

ACWA Power Sirdarya 1,500MW CCGT
Power Plant (IPP)
Republic of Uzbekistan



Stakeholder
Engagement Plan

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APPENDIX A – EXAMPLE OF GRIEVANCE FORM

LIST OF ABBREVIATIONS

ABBREVIATION	MEANING
CCGT	Combined Cycle Gas Turbine
CLO	Community Liaison Officer
COVID-19	Coronavirus Disease
DEG	Deutsche Investitions- und Entwicklungsgesellschaft
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EPC	Engineering, Procurement and Construction
EPFIs	The Equator Principle Financial Institutions
EPs	Equator Principles
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
IFC	International Finance Corporation
IFI	International Financial Institution
LRP	Livelihood Restoration Plan
MW	Mega Watt
NTS	Non-Technical Summary
O&M	Operation and Maintenance
PPA	Power Purchase Agreement
SEP	Stakeholder Engagement Plan
5 Capitals	5 Capitals Environmental and Management Consulting

1 INTRODUCTION

The government of the Republic of Uzbekistan aims to modernise and increase the electricity production in the country in order to foster economic growth. As part of this aim, the government plans to develop new gas fired Combined Cycle Gas Turbine (CCGT) plants on two adjacent plots of land near other existing power infrastructure near the settlement Shirin, a border town with Tajikistan. The eastern plot of land has been allocated to ACWA Power for development of a 1,500MW CCGT plant (the Project), whilst the western plot is being assessed separately for competitive bids by the IFC (part of the World Bank Group).

ACWA Power have since established a Project Company, 'ACWA Power Sirdarya LLC' (Tashkent) registered in the Republic of Uzbekistan and with registration number 306900046. ACWA Power Sirdarya LLC has entered into a 25-year Power Purchase Agreement (PPA) with JSC 'National Electric Networks of Uzbekistan', which is based on the ultimate operations of the Project. Under the PPA, the Project shall comprise 'a 1500 MW combined cycle gas-fired power plant consisting of two gas turbines and one heat recovery system generator with an efficiency of not less than 60%'. The Project will operate solely on natural gas and will contribute energy to the baseload of the Uzbekistan grid.

The Project scope also includes the design, development, construction, commissioning, testing and transfer of a 500/220kV switchgear station to the JSC National Electric Networks of Uzbekistan. This switchgear station will be a common facility between the ACWA Power Sirdarya Project and the adjacent CCGT project currently under the IFC tender. JSC National Electric Networks of Uzbekistan will be responsible for the operations and maintenance of the switchgear station once it has been constructed.

ACWA Power is seeking Project finance from the European Bank for Reconstruction and Development (EBRD) who have their own internal Environmental & Social Policies/Performance Requirements and Deutsche Investitions- und Entwicklungsgesellschaft (DEG) who are a subsidiary of KfW Development Bank who are signatories of the Equator Principles (EPs) (a voluntary set of principles established to manage environmental and social investment risks). As such, the Project has certain obligations to ensure relevant processes are in place for stakeholder engagement on an on-going basis in accordance with EBRD requirements and that of the EP's, IFC Performance Standards and World Bank Group EHS Guidelines.

5 Capitals Environmental and Management Consulting (5 Capitals) has been commissioned by ACWA Power to prepare this Stakeholder Engagement Plan (SEP) for the Project.

This SEP outlines the proposed framework methodology for stakeholder engagement throughout the lifecycle of the Project, with a specific emphasis regarding the guidelines of

the International Lenders and any applicable Uzbekistan laws. As the SEP will remain relevant throughout the lifetime of the Project as a 'live document', it will act as a plan within the Project's construction, commissioning and operational phase ESMS that will require updating as Project circumstances or stakeholder dynamics evolve; and to ensure continual improvement of the Environmental and Social Management System (ESMS).

1.1 Scope of the SEP

This document is the Stakeholder Engagement Plan Report (SEP) prepared for the ACWA Power 1,500MW Syrdarya CCGT Project in Uzbekistan. The scope of the SEP is to specify the methods to efficiently manage and facilitate future engagement with stakeholders through various stages of the Project lifecycle.

This SEP has been prepared to align with applicable requirements of the EBRD Performance Requirements, as well as the applicable elements of the IFC Performance Standards; also, via requirements in Equator Principle IV, specifically EP5 and EP6 that establish requirements for Stakeholders Engagement and Grievance Mechanism respectively.

1.2 Objectives of the SEP

The objectives of the SEP include:

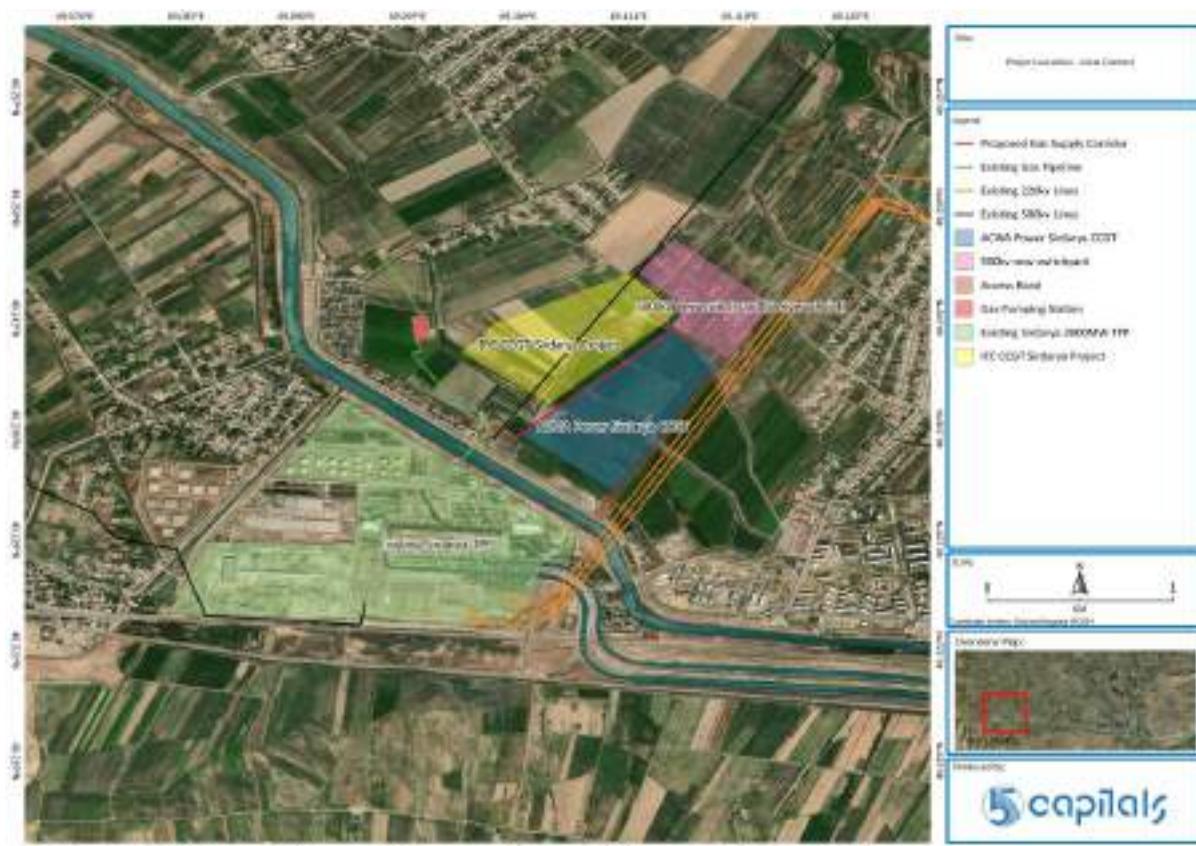
- To identify the key stakeholders that may be affected by the Project or may influence the outcome of the Project;
- To define processes to inform the identified stakeholders about the Project and to manage stakeholder expectations;
- To understand current and potential emerging issues and to capture views and concerns of the relevant stakeholders with regard to the Project;
- To provide a basis for stakeholder participation in environmental and social impact identification, prevention and mitigation including impacts and risks relating to Gender Based Violence & Harassment (GBVH) including Sexual Exploitation and Abuse (SEA);
- To propose a platform for reporting back on mechanisms to address these impacts; and
- To establish a grievance mechanism that will be implemented for the Project.

2 PROJECT OVERVIEW

2.1 Project Location

The Project is located approximately 1.9km northeast of the city of Shirin, which is a border town on the Uzbekistan side of the border from Tajikistan. The greenfield site is in close proximity to an existing 3,000MW oil/gas Thermal Power Plant (Syrdarya TPP), located immediately on the border with Tajikistan.

Figure 2-1 Project Location



2.2 Project Description

The Project is a 1,500MW natural gas fired Combined Cycle Gas Turbine (CCGT) power plant, that will operate independently and offload power to the grid via a shared electrical switchgear station with a future CCGT project (being tendered by IFC), expected on adjacent land.

The main project facilities will include:

- Power block and stacks including 2 * Gas Turbines (GT), 2 * Heat Recovery Steam Generators (HRSG) and 1 * Steam Turbine (ST);
- Closed Loop Cooling Water system and Open Loop Cooling System;
- Gas receiving terminal;
- Intake and outfall;
- Water treatment;
- Wastewater treatment; and
- Ancillary/support facilities (i.e. electrical system, site entrance and security building, laboratory, workshops etc).

Associated facilities will include:

- Gas pumping station and supply;
- 500/220kV switchgear station;
- Overhead transmission lines; and
- Access road.

2.3 Project Construction & Commissioning Requirements

Construction and commissioning will be the responsibility of the EPC Contractor. All temporary construction working areas and facilities will be located within the Project footprint including EPC Contractor accommodation facilities. It is expected that the EPC Contractor will engage several Sub-Contractors and there will be a peak workforce of approximately 2,160 workers.

2.4 Project Construction Operational Requirements

The operational workforce is expected to include approximately 40 people for the O&M Company. The workers will be required to make arrangements for their own accommodation facilities which will most likely be located in Shirin town or Bayavut District.

