



200 MW PHOTOVOLTAIC POWER PROJECT, BENBAN – ASWAN, ARAB REPUBLIC OF EGYPT

STAKEHOLDER ENGAGEMENT PLAN

Prepared for:

INFINITY POWER HOLDING – HASSAN ALLAM UTILITIES CONSORTIUM

March 2025



Document Information

PROJECT NAME	200 MW Photovoltaic Power Plant, Benban, Egypt
DOCUMENT TITLE	Stakeholder Engagement Report
CLIENT	Infinity Power Holding – Hassan Allam Utilities Consortium
EDG PROJECT MANAGER	Yousra El Meshawy
EDG PROJECT DIRECTOR	Mostafa Saleh

Issue and Revision Record

VERSION	DATE	DESCRIPTION	AUTHOR	REVIEWER	APPROVER
1	18/11/2024	SEP Report	HA	MS	RF
2	10/12/2024	Revised SEP Report	HA		
3	30/1/2025	Revised SEP Report	HA		
4	27/2/2025	Finalized SEP Report	HA		
5	25/3/2025	Finalized SEP Report	HA		

Disclaimer

EDG cannot accept responsibility for the consequences of this document being relied upon by any other party or being used for any other purpose.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from the party which commissioned it.

This document is issued for the party which commissioned it and for specific purposes connected with the above-identified project only. It should not be relied upon by any other party or used for any other purpose.

CONTENTS

1	Introduction.....	6
1.1	Scope and Objectives	6
1.1.1	Applicability.....	6
1.1.2	Effective Date.....	6
1.2	Plan Structure	7
2	Project Description	7
2.1	Project Overview	7
2.2	Location	8
3	Regulatory Framework.....	10
3.1	National Requirements.....	10
3.2	EBRD Requirements.....	10
4	Stakeholder engagement for the project.....	11
4.1	Stakeholder Identification and analysis	11
4.1.1	Stakeholder identification	11
4.1.2	Identified stakeholders	12
5	Stakeholder engagement programme	19
5.1	Previous stakeholder engagement activities	19
6	GRIEVANCE MECHANISM	25
6.1	Scope of Grievance Mechanism	25
6.1.1	Publicising Grievance Management Procedures	26
6.1.2	Access to Grievance Mechanism	26
6.1.3	Anonymous Grievances	26
6.1.4	Gender-Based Violence and Harassment (GBVH) Grievances	27
6.2	Community Grievance Mechanism.....	27
6.3	Worker Grievance Mechanism.....	27
6.3.1	Construction Phase	27
6.3.2	Operational Phase	31
6.4	Training.....	31
7	Performance Monitoring.....	31
7.1	Ongoing Monitoring	31
7.2	Internal and External Audits.....	32
7.2.1	Internal Audits.....	32
7.2.2	External Audits	32
7.3	Recording and Reporting.....	32
7.3.1	Recording	32

- 7.3.2 Reporting..... 33
- 8 Communication 33
 - 8.1 Communication within Project Management 33
 - 8.2 Communication with Contractors 33
 - 8.3 Communication with Regulators and the Community..... 33
- 9 Roles and Responsibilities 35
 - 9.1 PROJECT OWNER – SPV ROLE 35
 - 9.1.1 SPV Director..... 35
 - 9.1.2 Head of Delivery..... 35
 - 9.1.3 Environmental and Social Supervisor..... 36
 - 9.1.4 Project Community Liaison Officer (CLO)..... 36
 - 9.1.5 All SPV Management 36
 - 9.2 EPC ROLE 36
 - 9.2.1 EPC's Labor Compliance Officer 36
 - 9.2.2 EPC Contractor 36
 - 9.3 FMC Role..... 37
- 10 Annexes..... 38
 - Annex A: Grievance Form 38
 - Annex B: Grievance Register 40
 - Annex C: Grievance Resolution Form 41
 - Annex D: Stakeholder Engagement Log..... 42
 - Annex E: Project organigram..... 43
 - Annex F: FMC's Community Grievance Mechanism..... 44

LIST OF FIGURES

Figure 1. Location of the Benban Solar Park.....	8
Figure 2. Locations of the project plots in the Benban Solar Park.	9
Figure 3 WGM Flow Chart as provided by IH consortium.....	30
Figure 4 Project Staffing Chart as provided by IH consortium.Chart Source is in Annex F.....	35

LIST OF TABLES

Table 1 Detailed Stakeholder List.....	13
Table 2 Stakeholder Engagement Programme.....	20

Abbreviations & Acronyms

BSP	Benban Solar Park
BSDA	Benban Solar Developer Association
CAA	Competent Administrative Authority
CLO	Community Liaison Officer
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EDG	Environment and Development Group
EEAA	Egyptian Environmental Affairs Agency
EETC	The Egyptian Electricity Transmission Company
EHS	Environmental, Health & Safety
ESA	Environmental and Social Assessment
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management Systems
GIIP	Good International Industry Practice
HAU	Hassan Allam Utilities
IFC	International Finance Cooperation
ILO	International Labor Organization
IPH	Infinity Power Holding
IH	Infinity Power Holding – Hassan Allam Utilities
PPE	Personal protective equipment
PS	Performance Standards
SEP	Stakeholder Engagement Plan
UN	United Nations

