

# Initial Human Rights Risk Assessment

## Scatec 200MW Wind Farm in Egypt



REV-~~10~~11

26 November 2024

**Report Approval and Revision Record**

Template Code		J-UK-50783	Template Revision No.	REV-0
Version	Date	Description	Prepared By	Approved By
REV 0	19/11/2024	Scatec Egypt Wind Farm	EcoConServ	

**Prepared by:**

EcoConServ Environmental Solutions  
 12 El-Saleh Ayoub St., Zamalek Cairo, Egypt, 112111  
 Tel: + (2 02) 2735 9078 / 2736 4818  
 Fax: + (20 2) 2736 5397  
 E-mail: [genena@ecoconserv.com](mailto:genena@ecoconserv.com)

ECO Consult  
 Jude Center, Salem Al-Hindawi Street, Shmeisani, Amman, Jordan  
 Tel: 962 6 569 9769  
 Fax: 962 6 5697264  
 E-mail: [info@ecoconsult.jo](mailto:info@ecoconsult.jo)

**Prepared for:**

RCREEE - Regional Centre for Renewable Energies and Energy Efficiency  
 Hydro Power Building, Floor 7  
 Block 11, Piece 15, Melsa District  
 Ard el Golf, Nasr City, Cairo  
 Arab Republic of Egypt

**Issue and Revision Record:****Disclaimer:**

This report should not be relied upon or used for any other project without an independent check being carried out as to its suitability and prior written authority of RCREEE being obtained. ECO Consult and EcoConServ accepts no responsibility or liability for the consequence of this document being used for a purpose other than the purposes for which it was commissioned.

This report is confidential to RCREEE, and the Consultant accepts no responsibility of whatsoever nature to third parties to whom this Report, or any part thereof, is made known. Any such party relies upon this report at their own risk.

## TABLE OF CONTENTS

1. INTRODUCTION .....	2
2. OVERVIEW OF HUMAN RIGHTS CONTEXT IN EGYPT .....	3
2.1 Human Development Index in Egypt .....	3
2.2 Economic and Social Rights.....	3
2.3 Political and Civil Rights .....	4
2.4 Rights of Minorities and Gender Inequality.....	4
3. PROJECT SPECIFIC CONTEXT .....	5
3.1 Nature of the area.....	5
3.2 Bedouin communities in the Ras Gharib City .....	5
4. THE LABOUR CODE IN EGYPT .....	6
5. CLASSIFICATION OF IDENTIFIED HUMAN RIGHTS RISKS .....	14
6. MITIGATION MEASURES .....	21
7. RECOMMENDATIONS.....	28

## ABBREVIATIONS

ESIA	Environmental and Social Impact Assessment
GBVH	Gender-based Violence and Harassment
HDI	Human Development Index
ILO	International Labour Organization

## 1. INTRODUCTION

This document is an initial human rights assessment for the Infinity Power Holding Wind Power Plant 450 MW at Gulf of Suez in Egypt. The assessment was conducted in accordance with the *Equator Principles* as well as the *UN Guiding Principles on Business and Human Rights*.<sup>1</sup>

Egypt faces significant human rights challenges, with numerous groups and international organizations raising concerns about the deterioration of political and civil rights and poor conditions for economic and social rights in the face of high degrees of class and gender inequality. Demonstrating awareness of these concerns, in September 2021 the government announced a 5-year National Human Rights Strategy aimed at improving civil and political rights, economic social, and cultural rights, rights of women, children, persons with disabilities, youth and the elderly, and human rights education and capacity building. Further President Sisi declared 2022 to be the “the year of civil rights” in Egypt. However, as of March 2023, these efforts appear to have made little progress made toward meaningful changes, and significant human rights concerns remain in the country.

The initial human rights assessment was conducted through a thorough review of literature and labor legislation. It provides the following:

- A high-level review of human rights risks prevalent at the national level.
- A project-site specific context of socio-economic and development factors.
- An overview of the national labor law and the rights available to workers to identify possible gaps which may lead to labor violations. Gaps were reviewed and benchmarked against the International Bill of Human Rights and [the eight ILO Core Labour Standards](#) as outlined in EP4 Guidance Note.
- Based on the gaps identified, possible human rights risks are outlined and classified according to human rights categories and potentially impacted groups.
- Mitigation measures that are needed during the construction and operation phases.
- Recommendations.

## 2. OVERVIEW OF HUMAN RIGHTS CONTEXT IN EGYPT

This section provides a high-level overview of national-level human rights risks, drawing on reliable sources such as the United Nations Development Programme (UNDP), the World Bank, Amnesty International, the International Labour Organization (ILO) and Egypt's labour code.

### 2.1 Human Development Index in Egypt

The 2023 Human Development Index (HDI) ranks Egypt 106 out of 204 countries.<sup>2</sup> While HDI in Egypt has increased 26% since 1990 (from 0.572 to 0.73) progress has stalled in the past two years, decreasing 0.004 since 2019, in line with global post COVID-19 pandemic trends.<sup>1</sup> While overall, Egypt is classified as a “high” development country, this designation is marred by significant economic and gender inequality.

### 2.2 Economic and Social Rights

Economic and social rights in Egypt are challenged by high levels of poverty, income inequality, and a lack of social protection for vulnerable groups. According to the World Bank, 29.7% of Egyptians fell below the 2019 poverty line, a figure that is likely to have increased due to the impact of inflation and stresses related to COVID-19.<sup>3</sup> Furthermore, Egypt has struggled to provide adequate social services, including housing, education, and healthcare, which has disproportionately affected lower-income and rural communities. Access to quality education remains a challenge, with high dropout rates, low literacy levels, and a lack of resources for students with disabilities.<sup>4</sup>

While Egypt's labour laws (explored in detail in section 4) provide protections for workers, the implementation of these laws can be hindered by a slow-moving and complex bureaucracy. Child labour remains a pressing concern, with an estimated 2.76 million children working during the period 2021-2022.<sup>5</sup> Informal workers, who make up a significant portion of the workforce lack access to basic labour protections. Notably, Egypt has strict procedures and quotas for allowing non-Egyptians the right to work, which can leave refugees and economic migrants at increased vulnerability for exploitation and conditions of forced labour. Human Trafficking also remains an issue in Egypt, though the precise scope is unclear due to under-identification. According to the US Department of State in 2022 “Egypt does not fully meet the minimum standards for the elimination of trafficking but is making significant efforts to do so” with increased prosecutions and operationalising a trafficking shelter. Identified cases in recent years include sex trafficking of both adults and minors, forced begging, and forced labour primarily in construction, cleaning, and domestic servitude.<sup>6</sup> Organ trafficking remains a significant issue in Egypt, driven by economic disparities and the exploitation of vulnerable populations. Investigations have uncovered that organ traffickers in Egypt arrange numerous illegal kidney transplants weekly, often targeting African migrants and refugees. These individuals are coerced into selling their organs under false pretences, with many not receiving the promised compensation after the procedures. In 2010, Egypt enacted the

---

<sup>1</sup> The HDI sets a minimum and a maximum for each dimension, called “goalposts”, then shows where each country stands in relation to these goalposts. This is expressed as a value between 0 and 1. The higher a country's human development, the higher its HDI value.

