



Summarized Action Plan for 75 MW Power Plant of Abul Khair Power & Steel Ltd.

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e.Gen Consultants Ltd.

14A Chandrashila Suvastu Tower

69/1 Bir Uttam Qazi Nuruzzaman Road, Panthopath, Dhaka 1205 Bangladesh.

www.egenconsultants.com

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1 Introduction

Abul Khair Group is one of the largest in the country with a varied and diverse range of product offerings. Abul Khair Steel & Power Ltd. is a part of the larger Abul Khair Group. It largely consists of long steel and flat steel manufacturing, as well as gas-fired captive power plants providing support to its operations.

Abul Khair Steel & Power Ltd. is extending their power production capacity through erection and installation of a 75 MW gas-fired captive power plant, in the same vicinity of the already established and currently operating 24 MW gas-fired captive power plant of AKSPL.

As a part of a series of activities associated with this power plant extension, AKSPL has undertaken various activities, including Quality Management Standards Gap Analysis, Labour/ HR/ Regulatory Audits, and Environmental/ Social Impact Assessment and Monitoring Plan. Detailed findings, audit reports, and recommendations on all of such issues have already been shared with AKSPL.

In order to facilitate easier alignment of objectives and execution of the recommendations, this document outlines a combined action plan, categorized by sector of influence, complete with a monitoring framework.

2 Action Plan and Monitoring Framework

Various recommendations and their monitoring requirements have been explored throughout this assignment in the form of various reports. This segment of the document outlines the actions that are recommended based on specific sectors of influence, as follows:

1. Environmental Issues
2. Social Accountability
3. Organizational Health & Safety
4. HR & Labour Issues
5. Young Workers

The monitoring framework will consist of an internal monitoring group and an external monitoring group. While the internal monitoring group will provide continuous monitoring, the external monitor will provide periodic monitoring assistance to check if the monitoring process is compliant, and provide any necessary guidelines as well as prepare the periodic monitoring reports.

The frequency of the review reports are suggested as follows:

Year	Frequency
1	Quarterly
2	Half-yearly
3	Half-yearly
4	Annually
5	Annually

The action plans and respective timelines are outlined in the following sections.

2.1 Environmental Action Plan

A suggested monitoring framework for the Environmental Impacts are as follows:

Affected Component	Potential Impact	Parameters to be Monitored	Monitoring Type	Location	Measurements	Frequency
Site Preparation and Construction Phase						
General	Inspection of mitigation compliance	General compliance with mitigation measures presented in the ESMP	Internal	Project activity areas and construction worker's camp	Visual inspection of all active work areas	Daily
Noise	Increase in ambient noise levels	Noise levels in L_{eq} , L_{eq} day, L_{eq} night and hourly L_{eq}	Internal and External	Within 500 m of project boundary	24 Hour	Quarterly
	Workers' health	Noise levels in L_{eq}	Internal and External	Identified location within the construction area	24 Hour	Monthly
Soil	Contamination of soil	pH, salinity, NH ₄ , heavy metals, oil & grease	Internal	Construction site or laydown area or spill area	Standard analytical methods	In the event of any leakage or spillage of hazardous substances, oil, or toxic chemicals
Surface Water	Contamination of surface water	Turbidity, pH, DO, TSS, Total dissolved solids, oil & grease, total coliform, heavy metals	Internal and External	Drainage Stream/ Channel	Standard analytical methods	Half Yearly
Ground Water	Ground water quality	pH, salinity, NH ₄ , total P, heavy	Internal and External	Water source	Standard analytical methods	Half Yearly

