Lock Out and Tag Out (LOTO)
  - PLN.PST-SMK3.PR.MR-20 on Maintenance and Form FRM-U-020-01 on Maintenance/Repair Request for PPE, Fire Extinguisher, Equipment and Official Journey Vehicle
  - PLN.PST-SMK3.PR.MR-22 on Procurement of Goods/Services
  - PLN.PST-SMK3.PR.MR-24 on Human Resources Training, FRM-U-024-01 on Competence Matrix, and U-024-02 on Training Need Analysis
- Relevant PLN Integrated Management System of the Health, Safety and Environmental Division Manual and Procedures, including:
  - PT-HSSE-01 on Risk and Opportunity Assessment and Action Plan
  - PT-HSSE-13 on Emergency Preparedness and Response Procedure, FR-HSSE-13-01 on Emergency Identification and Response Form, FR-HSSE-13-02 on Emergency Equipment Inspection Form

- PLN PT-K3L-29 on Management of Hazardous Waste, PCB and Asbestos for Distribution Works with Foreign Funds
- PT-K3L-30 on Prevention of PCB Cross-contamination for Distribution Works with Foreign Funds
- PLN Security Management System Manual and Procedures;
- SPLN U1.006\_2021 PLN Contractor Safety Management System

Templates:

- World Bank Template for Labour Management Procedures, September 2018 (<https://pubdocs.worldbank.org/en/755121538513950752/Labour-Management-Procedures.docx>)
- World Bank Examples for Codes of Conduct in GBV, SEA/SH Prevention – Annex 5 of the July 2017 report “Working Together to Prevent Sexual Exploitation and Abuse: Recommendations for World Bank Investment Projects” (<https://documents.worldbank.org/en/publication/documents-reports/documentdetail/482251502095751999/working-together-to-prevent-%20sexual-exploitation-and-abuse-recommendations-for-world-bank-investment-projects>)

## 9 Appendices

Annex 1 – Examples for Template of Code of Conduct

Annex 2 – Potential OHS Hazards and the Relevant Requirements

Annex 3 – PLN Forms and Checklists

### Annex 1 – Examples for Template of Code of Conduct

#### **Consulting Firms/Contractors Code of Conduct Implementation of Health, Safety, and Environmental Standards and Prevention of GBV**

The Company, (Company Name), is committed to ensuring that the Project will minimize negative impacts on the surrounding environment, communities, and workers. This will be done by implementing Health, Safety, and Environmental standards and ensuring Occupational Health and Safety standards and gender-based violence prevention are in accordance with the laws and regulations and relevant requirements established by Project (Project name). (Company Name) is also committed to protecting children under the age of 18 by creating and maintaining a safe and violence-free environment and ensuring that there are no incidents of sexual exploitation and abuse and sexual violence. All inappropriate acts against children, including sexual exploitation, abuse, and violence, constitute violence against children. Therefore, all parties involved in the project, including workers, contractors, suppliers, partners, or company representatives, are not allowed to take such actions.

The Company is committed to implementing the following basic principles and minimum standards of conduct, which will apply to all parties involved in the project without exception:

#### **General**

1. (Company Name) including its employees, colleagues, representatives, subcontractors, and suppliers — is committed to complying with all applicable national and local laws, rules, and regulations.
2. (Company Name) is committed to fully implementing the minimum standards of behavior as stipulated in the code of conduct.
3. (Company Name) is committed to treating women, children (individuals under the age of 18), and men [equally] regardless of race, color, language, religion, political or other opinions, national, ethnicity, or social status, or any other status. Any action that is not in accordance with the rules stipulated in this code of conduct is considered a violation of this commitment.
4. (Company Name) must ensure that interactions with members of the surrounding communities are respectful, non-discriminatory, and free from violence.
5. All parties in the project are prohibited from using language and behavior that are degrading, threatening, harassing, abusive, inappropriate, or sexually provocative.
6. (Company Name) will follow all appropriate work instructions/rules (including those regarding environmental and social norms).
7. (Company Name) will protect and ensure proper use of the property (e.g., prohibit theft, carelessness, or waste).

### **Health and safety**

8. (Company Name) will ensure staff, workers, and all parties involved in the project effectively implement the project OSH Management Plan and other relevant Management Plan.
9. (Company Name) will ensure that everyone at the work location wears appropriate personal protective equipment provided at the location, prevents avoidable accidents, and reports conditions or events that could potentially pose a safety hazard or threaten the environment.
10. (Company Name) will:
  - i. prohibit the consumption of alcohol during work activities; and
  - ii. prohibit the use of narcotics and illegal drugs or other substances that may interfere with work activities.
11. (Company Name) will ensure that adequate water and sanitation facilities are available, and the workers can use them at the project location.
12. (Company Name) will not employ children under the age of 18 for construction and or domestic work or allow them to be on the work location due to the hazardous nature of the construction site.

