

**PROVISION OF ZERO-MAN ENTRY & AUTO-TANK CLEANING & SLUDGE REMOVAL,
TREATMENT & MANAGEMENT SERVICES AT SELECTED RENAISSANCE FACILITIES**

(RENAISSANCE Contract / Tender No.: CW-68582 / CW-515913)

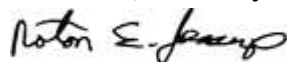
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1.0 EXECUTIVE SUMMARY

South West Design Africa (**SWDA**) is committed to upholding the highest standards of worker rights, dignity and representation throughout the execution of this Renaissance Africa Energy Company (**RAEC**) 18-Tank Cleaning Project to be implemented at four (**4**) locations in Nigeria. This Human Resources Plan (**HRP**) establishes a comprehensive framework designed to ensure that every worker, regardless of role, contract type, nationality, gender or social status, has meaningful access to representation, voice and redress.

The HRP Plan is structured around six core pillars derived from International Best Available Current Technologies (**BACT**) and Global Best Practices (**GBP**), and the specific requirements of this project include the following:

- **Freedom of Association:** Respecting and enabling workers' rights to organise and be represented without fear of retaliation or discrimination.
- **Vulnerable Group Inclusion:** Proactively identifying and engaging with workers who may face heightened barriers to representation.
- **Governance and Safeguards:** Implementing robust policies, codes of conduct and grievance mechanisms that protect worker representatives and encourage open dialogue.
- **Accessibility:** Removing language, literacy and cultural barriers that prevent equitable participation in worker representation structures.
- **Supply Chain Alignment:** Extending these standards to subcontractors and suppliers, ensuring consistency across the entire project ecosystem.
- **Assurance and Validation:** Establishing regular audits, feedback loops and corrective actions to verify ongoing compliance and drive continuous improvement.

This document also incorporates a Maturity Level Assessment Framework (**MLAF – Levels 1–4**) to enable SWDA to benchmark its current state, set improvement targets and demonstrate progress over the project lifecycle.

2.0 PROJECT OVERVIEW AND CONTEXT

2.1 Project Description

The Tank Cleaning Project involves decommissioning, cleaning, inspection and remediation of industrial storage tanks across Nigeria. The scope includes Confined Space Entry (**CSE**) operations, high-pressure washing and chemical cleaning, waste disposal and environmental compliance, structural inspection and non-destructive testing works.

2.2 Workforce Composition

The project engages a diverse workforce: 40 – 50 direct SWDA employees (Skilled Engineers, Supervisors, HSE Officers, Tank Entrants & Equipment Operators); 15 – 25 subcontracted Support & Suppliers (semi-skilled and unskilled workers); 10 – 20 local Host Community temporary Workers in entry-level positions and trainees; 15 – 25 Female Workers in administrative, catering, and limited field roles; and 10 – 20 Youth Workers aged 18–25 as apprentices and casual labour.

2.3 Regulatory and Cultural Context

Nigeria operates under a plural legal system. The Trade Unions Act (**Cap T14, LFN 2004**) provides for union registration and operation, though certain restrictions exist regarding union formation in specific sectors. The Labour Act (**Cap L1, LFN 2004**) governs employment contracts, worker welfare, and dispute resolution. The Nigerian Oil and Gas Industry Content Development Act (**NOGICD**) mandates local content and influences hiring practices.

Cultural norms present significant barriers: patriarchal structures in some regions inhibit female workers from voicing concerns; hierarchical deference to authority discourages junior workers from raising grievances, particularly in the presence of senior management or expatriate supervisors; and, ethnic and linguistic diversity creates communication fragmentation across worksites.

2.4 Risk Assessment Summary

Key Risks include restricted union activity in certain zones due to legal ambiguity; cultural inhibition of junior, and female workers stemming from fear of reprisal and social stigma; language barriers across indigenous local Languages; low literacy levels among casual workers preventing access to written grievance channels; subcontractor non-compliance due to weak HR systems among Tier 2 and Tier 3 suppliers; and, retaliation against worker representatives through informal sanctions or dismissal threats.

3.0 FREEDOM OF ASSOCIATION & WORKER REPRESENTATION

3.1 Policy Statement

SWDA unequivocally respects the right of all workers to freedom of association, including the right to form and join trade unions, worker committees, or other representative bodies of their choosing. This right applies without distinction to direct employees, subcontracted workers, migrant workers, and casual labourers.