Affected Component	Potential Impact	Parameters to be Monitored	Monitoring Type	Location	Measurements	Frequency
		metals, oil & grease, BOD, COD, and total coliforms				
	Ground water quality	Monitoring of soil quality in the event of any leakage or spillage of hazardous substances, with the parameters to be sampled based upon the likely chemical compositions of the material	Internal	Locations, to be defined on a case by case basis.	Standard analytical methods	Frequency to be defined on a case by case basis
Occupational Health & Safety	Accidents or incidents due to construction activities, worker's health	Near-misses, incidents, occupational diseases, dangerous occurrences	Internal and external	Project activity areas and construction workers residential area	As defined in construction phase, Health & Safety Plan to be prepared by AKG	As defined in H&S Plan
Community Health & Safety	Community disturbance and potential safety hazard due to road traffic	Accidents, incidents and complaints	Internal and external	Access Road connecting site	Incidents, accidents And community complaints	Based on occurrence
	Public concerns	Complaints from community	Internal and External	Neighbouring communities around the Project activity areas	As per the grievance redress mechanism	Continuous
Operation Phase						

Affected Component	Potential Impact	Parameters to be Monitored	Monitoring Type	Location	Measurements	Frequency
General	Inspection of mitigation compliance	General compliance with mitigation measures presented in the ESMP and operational manual	Internal	Project activity areas	Visual inspection of all active work areas	Daily
Air Emissions	Stack emissions	NO _x as NO ₂ , moisture content	Internal	Stack	Continuous Emission Monitoring System	Continuous
	Emission concentrations	CEM validation for NO _x , CO and PM _{2.5}	Internal and External	Stack	Standard Analytical Methods	Annually
	Ambient air quality	1-hour and 24-hour averaged NO ₂ and SO ₂ ; 24-hour averaged PM, PM ₁₀ and PM _{2.5}	Internal and External	In the plant vicinity	Standard analytical methods	Monthly
GHG Emissions	Climate Change	GHG generation	Internal and External	Plant control room	Natural gas consumption	Annually
Noise	Increase in ambient noise levels	Noise levels in L _{eq} , L _{eq} day, L _{eq} night and hourly L _{eq}	Internal and External	Within 500 m of project boundary	24-hour	Quarterly
	Worker's Health	Noise levels in L _{eq}	Internal and External	Identified location within the construction area	24-hour	Monthly
Surface Water	Surface Water Quality	Temperature	Internal	At cooling water discharge point	Standard analytical methods	Bi-weekly
	Surface Water Quality	Turbidity, pH, DO, TSS, Total dissolved solids, oil & grease, total coliform, heavy metals	Internal and External	At wastewater discharge point	Standard analytical methods	Quarterly

Affected Component	Potential Impact	Parameters to be Monitored	Monitoring Type	Location	Measurements	Frequency
Soil	Soil and Sediment Contamination	pH, salinity, NH ₄ , total P, heavy metals, oil & grease	Internal	Accidental spillage area and waste storage area	Standard analytical methods	Half Yearly
Ground Water	Ground water quality	Depth, pH, salinity, NH ₄ , total P, heavy metals, oil & grease, BOD, COD and Total Coliforms	Internal and External	Water source	Standard analytical methods	Half Yearly
	Ground water quality	Monitoring of ground water in the event of any leakage or spillage of hazardous substances, with the parameters to be sampled based upon the likely chemical compositions of the material.	Internal	Locations, to be defined on a case by case basis.	Standard analytical methods	Frequency to be defined on a case by case basis.
Occupational Health and Safety	Accidents or incidents due to operation and maintenance activities, workers' health	Near-misses, incidents, occupational diseases, dangerous occurrences	Internal	Project activity areas	As to be defined in the H&S Plan to be prepared for the Project	As defined in H&S Plan
Community Health and Safety	Community disturbance and potential safety	Accidents, incidents and complaints	Internal	Access Road	Incidents, accidents and community complaints	Based on occurrence

Affected Component	Potential Impact	Parameters to be Monitored	Monitoring Type	Location	Measurements	Frequency
	hazard due to road traffic					
	Discharge of effluent and cooling water	Accidents, incidents and complaints	Internal	Water drainage channel	Incidents, accidents And community complaints	Based on occurrence
	Public Concerns	Complaints from community	Internal and External	Neighbouring communities around the Project activity areas	As per the grievance redress mechanism	Continuous

2.2 Social Accountability Action Plan

For acquiring SA 8000 certification, which AKSPL wishes to undertake through 2018 – 2020, the following action plan will be useful.