Transplant of Human Organs and Tissues Act, criminalizing the commercial trade of organs and permitting donations from deceased donors.<sup>7</sup>

### **2.3 Political and Civil Rights**

Egypt has long been criticised for its lack of political freedoms and civil liberties. In 2023, Egypt scored 18 out of 100 in Freedom House Freedom in the World scoring, citing authoritarian governance, lack of viable political opposition, tight restrictions on freedom of press and assembly, and discrimination against women and minorities.<sup>8</sup> Under President Sisi, the country has seen a crackdown on political dissent, with numerous reports of arbitrary arrests, enforced disappearances, and torture.<sup>9</sup> Freedom of assembly is curtailed, with the government regularly using force to disperse protests and imprisoning demonstrators.<sup>10</sup> Freedom of expression is severely limited, with the government using a range of measures to control the media, including a wide application of laws on the dissemination of false information, and surveillance and censorship of social media networks.<sup>11</sup>

### **2.4 Rights of Minorities and Gender Inequality**

Gender inequality is a significant human rights issue in Egypt, with women facing widespread discrimination in both public and private spheres. Egypt ranks 134 out of 146 countries in the 2023 Global Gender Gap Index.<sup>12</sup> Gender-based violence, including sexual harassment, domestic violence, and female genital mutilation, remains pervasive, affecting large numbers of Egyptian women.<sup>13</sup> Despite the existence of laws to protect women's rights, enforcement is often weak, and social norms continue to perpetuate harmful practices.

Ethnic and religious minorities have also historically been marginalised in Egypt. Egypt is primarily made up of Arab Sunni Muslim with a small Coptic Christian population and smaller minorities including Shi'a Muslims, Baha'i, and non-Coptic Christians. Views on the status of minorities in post-Mubarak Egypt are mixed. For example, long marginalised Nubian Egyptians gained representation in the 2014 constitutional drafting process, which then referenced Nubian return. However, since 2013, the country's Coptic Christian minority, which makes up around 10% of the population, has continued to experience documented incidents of sectarian violence and restrictions on religious practices especially church construction.<sup>14</sup>

### 3. PROJECT SPECIFIC CONTEXT

The Project is located within the Red Sea Governorate, approximately 290km southeast of the capital city of Cairo. Administratively, the Red Sea Governorate is divided into 7 Cities (also known as Districts), each headed by a Local City Council. The Project site is located within the Ras Ghareb City (or District) and therefore administratively is under the Ras Ghareb City Council.

The closest official (under Ras Ghareb District) community settlements to the Project site include Wadi Dara settlement (located less than 1km to the south) and Ras Ghareb City (located around 35km to the north). Moreover, there is an unofficial community settlement known as Ras Shukeir that is located around 8km to the northeast of the Project site. This settlement is used by petroleum companies in the area as housing/accommodation units, offices, and also includes some petroleum facilities.

#### 3.1 Nature of the area

The real economic growth rate of the Red Sea governorate is about 1.7%, the governorate contributes about 4.07% of the gross domestic product, and the oil and agricultural sectors represent the largest economic sectors in the governorate, followed by the tourism sector.<sup>15</sup> Ras Gharib represents 17% of the total population of the Red Sea Governorate, where the majority of population is located in Hurghada, due to the large-scale touristic activities in the city. However, services and population activities are available in Ras Gharib City.<sup>16</sup>

#### 3.2 Bedouin communities in the Ras Gharib City

There are several Bedouin tribes in Ras Ghareb. These tribes settle in separate areas of the Red Sea Governorate and the Governorates of Upper Egypt. Families from the three tribes that are the Ma'aza, Bashareya, and Ababdeh tribes are settled in Ras Ghareb, Zafarana and Wadi Dara. However, the Ma'azah tribe is the most numerous of the tribes in the Project area. The Ma'azah is divided into three families, which are: The Hammadin, Tababna and Khoshman families. Some of the three families are sedentary, and live deep in the desert, far from the city and villages like the Khoshman family. Relationships between Bedouin families are very organized according to the customary law known as "Urfi" or "Ghafra system" that governs them. The "Ghafra" system is an informal security system and the "Urfi" system is the unofficial law that governs the relations of Bedouin families and their control over land. Bedouins cannot cross the border between each other because this could create endless conflicts between them, and this is undesirable and unacceptable for the heads of families. The Bedouins respect the customary arrangements between them because they preserve the right of each family to the land.<sup>17</sup>

The project site falls under the Ghafra system of the Ma'aza tribe and specifically under the Hammadin family of the Ma'aza tribe. Nevertheless, the Khoshman family works with the Hammadin family through the Ghafra system as the two families are related. Consultations were undertaken with Sheikh Eid Mesalam - head of the Hammadin family along with a number of male and female representatives from this family and the Khoshman family. The Bedouin families had no issues or concerns regarding the Project development. Conversely, they welcomed the Project. In general, the Bedouin families benefit from project developments in their areas as they provide safety and security for the project area under the Ghafra system in which they follow.<sup>18</sup>

### 3.3 Socio-economic context and women's economic participation

According to the Red Sea Governorate demographic data 2020, the population of Ras Gharib is 64,474 people, females representing about 47% of the population. According to Ras Gharib Labor Office data, most of the workforce can be divided into three main categories: government/ public sector, oil and gas petroleum sector, and fishing. Agricultural activities are relatively minor (only in Wadi Dara village). In addition, tourism-related activities are limited in Ras Gharib, even though some residents work in the tourism sector in other cities in the governorate, such as Hurghada and Safaga.

Women's employment in Ras Gharib is concentrated in the public sector, representing about 25%. Job opportunities in Ras Gharib are limited for women and are concentrated in the government sector, mostly in education, health, and administrative jobs in the city council, in addition to some jobs in the private sector such as retail, beauty salons and nurseries. Women's presence in other fields, such as the oil and gas field, remains low, as families prefer office jobs for women.

The community in Ras Gharib does not practice restrictions on women's participation in public work, where women in Ras Gharib clearly contribute to civil work, as they chair some civil associations (such as the Ebad El Rahman Association, Women's Association for Family Welfare and Resala Association). They also lead campaigns to develop health and environmental awareness in cooperation with the National Council for Women. The National Council for Women, the Red Sea Branch, is considered one of the working bodies interested in women in Ras Gharib, through holding awareness raising seminars on the role of the National Council for Women and the Women's Complaint Office in helping women and girls solve the problems that they face, and government programs such as (Ensure Opportunity) within the "Dignified Life حياة كريمة" initiative provided by the state.

## 4. THE LABOUR CODE IN EGYPT

The foundational labour law governing Egypt is Law 12/2003<sup>ii</sup> which consists of 247 articles and its relevant amendments and applies to both the private and public sectors. Labour law reform has been a major topic in Egypt in recent years. A reform law was drafted but not passed in 2017 and has recently been reintroduced and debated in the Egyptian government in late 2022 through early 2023. Proponents of the new code advocate that it will better balance interests of workers and employers, improve job security by clarifying termination procedures, and better align labour law with the 2014 Egyptian constitution. However, those in opposition have criticised the lack of participatory drafting and report that the proposals are too similar to the current law, arguing that the changes primarily benefit employers and contradict existing laws and international conventions.<sup>19</sup> To date, however, there has been no major reform, and law 12/2003 remains the primary instrument governing labour law in Egypt.

The below table outlines the most relevant labour laws as well as applicable sections of Egyptian Penal Code and 2014 Egyptian Constitution which underly Labour Rights in Egypt and compares these codes to established international benchmarks.