### **Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)**

13. SEA/SH, as part of Gender-based violence (GBV) is a serious offense and must be sanctioned, if proven guilty following the investigation result. Sanctions may be given in the form of punishment and/or termination of employment, and if necessary, they may be reported to the police if the case has entered the realm of law.
14. Any form of gender-based violence is unacceptable regardless of whether it occurs in the workplace, around the workplace, or in the surrounding community.
15. Sexual harassment of workers and staff (e.g., by flirting, making unwanted sexual advances, and other verbal or physical behavior of a sexual nature, or sexual gestures or



written messages) is a form of gender-based violence that is strictly prohibited for all parties in the project.

16. Prohibition of promising or giving rewards for the purpose of obtaining sexual favors (e.g., promising promotions, or threatening to terminate employment), making payments in kind or cash for the purpose of obtaining sexual favors, and all other forms of exploitative behavior.
17. Sexual interactions between the Company employees (at any level) and members of the public in the vicinity of the workplace are prohibited, unless there is full consent from all parties involved in the sexual act. This includes relationships involving the reduction/promise of actual benefits (monetary or non-monetary) to members of the public in exchange of sex – such sexual activity is considered non-consensual within the scope of this Code.
18. Sexual contact or activity with children under 18 — including through digital media, is strictly prohibited. The lack of information or misunderstanding about the child's age cannot be used as an excuse/justification for violence cases that occur. In addition, the child's consent cannot be used as an excuse/justification for violence cases.
19. In addition to being subject to sanctions by the company, perpetrators of gender-based violence may also be prosecuted if they are proven to have done so. The safety, support, and protection of victims of gender-based violence are guaranteed by the company. Victim will be assisted by capable organization during investigation process. Victim and perpetrators are not to be put in the same room during investigation process.
20. All employees, workers, and parties involved in projects are strongly encouraged to report suspicions or acts of gender-based violence and violence against children committed by fellow workers, both in the same company/institution or in different companies/institutions. Reports must be made in accordance with the project's existing gender-based violence reporting procedures.
21. The project manager (project leader) is obliged to report and handle gender-based violence, both suspected and occurred because the project manager has the responsibility not only to carry out company commitments but also to hold workers accountable for fulfilling their obligations in accordance with applicable regulations.

## **Implementation**

To ensure that the above principles are applied effectively, the company is committed to:

22. Ensure that all managers sign the project's 'Managers Code of Conduct,' which outlines their responsibilities to implement company commitments and enforce [individual] responsibilities in the 'Individual Code of Conduct.'
23. Ensure that all employees sign the project's 'individual code of conduct' confirming their agreement to comply with health, safety, and environmental standards, ensure occupational health and safety (OHS) standards, and not engage in activities that may result in gender-based violence, violence against children, or sexual exploitation and abuse/harassment.
24. Display the company and individual code of conduct in offices and public places in the workplace, such as the waiting room, rest area and lobby, canteen area, and health clinic.
25. Appoint/select the appropriate worker to be nominated as the company's focal point or the person in charge of handling SEA/SH or GBV and VAC cases.

26. Ensure that (Company Name) effectively implements the agreed Code of Conduct, monitors and evaluates its implementation, and provides appropriate final reports to the designated Project authorities of the hiring companies and the World Bank.
27. Ensure that all employees and workers undergo induction training before starting work on the location to ensure they understand (Company Name)'s commitment to complying with occupational health, safety, and environment (OHSE) standards and the project's Code of Conduct.
28. Ensure that all employees and workers participate in training or outreach activities related to SEA/SH or GBV/VAC that will be implemented by the Project, including daily briefings or training to increase understanding of occupational health, safety, and environment (OHSE) standards and the Code of Conduct.

I hereby declare that I have read the Company's Code of Conduct above and, on behalf of the company, agree to comply with all the provisions that have been stipulated. I understand my role and responsibility to support the implementation of Health, Safety, and Environmental projects and OHS standards as well as the prevention of gender-based violence and violence against children. I understand that any action that is inconsistent with the Company's Code of Conduct may result in disciplinary action and legal consequences.

Name of Institution:

Name of Institutional Officer:

Position in the Institution:

Date:

Signature (and Stamp):

Stamp duty 10,000

**Individual Worker Code of Conduct**  
**Implementation of Health, Safety, and Environmental Standards and Prevention of**  
**GBV**  
For Project (Project Name)

I, the undersigned, as written below, understand that I must carry out all project activities in compliance with the implementation of Occupational Health, Safety, and Environment (OHSE) standards and the Prevention of Gender-Based Violence (GBV) and Violence Against Child (VAC).