Findings	Recommendations	Timeline
Social Accountability Policy and Procedures are not established	The management should establish social accountability Policies and Procedures	31 December, 2016
SA 8000 guidelines are not communicated with the workers	Once formulated, the guidelines should be clearly and effectively communicated with the workers	31 March, 2017
Waste management practices exist in the plant, but Policy and Procedures are not established	The management should formulate a waste management policy and procedure for proper monitoring	31 May, 2016
OHS Committee existence confirmed, but no evidenced of a Social Performance Team	A separate Social Performance Team needs to be established	31 May, 2016
Risk assessment procedures are not found for assessing relevant risks for all elements of SA8000	The management should formulate a risk assessment procedure	30 June, 2016

Findings	Recommendations	Timeline
Evidence of internal audits on <i>all</i> elements of SA8000 are not found	An internal audit plan needs to be designed and acted upon	30 June, 2016
Social compliance monitoring mechanism is not established	A social compliance monitoring mechanism should be established	30 June, 2016
Relevant stakeholders are not involved in the SA8000 compliance process. There is no awareness program to communicate the SA 8000 compliance process to the relevant stakeholders	A compliance mechanism should be put forward in place with relevant stakeholders, and they should be communicated accordingly	30 June, 2016
Evidence of any Supplier Policy and Procedure not found, but there are some procedural documents	A supplier policy and procedure should be prepared	30 June, 2016
No evidence found of the factory management's communications of the SA 8000 requirements to senior leadership of suppliers/subcontractors, private employment agencies and subcontractors	Communication of SA 8000 requirements should be communicated to proper channels	31 April, 2016
no significant risks of non-conformance by suppliers/subcontractors, private employment agencies and sub-suppliers are currently identified in the work place	The management needs to identify if any significant risk of non-conformance exists in the process	31 April, 2016
Contractor workers are not separately identified in the workplace, and no identity card is provided to contractual workers	All employees must be provided with identity cards [Current employees have already been issued identity cards by 15 March, 2016 deadline]	15 March, 2015 for current employees, otherwise continuous effort

2.3 Social Management Framework

Guiding Principles	Guideline for Internal Monitor	Guideline for external monitor	Timeline
Human Resources and Labour Policy			
<ul style="list-style-type: none"> • Policy must include working relationship, working conditions and terms of employment, worker’s organizations, non-discrimination and equal opportunity, grievance mechanism, protecting the work force mainly the child and youth labour, policy on existing young labours, occupational health and safety etc. • Centrally organize all policies and procedures; • identify and record responsible person and last date modified • Conduct an annual review of all policies and procedures • Prominently display policies and procedures in local language • Appoint a person responsible for monitoring policies and procedures • Implement standardized routine training 	<ul style="list-style-type: none"> • Complete review of all policies and procedures • Review of management-worker committee meeting minutes • Communications (memos, letters, etc.) to workers, suppliers, contractors and multi-stakeholder groups • Interviews with management and workers • Interviews with external stakeholders • Budgets related to implementing labour policy • Training curricular and log book • If the contractors or sub-contractors do have a policy and if it do not support the policy of AKG, they must follow the policy of AKG 	<ul style="list-style-type: none"> • External Monitor will guide AKG about the preparing human resources and labour policy. Consultant will review and share the document with GIEK and AKG management before finalizing. • External monitor will keep a good liaison with the internal monitor, AK management and GIEK • Monitor will collect the present status of the policy of contractors and sub-contractors. • External monitor will make sure that all the contractors and sub-contractors is 	<ul style="list-style-type: none"> • 1st draft by 31 May, 2016 • Finalize by 30 June, 2016 • All contractors will come to an agreement with AKG by 30th April that they will follow the human resources policy of AKG if they do not have their own