2.5 Local Context and Sensitivities

Note: Full details of receptors, local sensitivities, land users and site baseline are described in the ESIA. A summary of this has been included below for context in this SEP.

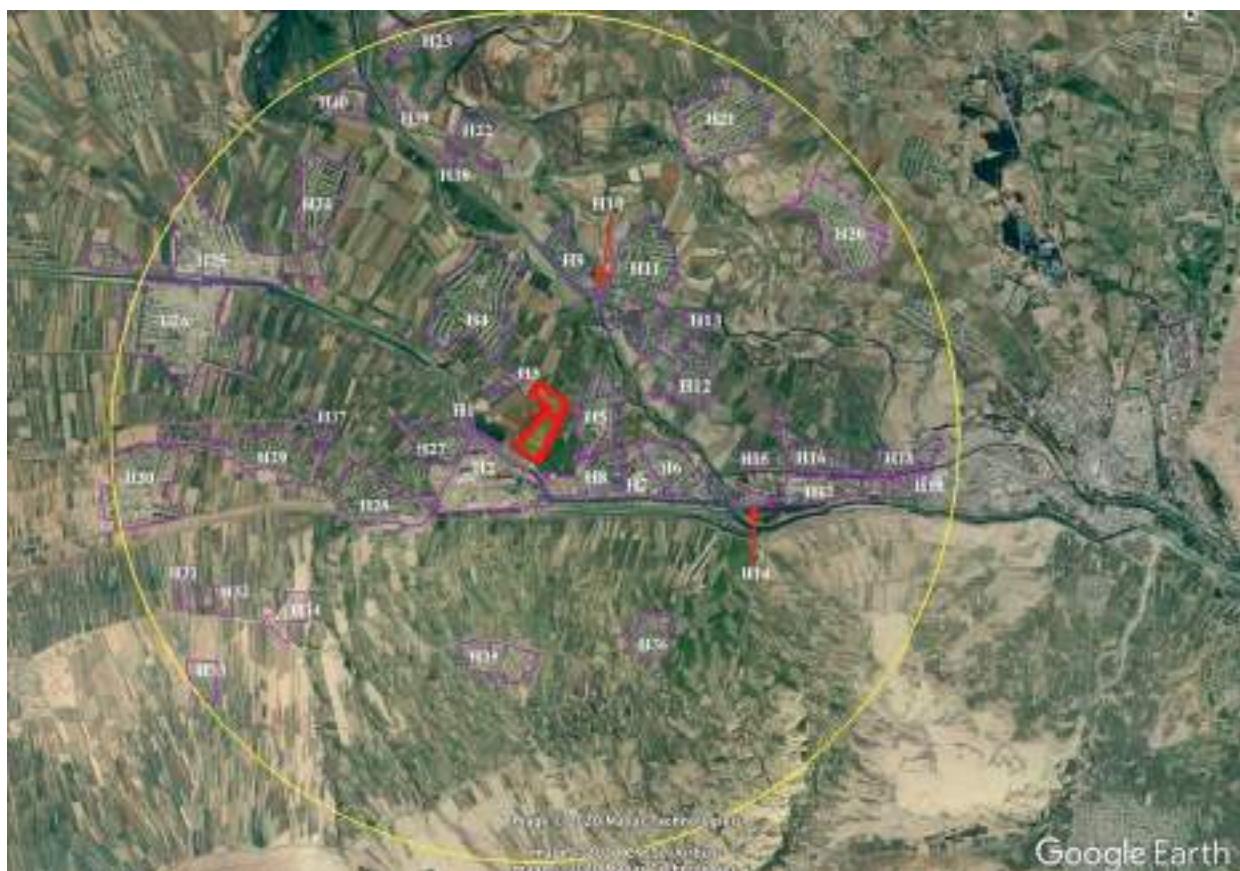
Table 2-1 Human Receptors

ID	RECEPTOR TYPE	PROXIMITY TO PROJECT	DESCRIPTION
Military Barracks	Residential	0.6km	The military barracks and facilities are enclosed by high walls and barbed wire and armed soldiers were seen in watchtowers.
Sirdarya TPP	Industrial	0.3km	The existing CCGT Plant is located to the south of the proposed Project site and there are plans to decommission it once the proposed Project becomes operational.
Kindergarten	Residential	0.82km	A number of residential, commercial, recreational and industrial receptors can be found within 10 km of the Project Site. Many of the residential receptors consist of newly constructed and old developments.
Sports Centre	Recreational	0.82km	
Farmer Houses	Residential	0.21km	
New Houses	Residential	0.94km	
Accommodation Blocks	Residential	1km	
Residential Areas	Residential	1.1km	
Gas Station	Commercial	0.12km	
H1	Residential	0.22 km	
H2	Industrial	0.38 km	
H3	Residential	0.38 km	
H4	Residential	1.23 km	
H5	Residential	0.39 km	
H6	Residential	2.02 km	
H7	Residential/com mercial	1.68 km	
H8	Residential/com mercial	0.30 km	
H9	Residential	2.52 km	
H10	Residential	2.38 km	
H11	Residential	1.98 km	
H12	Residential	1.96 km	
H13	Residential	3.57 km	
H14	Residential	4.90 km	
H15	Residential	4.62 km	
H16	Residential	6.11 km	
H17	Residential	5.40 km	
H18	Residential	7.46 km	
H19	Residential	7.79 km	
H20	Residential	6.94 km	
H21	Residential	6.28 km	
H22	Residential	5.31 km	

ID	RECEPTOR TYPE	PROXIMITY TO PROJECT	DESCRIPTION
H23	Residential	8.46 km	
H24	Residential	5.78 km	
H25	Residential	6.46 km	
H26	Residential	6.74 km	
H27	Residential	1.01 km	
H28	Residential	2.16 km	
H29	Residential	4.41 km	
H30	Residential	7.94 km	
H31	Residential	8.08 km	
H32	Residential	7.44 km	
H33	Residential	8.68 km	
H34	Residential	6.03 km	
H35	Residential	4.35 km	
H36	Residential	4.37 km	
H37	Residential	4.22 km	
H38	Residential	5.37 km	
H39	Residential	6.99 km	
H40	Residential	7.51 km	

Figure 2-2 Receptor Location within 2km Radius



Figure 2-3 Receptor Location within 10km Radius

2.5.1 Land Use and Site Condition

The Project plot is 84 Ha in area including the switchyard. Based site visits and satellite observations, it was observed that the land was entirely in use by local farmers for agricultural purposes, primarily rice and vegetable cultivation (also confirmed by the farmers). ACWA Power has provided 5 Capitals with government papers informing the land users of the termination of their land lease agreements. It is understood that there may also have been prior notification to this in 2015 and 2019 respectively but consultation with farmers revealed that they received written communication on termination of their land lease agreement in May 2020. The inventory, valuation and compensation of the farmers within the Project footprint and those within the routing of the associated facilities corridor is being undertaken by ACWA Power as part of the Livelihood Restoration Plan (LRP) and a Project specific Livelihood Restoration Framework has been prepared.

3 REGULATIONS AND REQUIREMENTS

3.1 National Requirements

The EIA procedure is regulated by Law on Environmental Expertise and the Regulation on State Environmental Expertise (SEE), approved by Decree No.491 of the Cabinet of Ministers on 31 December 2001 and amended in 2005 and 2009.

There are two non-mandatory mechanisms for public participation in the EIA assessment procedure which include the public environmental review (PER) and public hearings. The law allows for independent expert groups to organise PER but the findings are non-mandatory. However, there are no provisions for public hearings.

The EIA assessment procedure Manual provides some procedural guidance by recommending organisation of public hearings in the course of the draft EIA preparation. Review of past development Projects in Uzbekistan shows that public consultations in Uzbekistan do not generally involve public consultations and is limited to local, regional and national authorities as applicable. In addition, the law does not require public disclosure of the ESIA apart from the requirement to publish a summary of the conclusions received from the State Committee on Ecology and Environmental Protection.

3.2 Lender Requirements

3.2.1 EBRD - Performance Requirements

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

EBRD PR10 "recognises the importance of an open and transparent engagement between the client, its workers, local communities directly affected by the project and where appropriate, other stakeholders as an essential element of Good International Practice (GIP) and corporate citizenship. Such engagement will involve the following key elements:

- Stakeholder Identification and analysis;
- Stakeholder engagement planning;
- Disclosure of information;
- Consultation and Participation
- Grievance Mechanism and
- Ongoing reporting to relevant stakeholders.

EBRD PR10 BRIEFING NOTE (COVID-19)

The guidance note provides considerations for continuing effective information disclosure and stakeholder engagement during the COVID-19 pandemic. The note provides possible alternative approaches through email campaigns, Project leaflets, text-based messaging, traditional media, signage etc.

The following processes, systems and tools are recommended:

- Stakeholder database: Ensuring its updated and key contact information is provided. The development of the database must respect people's privacy and be consistent with regulations such as General Data Protection Regulations.
- Messaging: When using different engagement platforms, the information provided should be clear, concise and consistent and provided in relevant local languages.
- Documentation: Keep track of interactions through documentation of engagement activities, commitments and complaints.
- Resources: Ensure appropriate resources are in place to track and respond to queries, concerns and disputes or grievances that may be raised.

Note: EBRD notes that the briefing note is not a compliance document and should be taken as a source of information and analysis.

3.2.2 Equator Principles IV

The Equator Principles IV establish key requirements for stakeholder engagement through the following principles:

- Principle 5: Stakeholder Engagement
 - For all Category A and Category B Projects the EPFI will require the client to demonstrate effective Stakeholder Engagement, as an ongoing process in a structured and culturally appropriate manner, with Affected Communities, Workers and, where relevant, Other Stakeholders.
 - For Projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to: the risks and impacts of the Project; the Project's phase of development; the language preferences of the Affected Communities; their decision-making processes;

and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation.