The project is committed to implementing a code of conduct for occupational health, safety, and environmental standards as well as the prevention of gender-based violence and violence against children, either at work, in the surroundings of work location, or in the community. Failure to follow these standards is considered a serious violation and sanctions will be imposed, ranging from a warning, punishment, or employment termination. If it is categorized as a crime, then the perpetrator of the violation may be prosecuted by law (police).

**I agree to do the following when implementing the project:**

- 1) Comply with all the terms and conditions stipulated in the project code of conduct.
- 2) Wear personal protective equipment (PPE) while on the work location or when involved in project activities.
- 3) Comply with the zero-alcohol policy during work activities and do not use narcotics, illegal drugs, or other substances that may interfere or interfere with working abilities at any time.
- 4) Attend and actively participate in training and or socialization related to Occupational Health, Safety, and Environment (OHSE) and prevention of gender-based violence organized by the company where I work.
- 5) Respect diversity, local culture and norm, and treat all individuals, including women, children (under 18 years of age), and men with respect regardless of culture, ideas, opinions, limitations, gender, ethnicity, origin, political beliefs, religious beliefs, generation, citizenship status, social class, sexual orientation, and education level.
- 6) Do not use inappropriate language or behave in an inappropriate manner towards anyone, including women and children, such as being rude, sexually harassing, demeaning, or other actions that are inappropriate for the local community or general culture.
- 7) Do not commit sexual exploitation of fellow workers and or members of the surrounding community.
- 8) Do not sexually harass fellow workers and or members of the surrounding community, either verbally or sexually, making the person feel offended, humiliated and or intimidated. For example, ridicule, sexist jokes, inviting/coercing others to perform involuntary sexual acts, including giving personal gifts for sexual favors.
- 9) Do not make promises of anything favorable (e.g., promotions), or make threats (e.g., threats of losing a job) or paying in kind or money, for sexual favors.
- 10) Do not engage in sexual activity with children under the age of 18, including teaching or engaging through digital media. Misunderstanding the child's age cannot be considered a defense/justification for the violence. In addition, the child's consent cannot be used as a defense or justification for the violence.
- 11) Do not engage in sexual interactions with other Company employees (at any level) and members of the public in the vicinity of the workplace, unless there is full consent from all parties involved in the sexual act. This includes relationships involving the reduction/promise of actual benefits (monetary or non-monetary) to members of the public

in exchange of sex – such sexual activity is considered non-consensual within the scope of this Code.

- 12) Report to superiors or through existing reporting channel mechanisms on all actions related to gender-based violence or other forms of code of conduct violations, both for suspected cases and cases committed by colleagues.
- 13) If proven to have violated the code of conduct, will provide approval for background checks to be carried out by the local police (police certificate or Minutes of Investigation).

**For children under the age of 18 (only if applicable for the project and allowed by the DFI):**

- 1) Notify the supervisor if children are found at the project site or if children are involved in hazardous activities.
- 2) Whenever possible, ensure that another adult is present when working in the proximity children.
- 3) Will not invite children (non-family) to my home or camp without being accompanied by an adult who is their family or close to the child, unless they are injured or in physical danger.
- 4) Do not use computers, mobile phones, video and digital cameras, or other media to exploit or abuse children or access child pornography websites.
- 5) Avoid corporal punishment or discipline on children entering the project area.
- 6) Will not employ children under the age of 18 in the project, including for domestic work.
- 7) Comply with all relevant national and local laws and regulations, including manpower acts related to child labour.
- 8) Take caution when taking photographs or video recordings of children, both for project activities and for personal use. This action must be approved by the accompanying adult.

**Sanctions**

I understand that if I violate the provisions stipulated in this code of conduct, I will be subject to disciplinary action and will be given sanctions, which may be in the form of:

- 1) Unofficial warning.
- 2) Official warning.
- 3) Employment termination.
- 4) Legal process (report to police).

I understand that I am responsible for complying with all provisions stipulated in this code of conduct, by avoiding all actions or behavior that may be classified as gender-based violence and violence against children. I hereby certify that I have read the provisions in this individual code of conduct and understand my roles and responsibilities to prevent all prohibited actions, and I understand that any action that is not in accordance with this individual code of conduct may result in disciplinary action that may affect the applicable employment contract. Therefore, I agree to comply with all these terms.

