



**ENVIRONMENT, HEALTH  
& SAFETY**

**CODE OF CONDUCT**

of Investors & Units of  
the Glo-Djigbe Industrial Zone

# /INTRODUCTION

This “environment, health and safety” code of conduct supplements the terms of the Cahier des Charges adopted between the Benin Republic and ARISE to ensure the proper functioning of the Glo-Djigbe Industrial Zone (the “Zone”)- which is being constructed and will be administered by SIPI-Bénin. The aim of SIPI-Bénin is to promote socio-economic development and improve the level and quality of life of all populations that take part in activities within the Zone. Therefore, it is paramount that all work within SIPI-Bénin is carried out in an ethical and sustainable manner.

The creation of the Glo-Djigbe Industrial Zone is considered by the State as a strategic issue in terms of economic development and to promote the growth of the industrialization of the country in order to become a reference model for countries in the sub-region and in greater Africa.

This “environment, health and safety” code of conduct is intended for Units which set up in the Zone so that they individually and collectively meet the best standards in social, hygiene and health, safety and sustainable.

SIPI-Bénin want to make sure that the workplaces are healthy and safe for all employees, contractors and visitors. The goal is to instill a ‘zero harm culture’ to work towards mitigating as many risks, that can cause injuries or illnesses, as possible and to build more inclusive and sustainable communities through people, products, and partnerships. SIPI-Bénin wishes to promote sustainability and minimize the environmental footprint by improving operational efficiency within an environmentally friendly framework simultaneously helping to preserve the heritage of future generations.

This document outlines the minimum standards of ethical and responsible behaviour which will be met by all Units planning to develop their businesses within the Zone. These outlines are in line with the corporate culture of SIPI-Bénin and will help the investors to conduct their business in an environmentally sustainable manner working to achieve a “Zero harm” by promoting a safe working environment. This will ensure that all activities are carried ethically and sustainably while creating added value for companies and the products produced there.

These requirements are over and above national legal requirements, relevant legislation, regulations, guidelines of Bénin( which must be followed) in order to meet best industrial practices and international standards.

These requirements are imperative and will be imposed on any Unit who holds a right of any kind, for any reason whatsoever, within the Zone.

The Units are invited to communicate this “environment, health and safety” code of conduct to their managers, employees, suppliers and subcontractors.





# **/WORKING CONDITIONS**

# WORKING CONDITIONS

The investor planning to create a Unit within the Zone agrees to have the following safety and health practices:

- /1.** All persons working for a Unit within the Zone, including its contractors and subcontractors, must have official documents to justify their employment, such as employment contract, work permit and visas.
- /2.** Implement a safety management program based on safe method of work, including but not limited to, Risk Assessment and Mitigation, Standard Operating Procedures for all the operational activities to be carried out, Emergency Response Plan and the modalities of work authorization.
- /3.** Conduct its business operations with integrity in compliance with the :
  - a.** relevant laws of Benin;
  - b.** national and international health and safety standards and guidelines.
- /4.** Have a Health, Safety and Environment (HSE) Officer as per the national law, who is in charge for managing the day-to-day environmental, social, health and safety risks.
- /5.** Undertake a Job Risk Assessment (JRA) at the start of each new operational activity and review it yearly (at the minimum). The JRA should identify the hazards and the mitigation measures required to address those hazards. The results of these analyses must be kept by the Units in order to be communicated to the competent authorities, in the event of a request.
- /5.** Ensure that every worker has the skills and experience necessary to undertake all hazardous activities and apply suitable control and monitoring measures, for example for welding work, working at height, working in confined spaces, excavations, etc.
- /6.** Ensure that employees are fit for work activities through an annual medical examination.
- /7.** Have and provide protective equipment to all workers and ensure that all workers wear appropriate protective equipment while working.

**/8.** All accidents and incidents must be reported and investigated in order to be recorded in reports. The Units will have to identify the causes of such accidents or incidents in order to correct them and take the necessary measures to prevent them from recurring, in consultation with the staff representative and concerned staff.

**/9.** Put in place EHS internal audit measures based on clearly defined standards and principles (frequency of audits, people in charge of audits, list of internal standards and measures, etc.).

**/10.** A Health & Safety committee should be set up within each Unit and will meet quarterly or as often as necessary. The Health & Safety committee should keep a record of its meeting so that it is available to employees and accessible for management of the Unit as well as submitted administrative authorities in accordance with the regulations applicable in Benin.