1 INTRODUCTION

The Infinity Power Holding – Hassan Allam Utilities - Consortium (the “Consortium”) has been awarded the contract to develop the 200MW PV project on five plots in the Benban Solar Park. The Project award includes the design, engineering, permitting, procurement, construction, commissioning, performance testing, operation and maintenance of the PV plants. The Consortium has appointed Environment and Development Group (EDG) to prepare this Stakeholder Engagement Plan (SEP) as part of the project’s environmental and social management plans (ESMP)s for the construction and operations phase of the project.

1.1 SCOPE AND OBJECTIVES

This stakeholder engagement plan (SEP) is prepared for the 200 MW Photovoltaic Power Project in the Benban Solar Park (BSP) – Aswan, Arab Republic of Egypt. It is developed as part of the project’s construction, and operations phases ESMPs and is to be read in conjunction with other relevant ESHS plans.

The scope of the SEP is stipulate the procedures to efficiently manage and facilitate future engagements with stakeholders through various stages of the project lifecycle. It outlines the minimum requirements for implementation of the stakeholder engagement program for all contractors and subcontractors working on and/or involved in the construction and operations of the project. The plan is in line with IH’s consortium’s business objectives, which aim to effectively manage risks and secure alignment with ESHS national requirements, as well as EBRD’s performance requirement and other international standards and best practices.

The objective of this plan is to promote and provide means of adequate consultation, engagement, open dialogue, and information disclosure with all project stakeholders, especially potentially affected communities. It will aim to:

- identify the key stakeholders that may be affected by the project or may influence the outcome of the project;
- define processes to inform the identified stakeholders about the project and to manage stakeholder expectations;
- understand current and potential emerging issues and to capture views and concerns of the relevant stakeholders with regard to the project;
- provide a basis for Develop/outline a participatory approach to ensure stakeholder inputs in environmental and social impact identification, prevention and mitigation;
- propose a platform to engage and communicate with the project; and
- establish a grievance mechanism that will be implemented for the Project.

1.1.1 Applicability

This plan applies to all project activities related to the 200MW PV project on five plots in the Benban Solar Park. It will be implemented by the Developer in collaboration with FMC and all project contractors and subcontractors working on and/or involved in the construction and operations, phases, as relevant to their scope of work.

1.1.2 Effective Date

The plan will be effective with the disclosure of the SEP. It is considered a “live document”, and will be utilized throughout the lifecycle of the project in order to guide the necessary engagement with identified stakeholders at the various project phases.

In this instance, the SEP cannot be considered definitive for the lifetime of the project. As such, the SEP will evolve over time as the project progresses and will be updated as necessary to include any relevant changes (e.g. new processes, requirements, affected stakeholders, changes to engagement methods, etc.).

1.2 PLAN STRUCTURE

The plan outlines the management requirements for the project's stakeholder engagement, it is considered as part of the overall environmental, and social management system (ESMS), and is structured as follows:

- Section 1 and 2: Brief introduction to the project and the plan.
- Section 3: Overview of the national and international regulatory framework
- Section 4: Outlines detailed information on the project with regards to the scope of this plan.
- Section 5: Outlines management measures required.
- Section 5: Training needs for ensuring proper implementation of this plan.
- Section 6: Performance monitoring procedures for this plan.
- Section 7: Communication methods for this plan
- Section 8: Overview of the roles and responsibilities in implementing the measures of this management plan.

The plan is supported by the following annexes:

- Annex A: Grievance Form.
- Annex B: Grievance Register.
- Annex C: Grievance Resolution Form.
- Annex D: Stakeholder Engagement Log
- Annex E: Project SPV Organigram.
- Annex F: FMC's Grievance Mechanism

2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The PV Plant will be developed by a consortium comprising Infinity Power Holding (IPH), and Hassan Allam Utilities (HAU). This consortium structure provides a robust foundation for meeting project objectives through a balanced mix of international experience and local insights.

The proposed Benban Solar Park is a cornerstone in Egypt's renewable energy transition, designed to reduce reliance on fossil fuels and to contribute to lowering greenhouse gas emissions. The Battery Energy Storage System (BESS) component enhances the PV plants' reliability by supporting energy supply during non-sunlight hours, thus minimizing grid intermittency and maximizing the contribution of solar power to Egypt's energy mix. Given the scale of the Benban Solar Park, a Strategic Environmental and Social Assessment (SESA) was commissioned by NREA with support from the European Bank for Reconstruction and Development (EBRD) in 2016. This high-level assessment manages the cumulative environmental, health, safety, and social impacts of all Benban projects. The SESA framework ensures compliance with national regulations and international standards and outlines mitigation and monitoring strategies, particularly important for this remote, uninhabited desert location. Moreover, the Due Diligence Assessment commissioned for this assignment, further ensures the project's compliance with national regulations and EBRD performance requirements.

