



Sierra Leone Local Content Policy

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Acronyms

SLIEPA	Sierra Leone Investment and Export Promotion Agency
MTI	Ministry of Trade and Industry
LCR	Local Content Requirements
PSDS	Private Sector Development Strategy
NPPA	National Public Procurement Authority
MDA	Ministries, Departments and Agencies
SMEs	Small and Medium Enterprises
NSADP	National Sustainable Agriculture Development Plan
PRSP	Poverty Reduction Strategy Paper
TRIMS	Agreement on Trade Related Investment Measures
WTO	World Trade Organisation
ECOWAS	Economic Community of West African States
SLCCIA	Sierra Leone Chamber of Commerce, Industry and Agriculture

Definitions

For purposes of this Policy, the following definitions shall apply:

“foreign investor” means in the case of a natural person means a person who is not a citizen of Sierra Leone and in the case of a company, a company incorporated under the laws of any country other than Sierra Leone in which more than fifty percent of the shares are held by a person who is not a citizen of Sierra Leone and in the case of partnerships, means a partnership in which the partnership controlling interest is owned by a person who is not a citizen of Sierra Leone;

"local investor" means a natural person who is a citizen of Sierra Leone; a Company incorporated under the laws of Sierra Leone in which the majority of the shares are held by a person who is a citizen of Sierra Leone, or a partnership in which the partnership controlling interest is owned by a person who is a citizen of Sierra Leone;

Sierra Leone Local Content Policy

1. BACKGROUND

The Government's development objectives are focused on supporting the private sector in Sierra Leone which is considered to be the engine of growth for the overall economic development of the Country. Through wide-ranging legal and policy reforms, the Government seeks to create an environment that promotes the development of the private sector. Efforts are also being made to address the challenges that are faced by entrepreneurs including lack of access to finance and entrepreneurial skills development particularly amongst the small and medium enterprises.

In the same measure, the Government has placed emphasis on positioning Sierra Leone as an attractive investment destination through targeted policy and legal reforms that will facilitate the operations of large to small enterprises. With the creation of Sierra Leone Investment and Export Promotion Agency (SLIEPA), the Government has made strides in attracting large foreign investors in key sectors of agriculture, mining and tourism. By granting investment incentives to investors and improving access to facilities through the establishment of export processing zones, the Government has created an enabling environment for investors.

As a result of all these efforts, there is increased private sector participation and growth from national, regional and international actors. Foreign Direct Investment (FDI) to Sierra Leone has particularly seen an increase as investors take opportunities available in agriculture, agro-processing, mining, tourism and other sectors. Such investment is not only expected to improve Sierra Leone's economic performance through competitiveness of its products but to lead to transfer of technology, employment and transfer of skills to the local population.

Despite the increase in investment flows, the domestic private sector has not been integrated with the new investments. There has not been sufficient integration with the domestic market through utilization of locally sourced products, employment of Sierra Leoneans at managerial level, nor transfer of knowledge and skill to domestic firms and individuals.

Without the necessary regulatory and policy framework, the investment to Sierra Leone will not yield significant benefit to the economy of Sierra Leone. The national Policy on Local Content for Sierra Leone will therefore ensure that there are linkages between foreign companies or enterprises and the local economy. This Policy while building on the

efforts of the Government to promote foreign investment will require investors to meet a set of performance targets in their operations.

2. RATIONALE FOR POLICY

This policy is necessary to ensure that there is sufficient linkage between the local economy and foreign enterprises. By setting specific performance requirements, the Government aims to ensure that the benefits that Sierra Leone seeks to obtain from FDI including improved technology and managerial skills are integrated into the domestic market and distribution networks.

By ensuring linkages between large domestic and foreign firms, small and medium domestic firms will improve their competitiveness and economic performance as there is transfer of knowledge and skills to domestic firms.

As the domestic sector continues to grow and develop, the Local Content Policy will facilitate the transfer of knowledge and information which can be acquired through better interaction with the foreign enterprises which have more superior production methods. Sierra Leonean service providers such as lawyers, insurers and bankers also need to be integrated into the large investments in order to grow and acquire better expertise.

Although the need to integrate the domestic private sector to large investments has been identified as key to the development of the private sector, there is no comprehensive policy that provides a framework for its implementation. Different sector policies and laws currently address the need to have local content and as such, it has been difficult to monitor the extent to which large firms particularly foreign investors have integrated their production methods to the domestic market for instance through use of locally sourced products. The Policy will also streamline measures so that investors are not unduly burdened with the requirements for local content.