Name of Workers:

Name of Workers Company:

Position in the Company:

Date:

Signature (and Stamp):

Stamp duty 10,000

## Annex 2 – Potential OHS Hazards and the Relevant Requirements

OHS hazards are commonly classified based into its characteristics, namely physical, biological, chemical, ergonomic as well as psychological hazard. A workplace can contain various number of hazards, in which often, these hazards combine into a higher level of risk to workers who may not be aware of their presence. For example, excessive heat or reactions of chemicals that create fumes that cause dizziness to the workers, who then fall due to working at height or stepping on a slippery surface. Therefore, the most effective approach to be taken to make the work safer is to eliminate the source or to modify the workplace and/or the unsafe process so that the hazards are removed rather than try to get workers to adapt to unsafe conditions.

Described below, are examples of potential OHS hazards that can present the electric power generation, transmission and distribution projects, with a brief summary of the relevant management requirements from national regulations and PLN existing procedures.

### Physical Hazards

Physical hazards in the workplace can be caused by the use of machinery, equipment, materials and the conditions of the workplace that can cause incidents and occupational illnesses to workers. Examples of physical hazards relevant to electrical sector are exposure to heat or cold (working climate temperature), height, electrical, and electromagnetic fields (EMF), and fires.

Ministry of Manpower (MOM) Regulation No. 5/2018 on Occupational Health and Safety in the Workplace requires identification, assessment and control of the physical hazards to ensure that they are below the threshold limit values (TLV). For heat and electromagnetic field, the management strategies are through:

- Eliminate the source of hazards from the workplace;
- Replace equipment, material or work process that is the source of hazards;
- Isolate or limit the exposure to the source of hazard;
- Arrange or limit the exposure time and/or arrange for safe distance for workers towards the hazard sources;
- Provide and use of appropriate PPE (*as a last resort to reduce risks*); and/or
- Other control measures that are appropriate with the risk level.
- For heat: provide ventilation, drinking water supply, appropriate working cloth.

**Table 2.1** Threshold Limit Values (TLV) for Working Climate Temperatures (Heat) and Wet Bulb Globe Temperature (WBGT)

Working time (in hours)	WBGT (in Celsius)			
	Workload			
	Light	Medium	Heavy	Very Heavy
75% - 100%	31.0	28.0	-	-
50% - 75%	31.0	29.0	27.5	-
25% - 50%	32.0	30.0	29.0	28.0
0 – 25%	32.5	31.5	30.5	30.0

**Table 2.2** Threshold Limit Values (TLV) for EMF Exposure (1-30 kHz)

No.	Body Parts	TLV (TWA*)	Frequency Range
1	Whole body	60/f mT	1 – 300 Hz
2	Arms and thighs	300/f mT	1 – 300 Hz
3	Hands and feet	600/f mT	1 – 300 Hz
4	Limbs and whole body	0.2 mT	300 Hz – 30 KHz

\*TWA: Time-weighted Average, in 8 hours workday; f: frequency in Hertz; mT: mili Tesla

The attachment (point 1.A) of MOM Regulation No. 5/2018 provides TLVs for working climate temperatures based on the arrangement of working hours versus working load, and TLVs for EMF for different body parts (point 1.I, in frequency range of 1-30 Kilo Hertz), as described in **Table 2.1** and **Table 2.2**. Project to also check on the recommended international references for TLVs, such as the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and the Institute of Electrical and Electronic Engineers (IEEE). Where applicable and feasible with the available technologies, the project is advised to follow the more stringent requirement.

For height, the MOM Regulation No. 9/2016 on Occupational Health and Safety in Working at Height, defines this activity as work that is conducted above the ground or water surface with a differential in height and a potential for falling that may cause worker's injury, fatality or property damage. This regulation requires planning, work procedures, safe working techniques, PPE, fall protection devices and anchors, and supervision personnel, and prevention and mitigation measures, such as:

- Ensure that the work can be conducted safely and with an appropriate ergonomic conditions for access and egress;
- If the work cannot be conducted with an appropriate access and egress, provide appropriate safety equipment to prevent fall;
- In the case of falling risk cannot be prevented, provide working equipment that minimize the fall distance or reduce the consequences from falling; and
- Implement work permit for working at height and provide work instruction that relates with the working conditions (refer to PLN Procedure PLN.PST-SMK3.PR.MR-21 on Work Permit);
- Fences or boundaries should be installed to prevent unauthorized access to working area with potential height hazard, in accordance with the level of risks and impacts.

For electrical safety, the MOM Regulation No. 12/2015 on Electrical Occupational Health and Safety in the Workplace requires planning, installation, modification, maintenance, periodic testing and checking for electrical activities in the range between 50 volts (AC) and 120 volts (DC), by certified electrical OHS expert and technician, following the applicable Indonesia National Standard and applicable international standards. PLN Corporate Procedure PLN.PST-SMK3.PR.MR-19 on Lock Out and Tag Out (LOTO), requires an OHS Supervisor to conduct the identification, assessment and control of risk for any electrical installation works related with maintenance, repair, modification or others. This OHS Supervisor to ensure that the LOTO practice is properly implemented and the working equipment are in safe conditions for the electrical work, prior to workers being able to enter the working area and initiate their work. Then, to ensure that the maintained/repaired/modified equipment are safe to be operated, prior to remove the LOTO.