**/11.** Have a first aid center, trained first aiders inside the unit and first aid kits at the various workstations.

**/12.** Build facilities and have equipment that meet national regulations in terms of hygiene, health and safety.

**/13.** Ensure that all employees, sub-contractors and sub-contractors who work within the Units are informed of a “zero tolerance” in the Zone, in terms of working under the influence of drugs, alcohol or other illicit substances as well as the consequences of violating this prohibition.

**/14.** Units must implement an environmental management plan, including regulatory water and air analysis as well as waste management and environmental pollution prevention.



**/CONSTRUCTION  
ACTIVITIES**

# CONSTRUCTION ACTIVITIES

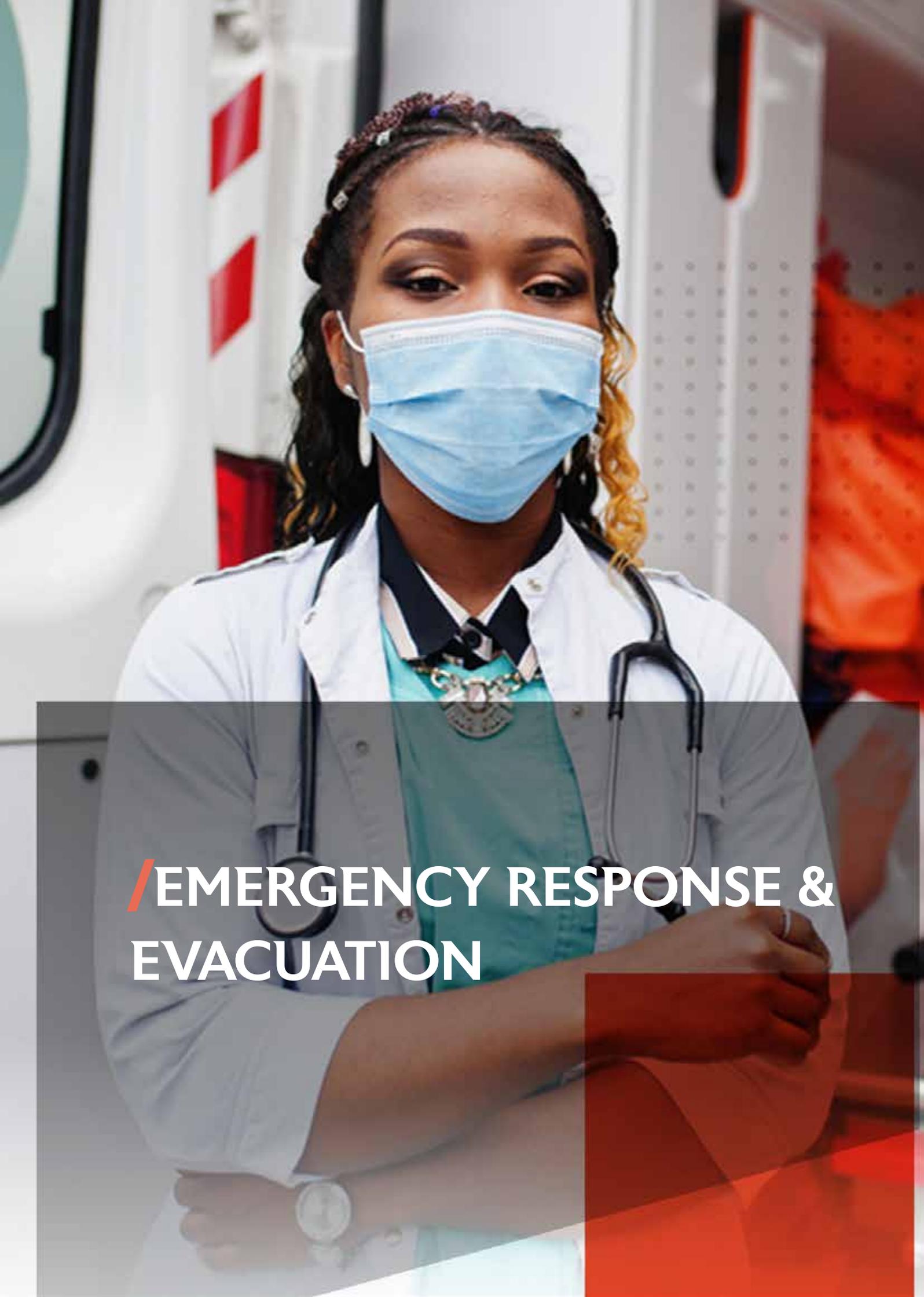
- /1.** Before the start of its construction works, each Unit must produce an Environmental and Social Impact Assessment (ESIA) and an Environmental and Social Management Plan (ESMP) and must also comply with the environmental and social guidelines set by SIPI-Bénin after completion of its construction work in order to guarantee the compliance of its activities with respect to environmental and social risks.
- /2.** Each Unit, including its subcontractors and suppliers, which carries out construction work must have the skills and an environmental, social, health and safety risk management system corresponding to their activities.
- /3.** The construction of the site must be planned in such a way as to reduce the risks to the safety of workers and third parties, particularly when using hazardous substances.
- /4.** In terms of waste management, the Units are required to comply with the stipulations of the *Cahier des Charges* and to their lease.
- /5.** Each Unit will be required to inform its staff and that of its subcontractors of the safety conditions that must be adopted on the site and only workers who have benefited from its information and / or adequate training will be authorized to work on the site.