- There are also other requirements for facilitating engagement and engagement with indigenous peoples.
- Principle 6: Grievance Mechanism
 - For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the ESMS, to establish effective grievance mechanisms which are designed for use by Affected Communities and Workers, as appropriate, to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance.
 - Grievance mechanisms are required to be scaled to the risks and impacts of the Project, and will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. Grievance mechanisms should not impede access to judicial or administrative remedies. The client will inform Affected Communities and Workers about the grievance mechanisms in the course of the Stakeholder Engagement process.

EQUATOR PRINCIPLES GUIDANCE ON IMPLEMENTATION OF THE EQUATOR PRINCIPLES DURING THE COVID-19 PANDEMIC

The guidance recommends that the borrower should communicate information to local communities on the Project's response to Covid-19 including control of work-force community interactions, any necessary changes to procedures, the Project approach to controlling COVID-19 risks in the workforce and any aspects of support being offered by the Project to the local community. This should include the review of appropriate stakeholders and include a focus on any identified vulnerable groups.

The guidance recommends the following alternative engagement processes:

- Consideration of opportunities for engagement through local actors such as women, youth, leaders, local authorities, traditional leaders etc.
- Implementation of additional training for Community Liaison Officers to ensure they can effectively deliver key messages, particularly to the most vulnerable and where Project impacts will be significant.

The engagement should be mindful of managing social stigma of COVID-19 and consider alternative methods that ensure anonymity.

IFC - PERFORMANCE STANDARDS

All of the IFC Performance Standards include requirements for an amount of stakeholder consultation/engagement (either in the ESIA, or as part of the future ESMS) and therefore the Project will require a level of engagement. In particular, IFC Performance Standard 1 on "Social

and Environmental Assessment and Management Systems" describes the stakeholder engagement requirements in more depth. It states the following:

"Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. Stakeholder engagement is an on-going process that may involve, in varying degrees, the following elements:

- Stakeholder analysis and planning;
- Disclosure and dissemination of information;
- Consultation and participation;
- Grievance mechanism; and
- On-going reporting to Affected Communities.

The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project's risks and adverse impacts, and the project's phase of development."

The IFC Performance Standards indicate that when Affected Communities are subject to identified risks and adverse impacts from a project, the developer/client will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them. Effective consultation is a two-way process that will:

- Begin early in the process of identification of environmental and social risks and impacts and continue on an on-going basis as risks and impacts arise;
- Be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities;
- Focus inclusive engagement on those directly affected as opposed to those not directly affected;
- Be free of external manipulation, interference, coercion, or intimidation;
- Enable meaningful participation, where applicable; and
- Be documented.

4 PREVIOUS STAKEHOLDER ENGAGEMENT

Stakeholder identification and consultations for the ACWA Power CCGT Project were conducted during the Scoping and ESIA Stage. The stakeholder identification process identified impact based, interest based and decision-making stakeholders. Outcomes of the consultations are provided in Volume 2 of the ESIA.

4.1 Stakeholder Consultation during the E&S Scoping and ESIA Stage

The methods used for the on-going stakeholder engagement process include bilateral meetings, emails, telephone calls and letters with national, regional and local authorities. Public consultations and meetings were also held between 28th May and 5th June 2020 as shown below:

- Consultations through the phone with directly impacted farmers whose land lease agreements were terminated.
 - Consultations performed between 22nd April to 1st May 2020.
- Bayavut District
 - 28th May 2020: This meeting was attended by 22 people out of which 19 were male and 3 were female.
 - Six of those in attendance were farmers found within the Project footprint.
- Shirin Town
 - 28th May 2020: This meeting was attended by 15 participants, including 7 City Council Deputies. Out of the 15 participants, 10 were male and 5 were female.
 - 5th June 2020: This meeting was attended by 30 participants and targeted the youth, unemployed and low-income families. This included 12 male and 18 female attendants.

To determine the venue and date of the consultation meetings, letters were sent to officials in Bayavut and Shirin. The officials in turn decided on the venue and informed the locals of the upcoming meetings in coordination with Juru Energy.

The agenda of all the meetings included:

- General overview of the CCGT construction and operation:
 - Purpose, nature and scale of construction
 - Timeline and schedule of construction
- Impacts of the CCGT
 - Positive (e.g., opportunities for new job placements, cheaper electricity and etc)

- Negative (noise, air pollution, and etc.)
- Measures for negative impact mitigation
- Safeguard measures including mitigation and management measures (that will be taken to reduce impact on environment and communities)
- Discussions
- Grievance Redress Mechanism: contact details for sending feedbacks, suggestions, inquires and compliance etc.

CHALLENGES IN ORGANISING THE PUBLIC CONSULTATION MEETINGS

The outbreak of a global pandemic (COVID 19) and the implementation of movement and assembly restrictions in Uzbekistan greatly hindered the organisation of public consultation meetings. Juru Energy and 5 Capitals were constantly in contact with officials in Shirin and Bayavut district in order to be able to determine the viability of holding public meetings. Due to rising cases of infections the following meetings were cancelled and could not be rescheduled due to ongoing restrictions:

- **Bayavut District:** Meetings scheduled on 24th June 2020 targeting the elderly, women, youth and the unemployed were cancelled at the advice of the Bayavut district officials.
- **Shirin Town:** Meetings scheduled for 25th June 2020 targeting women and the elderly were cancelled at the advice of the Shirin Municipality and as a result of rising COVID-19 cases in the area.

ALTERNATIVE CONSULTATION METHODS

As a result of the public assembly restrictions and in coordination with Bayavut and Shirin administrations Juru Energy and 5 Capitals prepared Project specific brochures that were distributed to the local communities in the Project area on 5th August 2020 as part of the disclosure process. The brochures included Project information, expected positive impacts including negative impacts during construction and operation. In addition, the brochures included provision of a grievance mechanism.

On 2nd July 2020, Juru Energy was invited to organise a Zoom video conference meeting with eight (8) women from Sarmich and Julangar communities in Bayavut (referenced as receptors H3 and H4 in table 2-1) . The video conferencing call was organised by Bayavut district Head of Investment Department.

4.1.1 ESIA Stage Grievance Mechanism

From the national legislation prospective there is a centralized complaints mechanism (online portal) for all public utility providers that was opened in 2017 by Presidential Decree No. 728 of 15/09/2017. As this online portal is intended for wide range of issues brought to government attention, it was considered more appropriate to develop a single system/approach for

receiving feedback and complains from stakeholders. The following approach was used in the establishment of the Project specific grievance mechanism.

- Applications/complaints from local individuals or groups were accepted both in written and verbal forms after conducting the meeting with affected community.
- 5 Capitals as well as local consultant Juru Energy review and, within their authority be responsible for resolving submitted grievances (in co-ordination with ACWA Power)

The following details were provided to the stakeholders in order to be able to submit additional grievances or comments regarding the proposed Project.

Table 4-1 Stakeholder Engagement - Grievance Mechanism Contact Details

COMPANY	CONTACT DETAILS
Juru Energy: Umida Rozumbetova – environmental and social consultant	Email: u.rozumbetova@juruenergy.com Mob: +998903487523 Work: +998712020440
Oleg Khegay - environmental and social consultant	Email: o.khegay@juruenergy.com Mob: +998909414371 Work: +998712020440
Representative of local khokimiyat (administration)	The local administration has an existing Telegram group that is used for communication between the community and officials.

The table below provides a summary of the consultation conducted to date.

Table 4-2: Summary of Stakeholder Consultation

CONSULTATION ON TARGET GROUP	PARTICIPANTS	MAIN AGENDA	ISSUES RAISED BY PARTICIPANTS
Bayavut District			
Directly Affected Communities	Deputy mayor, Head of investment department Farmers, local communities	<ul style="list-style-type: none"> General overview of the CCGT construction: <ul style="list-style-type: none"> Purpose, nature and scale of construction Timeline and schedule of construction Impacts of CCGT <ul style="list-style-type: none"> Positive (e.g., opportunities for new job placements, cheaper electricity and etc) Negative (noise, air pollution, and etc.) Measures for negative impact mitigation Safeguard measures (that will be taken to reduce impact on environment and communities) Open Discussions, Questions and Answers 	<ul style="list-style-type: none"> Compensation plans for the farmers that will lose their land due to the Project development. Concerns were raised on whether there will be enough water in the canal to support the operation of the new CCGT and the existing Sydarya TPP. Plans for the Project to improve the social infrastructure or build new infrastructure in the Project area such as schools, kindergartens. What safety measures will be implemented by the Project? Will the Project offer employment opportunities for local experts?
Shirin Town			
Targeted Groups	Women		<ul style="list-style-type: none"> Plans for the Project to help unemployed women in Bayavut district. Clarifications on whether the graduates from the College of Energy will be provided with job opportunities in the ACWA Power plant after completion of their studies

CONSULTATION ON TARGET GROUP	PARTICIPANTS	MAIN AGENDA	ISSUES RAISED BY PARTICIPANTS
Directly Affected Communities	Mayor, Head of investment department, city council deputies' local communities, farmers	<ul style="list-style-type: none"> • General overview of the CCGT construction: <ul style="list-style-type: none"> ◦ Purpose, nature and scale of construction ◦ Timeline and schedule of construction • Impacts of CCGT <ul style="list-style-type: none"> ◦ Positive (e.g., opportunities for new job placements, cheaper electricity and etc) ◦ Negative (noise, air pollution, and etc.) ◦ Measures for negative impact mitigation ◦ Safeguard measures (that will be taken to reduce impact on environment and communities) • Open Discussions, Questions and Answers 	<ul style="list-style-type: none"> • Clarification on how much fuel will be saved as a result of the development of the new CCGT compared to the Sydarya TPP. • Type of fuel that will be used by the Project. • Efficiency of the boilers and where they will be manufactured from. • Clarifications on whether there are any plans to develop wind energy in the area based on the wind speed. • What impact will the ACWA Power Project have on the local infrastructure and will the Project be involved in any social infrastructure development projects? • Will ACWA Power be involved in construction of both the new and future IFC CCGT Projects and will these two Projects be located on the 75 hectares of land? • Will the Project provide employment to the local communities?