Due to the disparity of information available to the private sector, the Policy will provide mechanisms that will enable the private sector to know and take advantage of opportunities in the market. The Policy will also create channels which will facilitate linkages between foreign enterprises and the domestic firms through which the available skill and resources can be identified locally.

Furthermore, the policy will provide a benchmark for negotiations of investment agreements which will be guided by the stipulations in the policy and apply not only to large domestic and foreign firms but also to their affiliates such as operators, contractors, subcontractors, and other entities involved in any project, operation, activity or transaction in Sierra Leone

3. SCOPE

The Policy will provide policy statements and strategies in the following areas:

- i. Promotion of the use of locally sourced Sierra Leonean goods and services
- ii. Promotion of the development of Sierra Leonean Small and Medium Enterprises
- iii. Employment and training requirements which will require investors to employ a stipulated percentage of Sierra Leoneans at various levels of the labour force
- iv. Institutional arrangements for the implementation of the Policy
- v. Monitoring and Evaluation Framework for the Policy

4. POLICY COORDINATION AND LINKAGE

This Policy will be designed to comply with the overall national policies including Sierra Leone Vision 2025 and the Agenda for Change (Poverty Reduction Strategy Paper (PRSP) II). In Particular, the Local Content Policy will enhance the implementation of the Agenda for Change which identifies the development of the private sector as central to achieving economic development of Sierra Leone.

The National Trade Policy also supports the development of the local manufacturing industry, by creating linkages, which is what this Policy seeks to achieve. The Local Content Policy will therefore provide the necessary policy direction to achieve the goals and objectives of the National Trade Policy. Furthermore, this Policy will support the Private Sector Development Strategy (PSDS) which seeks to promote the culture of entrepreneurship in Sierra Leone through the increase of transfer of know-how and skills by creating market linkages where larger businesses will be encouraged to transfer know-how and skills to their suppliers and distributors.

The Local Content Policy will also support existing sector strategies including the National Sustainable Agriculture Development Plan (NSADP) which *inter alia* seeks to promote commercial agriculture through private sector support. This Policy will boost the implementation of the Smallholder Commercialization programme of the NSADP with one of its component on productivity and formation of farmer based organizations that would benefit from being integrated into the large scale agricultural investments.

The Policy will also bring together the provisions relating to the promotion of local content in the various related policies and laws such as the Feeder Roads Policy, the Petroleum Act, the Mines and Minerals Act 2009, the Business Start-up Act (Amended 2007) and the National Public Procurement Act.

5. GUIDING PRINCIPLES

The Policy will be governed by the following principles which shall be adhered to by all actors in its implementation:

i. Promotion of a friendly investment climate

The Policy will be implemented with a view to improving the investment climate of Sierra Leone. The interests of investors shall be considered when implementing the policy to ensure that there are no obstacles created to doing business in Sierra Leone. The provisions of the Policy will therefore be crafted to ensure a balance between the interests of investors to ensure that they are not unduly affected while facilitating benefits for the domestic SMEs.

ii. Strengthening of the domestic Private Sector

The development of the domestic private sector is the overriding goal of this Policy which will ensure that domestic SMEs are integrated with foreign enterprises and are able to participate in the economic development. Policies will be designed to strengthen the domestic private sector to enable them take advantage of investment opportunities in the market by creating linkages with large investments.

iii. Transparency

The Policy recognizes the need for transparency in implementing various strategies and policy measures through for instance monitoring procurement, assessing the amount of local Content and review of employment of Sierra Leoneans. Running transparent systems will be vital to garnering the support of all players in the successful implementation of the Policy.

iv. Capacity and Institutional building

Mindful that there is limited skilled labour in many sectors of the economy, this Policy will operate with a view to building up a skilled work force in Sierra Leone. The Policy is also mindful of the need to build the capacity of trade support institutions such as Universities, Government Institutions as well as the private sector.

v. Adherence to international and regional Obligations

This Policy will adhere to Sierra Leone's international and regional obligations especially those arising due to membership to the World Trade Organization (WTO) and the Economic Community of West African States (ECOWAS). In regard to the WTO, this Policy will conform to the provisions of the WTO's Agreement on Trade Related Investment Measures (TRIMS) in as far as the agreement forbids some investment measures. This

Policy will also conform to obligations within the Mano-River Union area on promoting trade.

vi. Mutual Cooperation

The successful realization of the goals of this Policy shall be determined by the level of cooperation and transfer of technology between Government and the private sector actors. The Policy will therefore promote coordination between the different stakeholders in a manner that encourages mutual cooperation and transfer of technology.