3.2 Barriers to Inclusive Worker Representation

3.2.1 Legal Barriers

While Nigeria's Trade Unions Act permits unionisation, practical barriers include:

- **Registration Complexity:** Trade Unions must register with the Federal Ministry of Labour, a process that can be bureaucratic and time-consuming.
- **Sectoral Restrictions:** In some project locations, local by-laws or industry-specific regulations may create ambiguity around the right to organise in temporary or project-based employment.
- **Contractual Fragmentation:** Subcontracted workers often fall outside the scope of collective bargaining agreements negotiated by principal employers.

3.2.2 Cultural and Social Barriers

- **Gender Norms:** Female workers, particularly in field operations, may face cultural pressure to remain silent on safety and welfare issues. In some communities, women speaking in mixed-gender forums is discouraged.
- **Age and Seniority Hierarchies:** Junior workers and apprentices may feel unable to challenge senior supervisors or expatriate managers.
- **Informal Employment Status:** Casual and daily-paid workers may fear that raising concerns will result in non-renewal of contracts.

3.3 Mitigation Strategies Table

Barrier	Mitigation Strategy	Responsible Party	Timeline
Legal Complexity	Engage Labour Law Specialists to facilitate Worker Registration; provide legal support for Union formation	HR Manager / Legal Counsel	Month 1–2
Contractual Fragmentation	Mandate Subcontractor representation clauses; create Joint Worker Forums spanning all contract tiers	Project Director	Month 1

Barrier	Mitigation Strategy	Responsible Party	Timeline
Gender Norms	Establish Women-Only Safety Circles; appoint Female Worker Representatives; train Male Allies	Gender & Inclusion Officer	Month 1–3
Age / Seniority Hierarchies	Implement anonymous Reporting Channels; rotate Forum Leadership; recognise Junior Representatives	HR Manager	Month 1–2
Casual worker fear	Issue written Non-Retaliation Guarantees; separate Grievance Handling from Contract Management	HR Manager	Month 1

3.4 Worker Representation Structures

The project will establish a tiered representation system:

Tier 1: Site Worker Committee (SWC)

- Elected representatives from each work crew (minimum 1 per 20 workers)
- Mandate: Day-to-day welfare, safety observations & immediate grievances
- Composition: Minimum 30% female representation & at least 1 unskilled indigenous worker representative per site
- Election: Secret ballot; annual renewal; &, no management interference

Tier 2: Project Worker Forum (PWF)

- Representatives from each Site Worker Committee
- Mandate: Policy-level concerns, cross-site issues & subcontractor compliance
- Meets monthly with Project Director and HR Manager
- Minutes published in English and Pidgin within 48 hours

Tier 3: Issue-Specific Committees

- Health & Safety Committee
- Gender & Inclusion Committee
- Unskilled Worker Support Committee
- Youth & Apprentice Committee

4.0 IDENTIFICATION & SUPPORT OF VULNERABLE WORKER GROUPS

4.1 Vulnerable Group Identification Framework

Vulnerability is understood as the heightened risk of marginalisation from representation due to social, economic, legal, or cultural factors. The project identifies the following vulnerable groups:

4.1.1 Female Workers

- **Profile:** Administrative staff, catering workers, cleaners and a small number of field technicians
- **Vulnerabilities:** Gender-based harassment, cultural pressure to defer to male colleagues, limited access to female supervisors & pregnancy-related discrimination
- **Indicators:** Absence from safety meetings, reluctance to use shared grievance mechanisms & high attrition in field roles

4.1.2 Youth and Apprentice Workers

- **Profile:** Workers aged 18–25, often on temporary training contracts
- **Vulnerabilities:** Lack of experience in asserting rights, economic dependence on the job, fear of jeopardising future employment & limited understanding of labour rights
- **Indicators:** Low participation in feedback surveys, high accident rates & reluctance to report near-misses

4.1.3 Casual and Daily-Paid Workers

- **Profile:** Workers without formal contracts, engaged on task-specific or daily bases
- **Vulnerabilities:** No job security, exclusion from formal grievance channels, no access to union representation & immediate financial impact of any conflict

- **Indicators:** No written contracts, payment in cash, absence from worker forums