CONSULTATION ON TARGET GROUP	PARTICIPANTS	MAIN AGENDA	ISSUES RAISED BY PARTICIPANTS
Targeted Groups	Low income families Unemployed Youth		<ul style="list-style-type: none"> Clarification on the total area allocated for the Project construction. Provide further details on the efficiency of the Project. Clarification on what will happen to the farmers who will lose their land. Clarification on whether there are any plans to establish industrial facilities that will provide technical support to the Project. How many workers will be required for the project and what will be the skill/experience requirements?
Consultations Conducted through telephone calls	With 8 of the directly impacted farmers	<ul style="list-style-type: none"> Land use (i.e. how long have the farmers used the land, income generated from farming etc) Legal aspects, such as notification on the termination of their land lease agreements, whether they have been contacted by the local administration on valuation and compensation, presence of agricultural plants on the farm at the moment. Their future plans following the loss of agricultural land (if any). Presence of existing sites on their farms that might be of cultural importance. 	<ul style="list-style-type: none"> All the eight farmers responded that farming was their single source of livelihood and mostly rely on their family members and relatives as a source of labour in the farms. The majority of the farmers have been using the land for more than 5 years and they expressed concern that if moved to another farm it would take them between 3-5 months to cultivate vegetables and grains and 3-5 years for fruit trees. The farmers stated that they only use the land for agricultural purposes. Seven (7) out of the eight (8) farmers stated that at the time of consultation they had not received any written or verbal communication/notification about the termination of their lease agreement.

CONSULTATION ON TARGET GROUP	PARTICIPANTS	MAIN AGENDA	ISSUES RAISED BY PARTICIPANTS
			<ul style="list-style-type: none"> The local administration had not contacted the farmers regarding land valuation or the compensation process. None of the farmers had been offered alternative land for farming. Three out of the eight farmers have higher education diploma but stated that they would likely use the compensation money to start other businesses. The farmers stated that they did not have any sites on their land which they considered of cultural importance.

4.1.2 Grievances Received

To date, six grievances have been received through the Project grievance mechanism in relation to the farmers who will lose their land due to the Project development and availability of employment opportunities. The summary of these grievances and the responses provided are shown in the tables below.

NAME (INDICATE IF THE COMPLAINT IS PREFERRED TO BE ANONYMOUS)	Withheld for data privacy/protection reasons
CONTACT INFORMATION	Withheld for data privacy/protection reasons
DATE OF APPLICATION RECEIPT	10 th September 2020
MODE OF SUBMISSION	Text message
CONTENT OF SUBMISSION	<p>Since last week representatives of Syrdarya region administrations have been working on the Project site. They didn't introduce themselves in a formal way. Currently, they are indicating some borders. I assume they measured and indicated borders for CCGT. We have asked them about the ongoing process. However, we didn't get a clear response. Then I went to People's Reception of Syrdarya region and asked them to make a cadastral registration for trees in my farm. They took copies of my documents and asked to come in few days. Bayavut administration also can't answer to our questions. I want to know:</p> <ul style="list-style-type: none"> • What happens if we cannot get cadastral registration for my trees? • Will it be compensated or not? • When can we expect the receipt of compensation? • Who will inform us on the beginning of construction works? • When will it happen?
RESPONSE 1 PROVIDED ON 15TH SEPTEMBER 2020	Farmer was notified that the message has been received and will be responded to within 2 weeks maximum or earlier.
RESPONSE 2 PROVIDED ON 17TH SEPTEMBER 2020	<ul style="list-style-type: none"> • The compensation of crops, trees and other assets on the farm will be conducted in accordance with the Uzbek law and lenders requirements (EBRD & IFC). The trees on the farm were logged into the inventory and will be valued at the full replacement cost. Once the valuation is complete, the compensation package will be disclosed to all the impacted farmers for review and comments. • The compensation schedule is under development and will be disclosed to all the farmers once the valuation process is completed. • No construction activities will be undertaken until the compensation package is discussed and disclosed to all the affected farmers and negotiations have been completed. • The Developer and EPC Contractor will provide the construction timeline and schedule once it has been confirmed but the Limited Notice to Proceed is scheduled for October while the Notice to Proceed will be between November/December.

NAME (INDICATE IF THE COMPLAINT IS PREFERRED TO BE ANONYMOUS)	Withheld for data privacy/protection reasons
CONTACT INFORMATION	Withheld for data privacy/protection reasons
DATE OF APPLICATION RECEIPT	12 th September 2020
MODE OF SUBMISSION	Text message
CONTENT OF SUBMISSION	<p>We have been working on farm "Usmon bobo avlodlari" that is located on Shirin Fruit and Vegetable Agro, Bayavut district, Syrdarya region since 2010. We grow rice on this farm. Total capacity of farm "Usmon bobo avlodlari" is 33.9 ha. In average we get 6 tons of rice from 1-hectare, overall yield from farm is 200 tons. Our land was taken to the local municipality's reserve fund and was allocated for the construction of CCGT. This means that we and our workers will lose the source of income. Considering above mentioned, could you please clarify for us the procedure of compensation payment for us and when we shall receive it?</p>
RESPONSE 1 PROVIDED ON 15TH SEPTEMBER 2020	<p>Farmer was immediately notified that the message has been received and will be responded to within 2 weeks maximum or earlier.</p>
RESPONSE 2 PROVIDED ON 17TH SEPTEMBER 2020	<ul style="list-style-type: none"> • The inventory of crops and trees and any other assets has been completed. We are now at the valuation process which will be at full replacement costs based on current market prices. Once the compensation package has been finalised, the implementation schedule will be prepared. As part of the disclosure process, the details of the compensation package and its implementation schedule will be made available to all the impacted farmers. In addition, the farmers will be allowed to provide feedback on the compensation package and negotiations will also take place. • The information about your workers will be collected by Juru Energy including details such as the number of workers, type of contract (permanent, temporary), monthly wages etc. Based on this the impacts to these workers will be determined and the type of assistance/support to be provided to them determined.

NAME (INDICATE IF THE COMPLAINT IS PREFERRED TO BE ANONYMOUS)	Withheld for data privacy/protection reasons
CONTACT INFORMATION	Withheld for data privacy/protection reasons
DATE OF APPLICATION RECEIPT	12 th September 2020
MODE OF SUBMISSION	Text message
CONTENT OF SUBMISSION	<p>I prefer to receive compensation payment directly to my bank account that I have opened for my farming activities. I do not want to receive compensation through local administration. In addition, I will not to sign for any confirmation document unless I receive compensation payment</p>

RESPONSE 1 PROVIDED ON 17TH SEPTEMBER 2020	<p>The compensation process will be carried out in accordance with the Uzbek and lenders (EBRD & IFC) requirements. As a result, after the valuation process is complete, a compensation package will be prepared for the affected farmers and an implementation schedule prepared. This will be disclosed to the farmers as part of the Livelihood Restoration Plan disclosure process and the farmers will be able to provide their feedback and grievances.</p> <p>If the Uzbek law requires that the compensation funds are disbursed through the local administration, the process will be monitored and audited externally on behalf of the Project lenders, and the all the impacted farmers will have access to the grievance mechanism (which is also audited on behalf of Project lenders) to submit their grievances.</p> <p>The same monitoring and auditing process will be followed even if the compensation funds are disbursed directly into the affected farmers accounts and the grievance mechanism will still be available.</p>
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NAME (INDICATE IF THE COMPLAINT IS PREFERRED TO BE ANONYMOUS)	Withheld for data privacy/protection reasons
CONTACT INFORMATION	Withheld for data privacy/protection reasons
DATE OF APPLICATION RECEIPT	12 th September 2020
MODE OF SUBMISSION	Text message
CONTENT OF SUBMISSION	<p>I work on the farm, that will be affected by construction of planned ACWA CCGT. I work on that part of farm which will be affected by Sanitary zone. I have my own territory on this farm but there are no documents that can prove my right for the land or any sub agreements with legal owner of the farm. However, I have fruit trees and other agricultural crops. My income depends on my farming activities. I saw that you have been working with other farmers by performing surveys and other works. There are also some farmers who are in the same situation as me. How we will be treated?</p>
RESPONSE 1 PROVIDED ON 17TH SEPTEMBER 2020	<p>At the moment we are still in the process of clarifying if farming activities will be impacted on the sanitary zone through consultations with relevant government agencies. However, under the international lender's requirements (EBRD and IFC) the following 3 main categories are recognised for compensation:</p> <ul style="list-style-type: none"> • Those who have formal legal rights to the land (including customary & traditional rights recognised under national laws). • Those who do not have formal legal rights to land at the time of the census, but who have a claim to land that is recognised or recognisable under the national laws. • Those who have no recognisable legal right to claim the land that they occupy. <p>We have the list of the farmers who are renting land from the Inom Turanboyev farm and the inventory of their farms within the project footprint has already been undertaken.</p> <p>If the sanitary zone will require farmers to stop farming, the inventory of crops/trees and any other assets on your farm will be</p>

	undertaken and valuation conducted to determine the compensation package. You will also be notified if the requirements of the sanitary zone affect your agricultural activities and notified in advance on when the valuator will visit your farm. After the valuation is complete the compensation package and its implementation schedule will be disclosed to all impacted farmers for their review and feedback.
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NAME (INDICATE IF THE COMPLAINT IS PREFERRED TO BE ANONYMOUS)	Withheld for data privacy/protection reasons
CONTACT INFORMATION	Withheld for data privacy/protection reasons
DATE OF APPLICATION RECEIPT	25 th September 2020
MODE OF SUBMISSION	Text message
CONTENT OF SUBMISSION	<p>To ACWA Power company From farmers of Shirin FVAC</p> <p>Application</p> <p>In regard to construction of new CCGT, we, undersigned farmers (names withheld for privacy reasons), would like to ask you to transfer money for compensation payment to our direct bank accounts.</p>
RESPONSE 1 PROVIDED ON 25TH SEPTEMBER 2020	Farmer was immediately notified that the message has been received and will be responded to within 2 weeks maximum or earlier.
RESPONSE 2 PROVIDED ON 6TH OCTOBER 2020	<p>The compensation process will be carried out in accordance with the Uzbek and lenders (EBRD & IFC) requirements. As a result, after the valuation process is complete, a compensation package will be prepared for the affected farmers and an implementation schedule prepared. This will be disclosed to the farmers as part of the Livelihood Restoration Plan disclosure process and the farmers will be able to provide their feedback and grievances.</p> <p>The Livelihood Restoration Plan will also include the compensation timeline and how the compensation funds will be disbursed i.e. through private bank accounts or local administration.</p> <p>If the Uzbek law requires that the compensation funds are disbursed through the local administration, the process will be monitored and audited externally on behalf of the Project lenders, and the all the impacted farmers will have access to the grievance mechanism (which is also audited on behalf of Project lenders) to submit their grievances.</p>