<sup>ii</sup> Available in [Arabic](#) and [English](#) from the Egyptian government. Also available in English here [\[1\]](#) [\[2\]](#)

**Table 1 - Benchmarking National Legislation Against International Standards**

Question	Yes/No	Relevant articles from Law 12/2003 and other laws	Non-technical summary of Egyptian law	International benchmark	Notable gap between Egyptian law (as written) and international benchmark
Is there a national minimum wage?	Yes	Part – III Wages: article 34	A National Wage Committee under the Ministry of Planning should set the national minimum wage and minimum rate for annual raises based on cost of living.	<a href="#">Minimum Wage Fixing Recommendation, 1970</a>	None
Are employment contracts commonly used?	Yes	Part II: Individual Labour Contract: articles 31, 32	Three copies of the contract in Arabic must be kept and include specific personal and wage information.	<a href="#">Employment Relationship Recommendation, 2006</a>	None
Can employers confiscate passports?		Not specifically addressed in Law 12/2003	N/A	<a href="#">Abolition of Forced Labour Convention, 1957</a> (Ratified, 1958) <a href="#">Migrant Workers Convention, 1975</a> (Unratified)  Workers must have access to their identity documents at all times and be free to leave the country.	Law 12/2003 does not explicitly prohibit employers from confiscating employees' passports.
Are workers entitled to compensation for overtime?	Yes	Part VI – Organization of Work: Article 85	Overtime is a minimum 135% of the normal wage during the day and 170% at night, and 300% on official holidays.	<a href="#">Hours of Work (Industry) Convention, 1919</a> (Ratified, 1960)  The rate of pay for overtime shall not be less than one and one-quarter times the regular rate.	None
Are there established maximum working hours?	Yes*	Part VI – Organization of Work: Articles 80-84	Maximum 48 hours a week: 8 hours a day for 6 days including at least one hour break every 4 hours. Overtime is allowed with appropriate need, but in all cases, working hours should not exceed 10 per day. Workers should have a 24-hour period of rest after 6 days of work.	<a href="#">Forty-Hour Week Convention, 1935</a> (Unratified) <a href="#">Reduction of Hours of Work Recommendation, 1962</a>  Set 40-hour work week as the recommended standard.  <a href="#">Weekly Rest (Industry) Convention, 1921</a> (Ratified 1960)	Egypt did not ratify the forty-hour work week convention, 1935. However, the convention suggests that Egypt should work in stages to reduce maximum working hours from 48 to 40 hours a week.

				<a href="#">Weekly Rest (Commerce and Offices) Convention, 1957</a> (Ratified 1958) Workers should be entitled to an uninterrupted weekly rest period not less than 24 hours in each 7-day period.	
Are workers entitled to annual leave?	Yes	Part IV- Leaves: Article 47	Annual leave is 21 days per year after working 1 year (pro-rated after 6 months). 30 days for those who have worked more than 10 years or are aged 50+	<a href="#">Holidays with Pay Convention (Revised), 1970</a> (Unratified) At least 3 working weeks of annual paid holiday leave (note including public holidays) for one year of service.	None
Are workers entitled to official/public holidays?	Yes	Part IV- Leaves: Article 52	Full pay and leave on official holidays decreed by the minister (maximum 13 days).	No ILO standard	N/A
Are workers entitled to sick leave?	Yes	Part IV – Leaves: Article 54 Social Insurance Law	With established need from a medical authority, the employee is entitled to 90 days leave at 75% of their salary and up to a further 90 days at 85%.	<a href="#">Medical Care and Sickness Benefits Convention, 1969</a> (Unratified) Sets out rules for protecting employees and providing care in case of sickness.	None
Are male employees entitled to paternity leave?	No	Not specifically addressed in Law 12/2003	N/A	No ILO standard. However, paternity leave was identified as a “public good and collective responsibility” by a 2023 ILO <a href="#">report</a> . In 2021 115 out of 185 countries surveyed by the ILO offer a right to paternity leave (9 days as a global average).	N/A
Are female employees entitled to maternity leave?	Yes**	Part – VI Organization of Work: Articles 91-96	Once employed for 10 months, three months of maternity leave at 100% comprehensive wage (75% covered by social security), not more than twice within one period of service. At companies with more than 50 employees, 2 years unpaid leave. In companies with 100 employees,	<a href="#">Maternity Protection Convention, 2000</a> (Unratified) Provides for 14 weeks of maternity leave with cash benefit no less than two-thirds of her previous earnings, and breast-feeding breaks. Prohibits hazardous work for pregnant women	None

			employers must provide in-house nurseries or place children in adequate nurseries until they are school age. Women are entitled to 2 half hour nursing breaks for 24 months.	and termination related to pregnancy, maternity leave, or return.	
Must a valid reason be given to lawfully terminate an employment contract?	Yes	Part – VII Termination of Work Relationship. Articles 104 – 130. Part V – Duties and Impeachment of Workers: Article 69	Article 69 outlines valid reasons for termination based on gross negligence and article 110 for incompetence. Employers must receive approval from a labour court or give employee written notice 2-3 months prior to termination. In the case of unfair dismissal, employer must award at least two-month salary per year of service.	<a href="#">Termination of Employment Convention, 1982</a> (Unratified)	There is no explicit statutory requirement for severance beyond money owed. Additionally, employees have little recourse if employers do not provide the required 2-3 month notice of terminating their contract.
Are workers entitled to work injury benefit?	Yes	Part V – Vocational Safety and Health and Ensuring the Labour Environment Security: articles 202, 208-227, 256. Social Insurance Law	Part V calls for the employing establishment to take specific measures to prevent a wide range of risk and harm, medically examine workers for fitness, and provide proper training, information, and first aid. Injuries and entitlements for the injured are defined under Social Insurance Law. In the event of a work injury, the law provides the following benefits: <ul style="list-style-type: none"> <li>• <b>Medical Care:</b> Comprehensive medical treatment is provided until recovery or stabilization of the condition. This includes hospital stays, surgeries, medications, and rehabilitation services.</li> <li>• <b>Financial Compensation:</b> If the injury results in temporary disability, the worker is entitled to a daily allowance. For permanent disability or death, a pension is granted.</li> <li>• <b>Disability Pension:</b> In cases of complete disability or death, the pension is calculated at 80% of the</li> </ul>	<a href="#">Occupational Safety and Health Convention, 1981</a> (Unratified)	None

			stipulated wage and increases by 1% annually until the individual reaches 60 years of age.		
Does the labour law prohibit discrimination?	Yes	Part III – Wages: Article 35  Egyptian Constitution: article 53	Wage discrimination based on sex, origin, language, religion, or creed is prohibited.	<a href="#">Equal Remuneration Convention, 1951</a> (Ratified, 1960) Equal wages for men and women.  <a href="#">Discrimination (Employment and Occupation) Convention, 1958</a> (Ratified, 1960)	Law 12/2003 does not explicitly prohibit discrimination based on race, colour, or political opinion; however these are addressed in the 2014 Egyptian constitution.
Does the law explicitly prohibit sexual harassment?	Yes	2014 Amendment to the Egyptian Penal Code, again amended in August 2021 Law No.141. Not explicitly mentioned in law 12/2003.	The penal code for sexual harassment includes words, gestures, physical touch, indecent exposure, suggestions, and hints both in person and online. In August 2021 sexual harassment was changed from a misdemeanour into a felony. If a perpetrator has occupational authority over the victim, or exercised pressure, the minimum penalty is seven years imprisonment and a 500,000 EGP fine.	<a href="#">Violence and Harassment Convention, 2019</a> (Unratified) explicitly defines and prohibits sexual harassment in the workplace and defines measures to protect from, prevent, enforce measures, remedy, train, and raise awareness of sexual harassment related to labour.	Sexual Harassment in the workplace is not explicitly mentioned in law 12/2003. Accordingly, Egyptian labour law does not explicitly provide for the measures laid out in the Violence and Sexual Harassment Convention, 2019. Instead, sexual harassment is covered in the Egyptian penal code as a felony.
Is there a minimum age for employment?	Yes**	Part VI – Organization of Work: Article 99.	Juveniles can be employed once they reach 14 years old or upon completion of elementary education (whichever is older). However, training may begin at age 12.	<a href="#">Minimum Age Convention, 1973</a> (Ratified, 1999) Encourages a 15 as the minimum age of work with exceptions for developing countries (14 as suggested age).	In 1999 Egypt ratified the Minimum Age Convention, 1973 and specified 15 years as their minimum age, but has 14 in law 12/2003
Are there special protections for workers under the age of 18?	Yes**	Chapter 3 Employment of Infants/Juveniles articles 98 – 103.	Imposes restrictions such as 6-hour workdays, no work between 7pm and 7am, prohibiting overtime, and requiring displaying labour rights.	<a href="#">Minimum Age Convention, 1973</a> (Ratified, 1999) Outlines special provisions for workers under the age of 18. Egypt ratified in 1999.  <a href="#">Worst Forms of Child Labour Convention, 1999</a>	Law 12/2003 delegates specific terms for employees aged 14-18 to industrial Ministers. Accordingly, the law does not explicitly prohibit hazardous work.