4.1.4 Workers with Disabilities

- **Profile:** Workers with physical, sensory or cognitive impairments
- **Vulnerabilities:** Physical barriers to meeting spaces, communication formats incompatible with impairments, stigma and discrimination
- **Indicators:** Absence from site committees, no disability accommodations in grievance processes

4.1.5 Ethnic and Linguistic Minorities

- **Profile:** Workers from minority language groups within Nigeria (e.g., non-indigenous speakers sites)
- **Vulnerabilities:** Meetings conducted in dominant languages, cultural assumptions embedded in communication
- **Indicators:** Silent participation in mixed-language forums, clustering with co-ethnic workers

4.2 Tailored Communication Channels Table

Vulnerable Group	Dedicated Communication Channel	Features
Unskilled Workers	Unskilled Worker Liaison Officer (UWLO)	Confidential; independent of Line Management; based in Worker Accommodations
Female Workers	Women's Safety Circles (WSC)	Female-facilitated; held in Safe, Private Spaces; cover Safety, Harassment & Welfare; linked to Gender & Inclusion Committee

Vulnerable Group	Dedicated Communication Channel	Features
Youth Workers	Youth Representative Network	Peer-elected; meets separately before General Forums; trained in Labour Rights and Communication Skills
Casual Workers	Casual Worker Hotline	Anonymous; Toll-Free; operated by independent HR Officer; no Caller ID recorded
Workers with Disabilities	Accessible Grievance Desk	Sign Language Interpretation; Large-Print Materials; Voice-Recorded options; Wheelchair-Accessible location
Linguistic Minorities	Multilingual Forum Facilitation	Professional Interpreters at all formal meetings; translated materials; &, buddy system for new arrivals

4.3 Vulnerable Group Engagement Protocol

Step 1: Mapping and Registration

- During on-boarding, all workers complete a confidential self-identification form (optional & non-mandatory)
- HR maintains a secure, anonymised database of vulnerable group membership for planning purposes only
- No worker is compelled to disclose vulnerability status

Step 2: Targeted Outreach

- Within 14 days of site work commencement, HR conducts one-on-one introductory meetings with identified vulnerable group members

- Purpose: Explain representation options, introduce dedicated channels & distribute contact cards

Step 3: Regular Check-ins

- Monthly informal check-ins by dedicated liaison officers
- Quarterly focus group discussions (separate groups for each vulnerable category)
- Annual comprehensive review of vulnerable group satisfaction with representation

Step 4: Escalation and Advocacy

- Vulnerable group representatives have direct access to Project Director for escalation of unresolved issues
- Annual Report to SWDA Board of Directors (**BOD**) on vulnerable worker representation outcomes

5.0 GOVERNANCE MECHANISMS FOR WORKER REPRESENTATION

5.1 Code of Conduct for Worker Representation

The SWDA Code of Conduct (**CoC**) establishes clear standards of behaviour for all parties engaged in worker representation, ensuring integrity, respect and accountability. It applies to all SWDA employees, subcontractor staff, worker representatives and management personnel.

Core Principles:

Respect for Representative Autonomy: Worker representatives are elected by workers and accountable to workers. Management does not select, approve or remove representatives.

Non-Interference: Management shall not attend or observe worker-only meetings, nor shall they request minutes or attendance lists from such meetings.

Good Faith Engagement: Management commits to responding to worker representatives within 72 hours of receiving formal communications and to meeting with the Project Worker Forum within 14 days of a meeting request.

Transparency: All policies, procedures and meeting outcomes relevant to worker welfare shall be communicated in accessible formats within 48 hours.

Confidentiality: Grievances raised through representative channels shall be handled confidentially with the consent of the complainant. Anonymous grievances shall be investigated to the extent practicable.

5.2 Non-Retaliation Policy

SWDA prohibits any form of retaliation against workers for exercising their rights to representation, association or grievance. Retaliation includes termination, suspension or demotion; reduction in hours, wages or benefits; unfavourable reassignment or exclusion from training; harassment, intimidation or threats; blacklisting or negative references; and, social ostracism orchestrated by management.

Protection Measures: Upon credible complaint, the alleged retaliator is immediately removed from their supervisory role pending investigation. All retaliation complaints are investigated by an HR Manager with no line-management connection to the complainant. If retaliation is confirmed, the worker receives immediate reinstatement, back pay, a formal apology and disciplinary action against the retaliator. Workers reporting retaliation on behalf of others receive the same protections as direct complainants. Annual disclosure of retaliation complaints, investigations and outcomes appears in the project sustainability report.