Guiding Principles	Guideline for Internal Monitor	Guideline for external monitor	Timeline
<ul style="list-style-type: none"> • Policies for contractors and sub-contractors 	<ul style="list-style-type: none"> • If the contractors do not have the policy by their own, they must follow the policy of AKG 	<p>following this policy of AKG if they don't have their own policy.</p> <ul style="list-style-type: none"> • External monitor will make sure that human resources and labour policies is followed by the contractors, AKG management and workers 	
Working Conditions, Relationships and Terms of Employment			
<ul style="list-style-type: none"> • All workers of contractors/sub-contractors must receive a contract • Employment contracts must be understandable and will be in preferred languages mainly bangle • Workers must understand wage, benefit and deductions calculations • Overtime will be paid at a premium rate according to local law • Quotas and performance targets will be realistic and attainable. 	<ul style="list-style-type: none"> • Contracts for all workers • Policies and procedures related to worker contracts and wages • Communication and training on wage calculation, including local laws • Payroll records, time sheets and pay slips • Piece rate or performance pay calculations verified against minimum wage 	<ul style="list-style-type: none"> • External monitor will make sure that all the workers receive contract letter, pay slips, rate of payments etc. through interviewing the workers, documents verification, and record of contract letter verification. • External monitor will guide internal monitor about the working conditions, 	<ul style="list-style-type: none"> • All the workers of AK steel and power, AK limited and all the factory workers must receive contract letter by 15th March 2016 [completed] • All the workers must receive payslips (contractor/own labours) by 15th

Guiding Principles	Guideline for Internal Monitor	Guideline for external monitor	Timeline
<ul style="list-style-type: none"> • Ongoing internal verification that all workers are receiving wages and benefits as prescribed by law • Ongoing communication and training on legal labour rights and company personnel policies • There must be a worker representative and who will be elected by the workers • Worker representative will meet regularly with HR and company management Training on minimum legal benefits for all workers, including contractors, and sub-contractors 	<ul style="list-style-type: none"> • Worker interviews • Engineering studies used to set performance pay quotas and bonuses. • Policies and procedures related to wages, benefits, hours and leave Wage calculations as they relate to local laws • Worker and external stakeholder interviews • National law as it relates to wage and benefit minimums • Employment and termination record 	<p>relationships and terms of employment</p> <ul style="list-style-type: none"> • External monitor will also verify the living standards of the labours considering the Chittagong district • EM will also guide AKG to get the certification of SA8000. 	<p>March 2016 [completed]</p> <ul style="list-style-type: none"> • External monitor will verify the living cost and wage of Chittagong by the 1st monitoring period.
Collective Bargaining for the Labour Force			
<ul style="list-style-type: none"> • Clear policy allowing collective bargaining • Collective bargaining agreement will be negotiated and honoured in good faith • Management and workers nominates/elected worker representative 	<ul style="list-style-type: none"> • Documented policy regarding collective bargaining • Minutes and records from collective bargaining sessions, reviews or other actions 	<ul style="list-style-type: none"> • External Monitor (EM) will make sure the presence of workers representative • EM will verify the process of selecting or electing workers representative 	<ul style="list-style-type: none"> • Workers representative from contractors/sub-contractors will be selected by 30 April, 2016

Guiding Principles	Guideline for Internal Monitor	Guideline for external monitor	Timeline
<ul style="list-style-type: none"> • Management will clearly inform workers of their legal rights • Company will advise workers that effective unions are good for business and workforce • Regular training on worker-manager communications • Regular meetings between representative and manager • All types of meetings will be documented 	<ul style="list-style-type: none"> • Procedure for workers to select worker representative without management interference • Interviews with workers and unions • Worker-manager training curriculum • Collective bargaining agreements • Grievance mechanism 	<ul style="list-style-type: none"> • EM will verify whether workforce are acknowledged about the workers right • EM will conduct meetings with the workforce, management, contractors before the quarterly, bi-annual and yearly report 	
Non-Discrimination and equal Opportunity			
<ul style="list-style-type: none"> • Clearly define anti-discrimination policy in hiring, training, promotions and compensation • Regularly review worker and manager demographics • Develop long term remediation plan to address past discrimination • Provide regular training to workers and managers 	<ul style="list-style-type: none"> • Discrimination policy and related employment policies and procedures • Company policy and procedure to address and manage discrimination issues when found • Comparative demographics of workers and managers • Documentation of handled discrimination cases 	<ul style="list-style-type: none"> • EM will suggest AK management about the preparation of Contractors workers database • EM will make sure that all the contractors workers use finger print before entering to the factory • EM will have separate meeting with the contractors 	<ul style="list-style-type: none"> • EM will suggest and guide AK management and contractors about the better database maintenance of the contractors workers by 30 June, 2016