**/FIRE SAFETY**

# / FIRE SAFETY

- /1.** Each Unit, before starting its operation, must carry out a fire audit of its installations by an approved independent company which will be responsible for calculating the calorific load, identifying the fire risks and the control measures to be implemented.
- /2.** Each Unit must have extinguishers in an appropriate number and placed in its facilities in accordance with the recommendations of the fire expert. Extinguishers should be inspected regularly in accordance with national regulations or the recommendations of the fire expert.
- /3.** Smoking areas must be defined and communicated to employees.
- /4.** A fire hydrant system, if recommended by the fire expert, must be installed inside industrial premises and maintained regularly. The Unit must ensure that it always has water in the tanks dedicated to the hydrant system.
- /5.** Open burning of waste in the Area or in facilities is prohibited.

A female healthcare professional, likely an EMT or paramedic, is shown from the chest up. She is wearing a white lab coat over teal scrubs, a blue surgical mask, and a stethoscope. Her hair is styled in braids. She is standing in what appears to be the interior of an ambulance, with red and white striped safety markings visible in the background. The image has a semi-transparent dark grey overlay at the bottom, and a red graphic element in the bottom right corner.

**/EMERGENCY RESPONSE &  
EVACUATION**

# /EMERGENCY RESPONSE & EVACUATION

**/1.** Each Unit must have a response and evacuation plan, clearly defining the measures to be taken in an emergency. The Unit shall adopt, circulate and regularly update all information measures intended for its staff on the risks and the measures to be taken in the event of an emergency.

**/2.** Fire safety simulation drills and building evacuation drills will be carried out on a regular basis. The Unit is required to prepare and maintain evacuation simulation reports.

**/3.** Each Unit must have a fire safety plan that considers neighbouring local communities. This fire safety plan will be communicated to the local communities neighbouring the Unit.

**/4.** Each Unit should have an internal emergency team, trained and appropriate regarding the size and the activities of the Unit.

**/5.** Emergency exits must be clearly signposted and free to access both inside and outside the building.



# **/HEALTH & SAFETY TRAININGS**

# /HEALTH & SAFETY TRAININGS

- /1.** Safety induction should be provided to all employees, workers and persons who work or attend on the site as well as on what to do in case of emergency.
- /2.** Basic training in occupational hygiene, health and safety should be provided to management, supervisors, workers and third parties who work in high-risk or hazardous areas to ensure that they adopt all measures necessary in the performance of their work and safeguard that of their colleagues.
- /3.** Employees and workers must also receive specific training on the safety of their workstations, the equipment they use and the activities they perform.
- /4.** Occupational ' illness should be prevented through hygiene and health awareness and education initiatives and by providing adequate health services.

A construction site at sunset. The sky is a warm orange and yellow. In the foreground, two construction workers wearing hard hats and safety vests are silhouetted against the bright light. Behind them, a large piece of machinery, possibly a crane or excavator, is also silhouetted. The background is filled with the complex steel framework of a building under construction, including scaffolding and rebar structures.