Installation of electrical equipment may cause fires impacting the installation and other materials. Installation of electrical equipment have to follow the General Requirements of Electrical Installation 2011 (PUIL 2011), as stipulated by the Ministry of Energy and Mineral



Resources Regulation No. 36/2014. Described below are summary of some protective measures to prevent fires from electrical installation:

- Every factory installation guideline should be observed during the installation, along with the PUIL requirements;
- If the electrical equipment surface reach certain temperature that may cause fires, then equipment should be installed or insulated from building construction elements with materials that will withstand such temperatures and have a low thermal conductance; and installed within a safe distance that will allow dissipation of heat and prevent other materials from being impacted by such temperatures;
- If arcs can be ignited by the fixed or permanent installation, then the installation should be entirely enclosed within an arc-resistance materials; insulated by arc-resistant materials against building elements where the arc may give damaging thermal effects; or fitted to allow safe extinguishing of arcs at an adequate distance from building elements where arcing can have a damaging thermal effect. The arc-resistant materials for protective measures shall be non-combustible, low thermal conductivity, and of sufficient thickness to provide mechanical stability;
- The enclosure material that is arranged for electrical installation must withstand to the highest temperatures that may be generated by the electrical equipment. Combustible materials are not suitable for construction of such enclosures.

#### Chemical Hazards

Chemical hazards in the workplace can be caused by the use of chemicals and derivatives in the workplace that can cause occupational illness. This can include chemical contaminants in air, in forms of gas, vapors or dust. MOM Regulation No. 5/2018 requires measurement and control of the chemical hazards to ensure that they are below the TLVs of this regulation. The chemical limits described in the regulation includes carcinogenic categories of chemicals (point 3.B); calculation method for chemical mixtures; and TLVs, short-term exposure limit (STEL), maximum allowable concentration (MAC), and possible health impacts for each listed chemical (point 3.C). When chemicals are used, measurement should be conducted to the exposure and the exposed workers, to be then compared with:

- TLVs, using a minimum of six hours of measurement;
- Short term exposure limit, using a minimum of 15 minutes of measurement, conducted for four times within eight hours of work duration;
- Maximum allowable concentration, using a direct reading equipment to ensure that the threshold limit is not exceeded.

Control of the chemical hazards to be conducted following the mitigation hierarchy as follow:

- Eliminate the source of chemical hazard in the workplace;
- Substitute the chemicals with other chemicals with no or lower chemical hazards;
- Modify the process that can cause chemical hazard;
- Isolate or limit the exposure to the chemical hazard;
- Provide ventilation system;
- Limit the exposure to chemical hazard through arrangement of working time;
- Rotate the workers with other tasks with no chemical hazard potential;
- Provide Material Safety Data Sheet (MSDS) and labels of the chemicals;
- Provide appropriate PPE; and/or
- Other control measures that are appropriate with the risk level.

Specific for Polychlorinated Biphenyls (PCB), PLN has existing corporate procedures for prevention of PCB cross-contamination (PLN PT-K3L-30) and for management of PCB waste (PLN PT-K3L-29) for distribution works with foreign funds that are in accordance with the Ministry of Environment and Forestry (MOEF) Regulation No. 29/2020 on Management of PCB, with the following management principles:

- Prohibit the procurement of transformer oil containing PCB;
- Prohibit the use of oil or equipment that are contaminated with PCB;
- Involve all parties in management of PCB prevention, including the third party through contractual agreement;
- Separate the hazardous waste storage that contains PCB with storage that does not contains PCB to prevent cross-contamination.

### Biological Hazards

Biological hazards can be caused by biological factors such as animals, plants and its products, and microorganisms that can cause occupational illness. MOM Regulation No. 5/2018 requires measurement to (a) microorganism and/or its toxins, and requires monitoring to other biological hazards such as (b) arthropod and/or its toxins, (c) invertebrate and/or its toxin, (d) allergen and toxins from plants, (e) venomous animals, (f) wild animals, and other (g) dangerous animals and plants. For (a), (b), (c), (d), and (g), the control measures are through:

- Eliminate the source of hazard from the workplace;
- Replace the material and work process that can cause biological hazards;
- Isolate or limit the exposure to the biological hazards;
- Provide ventilation;
- Arrange or limit the exposure time to the biological hazards;
- Use appropriate working cloth;
- Use appropriate PPE;
- Install appropriate signages;
- Provide vaccines if possible;
- Improve personal hygiene;
- Provide disinfectant;
- Provide sanitation facility such as running water and/or antiseptic; and/or
- Other control measures that are appropriate with the risk level.