6. POLICY FRAMEWORK

6.1 Goal of the Policy

The overall goal of the Local Content Policy is to promote growth and development of the domestic private sector by creating linkages with the large domestic and foreign firms through the utilization of local resources and products, and to promote the integration of the Sierra Leoneans in all economic activities. Furthermore, this Policy intends to set a policy framework for the consistent implementation of sectoral based local content policies for key sectors of the economy such as the Oil and Gas , the Mining and the Agricultural ,

6.2 Policy Objectives

1. To promote the utilization of locally available Sierra Leonean goods in the industrial and manufacturing sectors.
2. To facilitate the development of Sierra Leonean service providers by promoting linkages with more advanced and experienced foreign companies.
3. To support the growth of small and medium enterprises through targeted Government procurement.
4. To promote employment of Sierra Leonean citizens through participation in the private sector.
5. To develop the human and institutional capacity of Sierra Leoneans through training and transfer of knowledge and technology from foreign firms to Sierra Leoneans.
6. To establish an institutional framework for the implementation and monitoring of the Policy.
7. To promote a culture of local ownership and participation in aspects of productive economic activity.

6.3 Policies and Strategies

6.3.1 To promote the utilization of locally available Sierra Leonean goods and services

In order to support and develop the domestic private sector and to realize financial benefits to a broader section of Sierra Leoneans, the Government will encourage enterprises operating in all sectors of the economy to use goods and services produced in Sierra Leone. As a pre-requisite to receiving any investment incentive, the Government will require all enterprises to give preference to Sierra Leonean goods where they are of better, equal or of comparable value to those obtained from other sources and available in the Sierra Leonean market. Government will grant incentives to only those enterprises that satisfy the local content requirements of this Policy or other related instruments. Non-compliance with the local content requirements will result in the withdrawal of fiscal incentives.

The Government will stipulate percentage targets of local content that are to be met by enterprises operating in key sectors of the economy such agriculture and tourism. The stipulated targets will ensure that there is an incremental use of Sierra Leonean goods especially as the domestic production capacity increases.

In order to develop the services sector, in particular the banking, legal, insurance, construction, catering, power and transportation including fleet handling, haulage, fuel transportation subsectors; enterprises shall be required to use Sierra Leonean service providers for a stipulated minimum percentage share of their requirements where the capacity exists in the market.

Policy Prescriptions

In order to achieve this objective, the Government will implement the following strategies:

1. Coordinate the award and continued use of government investment incentives by investors in order to ensure compliance with the Local Content Policy.
2. Stipulate percentage targets for local content requirements for sectors not specified in this Policy. The following sector local content targets are recommended to be met by manufacturing firms:
 - a. In the manufacturing industry, firms shall be required to use at least 10 % of domestically produced inputs. For the bakery and confectionery industry in particular 10% inclusion of Cassava flour produced locally from locally grown Cassava is a requirement.

- b. In the beer industry, manufacturers shall utilise at least 20% of locally produced sorghum.
3. In the application for any tax or other incentive by any enterprise, the Government will require the enterprise to submit a local content plan detailing how they will use and increase the percentage of Sierra Leonean content in their production and activities and how they will develop matching programmes between local and foreign firms.
4. All enterprises operating businesses in any services sector in Sierra Leone including but not limited to banking, insurance, transportation, construction, catering and legal matters, shall retain only the services of Sierra Leonean service providers whose firms are registered and located in Sierra Leone. Where there is no Sierra Leonean entity to render the required service and it becomes necessary to employ a foreign entity, the foreign entity shall operate in partnership with a Sierra Leonean owned and registered company. The foreign entity shall provide the Committee with a local participation plan which shall describe the roles and duties of each partner.
5. Support Sierra Leonean business associations to improve their capacity to supply local products and services.
6. Encourage out-grower schemes for agricultural products to supply large firms and manufacturers.