Reporting Mechanism: A dedicated anti-retaliation hotline operates 24 / 7 in multiple languages with an independent operator. An online portal offers anonymous submission. Direct escalation to the SWDA Ethics Committee is available.

5.3 Grievance Mechanism

The project grievance mechanism is designed to be legitimate, accessible, predictable, equitable, transparent and rights-compatible with Nigerian labour law and international human rights standards.

Grievance Channels:

Level 1 – Informal Resolution involves direct discussion with a supervisor or worker representative, appropriate for minor welfare issues and misunderstandings.

Level 2 – Site Worker Committee (**SWC**) handles formal written or verbal complaints to elected representatives, covering workplace conditions, safety concerns, and interpersonal conflicts.

Level 3 – Project Grievance Committee (**PGC**) is an independent panel comprising HR, an external labour expert and a worker representative, addressing harassment, discrimination, contract disputes and retaliation.

Level 4 – External Arbitration involves mediation by the Nigerian Industrial Arbitration Panel or an agreed independent mediator, for unresolved disputes, collective grievances and legal claims.

Grievance Procedure:

Intake (Day 0): Grievance received via any channel with acknowledgment within 24 hours.

Triage (Day 1–2): Categorisation by severity and channel. Urgent matters involving safety or harassment are escalated immediately.

Investigation (Day 3–14): Evidence gathering with separate interviews of complainant and respondent, plus witness consultation.

Resolution (Day 15–21): Decision communicated with remedial action agreed. If unresolved, escalation to the next level.

Appeal (Day 22–30): Complainant may appeal within 7 days. Appeal reviewed by a senior panel.

Closure (Day 30): Case closed with records maintained confidentially for 7 years.

Accessibility Features: Workers may submit grievances orally to any trained intake officer, who records and reads back for confirmation. Anonymous submissions are accepted via hotline and online portal, with investigation proceeding where possible despite limited scope. All grievance materials are available in English, Pidgin, Yoruba, Igbo, Hausa and French. Audio-recorded explanations, pictorial guides and assisted form completion accommodate illiteracy. Female complainants may request female investigators, with sexual harassment cases handled only by trained gender specialists.

5.4 Governance Structure

The governance structure flows from the SWDA Board of Directors (**BOD**), which conducts annual review of representation, down to the Project Director providing strategic oversight and escalation resolution. The HR & Compliance Manager handles policy implementation and assurance. Three operational committees report upward: the Project Worker Forum (**PWF**) meeting monthly, the Project Grievance Committee (**PGC**) convening ad hoc, and the Assurance Committee (**AC**) meeting quarterly. Site Worker Committees (**SWC**) operate per site with elected representatives meeting monthly and feeding into the Project Worker Forum.

6.0 ADDRESSING LANGUAGE, LITERACY & SOCIAL DRIVERS

6.1 Language Strategy

Nigeria's linguistic diversity presents both challenge and opportunity. The project operates where workers may speak English, Nigerian Pidgin, Yoruba, Igbo, Hausa and Ijaw.

Language Policy: Official project documents are in English with Pidgin summaries for field distribution. Site Safety Briefings use English plus the dominant local language plus Pidgin. Worker Forum meetings use English plus interpretation for dominant local languages. Grievance intake occurs in the worker's preferred language with interpreter provision within 4 hours. Training materials are available in English, Pidgin, Yoruba, Igbo, Hausa and Ijaw, with visual and pictorial formats where possible. Signage and notices use pictorial plus English plus the dominant local language.

Interpretation and Translation Services: Professional interpreters are contracted for all formal meetings involving linguistic minorities. A peer interpreter network of trained bilingual workers supports informal communication and day-to-day needs. All critical documents (grievance forms, code of conduct & safety procedures) are professionally translated and back-translated for accuracy. Real-time interpretation for urgent grievances is available via telephone interpretation service operating 24 / 7.