# **/MACHINERY & EQUIPMENT**

# /MACHINERY & EQUIPMENT

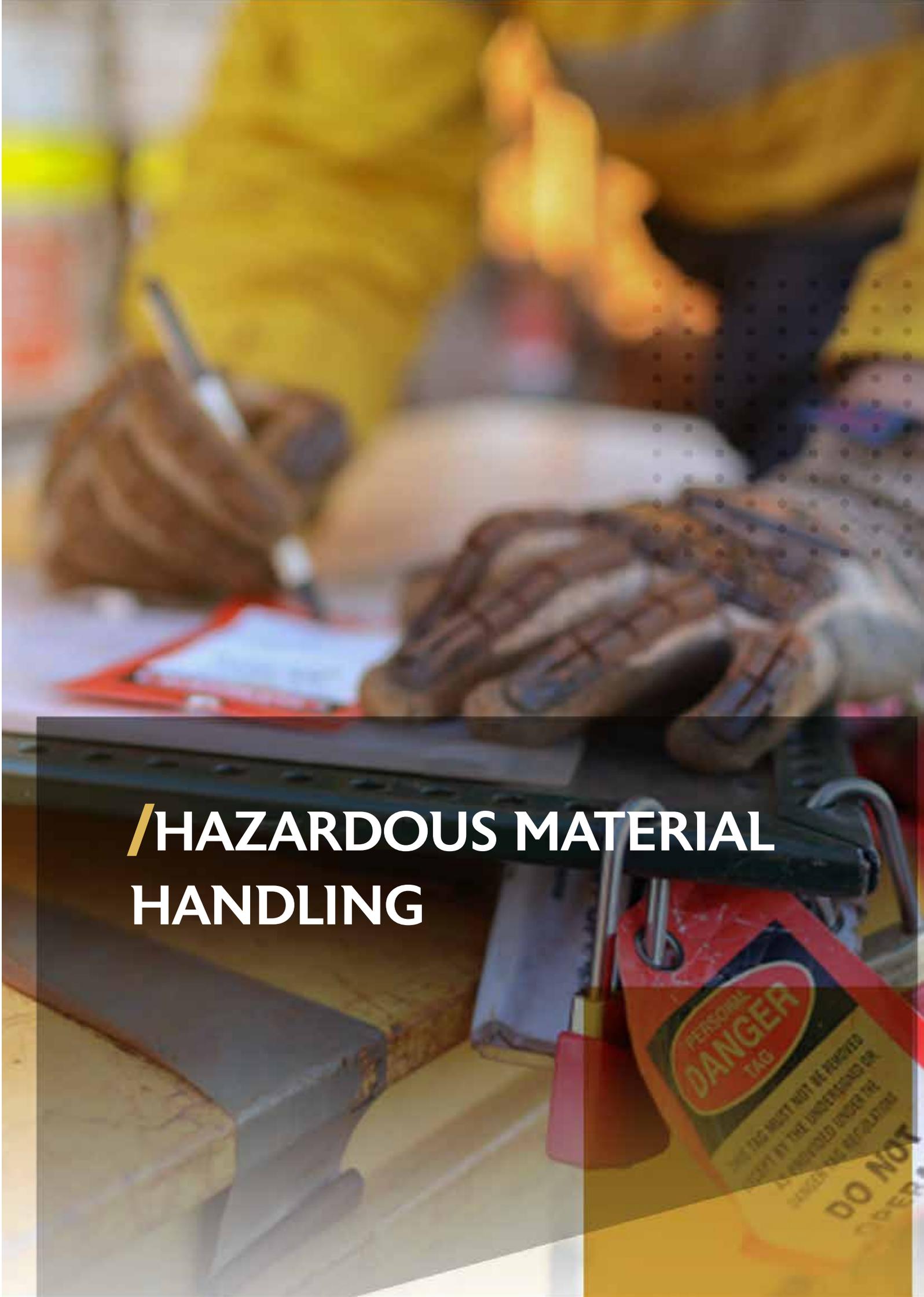
- /1.** Locked Out and Tagged Out' procedures must be developed and applied for machinery with exposed or guarded moving parts, or those in which energy can be stored (e.g. compressed air, electrical) during servicing or maintenance.
- /2.** Noise generating machinery and vehicles must be regularly maintained according to manufacturer specifications.
- /3.** Machinery with exposed or guarded moving parts, or in which energy can be stored during servicing or maintenance, must be turned off, disconnected, in accordance with related standards.
- /4.** All moving parts of machines must have protective systems to prevent them from coming into contact with or causing injury to workers or visitors.
- /5.** Depending on the nature of the equipment or machines (hand-arm system) that can cause vibrations and have health effects, this equipment or machines must have vibration attenuation devices. The Unit is required to limit the use of such equipment or machinery in order to avoid hand-arm vibration syndrome.
- /6.** All energised electrical devices, connection lines and substations must be marked with warning signs.
- /7.** All lifting tools and tackles shall be checked before and after use. Damaged tools shall not be used in any case. Third party inspection of these tools shall be done as per the local or international standards so as not to cause accidents or injuries.
- /8.** All equipment must be regularly inspected and maintained according to the manufacturer's specifications and used as intended purpose.