2.2 LOCATION

The Benban Solar Park, including this project sites is administratively within the Daraw Administrative Center (*Markaz Daraw*) of the Governorate of Aswan in Upper Egypt. It covers 37.2 square kilometers of desert land owned by the New and Renewable Energy Authority (NREA). Its total capacity is expected to be 1.8 GW. The park is located about 650 km south of Cairo, 40 km northwest of Aswan city, 15 kms west of the River Nile and approximately 1 km west of Aswan-Luxor Highway (Figure 1). The closest populated village is Benban village located approximately 12km to the east.

Five plots have been allocated to the project (140-70-70-20 MWp + 60 MWh for BESS) covering a total area of 4.3 km² (Figure 2).



Figure 1. Location of the Benban Solar Park.

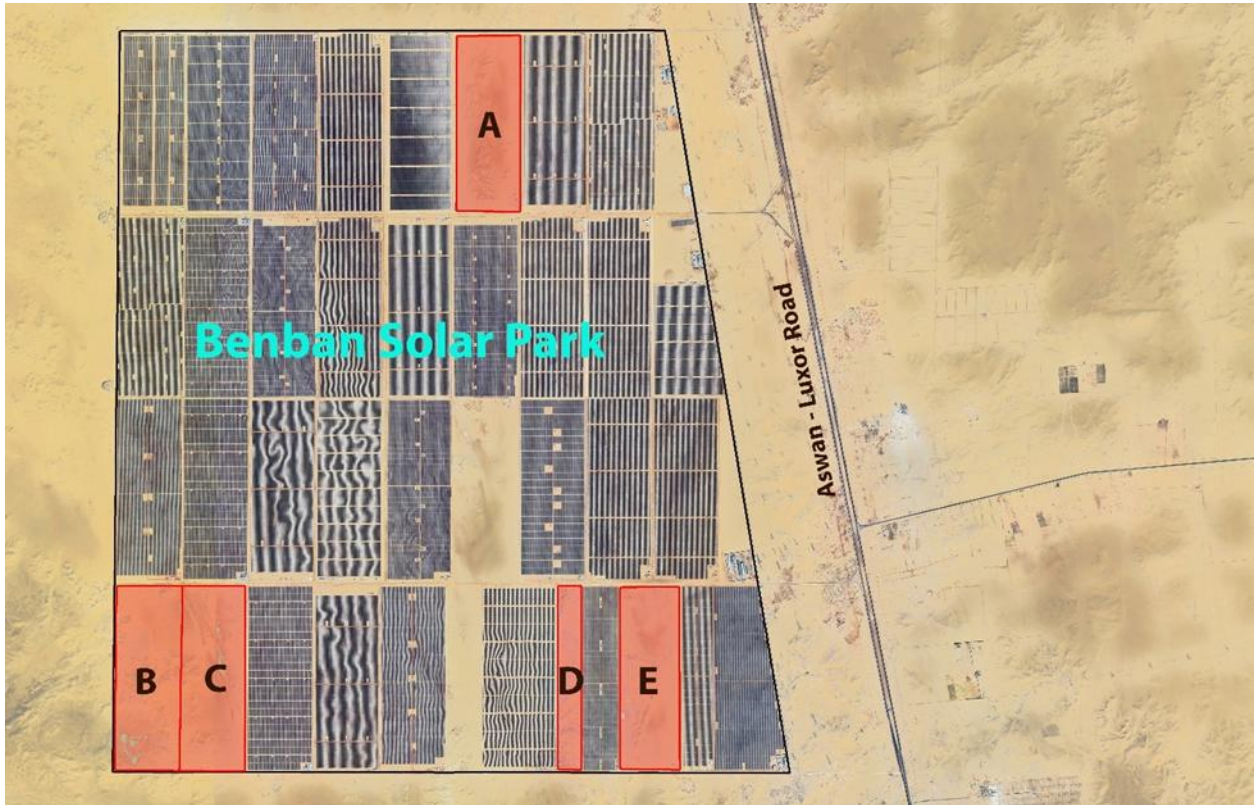


Figure 2. Locations of the project plots in the Benban Solar Park.

The following are key features of the project:

- **Total Capacity:** 200 MW of solar PV generation, contributing to Egypt's renewable energy grid.
- **Energy Storage Component:** Battery Energy Storage System (BESS), which enhances grid stability by storing surplus energy for use during peak demand or low solar production periods.
- **Technology and Design:** Advanced PV modules with optimized orientation and tracking systems to maximize energy yield. The design aims to minimize land impact and ensure efficient use of space.
- **Project Timeline:** Construction is scheduled to commence by the **end of December 2024** to meet the target **Commercial Operation Date (COD) of June 2025**. This timeline allows for the efficient mobilization of resources and timely completion of all critical construction and commissioning activities.