6.3.2 To support the domestic private sector through targeted Public and Private Procurement

In order to ensure that there is utilization of Sierra Leone goods and services in a way that promotes the creation of backward and forward linkages, public procurement shall be streamlined to give preferential margins to domestic SMEs. Government entities shall be encouraged to give preference to domestic suppliers according to the provisions of the National Public Procurement Act (NPPA) and Regulations regarding the award of preferential margins.

The private sector will also be encouraged to give first consideration to Sierra Leonean goods and services in their procurement process.

Policy Prescriptions:

In order to achieve this objective, the Government will implement the following strategies:

1. Ensure that Sierra Leonean firms are given first consideration in the award of contracts and concessions in sectors such as mining and the petroleum industry subject to established rules.
2. Provide a preferential margin of 10 per cent to domestic firms in government and private procurement.
3. The NPPA to develop guidelines for Government entities to provide a margin of domestic preferences in terms of ownership, origin of raw materials, partnership with local firms etc.
4. Facilitate the development of a bidding process for all large firms and investors for acquiring goods and services which shall give full and fair opportunity to Sierra Leonean service suppliers and ensure that all procurement bids by foreign enterprises are advertised locally and internationally.
5. Promote the consideration of Sierra Leonean Content when evaluating any bid. Where bids are within 5% of each other at financial stage, the bid containing the highest level of Sierra Leonean content shall be selected provided the Sierra Leonean content in the selected bid is at least 5% higher than its closest competitor.
6. Strengthen domestic firms through public private partnerships to train and build capacity to enable them to take advantage of the available opportunities and meet international competitive bidding standards.¹
7. Coordinate with private sector organisations such as the Sierra Leone Chamber of Commerce, Industry and Agriculture (SLCCIA) to facilitate access to information regarding available opportunities for procurement.

6.3.3 To promote the employment of Sierra Leoneans in all sectors of the economy

In order to harness maximum benefits from investment and to ensure transfer of knowledge to Sierra Leoneans, the Government will promote the employment of Sierra Leoneans in all sectors of the economy. Where the necessary skills exist, Sierra Leoneans shall have first priority of employment over foreign nationals. The Government will put in

¹ Article 7 of the Investment Promotion Act of 2004 states the Government's commitment to improving the capacity of Sierra Leonean business enterprises to compete effectively, both locally and internationally

place measures to develop the necessary skills for Sierra Leoneans in the sectors where such skills are needed.

The Government will also facilitate transfer of knowledge and skills to Sierra Leonean citizens in order to develop and improve the quality of the work force.

Policy Prescriptions:

To achieve this objective, the Government will implement the following strategies:

1. Sierra Leoneans shall be given the first consideration for employment and training in any project executed by any enterprise or investor in Sierra Leone.
2. Where the enterprises or investor can not employ Sierra Leoneans due to lack of trained personnel, the enterprise or investor shall submit to the Local Content Committee as established by this Policy, a plan to develop such training for Sierra Leoneans.²
3. For positions not held by Sierra Leoneans, the investor shall submit a succession plan which shall stipulate Sierra Leoneans to understudy the expatriate for a maximum period of five years.
4. In all enterprises operating in any sector of the economy; at least 20 % of the managerial and 50% of intermediate positions shall be held by Sierra Leonean citizens. The Work Permit Committee **as established under the Business Start-Up (Amendment) Act 2007** can however provide an exemption to this requirement where the requesting enterprise proves to the Committee that there is no sufficiently skilled manpower to take-up the managerial or intermediate posts. The respective ratio will be increased over the time and after 5 years of establishment will stand at 60% for managerial positions and 80% for intermediate positions. Where it is proven that required skills are not present locally and ratio cannot be met, the company must demonstrate a capacity building plan to substitute expatriate with local capacity within five years.
5. All junior level staff such as drivers, security personnel, secretaries, general casual labourers and all similar junior or intermediate positions shall be held by Sierra Leonean citizens.
6. All enterprises shall make application for expatriate quotas to the Ministry of Labour and Social Security . The application shall be detailed and shall include job titles, description of responsibilities, the duration of the proposed employment in Sierra

² These strategies are in conformity with Articles 34 B, 34 C and 34 D in Section 2 of the Business Start-up Act Amended 2007

Leone and any other information required by the Work Permit Committee for purposes of implementing the provision of this Policy.