6.2 Literacy Accommodations

Low literacy rates among casual and manual workers necessitate alternative communication formats. Pictorial guides explain safety procedures, grievance steps and rights summaries. Audio materials deliver policy explanations via toll-free phone line and WhatsApp audio. Video briefings provide animated explanations of worker rights and representation options, screened during induction. Assisted form completion involves trained intake officers assisting with written grievance forms, with workers confirming accuracy by thumbprint or verbal consent. Voice-recorded grievances allow workers to record grievances verbally with transcription and confirmation provided. All worker-facing materials are written at maximum Grade 6 reading level (Flesch-Kincaid).

6.3 Social Driver Mitigation

Fear of authority is addressed through assertive communication training for worker representatives, receptive listening training for management, and role-play exercises during induction. Group conformity pressure is managed through anonymous voting for representatives, secret ballot for grievance satisfaction surveys, and individual (not group) grievance intake. Economic dependency is countered through written non-retaliation guarantees, an emergency hardship fund for workers facing contract disputes and legal aid access. Social stigma related to gender, ethnicity or disability is tackled through dedicated safe spaces for stigmatised groups, anti-discrimination training for all, and visible diversity in leadership and representation. Migrant isolation is reduced through migrant worker social events, integration buddies and multi-lingual notice boards in accommodation areas.

7.0 SUPPLY CHAIN & SUBCONTRACTOR ALIGNMENT

7.1 Supply Chain Mapping

The project engages multiple tiers of subcontractors. Tier 1 comprises direct subcontractors under SWDA contract, including cleaning specialists and inspection firms, engaging 30 – 50 workers. Tier 2 comprises sub-subcontractors engaged by Tier 1, including local labour suppliers and equipment rental providers, engaging 50 – 70 workers. Tier 3 comprises informal suppliers and casual labour brokers, including day labour pools and transport providers, engaging 70 - 100 workers.

7.2 Subcontractor Alignment Requirements

All subcontractors must align with SWDA's worker representation standards through contractual clauses, onboarding and training, and grievance integration.

- **Contractual Clauses:** Every Subcontract Agreement must include a Freedom of Association Clause requiring the subcontractor to respect workers' rights to form and join representative bodies with no penalties for representation activities. A Non-Retaliation Clause mandates protections equivalent to SWDA's standard. A Grievance Mechanism Clause requires the subcontractor to establish an accessible mechanism or allow workers to access SWDA's project-level mechanism. A Vulnerable Group Clause requires identification of vulnerable workers and provision of tailored communication channels. A Language and Literacy Clause ensures language and literacy are not barriers to worker representation. An Audit and Assurance Clause permits SWDA or its representatives to conduct announced and unannounced audits of worker representation practices. A Termination for Non-Compliance clause reserves SWDA's right to terminate the Subcontract for material breach.
- **Subcontractor On-boarding and Training:** Pre-qualification assessment evaluates the subcontractor's existing HR policies, worker representation history and grievance mechanism before contract award. An alignment workshop within 7 days of contract signing covers SWDA standards, contractual obligations and implementation guidance. Representative training for subcontractor management and worker representatives on the SWDA Code of Conduct and grievance procedures occurs before site work commencement. Subcontractor worker representatives are invited to Project Worker Forum meetings on an ongoing basis. Quarterly compliance reviews assess subcontractor representation practices against SWDA standards.
- **Subcontractor Grievance Integration:** Subcontractor workers may access SWDA's project-level grievance mechanism directly, by-passing subcontractor management, if they choose. All Tier 1 subcontractors must display the SWDA grievance hotline number prominently at worksites and accommodation. Subcontractor grievance data is reported monthly to the SWDA HR Manager. Cross-subcontractor grievances, such as disputes between Tier 1 and Tier 2 workers, are escalated to the Project Grievance Committee (**PGC**).

7.3 Supplier Engagement

For material and equipment suppliers (non-labour), SWDA encourages adoption of open communication standards through a Supplier Code of Conduct setting expectations for worker representation in supplier operations. Suppliers demonstrating robust worker representation practices receive preferred status in procurement decisions. An annual Supplier Forum provides a platform for sharing best practices and aligning on industry standards.

8.0 ASSURANCE, VALIDATION & CONTINUOUS IMPROVEMENT

8.1 Assurance Framework

The project operates a multi-layered assurance system to verify effective implementation of worker representation standards.

Internal Monitoring includes monthly worker forum attendance review, analysing attendance data by worker category, monthly grievance data analysis with categorisation and trend analysis, monthly subcontractor compliance checks through document review and worker interviews, annual representative election verification with independent observation of the election process, and quarterly policy accessibility audits reviewing translation coverage and literacy accommodations.