While for (e) and (f), the control measures are through:

- Eliminate and/or avoid the source of animal hazard from the workplace;
- Isolate or limit the exposure to the biological hazard;
- Use appropriate PPE;
- Install appropriate signages; and/or
- Other control measures that are appropriate with the risk level.

Described in the Attachment (point 5) of this Regulation, biological hazards are factor that can affect the work activities, caused by living things and their biological by-products that can cause illness to workers, consist of microorganisms and its toxins (viruses, bacteria, fungi & and derivatives), arthropod (*crustacea*, *arachnid*, *insects*), allergen and toxins of vascular plants (atopic dermatitis, asthma, allergic rhinitis) and allergen proteins from non-vascular plants (*lichen*, *liverwort*, *fern*) and invertebrates (*protozoa*, *ascaris*). Control to be conducted through sanitization of the workplace, with maximum limits as follow:

- Bacteria: 700 cfu/m<sup>3</sup> and free from pathogens

- Fungi: 1000 cfu/ m<sup>3</sup>

### Ergonomic Hazards

Ergonomic hazards arise when work facility is not adapted to suit the physical or sensory characteristics of the workers that can include work method, work position and posture, design of work equipment and workplace, and lifting load. This applies not only to construction and operation workplaces, where most OHS risks occur, but also in offices, vehicles and other desk-based work activities. MOM Regulation No. 5/2018 requires control of the ergonomic hazards to ensure that they meet the standard, through:

- 
- Improve work methods and working positions;
- Re-design or replace the working place, working objects and/or materials, workplace design and working tools;
- Modify the working place, working objects and/or materials, workplace design and working tools;
- Arrange for working hours and break times;
- Perform work with body posture in a good or neutral position and avoid awkward working positions; and/or
- Use supporting devices

More details on the standards for measurement (point 6.A); anthropometric data processing (point 6.A.1), measurement tools (point 6.A.2), definition and standards of measurement points (point 6.A.3), individual characteristics (point 6.A.4), processing (point 6.A.5), and the data application to product design (point 6.A.6) for the design of the working area, work station, facility and work activity (i.e., manual handling and lifting) are available in the attachment of this MOM regulation.

### Psychological Hazards

Psychological hazards are caused by workload, roles and responsibilities and by social and organizational relationships in the workplace, impacting the worker's mental health and may lead to emotional distress, anxiety or other mental health conditions. MOM Regulation No. 5/2018 requires assessment to measure the risk and obtain information on contributing factors to work stress, then to control of the psychological hazards through the following stress management measures:

- Conduct selection, placement and education/training for the workers;
- Conduct a fitness program for workers;
- Conduct a counseling program;
- Conduct appropriate organizational communication;
- Provide freedom for the workforce to provide input in the decision-making process;
- Re-organize the structure, function and/or re-arrange the existing works; and/or
- Other control measures appropriate to the needs

Standardized questionnaire to diagnose occupational stress, to understand the extent of various working conditions from becoming the stress source, is available in the attachment (point 7) of this Regulation. It covers questions related with the clarity in roles and purpose of work, conflict of roles, working hours and workload, career development opportunity, and responsibility to other workers.



### ANNEX 3 – PLN Forms and Checklists

Described in this Annex 3 are the translated version of forms and checklists from the existing PLN Corporate Procedures, relevant for the OHS management.

FR-HSSE-13-01 Emergency Identification and Response Form (translated)

Emergency Preparedness and Response Form			
Emergency Situation	Preparedness Measures	Response	Emergency Recovery

Example on How to Fill the Form:

Emergency Preparedness and Response Form			
Emergency Situation	Preparedness Measures	Response	Emergency Recovery
Explosion/fires	<ul style="list-style-type: none"><li>- Fire extinguishers testing</li><li>- Periodic maintenance to the equipment</li><li>- Provide free access to fire truck</li><li>- Posts labels and warning signs</li><li>- Train staff</li><li>- Provide communication tools</li></ul>	<ul style="list-style-type: none"><li>- The first witness to an emergency situation/fire to conduct preventive measures. If this exceeds his/her capacity, immediately report to the authorized officer at the workplace to take action</li><li>- If fires/emergency occurs, then the ER Team to conduct mitigation measures in accordance with the task, roles and the organization structure</li></ul>	<ul style="list-style-type: none"><li>- Leave the area</li><li>- Save/relocate people from the emergency location to a safe place</li><li>- Priority is: people, environment, assets and business interests</li><li>- Evacuation map and area is made based on potential hazards identification and approved by the management representative</li><li>- The ER team conduct recovery</li><li>- Incident investigation can be conducted by independent parties, depending on the scale of the incident</li></ul>