NAME (INDICATE IF THE COMPLAINT IS PREFERRED TO BE ANONYMOUS)	Withheld for data privacy/protection reasons
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CONTACT INFORMATION	Withheld for data privacy/protection reasons
DATE OF APPLICATION RECEIPT	9 th September 2020
MODE OF SUBMISSION	Text message
PROJECT CONTACT PERSON	Umida Rozumbetova
CONTENT OF SUBMISSION	<p>I am Anvarjon Urinboyev. I live in Julangar makhalla (community). We have so many unemployed people here. During the meetings with local community representatives of the Project mentioned that during the construction work there will be a chance to get a job. I am a mechanic (4th ranked). Previously I used to work in Syrdarya TPP. However, due to the lack of salary, I had to migrate to Russia and worked there. After I came back to Uzbekistan, I can't find any job. I would like to know:</p> <ul style="list-style-type: none"> • Will Project developer need mechanics for construction work? • When do you plan to start construction works?
RESPONSE 1 PROVIDED ON 15TH SEPTEMBER 2020	Farmer was notified that the message has been received and will be responded to within 2 weeks maximum or earlier.
RESPONSE 2 PROVIDED ON 16TH SEPTEMBER 2020	<ul style="list-style-type: none"> • The Limited Notice to Proceed for the Project is scheduled for October 2020. The Notice to Proceed will then be issued thereafter at least within a month or two (November/December). This will be confirmed once the Project schedule has been updated by the EPC Contractor. • The construction phase of the Project will require both skilled semi-skilled and unskilled labour. The list of local workforce provided to ACWA Power will be provided to the EPC Contractor for consideration based on the qualifications and project requirements.

The above individuals expressed their satisfaction with the responses provided and no follow up questions have been received from them.

5 STAKEHOLDER IDENTIFICATION AND ANALYSIS

5.1 Approach to Stakeholder Identification

A systematic approach to identify affected stakeholders has been used. This approach not only consider the projects but also put into consideration associated facilities, transport routes and areas potentially affected by cumulative impacts. The stakeholders identified have been classified into two categories:

- Impacted Stakeholders – those who can be potentially affected by one or more of the potential impacts of the project; and
- Interest-based Stakeholders – Stakeholders concerned with any of the procedures set by the Project, the Project's beneficiaries, national and international non-governmental organizations and the interested part of the civil society.

5.1.1 Impacted Stakeholders

The Impacted stakeholders are individuals or group of people that can be potentially affected by the Projects' environmental and social impacts either directly or indirectly. Potential environmental and social impacts of the Project have been identified and assessed in the ESIA and are related to land take, ecosystem services, socio-economics, terrestrial ecology, soil and groundwater, air emissions and ambient air quality, noise and vibration, water resources and water environment, waste and wastewater management, traffic and transportation, archaeology and cultural heritage, landscape and visual impacts, community, health, safety & security, etc. Such impacts can directly relate to stakeholders, including receptors that have been outlined in Sub-section 2.5 above.

According to the draft land lease agreement "By the Presidential Resolution No...dated...2020 (the Presidential Resolution), the President of the Republic of Uzbekistan authorized (i) the allotment and the lease by the Seller of the Site for the purpose of the Project and (ii) the Khokimiyat of Sirdarya region to execute the Agreement in the name and on behalf of the Government. Following the issuance of the Presidential Resolution, the Site has been allotted to the Seller pursuant to the land allotment orders dated...." This process is still ongoing.

The agreement will give the Project Developer the right to carry out any activities related to the Project and develop and administer the site on its own or through any person, agency or company.

Identified stakeholders that can potentially be directly impacted by the Project or its environmental and social impacts during construction, commissioning or operation are listed in the table below.

Table 5-1 Identified Potentially Impacted Stakeholders

IMPACTED STAKEHOLDERS	DESCRIPTION	JUSTIFICATION
Directly Impacted		
Land users (Economically displaced Project Affected People (PAPs))	Land users found within the Project footprint, associated facilities and the Health Protection Zone who will lose their land to the Project development.	These land users use the land for agricultural purposes which generate income for their households. The development of the Project has led to the termination of their land lease agreements which will impact their livelihoods.
Directly Affected Communities (thermal power plant, overhead line, access roads, cooling tower)	Local residential communities (the distance between CCGT area and the nearest local communities is approximately 300 meters)	Exposure to potential impacts relating to changes in ambient air quality, noise, visual impact, increased traffic(safety) etc. and consideration for potential grievances.
Vulnerable groups	Vulnerable groups in the Project area include unemployed youth, low-income families and women, female led households & persons living with disabilities.	These groups may be disproportionately impacted by the Project impacts such as those relating to Gender Based Violence & Harassment (GBVH), spread of diseases, labour/economic exploitation etc.
Indirectly Impacted		
Any other external groups who may occasionally visit the Project area	External groups who may visit the Project site occasionally for business, family visits or driving through the area etc	These groups may be occasionally exposed to changes relating to ambient air quality, noise, increased traffic etc while visiting the Project area.

5.1.2 Interest-Based Stakeholders

Interest-based stakeholders are groups or organisations that are not adversely affected by the Project but whose interests determine them as stakeholders. In addition, there are stakeholders outside the affected area, which can be identified through “interest-based” analysis. These are usually government authorities, NGOs and national, social and environmental public-sector agencies whose area of interest is related to the Project, or where such organisations are undertaking projects with communities in these areas.

The identified interest-based stakeholders for the project together with the project interests, stake holding and information requirements are presented in the table below.

Table 5-2 Identified Interest-Based Stakeholders

STAKEHOLDERS GROUP	INTEREST-BASED STAKEHOLDERS	PROJECT INTEREST/STAKE HOLDING
Government Bodies	Ministry of Energy of the Republic of Uzbekistan	Responsible for development of the Project
	Ministry of Agriculture of the Republic of Uzbekistan	Regulatory body overseeing environmental issues.
	Ministry of Water Resources of the Republic of Uzbekistan	
	Ministry of Employment and Labour Relations of the Republic of Uzbekistan	Statutory consultees (Monitor working place and environment)
	Ministry of Health	Statutory consultees Protection of employee and public safety; establishment of health and protection zones around the power plant
	Ministry of Emergency Situations of the Republic of Uzbekistan	Statutory consultees (Planning preparedness for emergencies)
	Ministry of Transportation	Overall body in charge of setting transportation requirements in Uzbekistan.
	Ministry of Culture	Interested in the location of cultural and archaeological sites.
State Committees	State committee of the Republic of Uzbekistan on Ecology and Environmental protection	Statutory consultees. Control with National environmental policy and protection standards. Responsible for approval national EIA.
Local governmental authorities	Shirin town khokimiyat	Responsible for providing government support in the development of the Project at the local level.
	Boyavut District khokimiyat	
	State Sanitary Surveillance Department in Bayavut	Responsible for determining the health protection zone in coordination with the National Agency for Sanitary and Epidemiology Surveillance under the Ministry of Health
	Makhalla Committee (citizen's local self-governance body),	Citizens' local self-government body overseeing different aspects of the community in coordination with the local government.
	Water-Users Association	Authority for irrigation water distribution between water users and water usage monitoring at the local level
	HLRI	Hydrogeological and Land Reclamation Inspection, body for operation and maintenance of drainage system
	"Uztransgas" JSC	Main gas supplier for the Project

STAKEHOLDERS GROUP	INTEREST-BASED STAKEHOLDERS	PROJECT INTEREST/STAKE HOLDING
Industrial and business organisations	“National Power Networks of the Republic of Uzbekistan” JSC	Owner of the grid the CCGT connected. Approval of grid connection study. Responsible for operation and exploitation of the grid
	Sirdarya branch of “National Power Networks of the Republic of Uzbekistan” JSC	Owner of the grid the CCGT connected. Approval of grid connection study. Responsible for operation and exploitation of the grid
	Sirdarya TPP	Will share gas consumption with the new CCGT, connected to the same gas control unit.
Research Institutions	Science Academy of the Republic of Uzbekistan	Interested in the location of cultural and archaeological sites.
Environmental Political Parties	Ecological party of Uzbekistan	Interested in the execution of the Project and its environmental impacts and mitigation measures.
Financial institutions	EBRD/DEG /MIGA (and possibly others)	Key interest in the project development and project success. Interest includes potential environmental and social risks related to project financing and reputational impacts.

6 STAKEHOLDER ENGAGEMENT PROGRAMME

Stakeholder engagement is an on-going process that will be undertaken during the construction, commissioning and operational phases of the Project. As applicable, the process intends to be transparent, free of intimidation, interference and coercion. The aim of this section is to describe what information will be disclosed, in what formats, the types of methods that will be used to communicate information and the consultation methods to be used with each of the stakeholder groups identified in the previous sections.

6.1 Engagement Methods

Due to travel and public assembly restrictions as a result of COVID-19, stakeholders will primarily be informed about the on-going stakeholder engagement process via:

- Phone calls and email - Suitable to engage interest-based stakeholders and to notify them of the engagement and disclosure mechanisms.
- Posters or Notices - Signboards and Illustrative posters (info graphics) will be placed at the Project entrance gate, including direct access to the grievance mechanism and;
- Social Media – This may include use of messaging platforms such as WhatsApp, Telegram, Zoom etc to communicate general information about the Project. Data privacy must be ensured and protected if a stakeholder database is established.