				(Ratified, 199) Defines worst forms of child labour	
Can workers join and form unions?	Yes	Part V – collective organization: Articles 148 -152, 160, 164, 165. Part IV - Collective Labour Litigations: article 171, 180, 182, 190-193, 197-199  2014 Egyptian Constitution: Articles 75-77	Law 12/2003 include the right to join and form unions as well as the right to strike, while the constitution protects the right to establish associations, form syndicates, and establish trade unions.	<a href="#">Freedom of Association and Protection of the Right to Organise Convention, 1948</a> (Ratified, 1957)  <a href="#">Right to Organise and Collective Bargaining Convention, 1949</a> (Ratified, 1954)	None

Sources: Law 12/2003 Available in [Arabic](#) and [English](#) from the Egyptian government. Also available in English here [\[1\]](#) [\[2\]](#). International Labour Organization (ILO) Normlex database. / \*Minister of each industry can issue a decree for an exception if necessary for technical or operational conditions / \*\*Does not apply to agricultural sector

## ***Work and wages***

For the public sector, the current minimum wage (announced in March 2023 following an increase in fuel prices) is 3,500 EGP (113 USD)<sup>iii</sup> per month for the public sector<sup>20</sup> and 2,700 EGP (87 USD) for the private sector<sup>iv</sup> (established in December 2022).<sup>21</sup> Since taking office in 2013, President Sisi has steadily increased the minimum wage including twice in 2022. While minimum wage has been on the rise, the increases do not keep pace with the impact of inflation and the devaluation of the Egyptian pound on real wages in recent years, which has been exacerbated significantly since the steep currency devaluation of the EGP since late 2022.<sup>22</sup> In an October 2022 speech, President Sisi said that he believed the minimum wage to sustain a family would realistically not be less than 10,000 EGP per month.<sup>23</sup> Further, reports suggest that Egyptian officials fail to fully enforce minimum wage, and workers struggle to effectively seek redress for underpayment.

## ***Occupational Health and Safety***

Occupational Health and Safety stipulations are enshrined in Egyptian Labour law and upheld by a specialized agency for inspection that sits under the Ministry of Manpower. However, experts have suggested that, in practice, commitment to OHS sits at 40% due to legal, institutional and technical problems with inspections, ineffectiveness of sanctions, incomplete incident reporting, and an overall weak national OHS culture.<sup>24</sup> This lack of safety culture highlights the importance of developing effective internal OHS monitoring systems and providing thorough OHS training as workers and managers may be accustomed to unsafe behaviours.

## ***Termination of Employment***

Law 12/2003 lays out grounds for termination due to gross fault and incompetence and requires employers to seek approval for termination from a labour court. In practice, however, the cumbersome cost and time of seeking court approval, as well as some vague wording on procedures between article 69 and article 110 (which allows termination with 2-3 months' notice without mentioning the need for court approval) have encouraged employers to work outside of established law and circumvent judicial approval. Accordingly, some employers commonly turn to negotiated resignation to terminate contracts, which limits protections. Other cases have been recorded of employers requiring employees to sign open registration letters upon time of hiring, which severely limits protections and threatens job security.<sup>25</sup>

## ***Effectiveness of Labour Unions***

Egyptian Labour Law and the Egyptian constitution clearly protect the right of workers to form unions, collectively bargain, and to go on strike. Further, Egypt has ratified the two major conventions protecting collective and union labour rights. However, a widely criticised 2017 law which institutionalized all unions under a single government-controlled body, significantly curtailing the effectiveness and autonomy of all unions. The law also punished violations with imprisonment. Under pressure from the ILO, the 2017 law was amended in mid-2019 to be more in line with the relevant ratified conventions and Egyptian constitution.<sup>26</sup> While the law is now much more in line with the relevant ratified conventions and protections in the Egyptian constitution, this recent history may have a lasting impact on the strength and effectiveness of labour organisations in Egypt today.

---

<sup>iii</sup> Using 1 USD to 30.9 EGP (March 2023)

<sup>iv</sup> Notably, prior to 2021 no minimum wage had been explicitly established for the private sector. Instead, there was a de facto minimum of 1200 EGP per month, which was the minimum wage allowable for registering for social insurance taxes and benefits.

### ***Child Labour***

Egyptian Labour law has clear regulations for workers under the age of 18 and Egypt is a signatory to the Minimum Age Convention and the Worst Forms of Child Labour Convention. However, an ILO/CAPMAS study in 2016 estimated that 1.6 million children are engaged in hazardous or unlawful work out of 1.8 million working children in Egypt.<sup>27</sup> With so few working children adequately protected, there are clear gaps in implementation of child labour laws. Accordingly, child labour remains a concern in Egypt, and a topic of national conversation, with many children working in hazardous conditions in industries including agriculture, construction, and manufacturing. These children are often subjected to long hours, low pay, and dangerous working conditions, depriving them of their rights to education, health, and a safe environment.

### ***Gender Discrimination and Harassment***

Despite laws against gender discrimination, in practice, the Egyptian labour market remains highly unequal with only 15% of women participating in the labour force compared to 67% of men.<sup>28</sup> Women face significant barriers to entering the workforce, including cultural and societal norms that encourage traditional gender roles. Women who do find work are often concentrated in low-paying, low-skilled jobs and may experience wage discrimination especially in the private sector and in higher paying roles.<sup>29</sup>

Sexual harassment and gender-based violence in the workplace are also widespread, further discouraging women from participating in the labour market. According to a 2013 study by UN Women, 99% of women sampled across seven governorates in Egypt had been sexually harassed.<sup>30</sup> Formal reporting of harassment remains an issue. While the penalties for sexual harassment were made harsher by an August 2021 amendment to the Penal Code, the impact of the legislation is unclear. Some have raised concerns that harsher penalties may, in practice, discourage reporting.

### ***Informal Sector Employment***

In 2016, estimates suggested that some 51-70% of non-agricultural workers were employed in the informal sector,<sup>31</sup> a trend that is expected to have increased in recent years due to growing microenterprise in the private sector, influx of refugees, and impacts of COVID-19. While some workers prefer informal employment due to higher profits/wages, less bureaucracy, tax avoidance, and distrust of government, others are forced into informal arrangements due to barriers to work permits (for non-Egyptians), lack of formal opportunities, lack of skills, or discrimination. Ultimately, a significant portion of the Egyptian labour market is not regulated, and informal workers are vulnerable to exploitation and abuse, as they are not entitled to the same rights and benefits as their counterparts employed in the formal sector. Informal sector workers are also more likely to face hazardous working conditions, low wages, and job insecurity, further contributing to both economic inequality and social unrest.

## 5. CLASSIFICATION OF IDENTIFIED HUMAN RIGHTS RISKS

The following table outlines potential project-related human rights risks that could impact various rights-holders groups (i.e. workers and affected communities). The table outlines the most relevant risks organised by the category of human rights to which they belong, providing examples of potential harms, and identifies impacted groups. The level of risk for each issue is categorized as low, medium, or high based on an assessment of the scope, scale, remediability, and likelihood of doing harm. Two values are given for the level of risk for each issue: “National-level”, which assesses the level of risk in the general contextual environment of Egypt, and “with mitigation” which assesses the risk of harm occurring within the scope of the project, given proper mitigation measures listed below.