			<ul style="list-style-type: none"> <li>- Procedure will be reviewed annually or after an emergency situation occurs and drill will be done at least once a year</li> </ul>
Chemical spill, that is corrosive, toxic, flammable, or carcinogenic	<ul style="list-style-type: none"> <li>- Waterproof concrete storage area (obligation) to collect the spilled material from the tanks</li> <li>- Oil storage can only be above waterproof surface with controlled drainage to wastewater treatment system</li> <li>- Periodic inspection and compliance review to the bund, structure and drainage system</li> <li>- Trainstaff</li> <li>- Monitoring activity</li> <li>- Provide communication tools</li> </ul>	<ul style="list-style-type: none"> <li>- Hazardous material waste spill and pollution handling refer to the Work Instruction of Chemical Spill Handling</li> </ul>	<ul style="list-style-type: none"> <li>- Leave the area</li> <li>- Save/relocate people from the emergency location to a safe place</li> <li>- Priority is: people, environment, assets and business interests</li> <li>- Evacuation map and area is made based on potential hazards identification and approved by the management representative</li> <li>- The ER team conduct recovery</li> <li>- Incident investigation can be conducted by independent parties, depending on the scale of the incident</li> <li>- Procedure will be reviewed annually or after an emergency situation occurs and drill will be done at least once a year</li> </ul>



# FR-HSSE-13-02 Emergency Equipment Inspection Form (translated)

[illegible]

FRM-U-007-01 on Hazard Identification Form (translated)

		HAZARD IDENTIFICATION FORM				Document No. : FRM-U-007-01 Revision No. : 01 Effective Date : 01 July 2015 Page :		
No.	Activity	Hazard Identification	Risk Assessment			Risk Control	Implementer	Residual Risk
			Consequence	Likelihood	Severity			
A	<b>AREA :</b> <input type="checkbox"/> Initial <input type="checkbox"/> Corrective Action  <b>Activity</b>							

FRM-U-008-01 Inspection Report Form (translated)

Hari :  
Date :  
Time :  
Location :

No.	Inspection	Field Observation Description
1.	Working method	
2.	Working behavior	
3.	Equipment Condition and Completeness	
4.	OHS Facility	
5.	Environmental Conditions	

Summary :

Jakarta, .....

Secretary of the OHS Advisory Committee,

Head of the Inspection Team

(.....)

(.....)

FRM-U-008-02 Inspection Checklist Form (translated)

Day :		
Date :		
Time :		
Location :		
1. STORAGE WAREHOUSE		
	Yes	No
1.1. Material storage is in a good condition (don't have leak / damaged)		
1.2. Material storage has a clear label		
1.3. Material storage is clean from material spill		
1.4. Gas cylinders are stored in an upright position		
1.5. Empty gas cylinders are stored separately (with labels)		
1.6. MSDS is available at the hazardous material storage		
1.7. Spill kit is provided in the storage room		
1.8. PPE and First Aid kit is provided in the storage room		
2. WORKER & WORK METHOD		
	Yes	No
2.1. Worker is using the required PPE		
2.2. Work is conducted in accordance with established work procedure		
2.3. Use the work equipment correctly		
2.4. Clear warning signs are available		
2.5. Restricted area sign is available at hazardous/high risk area		
2.6. Worker has been trained in accordance with his/her task		
2.7. Worker work seriously/not playing or joking		
2.8. Ergonomics		
3. BUILDING INFRASTRUCTURE		
	Yes	No
3.1. Safety devices are in place		
3.2. Equipments are in good conditions and has been checked before being operated		
3.3. Surrounding area of equipment are clean from oil/other material spills		
3.4. Equipment under repair are tagged (with clear tag out)		
3.5. Emergency button is available and properly functioning		
3.6. Operating instruction of equipment is in place		
4. OHS INFRASTRUCTURE		
	Yes	No
4.1. Fire Extinguisher		
4.2. Hydrant		
4.3. Emergency Sign		
4.4. Emergency Lamp		
4.5. First Aid kit		
5. WORKPLACE ENVIRONMENT		
	Yes	No
5.1. Floor is clean		
5.2. Road/isle are clear from obstruction (of goods/furniture, i.e., drawers, etc.)		