Following the lifting of travel and public assembly restrictions, the following methods in addition to those stated above will be used to inform stakeholders about the on-going stakeholder engagement process during construction and operations of the Project:

- Letters - Suitable to engage interest-based stakeholders and to notify them of the engagement and disclosure mechanisms.
- Meetings with community leaders- These can be informal meetings held with community leaders so as to maintain good relations with the community and address any concerns the community might have.
- Bilateral meetings - Suitable to engage impacted and interest-based stakeholders as identified, to allow these stakeholders provide their views and opinions and to notify them of the engagement and disclosure mechanisms.
- Online – Useful for Interest-based Stakeholders. The engagement and disclosure mechanisms for the ESIA package during the construction and operational phases of the project will be advertised on ACWA Power's website with a contact point provided for comment. The same will be available on the lending institution respective websites.

6.2 Disclosure of E&S Documents

The Project's ESIA and related E&S documents will be disclosed on the ACWA Power website where they will be accessible to the Project stakeholders. The ESIA Non-Technical Summary and SEP (including Grievance Mechanism) will be disclosed to the different stakeholders through meetings to the impacted and interest-based stakeholders as applicable and where COVID-19 related public assembly restrictions allow.

Table 6-1 ESIA Public Disclosure Timetable

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Disclosure of E&S documents	All identified stakeholder (impacted and interest-based).	Once approved and acceptable to the lenders, the ESIA and SEP will be fully disclosed online (in English & Russian). The documents are expected to be available at the website of ACWA Power prior to financial close. Where appropriate, stakeholders have the opportunity to comment or request additional information during this disclosure period.	Minimum 60-day disclosure period prior to financial close.
	Impacted Stakeholders	In the event that public assembly is restricted due to COVID-19, the NTS and SEP will be disclosed using short videos shared through existing community news messaging applications such as Telegram. The NTS will be disclosed in Russian and Uzbek.	

6.3 Stakeholder Engagement During Construction and Commissioning

Stakeholders most likely to be affected by construction and commissioning activities will be engaged leading up to and during the physical construction and commissioning of the Project. Stakeholder engagement during construction and commissioning will allow stakeholders to assess whether measures are working as intended, if grievances are being responded to and identifying alternatives where there are failings. Effective management of stakeholder engagement during the construction and commissioning phase is important as it can set the tone for the remainder of the project (ref. IFC, Handbook for Stakeholder Engagement).

Construction and commissioning related engagement processes are set out below and will be the responsibility of the EPC Contractor, although support from the Project Company is expected (to provide a local cultural context).

Table 6-2 Construction Phase SEP timetable

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Notify stakeholders of construction and commissioning activities including the timelines.	Directly and Indirectly Impacted Stakeholders (See Table 5-1)	Official notices will be posted at the site entrance and at strategic locations along the road south of the site to advise of construction and commissioning commencement.	Prior to the start of construction and commissioning phases. This will be updated as necessary within the construction and commissioning phases if there are changes to the planned activities or processes.
	Government Bodies and Local Government Agencies and Industrial and business organisations	Official emails or letters in coordination with applicable local authorities will be sent to provide information on construction and commissioning activities and timelines	
	Members of the Public International and Local NGO's, Environmental political parties International and Local Research Institutions	Notification of the Project construction and commissioning activities and timelines on ACWA Power's website (this will be part of the ESIA documents uploaded on ACWA Power's website).	
Communication of emergency preparedness and action plan	Residents in communities near the Project site, nearby farms and commercial entities	Bilateral meetings will be held with local authorities and community leaders to inform them of the emergency plan and to optimise with any concerns from their side. Based on the outcome of these meetings, it will be decided in coordination with local government whether bilateral meetings with the communities are necessary.	Prior to the start of construction and commissioning and updated if key changes to the plan occur.
	Government Bodies Local Government Industrial and Business Organisations Project Lenders	Official emails or letters informing the applicable agencies about the emergency response procedures in place and any required co-ordination for specific events.	

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
		Bilateral meetings will be held where necessary.	
Communication of GBV and SEA/SH Prevention and Response	Women, young girls and boys	Bilateral meetings will be held with women, young girls and boys in the communities near the Project site to educate them on reproductive health, STDs, gender-based violence and to encourage them to report any cases of GBV, SEA & SH.	On a quarterly basis throughout construction phase of the project
Independent Environmental & Social Monitoring & Reporting (to include GBV – SEA/SH prevention and response activities, number of grievances handled, SEA/SH awareness creation trainings provided for project staff, etc.)	Project Lenders	Environmental and Social auditing to evaluate Projects compliance with Uzbekistan standards, lender requirements and loan covenants.	On a quarterly basis throughout construction and commissioning phase of the Project.
Implementation of grievance mechanism	All identified stakeholders	As described in the grievance mechanism section of this SEP (see Section 7).	Established at the start of construction and commissioning phases and updated throughout to facilitate rapid and effective response.

6.4 Stakeholder Engagement During Operation

Stakeholder engagement during the operational phase of the Project will be the responsibility of the O&M Company, although it is expected that the Project Company will provide key support in order to ensure local cultural context during engagement activities.

It will be important for the Project Company and O&M Company to ensure a smooth transition between stakeholder engagements from construction and commissioning phase to operational phase of the Project by understating the techniques that have been most effective during construction and commissioning phases. It will be important to continue these

techniques to avoid decrease in the frequency of stakeholder engagements, as the stakeholders are already familiar with the typical processes for engagement.

Table 6-3 Operational Phase SEP Timetable

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Notify stakeholders of the transition from construction/commissioning to operations	Directly and Indirectly Impacted Stakeholders (See Table 5-1)	Official notices will be posted at the site entrance to advise of commencement of the operational phase of the Project.	
	Government Bodies and Local Government Agencies, Industrial and business organisations	Official emails or letters in coordination with applicable government agencies will be sent to provide information on operational phase activities and timelines.	At least 2 months prior to commencement of operations.
Upon development of and any updates related to the emergency preparedness and action plan, or other HSE related matters that may affect local external parties.	Residents in communities near the Project site, nearby farms and commercial entities	Bilateral meetings will be held with local authorities and community leaders to inform them of the emergency plan and to optimise with any concerns from their side. Based on the outcome of these meetings, it will be decided in coordination with local government whether bilateral meetings with the communities are necessary.	2 months prior to the commencement of operations and updated if there are key changes to the plan occur.
	Government Bodies Local Government Industrial and Business Organisations Project Lenders	Official emails or letters informing the applicable government agencies/authorities about the emergency response procedures in place and any required co-ordination for specific events.	

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
		Bilateral meetings will be held where necessary.	
Communication of GBV and SEA/SH Prevention and Response	Women, young girls and boys	Bilateral meetings will be held with women, young girls and boys in the communities near the Project site to educate them on reproductive health, STDs, gender-based violence and to encourage them to report any cases of GBV, SEA & SH.	On an annual basis throughout operational phase of the project.
Independent Environmental & Social Monitoring & Reporting (to include GBV – SEA/SH prevention and response activities, number of grievances handled, SEA/SH awareness creation trainings provided for project staff, etc).	Project Lenders and other interested stakeholders	Environmental and social auditing to evaluate projects compliance with Uzbekistan standards, lender requirements and loan covenants.	On an annual basis throughout operational phase of the project.
Implementation of grievance mechanism	All identified stakeholders—including project workforce	As described in the grievance mechanism section of this SEP (Section 7).	Established at the start of operations and managed throughout the entirety of the operational phase to facilitate rapid and effective response.

6.4.1 Periodic Independent Monitoring and Reporting

Independent monitoring and reporting of environmental and social impacts of the Project will be required to be undertaken periodically, during construction, commissioning and operational phase of the Project as per the Lenders Requirement.

It is expected that this will require quarterly independent E&S audits to be undertaken during construction and commissioning and annual audits during operations. This has been included to the SEP timelines above. The purpose of these audits will be to evaluate compliance with Project requirements, including those in Uzbekistan, as well as for the lenders and those linked to E&S elements of the loan covenants.

All audit reports will include a Non-Technical Summary (NTS) describing the auditing process, any identified non-conformances, how non-conformances identified in the previous audits

have been corrected (or if they remain open). The reports will be submitted to the Project Company and then further disclosed to the Project Lenders.

7 GRIEVANCE MECHANISM

The Project's activities (during construction, commissioning and operation) may result in potential nuisances for stakeholders, or environmental and social impacts and as such it is required to establish a grievance mechanism to address potential complaints from affected parties. The aim of the grievance mechanism is establishing a system to receive and facilitate resolution of the stakeholder's concerns and grievances about the Project's environmental and social performance.

The grievance mechanism is an important part of stakeholder engagement and will be in place from the E&S disclosure process, throughout construction and operations through the end of the Project life. The grievance mechanism will use an understandable and transparent process that is culturally appropriate and readily accessible at no cost; so, all stakeholders/affected parties will have the opportunity to raise a complaint.

The overall responsibility and accountability for the grievance mechanism will be held by the Project Company. However, implementation may be delegated and fall under separate parties depending whether the grievance is related to the construction, commissioning or the operational phases, i.e. EPC Contractor during construction and commissioning and O&M Company during operations.

7.1 Key Principles of Grievance Mechanism

The grievance mechanism for the Project will comply with the following principles:

- The purpose of the grievance mechanism procedure will be clarified at the outset;
- The process will be scaled to the risks and impacts of the Project;
- The process will be transparent and accountable to all stakeholders by putting it into writing, publicising it and explaining it to relevant stakeholders;
- The grievance mechanism will be made clear, understandable and easily accessible by providing information in the local language and orally where communities cannot read;
- Complaints or concerns will be rapidly resolved;
- The mechanism will not involve any costs nor retribution associated with lodging a grievance; and
- Precautionary measures such as clear non-retaliation policy, confidentiality measures and safeguarding of personal data collected in relation to a complaint, as well as an option to submit grievances anonymously will be in place.