Rights category	Human Rights issues	Example of potential risk	Level of Risk	Group impacted
<b>Labour</b>	<b>Child labour:</b> ILO standards prohibit hazardous work for all persons under 18 years. While Egyptian law has some protections for workers under the age of 18, illegal and hazardous child labour remains widespread.	<ul style="list-style-type: none"> <li>Contractors or third-party service providers hiring workers under the age of 18 and not providing adequate protections (reduced working hours, non-hazardous work, displaying labour rights...) thus harming the child.</li> <li>Discovering children labouring in hazardous conditions and failing to resolve the situation in a manner that considers the best interest of the child. For example, immediate dismissal of the child may put them at risk of further exploitation, threatening their standard of living or security of person.</li> </ul>	<b>National-level - High</b> <b>with mitigation - Medium</b> Child labour remains common in Egypt and can cause significant harm to children exposed to hazardous conditions and deprived of education. However, with strict oversight and implementation of proper policies for the project and it's contractors there is a low likelihood of creating harm through child labour.	Workers (children)
<b>Labour</b>	<b>Right to Work:</b> Loss of income from termination impacts both the worker and their family's well-being. Workers should not be terminated without a valid reason connected to their conduct or performance. While there are established	<ul style="list-style-type: none"> <li>Managers, contractors, or third-party service providers that do not adhere to (or circumvent) legal and fair termination procedures and/or arbitrarily or unfairly dismiss a worker violating their right to work.</li> <li>Managers, contractors, or third-party service providers informally employ workers who do not have the legal right to work in Egypt such as refugees or non-Egyptian economic migrants without work permits. In addition to being illegal, these workers have no legal protections making them vulnerable to exploitation. As with child labour, the discovery and resolution of this situation presents the risk of creating additional harm</li> </ul>	<b>National-level - High</b> <b>with mitigation - Medium</b> Employers in Egypt commonly circumvent the established legal processes for termination, and the large informal economy in the country increases general tolerance of	Workers

	procedures and limitations to termination in Egyptian law, they are commonly circumvented.	to the worker if it is not resolved with consideration of their best interest.	informal work agreements and terminations. However, adherence to clear proper policies for work contracts and legal termination, and a commitment to properly compensate any workers who are found to have been unlawfully terminated, there is a low likelihood of creating harm by violating the right to work.	
<b>Labour</b>	<b>Fair Wages:</b> Workers should receive equal remuneration for work of equal value. Remuneration should provide for a decent standard of living and covering basic needs. While Egypt has an established minimum wage, currency devaluation and inflation has outpaced increases in the minimum wage.	<ul style="list-style-type: none"> <li>Hiring a contractor or third-party service provider that does not pay their workers a fair wage (cash-in-hand) sufficient to attain a standard of living that includes adequate food, clothing, and housing, depriving them and their families of achieving a basic standard of living.</li> <li>Hiring a contractor or third-party service provider that does not pay all workers equal remuneration for work of equal value due to discrimination or favouritism.</li> <li>Inadequately surveying the wage market for similar work of similar value and distorting that market with inappropriate wage values to the detriment of workers and the community.</li> </ul>	<b>National-level - High with mitigation - Medium</b> Wage violations are common in Egypt, and there is debate as to whether the established minimums are sufficient to provide an appropriate standard of living. However, by establishing and adhering to a clear, fair, and adequate wage scale that is applied equally to all positions and types of labour, the risk of causing harm through unfair wages is low.	Workers Local Community
<b>Labour</b>	<b>Working Hours:</b> While Egyptian law allows for a 6-day 48-hour work week, ILO recommends a standard 40-hour work week to provide for an adequate work-life balance and allow workers to have sufficient rest and	<ul style="list-style-type: none"> <li>Hiring a manager, contractor, or third-party service that does not adhere to established maximum working hours and/or does not compensate workers for overtime work, harming workers' work-life balance and threatening workplace safety.</li> <li>Workers are required to live on site without adequate periods of leave, infringing on their right to spend time with families, rest, and/or engage in leisure.</li> </ul>	<b>National-level - Medium with mitigation – Low</b> Given low wages and the large informal economy, working in excess of 48-hours a week is common in Egypt, harming workers right to rest, leisure, and	Workers

	leisure time. Overtime should be compensated above the standard rate and should not exceed 10-hours a day six days a week.		family time. However, with strict oversight and adherence to maximum working and overtime hours, the risk of doing harm by violating working hours is low.	
<b>Labour</b>	<b>Discrimination:</b> All individuals should be treated equally regardless of class, race, colour, religion, gender, age, political or other beliefs, national or social origin, sexual orientation, disability, civil status, family background etc.	<ul style="list-style-type: none"> <li>Workers are recruited, hired, advanced, and compensated based on social, familial, class, religious etc. connections to hiring managers thus creating discrimination against others of different origin, race, religion, ethnicity, family, class etc.</li> </ul>	<b>National-level – Medium with mitigation – Low</b> Bias in hiring is widespread in Egypt as social and familial networks are often used to seek and fill labour needs. Additionally, women are significantly less likely than men to be participants in the workforce, due in part to discrimination. With proper policies and proactive anti-discrimination measures, the risk of harm through discrimination is low.	Workers
<b>Labour</b>	<b>Forced Labour and/or Human Trafficking:</b> All individuals should be free from servitude and severe economic exploitation such as in the trafficking of workers or debt bondage. Egypt has a 2010 anti-trafficking and a 2016 anti-smuggling law and continues to make efforts to eliminate forced labour and trafficking, but incidents continue to be reported.	<ul style="list-style-type: none"> <li>The project unknowingly benefits from forced labour or human trafficking through its supply chain.</li> <li>A manager, contractor, or third-party service provider employs individuals under conditions of forced labour, such as confiscating personal travel documents, or putting workers in a position of debt.</li> </ul>	<b>National-level – Medium with Mitigation – Low</b> Forced Labour and human trafficking cause significant harm to affected peoples' human rights across multiple domains. While the exact scope is unclear, these practices are present in Egypt, especially within the informal economy. However, strict adherence to policies explicitly	Workers Local Community (other individuals under forced labour)

			prohibiting any conditions of forced labour of human trafficking (including prohibiting confiscation of passports/travel documents) the risk of creating harm through forced labour is low.	
<b>Labour</b>	<b>Occupational health and safety:</b> Companies should provide and actively promote safe and healthy work conditions for workers.	<ul style="list-style-type: none"> <li>A manager, contractor, or third-party service provider does not strictly adhere to OSH standards. For example, by bypassing regulators or inspections, or dealing with worker injuries informally rather than through an established reporting, response, and improvement mechanism thus creating an unsafe work environment and potential harm to workers.</li> </ul>	<b>National-level - High with mitigation – Medium</b> The Egyptian labour market does not have a strict culture of adherence to Occupational Health and Safety measures. Unsafe working conditions can place workers at significant risk, up to and including loss of life for working operating in hazardous roles. While the lack of a strong OSH-culture makes it more difficult to fully mitigate than more straightforward risks, with adequate training, strict adherence to proper protocols, and zero tolerance of unsafe behaviours the likelihood of causing harm by providing unsafe working conditions is low.	Workers
<b>Economic, Social, and Cultural</b>	<b>Right to Social Insurance:</b> The state should provide protections for a range of issues such as inability to	<ul style="list-style-type: none"> <li>With the high prevalence of informal work in Egypt, a contractor or third party may hire workers informally (or workers may want to work informally), which leaves workers largely unprotected and</li> </ul>	<b>National-level – High with Mitigation – Medium</b> Given the large size of the informal economy in Egypt,	Workers

	work due to illness and injury, unemployment support, and maternity leave.	unable to contribute to and access social insurance, including sick, injury, maternity, or annual leave as well as unemployment benefits.	many workers and employers are accustomed operating without contracts and outside of the national social insurance system, leaving workers without access to basic labour rights granted by the state. However, by requiring a formal contract with each worker which is recognized and enforced by the state the risk of doing harm by violating the right to social insurance is low.	
<b>Economic, Social, and Cultural</b>	<b>Right to Organize and Join Unions</b> Workers should have the right to form and join unions as well as the right to bargain collectively. These rights are enshrined in Egyptian labour law while the constitution also protects the right to establish associations, form syndicates, and establish trade unions.	<ul style="list-style-type: none"> <li>Workers are discriminated against or unlawfully terminated for expressing support for or joining a union.</li> </ul>	<b>National-level – Medium with mitigation – Low</b> In recent years Egypt has passed anti-union measures. While these measures were largely repealed, some anti-union sentiments and administrative barriers may remain nationally. However, with proper policies that allow and do not obstruct workers forming and joining unions, the likelihood of causing harm by violating workers right to organize is low.	Workers
<b>Group Rights / Heightened Risk of Vulnerability</b>	<b>Rights of Women:</b> Workers are entitled to a safe workplace free from sexual harassment. While men can	<ul style="list-style-type: none"> <li>Sexual harassment occurring without being reported through any formal channels, remaining ongoing and unaddressed harming victims and negatively impacting the work environment.</li> </ul>	<b>National-level – Medium with mitigation – Low</b> Sexual harassment is extremely common in	Workers