A large, rusted metal excavator bucket is suspended in the air, filled with a large amount of straw. The bucket is attached to a hydraulic arm that extends from the top left corner of the frame. The background is a clear blue sky with a faint grid pattern. In the lower right corner, there is a dark brown rectangular area. The overall scene suggests a process of waste management or recycling.

# /WASTE MANAGEMENT

# WASTE MANAGEMENT

- /1.** Waste sorting will be considered by the Unit depending of the availability of the treatment channels.
- /2.** Hazardous wastes will have to be segregated from other wastes, stored securely and disposed of only in licensed hazardous waste facilities and by licensed waste management contractors by SIPI-Bénin.
- /3.** Medical waste should be sorted at the source and treated according to the law.
- /4.** Hazardous waste must be properly stored to control and prevent accidental releases into the air, soil, subsoil and water resources.
- /5.** Waste must be stored in closed containers protected from light, wind and rain.
- /6.** For non-hazardous wastes that cannot be recycled, a waste management system must be developed as per the local regulation or as provided for in the *Cahier des Charges*.
- /7.** A waste management hierarchy that considers prevention, reduction, reuse, recovery, recycling, removal and finally disposal of wastes must be established by the Unit.
- /8.** Any waste management system must take into account the surrounding local communities and their well-being. Waste management at Unit level should not negatively impact or hamper the activities of local communities.
- /9.** Documented tracking of waste management must be maintained.

A close-up photograph of a worker in a yellow safety vest and brown work gloves. The worker is using a pair of pliers to work on a metal structure. A red padlock is attached to the structure, and a red tag with a yellow label is hanging from it. The tag has the text 'PERSONNEL DANGER TAG' and 'THIS TAG MUST NOT BE REMOVED EXCEPT BY THE UNDERSIGNED OR AUTHORIZED PERSONNEL UNDER THE SUPERVISION OF THE UNDERSIGNED'. The background is blurred, showing a workshop or industrial setting.

# /HAZARDOUS MATERIAL HANDLING

PERSONNEL  
**DANGER**  
TAG

THIS TAG MUST NOT BE REMOVED  
EXCEPT BY THE UNDERSIGNED OR  
AUTHORIZED PERSONNEL UNDER THE  
SUPERVISION OF THE UNDERSIGNED

DO NOT  
OPERATE

# /HAZARDOUS MATERIAL HANDLING

- /1.** Units which manufacture, handle, use or store hazardous materials must establish management programs adapted to potential risks. Activities that require the use of hazardous materials or substances must be supervised to ensure the protection and prevention of workforce, rejection and accidents.
- /2.** When there is a risk of spillage of hazardous materials or substances, the Units will have to prepare a plan of control, prevention and countermeasures as a specific element of their preparedness and emergency plan.
- /3.** Spill control measures (such as using spill trays, bund walls and pumps to transfer chemicals from drums etc.) should be implemented by the Unit.
- /4.** Reactive, flammable, and explosive materials be managed to avoid uncontrolled reactions, fire or explosion. This will include the storage and segregation of hazardous material as per the compatibility, provision of material-specific storage for extremely hazardous or reactive materials & use of flame arresting devices on vents from flammable storage containers.
- /5.** Storage of hazardous materials shall be done in an area of the facility separated from the production works and respect segregation rules base on compatibility and product nature.
- /6.** Material safety data sheet (MSDS) of all such stored chemicals must always be available in a case of emergency.
- /7.** Appropriate firefighting equipment must be installed near the hazardous storage area.
- /8.** Proper signages such as “Hazardous storage area”, “Danger” etc. shall be displayed near the hazardous storage area.
- /9.** Eyewash and shower station shall be made available near hazardous handling area.
- /10.** When handling hazardous materials, procedures and practices must be developed to enable the implementation of prompt and effective measures in order to prevent accidents, injuries or damage to the environment.

**11.** The Unit must establish a management plan and quantitative risk assessment relating to hazardous materials it stores above the usual thresholds.



**/SOCIAL & WELFARE**

## NO CHILD LABOUR

**/1.** Investors/operators/sub-contractors shall respect & follow the table below as a direct reference to ILO Convention No. 138 which defines child labour by the following categories :

Nature of Work	Age
Regular work	16 years
Hazardous work	18 years
Light work	15 years

**/2.** In cases where local legislation stipulates a higher minimum age, the higher limit shall apply.

## NO DISCRIMINATION

**/1.** Units shall not apply any type of discriminatory practice with regards to recruitment, compensation, access to training, promotion, termination of the employment agreement or retirement based on race, ethnic group, creed, nationality, religion, age, physical disorder, gender, marital status, sexual orientation and/or union membership or political affiliation.