7.2 Scope of Grievance Mechanism

The scope of the grievance mechanism is to evaluate and address stakeholders' problems and concerns regarding project activities, the implementation of mitigation and compensation measures as per the ESIA and environmental and social performance of the Project.

All relevant claims from affected stakeholders will be accepted and no judgment made prior to investigation, even if complaints are minor. This includes complaints in relation to gender-based violence, sexual exploitation and abuse, sexual harassment, conflict between project employees and community members etc.

However, according to good practice, the following claims will be directed outside of Project-level mechanisms:

- Complaints clearly not related to the project based on assessment of its legitimacy;
- Issues related to governmental policy and government institutions;
- Complaints constituting criminal activity and violence, which will be referred to the justice system; and
- Commercial disputes: Commercial matters will be stipulated for in contractual agreements and issues will be resolved through a variety of commercial resolution mechanisms or civil courts.

In the event that any of the grievances are rejected at the screening stage, the complainant will be informed of this decision including a justification why.

7.3 Steps in Managing Grievance Mechanism

7.3.1 Publicising Grievance Management Procedures.

The grievance mechanism of this Project will be publicised using the means outlined and as linked to the disclosure processes. In addition, notices will also be provided at the Project entrance in regard of how to lodge a grievance and the process related to follow up. The information provided will be available in both English, Uzbek and Russian and will include the following:

- What Project-level mechanisms are capable of delivering and what benefits complainants can receive from using the company's grievance mechanism, as opposed to other resolution mechanisms;
- Who can raise complaints (i.e. all stakeholders);
- Where, when, and how community members can file complaints;
- Who is responsible for receiving and responding to complaints;

- What sort of response complainants can expect from the company, including timing of response; and
- What other rights and protection are guaranteed.

7.3.2 Submitting a Grievance

Upon raising awareness and publicising the mechanism, grievances may be submitted by:

- Direct delivery to a sealed grievance box at the project site entrance;
- Submission by post or email; and
- Directly received by project personnel, including security personnel (security personnel at the Project's gate must be aware and trained to deal with any grievances appropriately).

Information will be provided at the Project entrance, at the location of grievance boxes to inform people about the process and timeline to follow up their grievances.

For illiterate complainants or those that prefer to submit their grievances verbally, they will have the possibility to meet with the relevant site E&S/HSE Manager who will take notes on the details of the complainant and read them out loud to the compliant to confirm that the key elements of the complaint have been captured. Where the respective manager is not available, security staff will take the grievances and ensure these are registered via the formal grievance process.

If an anonymous grievance (e.g. letter or email without details about the complainant) or the grievant requests to remain anonymous is submitted, the grievance will also be accepted and processed.

7.3.3 Keeping Track of Grievances

Upon receiving grievances submitted by any means mentioned above, the steps below will be followed to ensure all grievances are adequately investigated in order to avoid leaving any issues or concerns raised opened.

- The grievance will be recorded in a form of register. The register will contain:
 - Details of the grievance;
 - The personnel/division(s) responsible for resolving the grievance;
 - Process tracking fields (receipt dates, status, result dates);
 - Response provided to the complainant;
 - Corrective and preventive actions taken to prevent reoccurrence of such complaint; and

- The grievances will be acknowledged as soon as possible (no later than a week from reception) by sending a formal confirmation with a complaint number and a timeline for response to the complainant to assure the complainant that the organization is responding properly.
- In cases of sensitive grievances, such as those involving multiple interests and a large number of affected people or those relating to sexual abuse and harassment or gender based violence, where a more complex investigation is required, the complainant will receive an update within two weeks of the grievance being received, explaining the actions required to resolve the complaint, and the likely timeframe; and
- The Project Company will explain in the first letter of acknowledgment, which claims are clearly outside the scope of the mechanism and what alternative mechanisms communities can use to address these potential issues.

7.3.4 Reviewing and Investigating Grievances

Depending on the circumstances of complaints made, various departments may need to be involved in resolving the complaints. The person(s) responsible for handling grievance will organize the process to validate the complaints legitimacy and arrange for investigation of details.

When grievances are complex and cannot be resolved quickly, an extensive investigation may be required to prevent escalation of the issue. The responsible and accountable party remains the Project Company, although the investigation and review may be delegated to the EPC Contractor or O&M Company respectively. The grievance mechanism must conform to the principle of 'no cost'. If the investigation team is formed internally, issues that will be taken into consideration include potential conflicts of interest, qualifications, gender composition, and budget. Meetings with complainants and site visits will be undertaken, as appropriate.

All grievances will be investigated by the responsible Project party within 2 weeks of submittal. Where grievances require a longer duration for investigation, the grievant will be informed of this delay and advised of the expected timeline for a response.

In cases of sensitive grievances - such as those involving multiple interests or those relating to sexual abuse and harassment or gender-based violence or community related conflict- it may help to engage outside organizations in a joint investigation, or allow for participation of local or national authorities only if the complainants agree to this approach.

7.3.5 Grievance Resolution Options and Response

The approach used in resolving various types of grievances will be different depending on the nature of the issue, frequency of occurrence and the number of grievances. Rather than prescribing a specific procedure for each particular type of complaint, the flexibility of the

grievance mechanism allows for resolution options appropriate for different types of grievances to be provided. For example, these options may include altering or halting harmful activities or restricting their timing and scope (e.g. for construction dust, or access road noise), providing an apology and revising the stakeholder engagement strategy.

Resolution to the grievance will be communicated to the grievant either in written format or verbally depending on what format the grievant has selected as preferred, but in all cases a written record will be kept by the Company. In cases where the grievance/claim is rejected or where the company does not require action, the company representative will be diplomatic when informing the grievant about the outcome of the eligibility review process so as to prevent conflict from escalating.

Where the claim is accepted, a proposed solution will be provided and communicated to the grievant within a stipulated period. If the grievant does not accept the proposed resolution, the company would re-assess the situation, discuss and clarify the finding with the grievant and make sure that all alternatives within the grievance mechanism are explored. If the grievant is still not satisfied with the proposed resolution, the grievant will be allowed to take the dispute resolution mechanism outside of the company grievance mechanism (external mechanism).

Where a proposed solution is accepted or agreed upon by all parties involved, the case will be closed out and evidence that necessary actions have taken place will be collected. Such evidence includes:

- Conducting a meeting with the complainant to reach a collective agreement or get a confirmation and file it along with the case documentation to close out the claim; and
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how they were resolved.

Where the grievant is not satisfied with the outcome of the proposed resolution, actions concerning further discussion and re-assessment shall be completed and advised within 2-weeks of notification of dissatisfaction by the grievant.

7.4 Grievance Mechanism in Construction and Commissioning Phase

The construction and commissioning phase will require two separate grievance mechanisms to be implemented for the following parties:

- Internal parties; Construction and commissioning personnel, workers, project staff, (including sub-contractors' staff and visitors); and
- External parties.

Although the Project Company will remain responsible and accountable, the EPC Contractor will manage internal and external grievance mechanisms. A member of staff will be assigned the responsibility to receive and follow up on all grievances. They will also be required to train related staff (as outlined below). Grievances will be investigated by the EPC Contractor and may require co-ordination with the project company or other sub-contractors. All received grievances will be acknowledged within a week of receipt, or quicker depending on the urgency of the grievance.

Adequate resources will be allocated to the assigned staff member responsible for managing stakeholder engagement. This designated staff member will also be responsible for following up and managing grievances. An additional team or part of an existing team may support the member of staff; however, the staff will be experienced in engagement processes and will be familiar with the lender requirement for stakeholder engagement.

7.4.1 Internal Parties/Worker Grievance Mechanism

The internal grievance mechanism will be made available for all construction and commissioning personnel associated with construction and commissioning activities to enable them make work related concerns. This includes all those employed by the Project Company, EPC contractor, sub-contractors, any other related contractors and project site visitors. All construction and commissioning personnel will be made aware of the grievance mechanism during their employment inductions at the project site and in employment documents.

Grievances of construction and commissioning personnel will be made in writing to the EPC Contractor via a specific grievance form (see example grievance form in Appendix A). The grievance form will be made available at key locations on-site (e.g. administration block, canteen area, and office locations) as well as at any staff accommodation area. The grievance form will be available in Uzbek, Russian, English and any other languages of Project staff. Where the complainant is illiterate, the complaint can be made verbally in confidence to a manager, so that the manager will complete the grievance form on behalf of the grievant.

Grievance forms will include contact details of the complainant; however, a grievance can be raised anonymously if desired. Grievance forms will be posted in a sealed and locked 'post box', located at all key locations where grievance forms are available. The grievance box will be checked on a regular schedule several times a week. If a verbal grievance is preferred this can be specified by the complainant at the time of raising the grievance and the responsible staff will also record the grievance received and register it via the formal process.

Responses to grievances will be transparent and free of retribution. Follow-up to grievances will be completed on a grievance follow up form and signed off by the EPC Contractors grievance control representative. The follow up form will state all actions taken to resolve the

grievance and any further dialogue that had ensued, as well as any future monitoring of the situation or other planned actions. The completed and signed off forms will be kept in a dedicated grievance mechanism folder on site, which will be made available for review to the external independent environmental and social auditors during the periodic environmental and social audits required during the construction and commissioning phase.

7.4.2 External Parties/Local Community Grievance Mechanism

External grievance forms will be made available in Uzbek, Russian, English at the site entrance gate. Sealed and locked 'grievance boxes' will be made available at the Project site entrance for grievance form submission. The contact details of the E&S Manager will be advertised at the notice board at the site's main entrance gate, once the individual has been appointed. The process for recording, reviewing, following up and responding to will be the same as detailed in sub-section 7.3.

Where external complaints are received by telephone, letters or email these will also be formally recorded and followed up appropriately by the designated representative. The solution to the grievance will be communicated to the grievant depending on the format the grievant has selected as preferred. In cases where the grievance/complaint is rejected, the company representative will be diplomatic when informing the grievant about the outcome of the resolution process so as to prevent conflict from escalating.