	<p>also be targeted, the vast majority of Egyptian women report having been sexually harassed in their lifetime. Additionally, women are far less likely to participate in the workforce than men. This is, in part, due to cultural norms but has also been attributed to discrimination. Women who work are also subject to wage discrimination, especially in lower paying roles, making less than men for the same labour.</p>	<ul style="list-style-type: none"> <li>• Sexual harassment being reported through formal penal channels creating significant disruption to the workplace.</li> <li>• Women are passed over for hiring, promotions, and compensation increases in favour of men due to their gender.</li> <li>• Women are paid less than men for equivalent labour</li> <li>• Women are discriminated against or wrongfully terminated for becoming pregnant</li> </ul>	<p>Egypt, ranging from verbal harassment to physical assault. While covered as a felony in the Egyptian Penal Code, it is not explicitly addressed in labour law and therefore workplace harassment can be difficult to remedy. However, with strict adherence measures and access to remedies, the risks become low. While discrimination against women in work and wages is prevalent in Egypt, with strict adherence to proper policies and proactive measures (as noted under the risks of fair wages, and discrimination) the risk to causing these harms to women is low.</p>	
<b>Group Rights / Heightened Risk of Vulnerability</b>	<p><b>Rights of migrant workers</b> should be respected. Migrant workers should not be discriminated or denied labour rights such as legal work contracts, reasonable working hours, and fair wages, and should not be subject to conditions of forced labour or human trafficking. Egypt is not a signatory to the Migrant Workers Convention, 1975.</p>	<ul style="list-style-type: none"> <li>• Migrant workers are brought into the project site and made to work beyond maximum recommended working hours and are not compensated above the regular rate for overtime. The workers feel they have little recourse to remedy the long hours / unfair wages as their stay in the country, and access to travel home are tied in with their work contract and they fear they may be terminated if they raise these issues.</li> </ul>	<p><b>National-level – Medium with mitigation – Low</b></p> <p>In Egypt, unprotected migrant workers, who are primarily employed in the informal economy, are commonly hired without contracts and are at significant risk of wage and labour exploitation. However, sound and fair contracts with migrant workers and proper policies which mandate and enforce the protection of migrant</p>	Workers

			workers' labour rights against common risks issues such as fair wages, working hours, and occupational health and safety, the risk of doing harm to migrant workers is low.	
<b>Group Rights / Heightened Risk of Vulnerability</b>	<b>The local community, including groups of Bedouins,</b> should be respected including. Local community has the right to consent to projects that impact them.	<ul style="list-style-type: none"> <li>Engaging in business activities without taking into account the impact it has on local communities or without due consultation with local population groups.</li> </ul>	<b>National-level – Low with mitigation – Low</b> According to the ESIA there are no Bedouin families living directly in the project area, and community leaders have been identified and informed of the project.	Local Community

Guidance Material: The Equator Principles Guidance Note on implementation of Human Rights Assessments Under the Equator Principles, September 2020

## 6. MITIGATION MEASURES

Based on the classified human rights risks identified in the previous section, the following mitigation measures should be applied during the construction and operation phases of the Project. The below mitigation measures are applicable to the EPC Contractor, Project Operator and any involved subcontractor throughout the construction and operation phase.

Risks	Mitigation measures	Reference Plan
<p><b>Child labour:</b> ILO standards prohibit hazardous work for all persons under 18 years. While Egyptian law has some protections for workers under the age of 18, illegal and hazardous child labour remains widespread.</p>	<p>The Labour and Working Conditions Management Plan should explicitly prohibit the recruitment of children under the age of 18 in illegal and hazardous work. However, if children between the ages of 15-18 are to be employed at any stage throughout the construction or operation stages, the following should apply:</p> <ul style="list-style-type: none"> <li>• An official letter with the approval of their parents or guardian should be provided.</li> <li>• Young workers must provide valid identification that presents proof of age at the recruitment stage. Driver licenses are not admissible as proof of age.</li> <li>• Minor workers are not allowed to work onsite and are only allowed to work in the Project's worker camp. They are not to be employed in any kind of work which by its nature is likely to harm their health and safety or expose them to risks and hazards. Hazardous jobs include but not limited to the following:             <ol style="list-style-type: none"> <li>a. Operating or supervising machines, apparatus, and equipment of substantial power</li> <li>b. Operating vehicles of any kind</li> <li>c. Exposure to petroleum products and/or hazardous materials of any kind</li> <li>d. Lifting, moving, or pushing heavy materials</li> <li>e. Work performed at heights</li> <li>f. Any underground works</li> <li>g. Other activities which entail exposure to dangerous or hazardous equipment, materials, or activities</li> <li>h. Other activities similar in nature to the above</li> </ol> </li> <li>• To prevent the hiring of underage workers, a comprehensive ID verification process must be conducted—this includes thoroughly checking the authenticity of all identification documents and ensuring the individual's physical appearance matches the provided credentials to guard against the use of false IDs.</li> </ul>	<p>Labour &amp; Working Conditions Management Plan</p>

	<ul style="list-style-type: none"> <li>• In accordance with the Labour law, young workers shall not work for more than six hours a day, during which one or more break periods totalling not less than one hour shall be granted for meals and rest. They shall not be made to work overtime hours or required to come to work on weekends and official holidays. They shall not be made to work between 7:00 pm and 7:00 am.</li> </ul>	
<p><b>Right to Work / termination:</b> Loss of income from termination impacts both the worker and their family's well-being. Workers should not be terminated without a valid reason connected to their conduct or performance. While there are established procedures and limitations to termination in Egyptian law, they are commonly circumvented.</p>	<ul style="list-style-type: none"> <li>• The Labour and Working Conditions Management Plan should explicitly prohibit wrongful termination.</li> <li>• The employment of a worker shall not be terminated unless there is a valid reason for such termination connected to the capacity or the conduct of the worker.</li> <li>• In accordance with the Labor law, the following reasons shall not be considered as legitimate and adequate justifications for termination: <ul style="list-style-type: none"> <li>a. Colour, sex, social status, family obligations, pregnancy, religion, or political view.</li> <li>b. The worker's affiliation to a union organization, or his participation in a union activity within the context of the limits set by the laws.</li> <li>c. Exercising the quality of workers' representative, fanner exercise of that quality, or seeking to represent the workers.</li> <li>d. Submitting a complaint, filing an action against the employer, or joining in that, in protest against violating the laws, regulations, or labour contracts.</li> <li>e. Laying garnishment with the employer on the worker's dues.</li> <li>f. The worker's use of his/her rights to the leaves.</li> </ul> </li> <li>• The employment of a worker shall not be terminated for reasons related to the workers' conduct or performance before they are provided an opportunity to defend themselves against the allegations made.</li> <li>• A worker who considers that his employment has been unjustifiably terminated shall be entitled to appeal against that termination to an impartial body, such as a court, labour tribunal, arbitration committee or arbitrator.</li> <li>• If a worker's employment is terminated without justification, the worker shall be entitled, in accordance with national law to compensation that is not less than the wage of two months of the comprehensive wage for each year of service, to be determined by a judicial committee.</li> </ul>	<p>Labour &amp; Working Conditions Management Plan</p> <p>Worker Grievance Mechanism</p>