## HYGIENIC WORKING CONDITIONS

**/1.** Ensure that all employees and other workers have access to adequate clean, potable water, and safe, hygienic food during working hours.

**/2.** Create separate toilets and changing rooms for men and women.

**/3.** Accommodation, where provided by Units, shall be clean and safe. Dormitories provided to workers should not be overcrowded (for reference; in a 20-inch container 6 people can be accommodated).

**/4.** The Units must have rest rooms for their employees and respect the compulsory rest times for difficult tasks.

**/5.** SIPI-Bénin reserves the right to annually assess, each worksite to gauge worker's access to clean and potable water; fresh and healthy food during working hours and define priority actions in the event of non-compliance with these essential principles.

## WORKING HOURS & WAGES

**/1.** Comply with applicable local laws regarding maximum working days, hours of work and overtime hours.

**/2.** The Units ensure that the wages paid cover at least the minimum thresholds provided for by the provisions of the labor code or by the collective agreement if it is more favourable.

**/3.** Comply with the minimum wages and ensure that wages are paid on time and in full, with all legally mandated deductions, such as taxes or social insurance.

**/4.** Establish pay slips in accordance with legal requirements and keep a staff entry and exit register.

## GRIEVANCE MANAGEMENT

**/1.** SIPI-Bénin has a complaints mechanism based on “Good International Industrial Practice”, including IFC performance standards available from SIPI-Bénin. The Units will have to put in place rules to allow the presentation of complaints and to ensure that all persons can have access to them and that they are not penalized when they present a complaint.

**/2.** Each Unit shall install grievance boxes for workers (documentation in English and other languages as relevant).

**/3.** Internal and external audits of working conditions must be carried out regularly to ensure that they are adequate and comply with current regulations.

**/4.** Any kind of harassment is prohibited. Allowing or encouraging harassment will involve the intervention of SIPI-Bénin and / or the competent administrative authorities.

## ENVIRONMENT MANAGEMENT

**/1.** Regular monitoring of pollutants, such as surface water, air and noise must be conducted by the Unit. SIPI-Bénin will have the ability to verify that the Unit meets the criteria of non-pollution and respect for the environment within the Zone.

**/2.** Emissions to the air must not result in pollutant concentrations that reach or exceed the directives or standards provided for by Beninese regulations.

**/3.** It is recommended that the Units set up an energy management program and promote new non-polluting energies.

**/4.** Hazardous materials and wastes (oil, gasoline, dyes, etc.) must not be discharged into the environment or into wastewater drainage networks. The Units must have hazardous waste recovery systems, treat and dispose them in accordance with Beninese regulations.

**/5.** Measures to control and limit noise pollution (maximum 70 decibel outside emission source) must be implemented in accordance with Beninese regulations.

**/6.** Arrangements will be adopted to minimize the flow or discharge of wastewater to watercourses, irrigation basins and that it will not be mixed with rainwater.

**/7.** The Units, depending on the nature of their activities and before the start of their operation, must put in place specific measures and install all equipment to reduce toxic or harmful emissions into the air.

**/8.** Have a rainwater collection and drainage and wastewater treatment system.

**/9.** Have water-oil separators and oil spill kits at all necessary points (equipment washing areas, yards, mechanics workshop) and to prevent them from being released into the wastewater networks.

**/10.** Production, business and service establishments that emit exhaust gas and cause noise shall procure and install exhaust gas treatment and noise reduction systems compliant with Beninese regulations, in particular those applicable in environmental matters.

**/11.** Implement a plan for the prevention, intervention and repair of environmental damage.

## **SURVEILLANCE AND GUARDING**

**/1.** Units which use surveillance companies or night guards must ensure that the supervisors or guards are not armed.

**/2.** The Units should ensure that the night guards have an equipped gatehouse located inside the facilities.

**/3.** The Units will ensure that their night guards comply with the instructions applicable within the Zone.

**/4.** All illegal acts or acts contrary to the stipulations of the Cahier des Charges carried out by subordinates, employees or contractors of the Unit are the sole responsibility of the respective Unit.

This “environment, health and safety” code of conduct is not exhaustive and it could be modified or supplemented by SIPI-Bénin to improve operations and activities within the Zone.



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