7. **Employment and Training Plan:** An investor shall submit to the Work Permit Committee an Employment and Training Plan which shall contain the following:
 - i. an outline of the hiring and training needs of the investor with a breakdown of the skills needed, anticipated skills shortages in the Sierra Leonean labour force, specialized training requirements and the anticipated expenditures that will be made directly by the investor in implementing the Employment and Training Plan.
 - ii. a time frame for employment opportunities for each phase of project development and operations, to enable members of the Sierra Leone workforce to prepare themselves for such opportunities
8. The investor will report regularly to the Committee on employment and training activities. The report shall include number of new employees hired during the reporting period, their nationality and their employment status;

6.3.4 To promote the development of human resources capacity of Sierra Leoneans

In order to develop and enhance the skills of the Sierra Leonean workforce, the Government will support tertiary and technical institutions to provide training according to the skills needed in the economy.

The Government will coordinate with the private sector, foreign investors and development partners to develop the necessary skills through specialized training provided in universities and other technical institutions.

Policy Prescriptions

The Government will implement the following strategies in order to achieve the above objective.

1. Transform the education curriculum of tertiary, vocational, technical and commercial education institutions to prioritize science and technology according to the skills requirements of the industrial sector.
2. Align the education curriculum of tertiary, vocational, technical and commercial education institutions with the growth sectors of the economy, such as mining, oil

and gas, fisheries, agriculture, etc to produce a skilled workforce for these sectors by 2025.

3. Encourage private sector investment in the development of entrepreneurship and management training institutes.
4. Provide incentives for sector-specific training and skills development in entrepreneurship and management, in public and private sector training institutions as well as within industry associations and at the firm-level.
5. Encourage skills development for the youth through on-the-job training, internships and artisanal apprenticeships in established industries and firms
6. To encourage large domestic and foreign industrial enterprises to develop training programmes for Sierra Leoneans to ensure transfer of knowledge, technology and expertise.

6.3.5 The promotion of Local Ownership

To ensure the promotion of local ownership, the Government will encourage local partnership between Sierra Leoneans and foreign investors and their agents. A foreign company that partners with Sierra Leonean firms will be granted preferential treatment when competing against companies with no percentage of equity share ownership by Sierra Leonean firms or citizens.

Policy Prescriptions:

The Government will implement the following strategies aimed at achieving the above objective:

1. Give first consideration for assigning rights such as mineral concessions to companies with significant equity ownership by Sierra Leoneans citizens.
2. Increase access to finance for Sierra Leoneans citizens through Government initiated programmes as set out in the financial sector development plan and in the Agenda for Change.
3. Incorporate the promotion of partnership between foreign investors and Sierra Leoneans into investment promotion strategy.
4. Encourage capacity building amongst Sierra Leonean entrepreneurs to enable them develop the technical skills needed to effectively engage in partnership with foreign companies and entities.

7. IMPLEMENTATION

7.1 Negotiation of Investment Agreements

This Policy shall provide a benchmark for the negotiation of investment agreements between the Government of Sierra Leone and other countries or with business enterprises to ensure that all investors conform to the stipulations of this Policy.

7.2 Granting of Incentives conditional on fulfilment of the conditions in the Policy

The successful implementation of this Policy will be supported by making the initial award to or continued use of incentives by investors conditional on them putting into operation the obligations stipulated in this Policy.

7.3 Institutional framework

There are several Government agencies that are currently monitoring aspects relating to private sector development in general and the promotion of local content development in particular. Some of the most important institutions are the following:

Coordination and Role of Existing institutions

i. Ministry of Trade and Industry

The Ministry in general has the mandate to develop private sector development in Sierra Leone. Through its implementing agency, the Sierra Leone Investment and Export Promotion Agency (SLIEPA), the Ministry also has a mandate to encourage and facilitate investment and to promote exports in Sierra Leone. The Ministry of Trade and Industry shall have the overall responsibility of overseeing the implementation of this Policy.

ii. Ministry of Labour and Social Security

This Ministry is mandated to coordinate matters relating to labour, and in particular monitor the employment of expatriates in Sierra Leone. Under the General Law (Business Start-up) Amendment Act, the application for permits is to the Work Permit Committee that is chaired by the representative from the Ministry responsible for Labour. This Committee therefore will play a very important role in monitoring the level of employment of Sierra Leoneans.

iii. National Public Procurement Authority (NPPA)