3 REGULATORY FRAMEWORK

This chapter presents the regulatory requirements for conducting Stakeholder Engagement for the Project in accordance with Egyptian national regulations as well as international guidelines, standards and good practices.

3.1 NATIONAL REQUIREMENTS

Engagement processes are only required in Egypt during the Project ESIA for certain categories of Projects. There are no specific requirements for on-going consultation/engagement post approval of the ESIA.

It is noted that public consultation during the ESIA process is not a requirement for Category B Projects as stipulated by EEAA ESIA guidelines. "The involvement of the public and concerned entities in the ESIA planning and implementation phases is mandatory for Category C projects (the equivalent of Category A in most international guideline) through the public consultation process with concerned parties." (Ministry of State for the Environment Egyptian Environmental Affairs Agency, 2009). This 200MW PV Project is categorized as a Category "B" project by EEAA.

EEAA guidelines require that ESIA for category B projects to "be posted on EEAA website, excluding any sections that include sensitive information related to commercial, technical and security issues. Electronic copies of category B forms and scoped EIA will be stored in the electronic library of EEAA EIA Central Department, and the original forms and scoped studies will be stored at the Regional Branch Offices (RBOs) responsible for the areas where the projects are located. The involvement of the public and concerned entities in the ESIA planning and implementation phases is mandatory for Category C projects through the public consultation process with concerned parties." (Ministry of State for the Environment Egyptian Environmental Affairs Agency, 2009)

In addition, Presidential Decree No. 314 of 2017 established a national electronic grievance portal dedicated to receiving, reviewing, directing, and responding to all grievances electronically. Its scope of work extends to all ministries, agencies, government bodies, local administrative units, public authorities, and other government entities.

3.2 EBRD REQUIREMENTS

All EBRD Performance Requirements include the need for a level of stakeholder engagement particularly the EBRD Performance Requirement 10 on "Information Disclosure and Stakeholder Engagement" which "recognizes 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.
- Ongoing reporting to relevant stakeholders.

4 STAKEHOLDER ENGAGEMENT FOR THE PROJECT

Stakeholder engagement can be described as the systematic method to understand and involve stakeholders and their concerns in project activities and decision-making processes. It identifies the appropriate approach to be used for consultation and information disclosure.

The Stakeholder Engagement Plan (SEP) for the Project has been prepared to guide on-going stakeholder engagement. The Stakeholders considered in this plan include persons or groups that may be directly or indirectly affected by the project, as well as those that may have interest in the project and/or those that may influence the projects outcome either positively or negatively. These stakeholders may change over time, and as such this plan will need to be updated as and when new stakeholders are identified, or the circumstances of stakeholders evolve.

The SEP has been prepared according to applicable elements of EBRD's Performance Requirements. The SEP is a living document which will be updated throughout the lifecycle of the project (within the ESMS) in order to guide the necessary engagement with identified stakeholders at the various project phases.

4.1 STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1.1 Stakeholder identification

This section of the document identifies potential stakeholders of the Project as those affected at a local, district, regional, national and international level. EBRD and other international organizations consider stakeholder engagement as fundamental to good business practice and corporate citizenship. Moreover, stakeholder engagement provides a means for improving the overall quality of the projects. Effective community engagement is central to managing risks and impacts as well as achieving enhanced community benefits. Stakeholders may include individuals and organizations that may be directly or indirectly affected by the project either in a positive or negative way and that wish to express their views.

The stakeholders identified have been classified into two categories:

- **Key stakeholders:** any stakeholders with **direct** influence on, or those who are directly significantly impacted by the project, and whose interests and influences must be recognized if the work is to be successful.
- **Non-key Stakeholders:** any person, group or organization with a significant vested interest or those who are influenced by the project, however, **indirectly**.

A diverse range of stakeholders will be involved in the proposed project. Stakeholders have been, and will continue to be, identified on an on-going basis by:

- identifying people or communities that are, or could be, affected by the project, along with other interested parties; and
- ensuring that these stakeholders are appropriately engaged in environmental and social issues through a process of meaningful consultation and information disclosure.

4.1.2 Identified stakeholders

Interviews and consultations were conducted between November 13 and 17 to identify potential stakeholders of the project.

For all identified stakeholders, a primary analysis is applied to identify their respective level of engagement. The stakeholder analysis tool is used to group stakeholders according to their impact and support pertaining to the project.