Guiding Principles	Guideline for Internal Monitor	Guideline for external monitor	Timeline
<ul style="list-style-type: none"> Establish confidential and secure communication channels for workers to reach managers Actively promote a harassment-free workplace Contractors and Sub-contractors must follow the above guidelines and AKG will monitor this regularly 	<ul style="list-style-type: none"> Diversity training curriculum and attendance log Interviews with workers and managers, including those who may be likely to be discriminated against Interviews with local unions Hiring, promotion and termination records National law as it relates to discrimination 	<ul style="list-style-type: none"> workers during the monitoring EM will check and verify the training records of all workers EM will verify hiring, promotion and termination records 	
Retrenchment			
<ul style="list-style-type: none"> Policy and procedure for workforce reduction, including worker selection Analysis of alternatives to workforce reduction Engage workers in discussions with workers related to workforce reduction as early as possible Communication to all workers about why and how the reduction will take place 	<ul style="list-style-type: none"> Policy and procedure related to workforce reduction, severance and transition Analysis of alternatives Procedures for selecting workers impacted by workforce reduction Documentation of prior instances of workforce reductions Minutes from management meetings and discussions 	<ul style="list-style-type: none"> EM will work closely with internal monitor, AK management and contractors in this retrenchment issues He will make sure that in the HR and labour policy define this issues clearly If any issues arise during EM monitoring period, EM will 	<ul style="list-style-type: none"> 1st draft by 31 May, 2016 in the Human Resources and labour policy of AKG Finalize by 30 June, 2016

Guiding Principles	Guideline for Internal Monitor	Guideline for external monitor	Timeline
<ul style="list-style-type: none"> Discussions with local NGOs about how the community impact of workforce reduction could be minimized Above procedures are applicable for the contractors as well. 	<ul style="list-style-type: none"> Communications with workers related to workforce reduction Communications with external stakeholders and community groups Interviews with current and past worker 	<p>attend meeting with the management and workers.</p>	
Grievances Mechanism			
<ul style="list-style-type: none"> Establish clear policies and procedures for grievances for AKG and contractors Communicate the grievance process to all workers in a clear, understandable manner Provide ongoing training to all workers Document all grievances and the resulting actions Make worker reps a key part of the process Contractors must follow the Grievances Procedure Grievances can be placed by the workers verbally or in a written form 	<ul style="list-style-type: none"> Documented policy and procedure for worker grievances Worker and manager interviews Training curriculum and log on grievance handling Communications to workers, supervisors and managers Trade union interviews Records of complaints lodged and actions taken on grievances Employment and termination record 	<ul style="list-style-type: none"> EM will verify the procedures of GM He will verify whether workers are known about the GM EM will verify numbers of grievances receives and solved within one monitoring period EM will have a separate meeting with the workers those have place grievances within one monitoring period of EM 	<ul style="list-style-type: none"> 1st draft by 31 May, 2016 in the Human Resources and labour policy of AKG Finalize by 30 June, 2016

Guiding Principles	Guideline for Internal Monitor	Guideline for external monitor	Timeline
Child and Young Workers			
<ul style="list-style-type: none"> • Policies and procedures for age verification in hiring • Documentation regarding apprentice programs • Interviews with workers, local children, trade unions • Pay records, medical records, birth certificates, IDs, school record • Contractors must follow the all guidelines 	<ul style="list-style-type: none"> • Write clearly defined policies and procedures for age verification – make them publicly available • Offer an apprentice program designed with the involvement of external stakeholders • Develop remediation plan for use in cases where children are unknowingly employed despite your No Child Labour policies and procedures (ex: child presents false ID) • Engage with local stakeholders to develop proactive plans to address child labour issues • Communicate AKG’s child labour policies to suppliers and contractors – and provide them with the training and tools to address the issue 	<ul style="list-style-type: none"> • Guide and suggest AKG in preparing standalone child and young labour policy • EM will make sure that all the young labours (those have not completed) are receiving primary education • The quality of education receives • EM will make sure that young workers receives career development training • EM will make sure that all young workers are receiving regular salaries as they used to receive • EM will monitor the effectiveness of the Back to 	<ul style="list-style-type: none"> • Draft Standalone child and young labour policy by 31 May 2016 • Final Standalone child and young labour policy by 30 July 2016 • Back to school for the young workers by 1st June, 2016 • Career development training for young workers by 1st June, 2016