The NPPA's responsibility is to oversee government procurement to ensure transparency and value for money. Since this Policy also requires that Government Agencies consider

local content in the award of contracts, the role of the NPPA is vital in publishing guidelines for the MDAs to follow when considering local content. The NPPA will also play an advocacy role among MDAs to encourage the implementation of the Policy.

iv. Ministry of Finance and Economic Development

By overseeing the granting of government incentives including fiscal incentives to investors, the MoFED is a key institution that shall be involved in the implementation of the Policy. The continued enjoyment of fiscal incentives by investors will be conditional on their adherence to the requirements of this Policy. MoFED will therefore need to coordinate with MTI and other stakeholders before incentives are awarded or extended.

v. Sector Specific MDAs

Other government agencies such as the Ministry of Mining and Mineral Resources, the Ministry of Works, Housing and Infrastructure (MWHI), the Ministry of Agriculture, Forestry and Food Security (MAFFS), the Ministry of Fisheries and Marine Resources (MFMR) and the Directorate of Petroleum Resources also deal with issues relating to the private sector and in particular effort to increase the participation of Sierra Leoneans in the economy. The Ministry of Mines and Mineral Resources oversees the application of local content in the mining sector as provided by the Mining and Minerals Act. It is therefore important that all these sector specific agencies participate in the implementation of the Local Content Policy.

vi. Private Sector Participation

The role of the private sector is vital for the successful implementation of this Policy whose main aim is to support the development of the local private sector. The Government will promote and support the private sector by creating information channels through which the members can know about the opportunities for investment created through this Policy. Through established institutions such as the Sierra Leone Chamber of Commerce, Industry and Agriculture (SLCCIA), the Government will also support the domestic private sector to create linkages with large domestic as well as foreign firms. Since the domestic private sector is still weak with serious constraints to produce sufficient quantities with competitive quality, the Government will continue to address obstacles such as access to finance that will enhance the capacity of the domestic SMEs.

7.4 Creation of the Local Content Committee

In order to effectively coordinate amongst the different institutions and stakeholders on the implementation of the Policy, a committee called the Local Content Committee shall be established.

7.4.1 Composition of the Local Content Committee

The Local Content Committee shall consist of the following members:

- i. A representative of the Ministry of Trade and Industry who shall be the Chair of the Committee
- ii. A representative of the Ministry of Justice and Attorney General
- iii. A representative of the Ministry of Finance and Economic Development
- iv. A representative of the Ministry of Labour and Social Security
- v. A representative of the Strategy and Policy Unit in the Office of the President.
- vi. A representative of the National Public Procurement Agency
- vii. A representative of the National Revenue Authority
- viii. A representative of the Sierra Leone Investment and Export Promotion Agency
- ix. Two representatives of the Sierra Leone Chamber of Commerce Industry and Agriculture (SLCCIA)
- x. Two representatives from Civil Society
- xi. A representative from a Government Ministry, Government Agency or professional body directly responsible for a particular sector, or having a major stake in the subject matter under review by the Committee.

7.4.2 Functions of the Local Content Committee

The Committee shall carry out the following functions:

- i. Supervise, coordinate and monitor the implementation of this Policy
- ii. Appraise, evaluate and approve local content plans and reports submitted to the Committee
- iii. Liaise with sector operators and institutions to monitor the implementation of the policy
- iv. Coordinate with the private sector to enable Sierra Leoneans to take advantage of available opportunities.
- v. Receive the local content plans of investors and assess their implementation.

8. MONITORING AND EVALUATION OF THE POLICY

In order to enable the Local Content Committee to monitor the implementation of the Local Content Policy, investors will be obligated to submit to the Committee the following documents

- i. Business plan
- ii. Capital plan

- iii. Procurement plan
- iv. Imports plan
- v. Employment plan
- vi. Training plan.

These plans will be revised on an annual basis and submitted to the Committee. It is also expected that companies will comply with all regulated obligations to provide annual financial reports to OARG, and copy the Committee.

The Ministry of Trade and Industry in its oversight role to develop the private sector and serving as a secretariat to the Local Content Committee will be responsible for gathering information regarding the status of implementation of the various programmes, and will conduct random checks at companies sites. The Private Sector Unit of the Ministry will support the Committee to coordinate with all stakeholders and to obtain the relevant information relating to the implementation of the programme. The Committee shall compare various benchmarks with actual implementation of the programmes in the Policy.