Table 1 Detailed Stakeholder List

Categories	Stakeholder List	Relevance and Impact	Influence of Stakeholder
Key Stakeholders			
Neighbouring Plots	<p>Plot A is adjacent to:</p> <ul style="list-style-type: none"> Infinity Solar SBN 5-1 50 Mw to the west ATEN SBN7-1 50 Mw project to the east <p>Plots B and C are adjacent to:</p> <ul style="list-style-type: none"> El Subh 50Mw project from east and from north by El Sewedy 50 Mw and Rising Sun 50 Mw projects. <p>Plot D is located between:</p> <ul style="list-style-type: none"> Edf SBN30-4 50 Mw project on the west and Phoenix SBN32-4 50 Mw project on the east <p>Plot E is adjacent to:</p> <ul style="list-style-type: none"> RA SBN 39-4 20 Mw project from the west and from east by TK SBN 42-4 20Mw project. 	<ul style="list-style-type: none"> Projects on adjacent land Works of neighboring facilities may be within the project's influence zone. 	<ul style="list-style-type: none"> Workers may become impacted by project's activities during construction. The neighboring plots and their work force share with the project the services and utilities provided at Benban Solar Park.
Private Associations/companies	<ul style="list-style-type: none"> Benban Solar Developer Association (BSDA) 	<ul style="list-style-type: none"> Responsible for communicating with Benban community all projects' employment opportunities updates and CSR 	<ul style="list-style-type: none"> May result in reputational risks to the project in case of outside/foreign labour influx or inefficient allocation of CSR resources Increase project's local content

Categories	Stakeholder List	Relevance and Impact	Influence of Stakeholder
		<p>activities provided by the developers].</p> <ul style="list-style-type: none"> Responsible for the allocation of local resources 	<ul style="list-style-type: none">
	<ul style="list-style-type: none"> FMC 	<ul style="list-style-type: none"> Responsible for community liaison and communications, central facilities services and Developers' ESHS oversight and governance 	<ul style="list-style-type: none"> May result in reputational risks to the project in case of outside/foreign labour influx, or safety and security impacts May pose a liability risk on IH consortium in case of not acquiring necessary permits, paying workers' insurance, contamination, or not fully conforming to environmental and labor laws Increase project's local content
Users of Aswan- Luxor highway and road to site	<ul style="list-style-type: none"> Road Users 	<ul style="list-style-type: none"> Potentially affected by Project vehicle movements. 	<ul style="list-style-type: none"> May result in reputational risks to the project in case of traffic congestion or accidents.
Local communities surrounding BSP and on the road leading to Benban village	<ul style="list-style-type: none"> Farm workers and owners of small farms on the road leading to Benban village 	<ul style="list-style-type: none"> Agricultural activities in the area use groundwater. In all of the farms, PV solar power is the source of energy for pumping groundwater. 	<ul style="list-style-type: none"> While these communities are not directly involved in the project's operations, their well-being and perceptions can influence

¹ Information as per interview with BSDA Management, 11th of November 2024.

Categories	Stakeholder List	Relevance and Impact	Influence of Stakeholder
		<ul style="list-style-type: none"> 	<p>the project's acceptance in the community</p> <ul style="list-style-type: none"> Communities in small clusters east of the Luxor - Aswan Highway and along the Benban Village Road are far away from the BSP and are unlikely to be impacted positively or negatively by the project.
Vulnerable groups	<ul style="list-style-type: none"> Females and people with disabilities 	<ul style="list-style-type: none"> They provide needed diversity, and meet requirements of equal employment opportunities (EEO) and non-discrimination (NDR) policy 	<ul style="list-style-type: none"> Consideration for female workforce and employees with disabilities
Local Suppliers and Service Providers	<ul style="list-style-type: none"> Provision of workers Worker's transportation companies Suppliers of raw and operational materials and supplies. Food suppliers Others 	<ul style="list-style-type: none"> Provision of raw material, supplies, and workforce Following IH's ESMS and policies 	<ul style="list-style-type: none"> May result in material and reputational risks on the project in case of contamination, or health, safety and security impacts. May pose a liability risk on IH in case of contamination, or provision of non-compliant services
Project Employees	<ul style="list-style-type: none"> Skilled, semi-skilled and unskilled project workers 	<ul style="list-style-type: none"> Acting as ambassadors for the project and company 	<ul style="list-style-type: none"> Reputational risk in case of not following projects' environmental and social requirements
Contract Workers	<ul style="list-style-type: none"> Skilled, semi-skilled and unskilled project workers 		