The company would re-assess the situation, organise a meeting with the complainant and local community members responsible for arbitration during conflicts or mediating of conflicting groups to discuss and clarify the findings and make sure that all alternatives within the grievance mechanism are explored.

Formal records of the grievance submission, investigation, determination of root cause (if any), corrective and preventative actions and any follow up (including monitoring) will be recorded in a grievance follow up form and maintained as documented information.

The follow up form will state all actions taken to resolve the grievance and any further dialogue that had ensued, as well as any future monitoring of the situation or other planned actions. The completed and signed off forms will be kept in a dedicated grievance mechanism folder, which will be made available for review to external parties such as independent environmental and social auditors.

7.5 Grievance Mechanism in Operational Phase

The grievance mechanism in the operational phase of the Project will be similar to that of the construction and commissioning phase. The grievance mechanism will be available for both internal parties (site workers) and external parties.

A member of staff will be assigned and responsible for managing internal and external grievances received (recording, reviewing, investigating and responding) appropriately. Internal grievance forms will be made available in Uzbek, Russian and English at key locations on-site with a sealed and locked 'post box' available for submitting grievance at every location. The post box will be checked regularly.

External grievance forms will be made available in both Uzbek, Russian and English at the site entrance gate. Sealed and locked 'grievance boxes' will be made available at the Project site entrance for grievance form submission. The process for recording, reviewing, following up and responding to will be the same as detailed above. All grievances during operations will be recorded for a minimum of 5 years, with records being kept on site.

Where external complaints are received by letters or email these will also be formally recorded and followed up appropriately by the designated representative. The contact details of the E&S Manager will be advertised at the notice board at the site's main entrance gate, once the individual has been appointed.

7.6 Grievance Mechanism Contact Details

The following details will be provided to the stakeholders in order to be able to submit their grievances or comments regarding the proposed Project.

Table 7-1 Stakeholder Engagement - Grievance Mechanism Contact Details

COMPANY	CONTACT DETAILS
Project Developer ACWA Power	Sherzod K Onarkulov Tel: +998 71 238 9960 Email: Sonarkulov@acwapower.com
Project Company ACWA Power Sirdarya FE LLC	International Business Center Block-A, 13 th Floor 107-B, Amir Temur Avenue Tashkent, 100084, Uzbekistan Telephone number: To be confirmed Email: To be confirmed
EPC Contractor China Gezhouba Group International Engineering Co., LTD (CGGC)	To be confirmed
O&M Company First National Operation and Maintenance Co. Ltd (NOMAC)	To be confirmed

The Project Company, EPC Contractor and O&M Company's contact details will be confirmed before the commencement of the construction and operational phases as applicable.

7.7 Process Flow and Timeline

Table 7-2 Grievance Process and Timeline

STAGE	TIMELINE
Grievance Received/Submitted	-
Grievance logged and acknowledged	Within 1 week of grievance being submitted
Grievance investigated	Within 2 weeks of grievance being submitted*
Proposed resolution conveyed to grievant	Within 2 weeks of grievance being submitted
If applicable following dissatisfaction of resolution by Grievant	
Actions to re-assess grievance/propose new solution/inform Grievant of final decision	Within 2 weeks of notification of dissatisfaction by Grievant
In the event that a grievance cannot be resolved between the two parties a mediator will be involved i.e. local leaders who understand the culture and practices within the Project site.	Within 2 weeks of notification of dissatisfaction by the Grievant.

*Where complex grievances, or other factors are extending the investigation time, the Grievant will be informed of this delay and advised of an updated expected timeline for response.

7.8 Training

- It will be the responsibility of Project management to endorse the grievance mechanism and ensure that they are aware of the availability of this process. It is also necessary for Project management to ensure that personnel are allocated to manage the grievance mechanism;
- These personnel shall be made fully aware of the outlined grievance mechanism and have access to this document to ensure that they can undertake the necessary duties for effective implementation; and
- As grievances can be submitted/taken at the Project entrance, it will be necessary to ensure that security staff are trained in regard to this process and have access to this document and any applicable forms, contact details of responsible project parties etc.
- All staff will be advised of the availability of the grievance mechanism in the Project induction, including its key features such as how to submit gender-based violence & harassment incidences, processes and where to access it.

8 IMPLEMENTATION PLAN

In order for this Stakeholder Engagement Plan to function effectively, it is important to determine a management structure and assign suitable personnel(s) to implement and manage this Stakeholder Engagement Plan.

8.1 Roles and Responsibilities

Note: The roles below will need to be revised upon finalisation of Project staff and responsibilities on-site.

The responsibilities of the HSE Manager, Environmental and Social Manager and Community Liaison Officer are to be outlined below once confirmed by the EPC Contractor and O&M Company respectively.

8.1.1 HSE Manager

NAME	
CONTACT DETAILS	

The HSE Manager is responsible for:

- Ensuring stakeholders are recognised as partners in the development and delivery of strategic goals;
- Assisting the stakeholder management unit to effectively consult and engage stakeholders;
- Advising Senior Management of issues and/or risks to stakeholder relationship as soon as they arise so risk can be managed effectively;
- Supporting the implementation and management of the SEP;
- Getting involved in stakeholder engagement activities that relate directly to HSE concerns or emergency planning; and
- Engaging with any external stakeholders with respect to emergency planning, drills, and instances of emergency as appropriate.

8.1.2 Environmental and Social Manager

NAME	
CONTACT DETAILS	

The EPC Contractor will employ/nominate the Environmental and Social Manager during the construction and commissioning phase and the O&M Company during the operation phase.

The Project Company HSE Manager will oversee the Environmental and Social Manager. The Environmental and Social Manager is responsible for:

- Implementation of all aspects of the SEP ensuring that the Project is compliant with lenders requirements;
- Identifying stakeholder issues and acting appropriately to address those issues.
- Ensuring that the SEP and the available engagement methods are publicised by the Community Liaison Officer;
- Ensuring that Project personnel are well briefed in regard to the SEP and grievance mechanism (including security personnel), and that the required resources (e.g. vehicles, company phones, office materials) are provided;
- Ensuring stakeholder meeting and disclosure of information are managed properly.
- Supervising the processing and resolution of all grievances; and
- Supervising the independent periodic monitoring and disclosure of the non-technical summary of the audit reports and of the full reports if required.

8.1.3 Community Liaison Officer

NAME	
CONTACT DETAILS	

In order to maintain regular communication with affected stakeholders, a Community Liaison Officer (CLO) will be employed/nominated (this role may be shared by the nominated E&S Manager). The CLO will be knowledgeable about the project region and will be able to speak local language. The responsibilities of the CLO include:

- Identifying, informing and recording public views, opinions & grievances and or relaying them to the necessary personnel for follow up;
- Setting up a grievance complaint tracker system to keep track of the type of complaints filed, the complainant and status of each complaint;
- Publicising & Distributing information to applicable stakeholders and translation of the material into applicable languages;
- Handling minor, straightforward issues such as those related to a complainants request for information;
- Obtaining clarification from other members of management in regard to dealing with specific grievances, such as a need to notify the Project Company (or other Project parties) in regard to the content or response to specific grievances;
- Ensuring all received external grievances are properly recorded, addressed and managed within the specified timelines as detailed in this procedure; and
- Keeping up to date with any changes in compliance obligations with respect to stakeholder engagement and grievances.

8.2 Evaluation

The following Key Performance Indicators (KPIs) should be considered to evaluate the progress or successful implementation of the SEP. KPIs should be accounted on a monthly basis.

- Number (per type) of grievances related to local community health, safety and security (injuries, damage, diseases, etc.);
- Number of incidents causing injuries/damage to community member(s);
- Number of incidents offsite that could have caused injuries or loss of life/property to community member(s);
- Number of project training/inductions provided to workers on a monthly basis, number of attendees and number of new employees;
- Number of women employed;
- Number of education and awareness training on reproductive health, STDs and HIV/AIDS provided to women & adolescent girls residing in the project's area of influence;
- Number of awareness training provided to all project workers in regards to SEA/SH risks;
- Number of mandatory regular training and awareness provided to workforce about gender-based violence and harassment towards local community members (including women) and their colleagues especially women;
- Number of grievances received and resolved in regards to SEA, SH and GBV etc.;

9 REVIEW

As stated herein, the SEP is a living document that will be utilised in the ESMS throughout the project's lifecycle as a reference document. As such, there is a need to continuously update the SEP as necessary to include any relevant changes such as changes in projects circumstances, new requirements, new affected stakeholders, reviews of techniques, changes to engagement methods, changes of relevant personnel, changes to grievance mechanism, etc.

As a minimum, the SEP will be reviewed on an annual basis, with the aim of achieving continual improvement.

APPENDIX A – EXAMPLE OF GRIEVANCE FORM

GRIEVANCE FORM	
<p><i>To be used for grievance(s) only. Shall not be used to raise comments, suggestions, or/and inquiries or any other matters</i></p>	
INSTRUCTIONS	<p>Please fill in this Grievance form in clear handwriting and submit through one of the following means:</p> <ul style="list-style-type: none"> - Directly to Environmental & Social Manager - By email to: - Deposit in the letter box at the Project main entrance
Full Name	<input type="text"/> First Name:
	<input type="text"/> Last Name:
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> I wish to raise my grievance anonymously (You can remain anonymous if you prefer but we will not be able to contact you with a response to your concern)
	<input type="checkbox"/> By Post: Please provide mailing address:
	<input type="checkbox"/> By telephone:
	<input type="checkbox"/> By email:
Preferred Language of Communication	<input type="checkbox"/> Uzbek
	<input type="checkbox"/> Russian
	<input type="checkbox"/> English
Description of Incident/Grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident/Grievance	<input type="checkbox"/> One-time incident/grievance (date...)
	<input type="checkbox"/> Happened more than once (how many times?)
	<input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Signature:	
Date:	