	<ul style="list-style-type: none"> <li>• <b>A Worker Grievance Mechanism</b> shall be developed and implemented throughout the construction and operation phases, and should be available to all workers and explained during the induction of workers. Such a mechanism safeguards worker's rights to have their work related grievances considered and addressed. Worker Grievance Mechanism to be included in the initial worker induction training, as well as routinely during toolbox talks.</li> <li>• <b>Every worker will have the right to submit a complaint about their termination through the Worker Grievance Mechanism.</b></li> </ul>	
<p><b>Fair Wages:</b> Workers should receive equal remuneration for work of equal value. Remuneration should provide for a decent standard of living and covering basic needs. While Egypt has an established minimum wage, currency devaluation and inflation has outpaced increases in the minimum wage.</p>	<ul style="list-style-type: none"> <li>• Wages will be based on a clear and established salary scale that is applied without discrimination and takes into account the local market and will be fair and should meet the basic needs to maintain a safe and decent standard of living.</li> <li>• Wages must be established based on qualifications and competencies, professional experience, job responsibilities, and wages at equivalent positions.</li> <li>• Remuneration for work of equal value should be provided for female and male workers.</li> <li>• Wages should not be below the nationally established minimum wage.</li> </ul>	Labour & Working Conditions Management Plan
<p><b>Working Hours:</b> While Egyptian law allows for a 6-day 48-hour work week, ILO recommends a standard 40-hour work week to provide for an adequate work-life balance and allow workers to have sufficient rest and leisure time. Overtime should be compensated above the standard rate and should not</p>	<ul style="list-style-type: none"> <li>• According to the Labour law, working hours should be set to a maximum of 8 hours a day for 6 days including at least one hour break every 4 hours.</li> <li>• Overtime is allowed with appropriate need, but in all cases, working hours should not exceed 10 per day. Workers should have a 24-hour period of rest after 6 days of work.</li> <li>• All workers will be notified of their schedule for the weekly day rest, working hours, break periods and any changes introduced to such a schedule.</li> <li>• Labour and Working Conditions Management Plan to emphasise effective contractor management by project sponsor, through solid monitoring of EPC and sub-contractor's working</li> </ul>	Labour & Working Conditions Management Plan

exceed 10-hours a day six days a week.	hours/ overtime practices, including joint monitoring routines of OHS staff of project sponsor and OHS staff of contractors.	
<b>Discrimination:</b> All individuals should be treated equally regardless of class, race, colour, religion, gender, age, political or other beliefs, national or social origin, disability, civil status, family background etc.	<ul style="list-style-type: none"> <li>• The local recruitment process will be conducted in an inclusive and diverse manner, which means job opportunities will be open to all community members regardless of their class, race, colour, gender, age, disability, civil status etc.</li> <li>• Recruitment will be based on competency and skill.</li> <li>• Efforts and resources will be allocated to make sure that women are also fairly targeted and recruited and are provided opportunities for learning skills to participate equally as men.</li> <li>• Gender inclusive advertising will be identified, in consultation with female stakeholders (such as women's groups and CBOs) and will be utilized in the announcement of job opportunities.</li> <li>• Candidate selection (recruitment) will be conducted by a mixed-sex panel (comprising of at least two people). Candidate promotion selection will always be carried out by a gender diverse and balanced panel (more than one person and never by a single-sex panel).</li> <li>• It will be prohibited to terminate the contract of a female worker during her maternity leave.</li> </ul>	Labour & Working Conditions Management Plan
<b>Right to Social Insurance:</b> With the high prevalence of informal work in Egypt, a contractor or third party may hire workers informally which leaves workers largely unprotected and unable to contribute to and access their rights.	<ul style="list-style-type: none"> <li>• All workers on site will be provided with a contract. Each worker will be provided with a signed copy of the contract and another copy will be retained with the HR Manager.</li> <li>• Each employee will be provided with a copy of the contract and Code of Conduct as well as Gender Based Violence and Harassment (GBVH) Code of Conduct and will be required to sign it. The signed copy will be retained with the HR Manager.</li> <li>• At recruitment stage and before signature, contracts and codes of conduct have to be verbally explained to workers in a language that they understand – to ensure that illiterate workers are fully informed of their rights and responsibilities.</li> <li>• Workers should be entitled to annual and sick leaves as well as any other social benefits as stipulated in the Labour law. These will be included in the worker's contract.</li> </ul>	Labour and Working Conditions Management Plan
<b>Right to Organize and Join Unions</b> Worker should have the right to organize, including the ability to form	<ul style="list-style-type: none"> <li>• The Labour and Working Conditions Management Plan should explicitly state that workers have the right to organize and form and join unions and collectively bargain.</li> </ul>	Labour and Working Conditions Management Plan

and join unions and bargain collectively.	<ul style="list-style-type: none"> <li>Discrimination against workers who join unions or support organizing efforts should be explicitly prohibited.</li> </ul>	
<b>Forced Labour and/or Human Trafficking:</b> Egypt has a 2010 anti-trafficking and a 2016 anti-smuggling law and continues to make efforts to eliminate forced labour and trafficking, but incidents continue to be reported.	<ul style="list-style-type: none"> <li>The Labour and Working Conditions Management Plan should explicitly prohibit forced labour and human trafficking.</li> <li>Confiscation of employees' passports should be explicitly prohibited.</li> </ul>	Labour and Working Conditions Management Plan
<b>Occupational health and safety:</b> Companies should provide and actively promote safe and healthy work conditions for workers.	<ul style="list-style-type: none"> <li>An Occupation Health and Safety Plan (OHSP) that is project and site specific will be developed that ensures the health and safety of all personnel and prevents accidents which may injure personnel or damage property.</li> <li>A Worker Influx Plan should be developed and to take into account: i) medical examination program for workers; ii) procedures to maintain hygienic conditions onsite, iii) code of conduct for workers; iv) induction training and awareness requirements for risk diseases.</li> <li>Labour and Working Conditions Management Plan to emphasise effective contractor management by project sponsor, through solid monitoring of EPC and sub-contractor's OHS practices, including joint monitoring routines of OHS staff of project sponsor and OHS staff of contractors.</li> </ul>	Occupational Health and Safety Plan  Worker Influx Plan  Labour and Working Conditions Management Plan
<b>Rights of Women:</b> Workers are entitled to a safe workplace free from sexual harassment. While men can also be targeted, the vast majority of Egyptian women report having been sexually harassed in their lifetime.	<ul style="list-style-type: none"> <li>Female workers should explicitly be subject to the same protections as male workers, including legal contracts, fair wages, reasonable working hours, occupational health and safety measures, and non-discrimination.</li> <li>The Worker Grievance Mechanism will prohibit gender-based violence and harassment in the workplace and will outline that a suitably trained male and female person is designated to process grievances in which male / female workers might feel uncomfortable discussing with a person of the opposite sex. The grievance mechanism also includes a procedure to deal with GBVH grievances.</li> </ul>	Labor & Working Conditions Management Plan  Worker Accommodation Management Plan