Categories	Stakeholder List	Relevance and Impact	Influence of Stakeholder
Non-key Stakeholders			
Nearby, Nile Valley Communities	<ul style="list-style-type: none"> • New and old Benban Village population, especially those who are unemployed or without stable jobs. • Disadvantaged/Vulnerable individuals or groups: <ul style="list-style-type: none"> ○ Local female workforce ○ People with disabilities • Benban- wider population 	<ul style="list-style-type: none"> • Likely to be expectant of employment opportunities and CSR services. • May potentially come into contact with the project/ people working at the project/a supply chain etc. • Potential employees or contractors 	<ul style="list-style-type: none"> • Local communities to provide employment supply for the projects
Financial Institutions/Lenders	<ul style="list-style-type: none"> • European Bank for Reconstruction and Development (EBRD) 	<ul style="list-style-type: none"> • Investors/lenders 	<ul style="list-style-type: none"> • Ensuring project compliance with international and local ES standards and local laws to continue provision of finance • Interest in project success
National Government Agencies	<ul style="list-style-type: none"> • New and Renewable Energy Authority (NREA) 	<ul style="list-style-type: none"> • Competent administrative authority and land owner 	<ul style="list-style-type: none"> • Project licensing authority
	<ul style="list-style-type: none"> • Egyptian Environmental Affairs Agency (EEAA) 	<ul style="list-style-type: none"> • Review and approval of ESIA's • Protecting and preserving natural environment in coordination with concerned and responsible authorities • Monitoring of any potential environmental pollution resulting from the project 	<ul style="list-style-type: none"> • Securing environmental permit •

Categories	Stakeholder List	Relevance and Impact	Influence of Stakeholder
		<ul style="list-style-type: none"> Inspection of environmental measures related to solid waste management 	
	<ul style="list-style-type: none"> Governorate's Environmental Management Office 	<ul style="list-style-type: none"> Responsible for inspecting the project and ensuring compliance with its Environmental and Social Management Plan 	<ul style="list-style-type: none"> May hold project liable in case of any environmental and OHS non-conformities
	<ul style="list-style-type: none"> Governorate of Aswan 	<ul style="list-style-type: none"> Local governorate at the project area. 	<ul style="list-style-type: none"> Ensuring project compliance with local laws
	<ul style="list-style-type: none"> Egyptian Electricity Regulatory Authority 	<ul style="list-style-type: none"> Issuers of the construction permit and power generation permit. 	<ul style="list-style-type: none"> Securing permits
	<ul style="list-style-type: none"> Egyptian Electricity Transmission Company (EETC) 	<ul style="list-style-type: none"> The Project proponent with a particular interest in project operability. Responsible for construction and operation of associated facilities (substations and overhead transmission lines). 	<ul style="list-style-type: none"> Provision and operation of associated facilities Project operational licensing authority
	<ul style="list-style-type: none"> Ministry of Labor 	<ul style="list-style-type: none"> Monitoring labor and working conditions 	<ul style="list-style-type: none"> Risk to project Developers due to fines or business close down in case of violation of labor, health and safety laws.
	<ul style="list-style-type: none"> Civil Protection Authority 	<ul style="list-style-type: none"> Reviewing and approving emergency and firefighting plans 	<ul style="list-style-type: none"> Securing firefighting permit Providing firefighting emergency teams in case of fire

Categories	Stakeholder List	Relevance and Impact	Influence of Stakeholder
Media	<ul style="list-style-type: none"> Local and national Newspapers and national media 	<ul style="list-style-type: none"> Disseminating information about the project Responding to rumors or misconceptions about any specific project Interest in the development of the project. Interest may include potential environmental and social risks related to the project construction and operation 	<ul style="list-style-type: none"> Reputational risk in case of poor engagement leading to disseminating of incorrect information Positive view of the project and HSES performance on the national level in case of good engagement and information disclosure
Public	<ul style="list-style-type: none"> Members of the public 		
Research Institutions	<ul style="list-style-type: none"> International & Local Research Institutions 		
Civil Society	<ul style="list-style-type: none"> Local NGOs and local Community Development Associations 		

5 STAKEHOLDER ENGAGEMENT PROGRAMME

Stakeholder engagement is an on-going process that will be undertaken during the construction and operations phases of the project. The process is 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. Table 2 below summarizes the stakeholder engagement strategy and plan, to include stakeholders relevant to the Project (as identified in Table 1 earlier), objective of consultations with each group and subgroups, communication methods and tools, schedule, and responsible entity for undertaking such engagement.

5.1 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Public consultation and stakeholder engagement activities have started as part of the ESIA and ESDD commissioned for the project . As part of stakeholder identification, a number of interviews and consultations were conducted from 11-17 November 2024 to identify stakeholders and their expectations of the project- mainly as part of the ESIA. A group of stakeholders consisting of local men and women from old and new Benban community, Benban Solar Developer's Association representatives, nearby plots employees and small farmers surrounding the BSP site were interviewed.

These consultations highlighted important insights into the existing socio-economic conditions of the Benban community. Interviewed stakeholders anticipate that the project will have a positive impact on the community, primarily through job creation and economic development. Detailed findings of the interviews and consultations are included in the Socio-economic baseline conditions of the ESIA.