Guiding Principles	Guideline for Internal Monitor	Guideline for external monitor	Timeline
		school programme for the young workers.	
Occupational Health and Safety			
<ul style="list-style-type: none"> • Structuring an OHS team and an OHS accountability framework (including production area) • Conducting a comprehensive job safety or job hazard analyses • Developing a Corrective OHS Action Plan based on the likelihood and severity of the consequence of exposure to the identified hazards • Proper equipment design, maintenance and procedures, such as Designing machines to eliminate trap hazards ,Turning off, disconnecting, isolating, and de-energizing (Locked Out and Tagged Out) machinery with exposed or guarded moving parts or being serviced Marking and checking all energized electrical devices, cords and lines with warning 	<ul style="list-style-type: none"> • Visual observation • Exposure to hazardous agents monitoring log • Manager and worker interviews • Accident and medical treatment logs • Equipment maintenance logs • Fire and safety drill logs • Health and safety risk analysis • Health and safety inspection logs with test results • Government health inspection reports ,, Training curriculum and log 	<ul style="list-style-type: none"> • EM will guide health and safety manager of AKG and management about the certification of the OSHAS by 2020 • EM will regularly monitor the gaps and how the gaps is being filled • EM will conduct training for internal monitor, safety managers, workers representative, contractors about the OSAHS certification 	<ul style="list-style-type: none"> • OSHAS certification by 2020

Guiding Principles	Guideline for Internal Monitor	Guideline for external monitor	Timeline
signs Implementing proper monitoring systems of hazardous agents and proper control measures (eliminating risk, PPC, PPE)			

2.4 Organizational Health & Safety Action Plan

Action	Frequency/ Timeline
Prepare risk assessment procedure and carry out risk assessment	31 September, 2016
Identify ergonomics risks	31 September, 2016
Provide <i>regular</i> training in recognition of hazards and emergencies	Periodic, as to be identified in the detailed OHS procedure document
Post evacuation plans and maps along with directions in production area	30 June, 2016
Visual Fire alarm should be cover all noisy areas	31 December, 2016
Working floor should be kept dry	Continuous
Emergency fire evacuation plan to be post at <i>every</i> exit	31 June, 2016
Fire drills should be conducted <i>regularly</i> at the Flat steel production site	Periodic [fire drills are identified to have become regular already, and a periodic routine has been drawn up]
Periodically Medical check-ups should be ensured for high risk area employees	Periodic, as to be identified in the detailed OHS procedure document
Major injury awareness training should be stored and maintained	When incidence takes place
Ensure aisle markings	Continuous

Action	Frequency/ Timeline
Check electrical equipment/ wiring for maintenance and loose wiring.	Continuous
Electrical panels/ boxes should be used for all electrical switches in the plants.	Continuous
Fire alarm should be installed at each exit	Continuous
Sufficient Emergency lights should be installed	Continuous
First aid medicine list and First aider Photo should be post on/ around the first aid box	May 2016 onwards, continuous
Warning labels should be posted at Electrical panels/ boxes (SDB, DB)	Continuous
Management shall ensure that the Child care facility plan is executed	Continuous
The PPE shortage must be met on an immediate basis	30 June 2016