External Validation includes an annual independent worker representation audit by an accredited labour rights audit firm, a bi-annual worker satisfaction survey by an independent research organisation, an annual stakeholder consultation with a multi-stakeholder panel including unions, NGOs, and community leaders, and an annual legal compliance review by Nigerian labour law specialists.

Worker-Led Validation includes worker verification teams of elected worker representatives conducting quarterly spot-checks of grievance handling and representation accessibility, peer review where Site Worker Committees review each other's practices annually, and an annual worker assembly where all workers vote anonymously on satisfaction with representation structures with independent facilitation.

8.2 Key Performance Indicators

The project tracks eight (8) Key Performance Indicators (**KPIs**). Worker forum attendance rate targets 75% of eligible workers measured through sign-in records. Grievance resolution within 30 days targets 90% of cases tracked through case management. Worker satisfaction with representation targets 80% positive measured bi-annually by survey. Subcontractor compliance score targets 85% on audit assessed quarterly. Retaliation complaints operate under zero tolerance tracked through incident reporting. Vulnerable group representation in forums targets proportional composition measured by demographic analysis. Multi-lingual material coverage targets 100% of critical documents verified by document inventory. Literacy-accessible format availability targets 100% of worker-facing materials confirmed by accessibility audit.

8.3 Corrective Action Protocol

Level 1 – Minor Deviation is identified through routine monitoring. The HR Manager develops a Corrective Action Plan with implementation within 30 days and verification by the Compliance Officer.

Level 2 – Significant Non-Compliance is identified through audit or worker complaint. Immediate suspension of related activities occurs where safety-critical. The Project Director conducts Root Cause Analysis with a Corrective Action Plan on a 60-day timeline and external verification required.

Level 3 – Material Breach involves systemic failure or repeated significant non-compliance. Immediate escalation to the SWDA Board occurs. Subcontractor suspension or termination follows. An independent investigation is conducted with public disclosure in the sustainability report.

8.4 Continuous Improvement Cycle

The project follows a Plan-Do-Check-Act cycle. Planning sets targets and standards. Doing implements representation. Checking monitors and validates. Acting corrects and improves. An annual review of this HR Plan incorporates lessons learned, worker feedback, and regulatory changes. Quarterly best practice sharing disseminates successful interventions across SWDA projects. An annual innovation pilot tests one new representation approach such as a digital grievance platform or worker-led safety inspections.

9.0 MATURITY LEVEL ASSESSMENT FRAMEWORK

9.1 Framework Overview

The Maturity Level Assessment Framework (**MLAF**) enables SWDA to evaluate its current state of implementation for each project requirement, set improvement targets and track progress over time. The framework consists of four levels, from initial formation to sustainable integration.

9.2 Level Definitions

Level 1: 'Forming'

- **Process State:** Little or no formal process exists. Activities are ad hoc and reactive.
- **Requirement Met:** The principle requirement is not met. Workers and managers act based on personal judgment rather than established standards.
- **Evidence:** No documented procedures, inconsistent practices and no awareness of standards among workforce.
- **Characteristics:**
 - Worker Representation is informal or non-existent
 - Grievance Mechanisms handled arbitrarily by Line Managers
 - No recognition of Vulnerable Groups
 - Subcontractors operate independently
 - No Assurance Activities

Level 2: 'Developing'

- **Process State:** Early stages of building and implementing processes. Some structures exist but are not fully operational.

- **Requirement Met:** The principle is met occasionally, but without consistent supporting evidence.
- **Evidence:** Partial documentation, isolated examples of good practice, limited adoption.
- **Characteristics:**
 - Worker Committees established, but not fully functional
 - Grievance Mechanisms exist but under utilised
 - Some Vulnerable Group identification, but no dedicated Channels
 - Subcontractor clauses included, but not enforced
 - Sporadic monitoring, without systematic follow-up

Level 3: 'Established'

- **Process State:** Implementation of processes is largely complete, with occasional exceptions.
- **Requirement Met:** The principle is met most of the time, with supporting evidence, but not consistently across the entire scope.
- **Evidence:** Comprehensive documentation, regular practice, widespread, but not universal adoption.
- **Characteristics:**
 - Functional Worker Committees with regular meetings and documented outcomes
 - Grievance Mechanisms actively used with reasonable resolution times
 - Vulnerable Groups identified with tailored Communication Channels
 - Subcontractor Compliance monitored and mostly aligned
 - Regular Assurance Activities with identified gaps

Level 4: 'Sustainable'

- **Process State:** Robust, integrated processes that are embedded in organisational culture.
- **Requirement Met:** Requirements are consistently met with good evidence across the full scope of the project.
- **Evidence:** Full documentation, continuous data, independent validation & worker confirmation.