Table 2 Stakeholder Engagement Programme

STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY	INFORMATION TO DISCLOSE AND REPORT BACK	RESPONSIBLE PARTY
<ul style="list-style-type: none"> Local Community and vulnerable groups 	<ul style="list-style-type: none"> Informative announcements and press statements in national media and newspapers Information sharing through CLO weekly community visits. SEP disclosed on Company website (in Arabic) Announcement of opportunities through BSDA social media Advertisements in NGOs and CDAs that work with vulnerable groups in Benban and Aswan. 	<p>Prior to the start of construction and on on-going basis-weekly/monthly depending on activity operations phase and updated as necessary within the each phase if there are changes to construction, or operations activities or processes.</p>	<ul style="list-style-type: none"> Employment Opportunities Notify of start of construction activities and construction timeline Disclose SEP and NTS on company website in Arabic and English Local content plan Management Plans Grievance Management 	<p>IH Consortium</p>
<ul style="list-style-type: none"> Local Suppliers 	<ul style="list-style-type: none"> Transparent and fair tender awards and recruitment 		<ul style="list-style-type: none"> Tender documents for construction and related services Award of contracts Job opportunities Local Content Plan Management Plans Grievance Management 	<p>IH Consortium</p>

STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY	INFORMATION TO DISCLOSE AND REPORT BACK	RESPONSIBLE PARTY
<ul style="list-style-type: none"> • Neighboring Plots 	<ul style="list-style-type: none"> • Informative announcements and press statements in local media • SEP disclosed on Company website 		<ul style="list-style-type: none"> • Progression of construction • Planned service & facilities that might affect neighboring plots • Nuisance / environmental issues • Mitigation measures for nuisance issues • Employment Opportunities • Grievance Management 	IH Consortium
<ul style="list-style-type: none"> • Project Workforce, contractors and sub-contractors 	<ul style="list-style-type: none"> • Internal communications • Presenting of ES policies on walls and through noticeboards/posters around the project sites • Toolbox talks • Weekly Meetings 		<ul style="list-style-type: none"> • Management Plans, E&S requirements • Job opportunities • Training • Changes / improvements to the service • Workers Grievance Management 	IH Consortium
<ul style="list-style-type: none"> • Government agencies, regulators, • Local Government 	<ul style="list-style-type: none"> • Official emails or letters in coordination with local authorities will be sent to provide information on construction activities and timelines • Informative announcements and press statements in local media • Information sharing through CLOs and FMC 	<p>Prior to the start of construction, and operations phases and updated as necessary within the each phase if there are changes to construction, or operations activities or processes.</p>	<ul style="list-style-type: none"> • Progression of construction • Accidents and incidents • Safety initiatives • Employment Opportunities • Firefighting and Emergency Plans (for civil protection Authority) • Disclosure of Community Health and Safety Plan 	IH Consortium

STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY	INFORMATION TO DISCLOSE AND REPORT BACK	RESPONSIBLE PARTY
<ul style="list-style-type: none"> • Civil Society • National and International research agencies 	<ul style="list-style-type: none"> • Informative announcements and press statements in local papers, local TV • Notice boards within community to be identified • Information sharing through CLOs and BSDA • SEP disclosed on Company website in Arabic 		<ul style="list-style-type: none"> • Employment Opportunities • Sustainability/CSR programs • Grievance Management 	IH consortium BSDA for CSR programs
<ul style="list-style-type: none"> • Media 	<ul style="list-style-type: none"> • Press releases and statements 	Prior to the start of construction, and operations phases and updated as necessary within the	<ul style="list-style-type: none"> • Schedule of construction works, and operations 	IH consortium

STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY	INFORMATION TO DISCLOSE AND REPORT BACK	RESPONSIBLE PARTY
	<ul style="list-style-type: none"> Announcement in local newspaper and on local radio (in Arabic) SEP disclosed on Company website in Arabic 	each phase if there are changes to construction, or operations activities or processes.	<ul style="list-style-type: none"> activities and progress of each. CSR programs for community and governorate Grievance Management 	BSDA for CSR programs
<ul style="list-style-type: none"> Project Lenders 	<ul style="list-style-type: none"> Environmental and Social auditing to evaluate projects compliance with Egyptian standards, lender requirements and loan covenants. Monthly Reports Quarterly audits by lenders' HSES consultant Annual Sustainability Reports, covering HSES performance 	On a quarterly basis throughout each phase of the project	<ul style="list-style-type: none"> Compliant ESMS and ESMPs Corrective actions as required by the lenders' consultant Monthly reports of ES performance, including stakeholder engagement and resolution of grievances associated with the project Annual Sustainability and HSES data/statistics 	IH Consortium

During stakeholder engagement meetings, to prevent risks of retaliation against project stakeholders, especially community members, the following should be adhered at minimum but not limited to:

- Ensure that some meetings with communities and state authorities are conducted separately as necessary. No private security forces shall be present in these community or NGO meetings. For any potential safety concerns raised by the community or NGO members, The Consortium will assess these concerns in advance to devise alternative engagement avenues in order to minimize these risks
- Ensure there is an anonymous grievance reporting channel for those who want to remain anonymous. This channel will have password protection protocols in place accessed by only designated personnel; i.e HSE Manager of consortium members and Project's CLO. The

Consortium will always keep confidentiality of the information provided by community members and not share anything externally without their written consent provided.