2.5 Human Resources and Labour Related Action Plan

Sl. No.	Corrective Actions Required	Approximate Budget (BDT)	Responsible Party and present situation	Present Status	Deliverable	Timeline
1	Prepare draft HR and labour policies and handbook.	Internal cost	AKG	Ongoing	Policy handbook	30 th April 2016
2	All the workers and staffs of AKG and contractors should be issued ID Card. Wearing ID Card should be made mandatory for all workers and staffs. Reference of identification number should be ensured in labour	Internal cost	AKG and Contractor: Most of the ID cards already issued	Completed	ID Card and contract letters for workers and staffs. These will be mentioned in the	15 th March 2016

Sl. No.	Corrective Actions Required	Approximate Budget (BDT)	Responsible Party and present situation	Present Status	Deliverable	Timeline
	register, attendance/time sheet, salary/wage payment sheet and OT payment sheet. All the workers must receive contract letters				HR and Labour Policy	
	All the workers in the steel production facilities including power plant, steel production factories, canteen, and office workers (including full time, part time, temporary, daily basis etc. labours) must receive contract letters, payslips and ID cards. Facilities provided to them including wage rate and overtime must be mentioned in the contract Letter.	Internal cost of AKG and Contractors	AKG and Contractors.	Completed	Contract letters and ID cards to the labours. These must be mentioned in the HR and Labour Policy	15 th March 2016
3	Each labour should get one day off after maximum 6 days of continuous works. Maximum regular working hour should be 8 hours and daily overtime should not exceed 2 hours. Including overtime, average working hour should not exceed 56 hours per week per labour.		AKG and Contractor	Completed	Will be mentioned in the draft HR and Labour Policy	30 th April 2016
4	Payment of wages and OT should comply with minimum wage fixed by Bangladesh Minimum Wages Board and Bangladesh Labour Law.		AKG and Contractor: Already implementing	Receiving more than minimum wage	Will be mentioned in the draft HR and Labour Policy	Done by 31 th Jan 2016
5	Labour union or CBA		Should be formed in a documented way.	Ongoing	Labour union or CBA	30 April, 2016

Sl. No.	Corrective Actions Required	Approximate Budget (BDT)	Responsible Party and present situation	Present Status	Deliverable	Timeline
6	Regular internal monitoring should be ensured from both AKG and Contractor to ensure use of PPEs as well as necessary safety measures.	Internal cost	AKG/ Contractor	Ongoing	Improved monitoring.	On Going
7	One focal person will be designated for each factory for reporting and monitoring not employing child/adolescent labours under the age of 18 by AKG and the contractors. As well as monitoring labour rights, standards, ID cards, pay slips , working hours etc.	Internal Cost	AKG/ Contractor in the rank of manager	Ongoing	Improved monitoring	On going
8	No Young labour will be engaged in hazardous areas. Lists of existing young labours have to be submitted to consultant by 31th December and AKG will provide basic educational support and skill development training internally. They will be away from the hazardous work.		AKG/ Contractors No young labours is recruited in the last 3 months.	Preparatory work ongoing	Existing adolescent labour will receive basic education and skill development training.	Schooling will be started by 1 June, 2016
Monitoring (external and internal)						
9	a) All the above mentioned issues will be monitored by the external and internal monitor. Detailed duties of the internal and external monitors are explained in the ESMP report.	The external monitoring cost for labour component including	AKG/ Internal monitor		1) Quarterly report for 2016. 1 st quarterly report will be submitted at the end of May 2016	

Sl. No.	Corrective Actions Required	Approximate Budget (BDT)	Responsible Party and present situation	Present Status	Deliverable	Timeline
	b)Both external and internal monitor will monitor Back to school programme and effectiveness if this, Basic labour standards issues like receiving contract letters, overtime payments, young workers not working in the hazardous place etc. They will also make sure that HR and labour policy is prepared on time and proper implementation of this policy in the factory. External monitor will also suggest/advice AKG in getting the certification of SA8000 and OSHAS	monitoring the back to school programme, health and safety component and the environmental monitoring is maximum BDT 1.25 crore (125 lacs).			2) Half yearly reports for 2017/2018, and annual for 2019 and 2020.	
	c) Health & Safety Audit	This cost is for five				
	d) Environmental Monitoring	years period.				