- **Characteristics:**

- Worker Representation is worker-driven, with high participation and satisfaction
- Grievance Mechanisms are trusted, accessible and effective
- Vulnerable Groups are fully included with proactive support
- Supply Chain is fully aligned and self-assessing
- Assurance is comprehensive, external and drives innovation

9.3 Project Requirement Maturity Assessment Matrix Table

Project Requirement	Level 1 (Forming)	Level 2 (Developing)	Level 3 (Established)	Level 4 (Sustainable)
Freedom of Association & Barriers	No Worker Forums; Management denies or ignores Representation Requests	Worker Committees exist, but face interference & some Barriers	Functional Committees with identified Barriers and Mitigation Plans, with occasional	Fully-Autonomous Worker Representation; all Barriers systematically identified and

		Identified, but not addressed	Management resistance	mitigated; Management actively promotes Representation
Vulnerable Group Identification & Communication	No identification of Vulnerable Groups & one-size-fits-all Communication	Vulnerable Groups loosely identified & generic Communication with some Translation	Vulnerable Groups formally mapped; dedicated Channels operational & regular Engagement	Vulnerable Groups self-identify Confidently; Channels are Worker-Designed; proactive Outreach & full Participation Parity

Governance Mechanisms	No Code of Conduct, Non-Retaliation Policy, or Grievance Mechanisms	Policies Drafted but not widely known & Grievance Mechanism exists, but not trusted	Policies implemented and communicated; Grievance Mechanisms used & Non-Retaliation mostly Enforced	Policies are Living Documents; Grievance Mechanisms are benchmarked against International Standards; Zero Tolerance for Retaliation & Workers Co-Design Governance
Language, Literacy & Social Barriers	All Materials in English only; No Literacy Accommodations & Social Barriers ignored	Some Translation; limited Literacy Alternatives & awareness of Social Barriers	Multi-lingual Materials for Key Documents; Literacy Accommodations available & Social Barriers partially addressed	Full Multi-lingual Coverage; Multiple Format Options; Social Barriers systematically Mitigated & Migrant Workers fully integrated

Project Requirement	Level 1 (Forming)	Level 2 (Developing)	Level 3 (Established)	Level 4 (Sustainable)
Supply Chain Alignment	No Subcontractor Requirements & Suppliers operate independently	Subcontractor Clauses included, but not monitored & limited Alignment	Subcontractor Compliance monitored; most Tier 1 Suppliers aligned & Integration with Project Forums	Full Supply Chain Alignment; Subcontractors Self-assess; Supplier Performance linked to Representation Standards & Industry-wide Influence
Assurance & Validation	No Monitoring or Validation activities	Ad hoc Audits; No Systematic Assurance Plan & Reactive to Complaints	Regular Internal Monitoring; periodic External Audits & Identified Gaps with Improvement Plans	Comprehensive Assurance Ecosystem; Worker-led Validation; External Benchmarking; Continuous Improvement Culture & Public Transparency

9.4 Current State Assessment & Target Setting Table

Project Requirement	Current Assessment (Project Start)	Target Level (Month 6)	Target Level (Month 12)	Target Level (Project End)
Freedom of Association & Barriers	Level 1	Level 2	Level 3	Level 4

Vulnerable Group Identification & Communication	Level 1	Level 2	Level 3	Level 4
Governance Mechanisms	Level 2 (Draft Policies exist)	Level 3	Level 3	Level 4
Language, Literacy & Social Barriers	Level 1	Level 2	Level 3	Level 4
Supply Chain Alignment	Level 1	Level 2	Level 3	Level 4
Assurance & Validation	Level 1	Level 2	Level 3	Level 4

9.5 Progress Tracking Template Table

Requirement	Assessment Date	Current Level	Evidence Summary	Actions to Advance	Target Date
[To be Completed Quarterly]					