5.3. Goods are placed in accordance with the predetermined locations		
5.4. Workplace has the appropriate lighting		
5.5. Workplace has the appropriate ventilation		
5.6. Fire extinguishers are provided at the workplace		
5.7. Fire extinguisher is within reach and unobstructed		
5.8. Installed fire extinguishers are inspected		
5.9. Evacuation route signs are clearly visible		

Inspector(s) :

- 1.
- 2.
- 3.

Secretary of OHS Advisory Committee,

Jakarta ,.....20 ...

Head of Inspection Team

(.....)  
(.....)

FRM-U-010-01 form for Incident and Illness Notification Report (translated)  
**INCIDENT & ILLNESS NOTIFICATION REPORT**

Report No. : .....

To:  
Senior Corporate OHS and Security Manager  
PT PLN (Persero) Head Office

To whom it may concern,

I, the undersigned below:

Name : .....  
Job Title : .....  
Company : .....

Report that an (Illness, Incident & Non-conformance) has occurred on:  
Day.....Date.....Month.....Year.....at the location  
.....

and has the potential or has caused injury, property and environment damage:

Estimated Injury/Damage : People, Property, Environment  
(remove the unnecessary)

People/Property/Environment : .....

Estimated Incident Level : Fatal-medium, low, incident & non-compliance  
(choose the appropriate)

Thus this report is made to be used for further follow up

.....  
Reporter Name

(.....)

Remarks:

- All workers must report all workplace incidents
- Immediately report the incident either verbally or in writing using this notification report format

FRM-U-010-02 Incident, Accident and Occupational Illness Investigation Form  
(translated)

PT PLN (PERSERO) KANTOR PUSAT		FUNCTION .....	
IDENTIFICATION INFORMATION	LOCATION OF INCIDENT .....	DATE OF INCIDENT/TIME .....	REPORT DATE .....
	CEDERA : KERUSAKAN HARTA BENDA :		
	INSIDEN :		
	Name of the Victim & Job Title	Property Damage	Potential Injury
	Body Parts/ Lost Time	Estimated Loss	Potential Loss
Involved Object/Equipment	Witness of the Incident		
RISKS	EVALUATION OF POTENTIAL LOSS IF THERE IS NO REPAIR  Rp. ....	POTENTIAL SEVERITY  O Fatal/Serious O Medium      O Low	POTENTIAL RECURRENCE  O Likely      O Moderate O Rare
EXPLANATION	EXPLAIN HOW THE INCIDENT OCCURED		
ROOT CAUSE ANALYSIS	DIRECT CAUSE (UNSAFE ACT OR CONDITION CAUSING INCIDENT)		
	ROOT CAUSE (JOB AND HUMAN FACTORS CAUSING INCIDENTS)		
CORRECTIVE ACTION	CORRECTIVE ACTION THAT WILL BE TAKEN ( refer to: incident report, corrective and preventive action)		
	Jakarta,..... Victim/witness    Investigator    Sr. OHS & Security Mgr.  _____		STATUS OF CORRECTIVE ACTION



FRM-U-020-01 Maintenance/Repair Request for PPE, Fire Extinguisher, Equipment and Official Journey Vehicle Form (translated)

No	PPE/Fire Extinguisher/Equipment & Official Journey Vehicle*	Amount	Condition		Repair/Maintenance Schedule	PIC	Remark
			Good	Damaged			

Inspection Date : .....

\*remove the unnecessary

Acknowledge

.....,.....

Developed by,

FRM-U-024-01 Competence Matrix Form (translated)

No	Job Title	Competencies																Remark***
		OHS MS Awareness	OHS MS Documentation	General OHS Expert Urmum *	Electricity OHS Expert **	Fire OHS Expert **	Construction OHS Expert *	Risk Management	Fire fighting	First Aid	Hazardous Material **	Specialist (Operator Licence for Crane, Forklift & Lift)*	ISO 14001*	CSMS **	Behaviour Based Safety **	Job Safety Analyst **	Basic Safety **	
1.																		
2.																		
3.																		
4.																		
5.																		

\* = regulatory requirement

\*\* = other training/seminar as required

\*\*\* = if necessary to provide specific information or training

Jakarta, ..... year

Approved by,

Made by,

Head of General Division and  
Management

Senior OHS and Security Manager

U-024-02 Training Need Analysis Form (translated)

No	EMPLOYEE NAME	JOB TITLE	TRAINING TYPE / MATERIAL									SCHEDULE
			OHS MS Awareness	OHS MS Documentation	Risk Management	Fire fighting	First aid	Hazardous Material	Specialist*	Others**	Remarks***	

\* = regulatory requirement

\*\* = other training/seminar as required

\*\*\* = if necessary to provide specific information or training

Jakarta, ..... 20....

Approved by,

Made by

Senior Corporate OHS and Security  
Manager

Respective Senior Manager