	<ul style="list-style-type: none"> <li>• Female sanitary, toilet facilities, and prayer rooms will be kept separate from men. All such facilities will have lockable doors with adequate numbers provided.</li> <li>• Separate changing rooms and cabinets will be provided for men and women both of which have locking mechanisms.</li> <li>• In case of hotel and apartments, separate sleeping rooms for men and women will be provided in shared accommodations. Means of securing bedroom doors from inside and out will be provided. Finally, female sanitary and toilet facilities will be kept separate from men.</li> <li>• Men and women will be provided with separate sleeping rooms/ dormitories. In addition, female sanitary and toilet facilities will be kept separate from men.</li> <li>• All workers will be required to read and sign a Worker Code of Conduct which will be explained verbally. The code of conduct prohibits the following and which is subject to disciplinary action: (i) harassment, gender-based violence and abuse of any kind will not be tolerated; (ii) discrimination based on personal characteristics is prohibited to include but not limited to gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, or sexual orientation.</li> <li>• In the case body searches are required for security reasons, those will be gender sensitive (i.e. body searches on female workers / employees /visitors should be undertaken by female security officers and vice versa).</li> </ul>	
<p><b>Rights of migrant workers</b> should be respected. Migrant workers should not be discriminated or denied labour rights. Egypt is not a signatory to the Migrant Workers Convention, 1975.</p>	<ul style="list-style-type: none"> <li>• The project should ensure that migrant workers employment is in conformity with Egyptian laws and regulations, to ensure workers are not vulnerable to exploitation for fear of deportation or arrest.</li> <li>• Migrant workers should explicitly be subject to the same protections as non-migrant workers, including legal contracts, fair wages, reasonable working hours, occupational health and safety measures, and non-discrimination.</li> <li>• Migrant workers should have access to fair and reasonable complaint mechanisms for rights violations. In the case of a dispute, the migrant worker should have the right to present his case to a competent body without fear of retribution.</li> <li>• In the case of expulsion of a migrant worker of their family, the cost shall not be borne by them.</li> </ul>	<p>Labor &amp; Working Conditions Management Plan</p> <p>Worker Accommodation Management Plan</p>

	<ul style="list-style-type: none"> <li>• Migrant workers should have access to their personal and travel documents including passports at all times.</li> <li>• If provided, accommodations for migrant workers should provide adequate personal space and standard of living.</li> </ul>	
<b>Rights of local community groups</b>	<ul style="list-style-type: none"> <li>• The Project is expected at a minimum to provide job opportunities for local communities. This, to some extent, could contribute to enhancing their socio-economic conditions.</li> <li>• While the ESIA notes that there are no economic activities relating to Bedouin Groups within the Project site, the area is under their “Ghafra System” and therefore it is recommended that a Community Integration Plan for employment and procurement opportunities for local communities and Bedouin groups is developed.</li> <li>• The Stakeholder Grievance Mechanism included within the Stakeholder Engagement Plan (SEP) allows local communities (including Bedouin groups) to lodge grievances.</li> <li>• In addition to offering job opportunities, the Project will also offer supplier opportunities to local businesses and service providers.</li> </ul>	Community Integration Plan

## 7. RECOMMENDATIONS

This Initial Human Rights Risk Assessment was conducted for the Infinity Power Holding Wind Power Plant 450 MW at Gulf of Suez and based on a desk review identified potential human rights risks that could occur during the different stages of the Project. In accordance with the Equator Principles, the risks were classified according to category and the groups that may be impacted. For each risk, mitigation measures were identified along with the respective reference plans. As mitigation measures were identified for each risk, along with appropriate pathways (through policies and plans) through which workers and community members can access remedies, **the recommendation is that a detailed human rights risk assessment is not required.**

## END NOTES

---

- <sup>1</sup> Equator Principles, [Guidance Note: On Implementation of Human Rights Assessments Under the Equator Principles](#). The UN Working Group on Business and Human Rights, [The UN Guiding Principles on Business and Human Rights: An Introduction](#).
- <sup>2</sup> UNDP (2023), [Human Development Report 2021/2022](#).
- <sup>3</sup> World Bank, December 2022, [Egypt Economic Monitor: Strengthening Resilience through Fiscal and Education Sector Reforms](#).
- <sup>4</sup> UNICEF, [Education: Egypt](#), Accessed March 2023
- <sup>5</sup> Walaa Elsayed (2024), [Breaking the cycle of child labor in Egypt: Exploring social and economic factors associated with child labor in Egypt for a sustainable future](#), Sustainable Futures, Volume 8.
- <sup>6</sup> U.S Department of State Office to Monitor and Combat Trafficking in Persons, [2022 Trafficking n Persons Report: Egypt](#), July 2022
- <sup>7</sup> BBC (2020), [Egypt's Organ Trafficking](#)
- <sup>8</sup> Freedom House, [Freedom in the World 2023: Egypt](#), Accessed March 2023.
- <sup>9</sup> Human Rights Watch, [World Report: Egypt - Events of 2022](#). 2022
- <sup>10</sup> Amnesty International, [Amnesty International Report 2021/2022: Egypt](#). p.152 – 157. 2022
- <sup>11</sup> Reporters without Borders, [Country Profile: Egypt](#).
- <sup>12</sup> World Economic Forum, [2023 Gender Gap Index](#), 2023.
- <sup>13</sup> UN Women, [Global Database on Violence Against Women: Egypt](#). Accessed March 2023
- <sup>14</sup> Ashok, Alex Luke. The Plight of Coptic Christian Minorities in Post Mubarak Egypt, <https://journalspoliticalscience.com/index.php/i/article/view/230/65>
- <sup>15</sup> [Localization of sustainable development goals in Egypt](#), Red Sea Governorate. December 2020.
- <sup>16</sup> Red Sea Governorate, Statistical Yearbook 2020.
- <sup>17</sup> Project Environmental and Social Impact Assessment.
- <sup>18</sup> Project Environmental and Social Impact Assessment.
- <sup>19</sup> Al Jazeera, [Criticism of Egypt's New Labour Law Bill](#), January 2023 (Arabic)
- <sup>20</sup> Ahram, [Egypt Raises Minimum Wage for Government Employees to 3,500 EGP as of 01 April](#), March 2023. The announcement indicated that employees with masters and doctorate degrees would have higher minimum wages from 6,000 to 10,000 EGP
- <sup>21</sup> Ahram, [Egypt Increases Private Sector Minimum Wage to 2,700 EGP a Month](#), December 2022.
- <sup>22</sup> Prior to November 2016 the EGP did not rise above 10 EGP to 1 USD. From November 2016 to October 2022 the EGP remained below 20 EGP to 1 USD. Since then, the currency has significant devalued, sitting just over 30 RGP to 1 USD as of March 2023.
- <sup>23</sup> Egypt Today, [Sisi Elaborates on Challenges, Achievements at Economic Conference](#), October 2022.
- <sup>24</sup> Said, Nihal Hatem; Fahmy, Nourhan; and Hanafy, Ossama, [Occupational Health and Safety Implementation Issues in Egypt](#), 2019
- <sup>25</sup> Al Tamimi & Co, [The Need for Labour Law Reform in Egypt](#), July 2019
- <sup>26</sup> The Arab Weekly, [Egypt Eases Restrictions on Trade Unions to Avoid International Censure](#), July 2019
- <sup>27</sup> ILO, [Capacity of Egyptian Government, Works, and Employers' Organizations Strengthened to Combat Child Labour](#). April 2016
- <sup>28</sup> UNDP, [HDI Country specific Data: Egypt](#). Data current as of September 2022

---

<sup>29</sup> Marwa Biltagy, [Gender wage disparities in Egypt: Evidence from ELMPS 2006 and 2012](#), The Quarterly Review of Economics and Finance, Volume 73, 2019. And Aysit Tansel, Halil Ibrahim Keskin, Zeynel Abidin Ozdemir, [Public-private sector wage gap by gender in Egypt: Evidence from quantile regression on panel data, 1998–2018](#), World Development, Volume 135, 2020.

<sup>30</sup> UNFPA, [Gender-Based Violence: Egypt](#). Accessed March 2023

<sup>31</sup> African Development Bank, [Working Paper: Addressing Informality in Egypt, 2016](#). Source: ILO