10.0 IMPLEMENTATION ROADMAP

10.1 Phase 1: Foundation (Months 1–3) Table

Week	Activity	Deliverable	Responsible
1–2	Stakeholder Mapping and Legal Review	Legal Barrier Assessment & Stakeholder Register	Legal Counsel
2–3	Policy Drafting and Approval	Code of Conduct; Non-Retaliation Policy & Grievance Procedure	HR Manager
3–4	Worker Communication Strategy	Multi-lingual Communication Plan & Literacy Accommodation Plan	Communications Officer
4–5	Subcontractor Pre-Qualification	Aligned Subcontractor Agreements & Compliance Baseline	Procurement Manager
5–6	Vulnerable Group Mapping Framework	Self-identification Protocol & Liaison Officer Job Descriptions	HR Manager
6–8	Site Worker Committee Elections	Elected Representatives & Training Programme	HR Manager / External Facilitator
8–10	Grievance Mechanism Launch	Operational Hotline; On-line Portal & Trained Intake Officers	Compliance Officer
10–12	First Project Worker Forum	Meeting Minutes; Action Register & Worker Feedback	Project Director

10.2 Phase 2: Consolidation (Months 4–9) Table

Month	Activity	Deliverable
4	First Quarterly Assurance Review	Internal Audit Report & Corrective Action Plan
5	Subcontractor Compliance Review	Tier 1 Assessment & Improvement Notices where needed
6	Maturity Level Assessment	Baseline Report against Level 2 Targets
7	Vulnerable Group Focus Groups	Qualitative Feedback Report & Channel Adjustments
8	External Worker Satisfaction Survey	Independent Benchmark Data
9	Mid-Year Policy Review	Updated Policies & Lessons Learned Integration

10.3 Phase 3: Optimisation (Months 10–12) Table

Month	Activity	Deliverable
10	External Audit of Worker Representation	Independent Assurance Statement

Month	Activity	Deliverable
11	Advanced Training for Representatives	Refresher Training & Leadership Development
12	Annual Review & Target Reset	Maturity Level 3 / 4 Assessment & Year 2 Plan

11.0 MONITORING, REPORTING & ACCOUNTABILITY

11.1 Internal Reporting

Worker Forum Minutes are published monthly for all workers and management, covering decisions, actions and escalations. The Grievance Dashboard is produced monthly for the Project Director and HR Manager, showing volumes, categories, resolution times and trends. The Subcontractor Compliance Report is produced quarterly for Procurement and the Project Director, showing scores, improvement actions and terminations. The Vulnerable Group Engagement Report is produced quarterly for the HR Manager and Gender & Inclusion Officer, showing participation rates, feedback and interventions. The Maturity Level Assessment is produced quarterly for the Project Director and Board, showing progress against targets and gap analysis.

11.2 External Reporting

The Project Sustainability Report is published annually for clients, regulators and the public, covering worker representation outcomes, grievance statistics and assurance results. Worker Rights Disclosure is published annually for investors and NGOs, showing alignment with international frameworks, including the UN Guiding Principles on Business and Human Rights and ILO conventions. Incident Reports are produced as required for regulators, covering retaliation incidents, serious grievances and corrective actions.

11.3 Accountability Structure

The SWDA Board of Directors (**BOD**) holds ultimate accountability for Worker Rights Compliance, reviewing annual reports and approving policy changes. The Project Director owns this HR Plan strategically, allocating resources, resolving escalations and engaging external stakeholders. The HR & Compliance Manager handles day-to-day implementation, policy maintenance, assurance coordination and subcontractor compliance oversight. The Gender & Inclusion Officer manages vulnerable group engagement, gender-sensitive grievance handling and diversity metrics. Site Supervisors handle local implementation, non-retaliation enforcement, worker forum facilitation and immediate grievance intakes. Worker Representatives provide worker voice, participate in forums, support grievances, conduct peer education and feedback to constituents.

11.4 Whistleblower and Ethics Line

A dedicated Ethics Line is available for reporting concerns about:

- Management interference in Worker Representation
- Retaliation against representatives or complainants
- Subcontractor non-compliance
- Fraud or corruption in Grievance handling
- Any other breach of this HR Plan

Contact: maryann.ihejirika@gasgroupintl.com +234-9081333348 (-49, Anonymous Option available).