2.6 Young Workers' Action Plan

Targeted group/Activities	Steps to be taken	Remarks/Budget	Implementing Body	Timeline/present status
Deployment of Child Labour				
Prohibit Recruiting Child labour	-ID card and Birth certificate will be verified during employment -Zero tolerance about the employment of child labour	Sub-contractor and contractors will follow the same framework and AKG will monitor on a regular basis. Approximate cost: BDT 1 lac	AKG, contractor and sub-contractor	A separate child labour policy will be prepared.

Targeted group/Activities	Steps to be taken	Remarks/Budget	Implementing Body	Timeline/present status
	-If possible parents might be hired			
Internal Monitor	-One dedicated manager will be selected for the social welfare of the child labour	Sub-contractor will report him weekly about the new employed staff Estimated cost BDT 10 lac per year	AKG	February 2016/ one internal monitor for each company is already appointed.
Existing Young Labour				
List of young labours Group wise:	A list of existing young labour have to be prepared mentioning name, fathers name, mothers name, date of birth, permanent address, length of work with AKG, present working	Sub-contractors and AKG has worked together to prepare this list	AKG/sub-contractors	A list is already prepared

Targeted group/Activities	Steps to be taken	Remarks/Budget	Implementing Body	Timeline/present status
	department, available skills and future plan etc.			
Work Contract	Appointment Letter with clear job role and wage level to be handed over during employment	Abul Khair group will ensure implementation including the subcontractors	AKG/sub-contractors	15th March 2016/ All the workers of AKG has received contract letters
Swapping children with parents/Guardian instead as labours	In case there are children under the age of 15 in Abul Khair or the contractor/Sub-contractors, their parents/keen members might be offered suitable job roles with full remuneration according to national standard for adult workers.	Abul Khair group will ensure implementation including the subcontractors	AKG/sub-contractors	Meeting session with the parents by end of March 2016

Targeted group/Activities	Steps to be taken	Remarks/Budget	Implementing Body	Timeline/present status
Basic education for the young labours Rehabilitation programme for age group 14-15 if any	-Basic education -skill development by the training and development units of AKG	-1 st year education 2 hours/day maximum -2 nd , 3 rd and 4 th year 3 hours/day education maximum -skill training for 2 hours/day maximum -work 3 hours/day maximum Estimated cost BDT 2 lac per year	AKG/sub-contractors and NGO	From 1 June, 2016
Age appropriate training programme for age group 16-18	Technical training, workshops, skills development for adolescent workers with support from UCEP, BRAC or other recognized organizations	Abul Khair group: to ensure on behalf of the subcontractor Estimated cost BDT 8 Lac /year	Training and development department of AKG/sub-contractors	From 1 June, 2016
Full time Job Opportunity after completion of the basic education and training	With full time wages according to national standard to be offered	Abul Khair group may offer based on vacancy and performance of the labour	AKG	As required

Targeted group/Activities	Steps to be taken	Remarks/Budget	Implementing Body	Timeline/present status
Employment of third party monitoring agency to monitor Abul Khair and the sub-contractors	Quarterly monitoring for the year of 2016, Bi-annually monitoring for the year of 2017, 2018, Yearly monitoring for the year of 2019 and 2020.	Approximately 1.25 crore Bangladeshi Taka for external monitor for 5 years for monitoring labour, health and safety and environment.	AKG	Quarterly for the 1 st year and 1 st report will be submitted by end of April 2016. 2 nd report by July 2016, 3 rd report October 2016 and year ending report by December 2016. For the year 2017 and 2018, report will be submitted in June and December. For year 2019 and 2020, report will be submitted end of the year.

Our Clients



For any queries or clarifications, please feel free to contact us at the address below:

e.Gen Consultants Ltd.

14A Chandrashila Suvastu Tower,
69/1 Bir Uttam Qazi Nuruzzaman Road, Dhaka 1205, Bangladesh.
Telephone: +88 02 964 1256-9 | Fax: +88 02 964 1260-1

Email: info@egenconsultants.com | Web: www.egenconsultants.com