6 GRIEVANCE MECHANISM

The Project activities may result in potential nuisances for stakeholders, or adverse environmental and social impacts. 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 for the E&S disclosure process, throughout construction, and operations phase. 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 have the opportunity to raise a complaint.

The FMC is responsible for handling all community grievances and has a functioning grievance mechanism that is applied to all developers in BSP². **With regards to community grievances, IH consortium will follow the current FMC community grievance mechanism approved by the lenders and implemented by the FMC.** Please refer to FMC's Grievance Mechanism attached in Annex F.

Clarification on role and division of tasks and coordination with FMC is detailed in Section 9: Roles and Responsibilities.

Moreover, the project developed its overall grievance mechanism for the workers' grievances.

The grievance mechanism is designed to allow submitting anonymous and GBHV complaints.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy (2019) 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 PAPs, and civil society organisations about EBRD financed projects among project stakeholders or to determine whether the EBRD 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 EBRD.

6.1 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. The assessment of grievances will be carried out in accordance with Egyptian Law and Good International Practice³.

² As per FMC's document: 06-06-GMP Grievance Mechanism Plan

³ Addressing Grievances from Project affected community, IFC's Good Practice Note.

All relevant claims from will be accepted and no judgment made prior to investigation, even if complaints are minor. However, according to international good practice, the following claims will be directed outside of project-level mechanisms:

- Complaints are clearly not related to the project based on an 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.
- Commercial disputes: Commercial matters will be stipulated in contractual agreements and issues will be resolved through a variety of commercial resolution mechanisms or civil courts.

6.1.1 Publicising Grievance Management Procedures

The grievance mechanism of this project will be publicized as outlined in Table 2 of the Stakeholder Engagement Plan section. In addition, notices will also be provided at the project entrance in regard of how to lodge grievance and the process related to follow up. The information provided will be available in both English and Arabic.

6.1.2 Access to Grievance Mechanism

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

- Direct delivery to a sealed grievance box at the project site entrance.
- Submission by post or a dedicated email; and
- Directly received by project personnel, including direct managers for workers' grievances, EPC's Labor Compliance Officer, and Project's CLO.

Information will be provided at the project entrance, at the location of grievance boxes to inform complainants 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 their relevant direct manager, EPC's Labor Compliance Officer, or FMC's Community Liaison Officer team (depending on the nature of the grievance whether workers' related or community related), 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.

6.1.3 Anonymous Grievances

If an anonymous grievance is submitted (e.g. grievance form without a name, letter or email without details about the complainant) or the complainant requests to remain anonymous, the grievance will also be accepted and processed. Anonymous grievances submitted on site will have password protection protocols in place and will be accessed by only designated personnel.

Gender Based violence and harassment (GBVH)-related grievances can be submitted through confidential means, such as sealed boxes (with password protection protocols or secure email),

ensuring the complainant's anonymity is maintained if desired. The project will provide specialist investigation on any GBVH matters that arise.

6.1.4 Gender-Based Violence and Harassment (GBVH) Grievances

Handling GBVH grievances requires specific safeguards to ensure the safety, confidentiality, and rights of the complainant:

1. **Confidential Reporting Channels:**
 - Secure email addresses and sealed grievance boxes will be made available.
 - The anonymity of the complainant will be maintained if desired.
2. **Assessment by Trained Staff:**
 - All staff will be trained to assess GBVH complaints and how to handle sensitive cases.
3. **Ensuring Safety and Preventing Retaliation:**
 - The assigned Community Liaison Officer will oversee the case and submit to the FMC.
 - Ensuring privacy during all stages of the investigation.
 - Any immediate safety risks to the complainant will be mitigated through temporary measures, such as relocation or alternative work arrangements.
4. **Support Services:**
 - Partnerships with local or national organizations specializing in GBVH may be leveraged to provide support and ensure fairness
5. **Follow-Up and Resolution:**
 - Outcomes of the investigation will be shared with the complainant in a confidential manner.
 - Steps to prevent recurrence will be implemented, such as awareness campaigns or policy adjustments.

6.2 COMMUNITY GRIEVANCE MECHANISM

The FMC is responsible for handling all community grievances and has a functioning grievance mechanism that is applied to all developers in BSP⁴. **With regards to community grievances, IH consortium will follow the current FMC community grievance mechanism approved by the lenders and implemented by the FMC.** Please refer to FMC's Grievance Mechanism attached in **Annex F**.

6.3 WORKER GRIEVANCE MECHANISM

6.3.1 Construction Phase

The workers' grievance mechanism will be made available for all construction personnel associated with construction activities to enable them to make work related concerns. This includes all those

⁴ As per FMC's document: 06-06-GMP Grievance Mechanism Plan

employed by the Project, its contractor, sub-contractors, any other related contractors and project site visitors. All construction personnel will be made aware of the grievance mechanism during their employment inductions at the project site. Below is a detailed steps in the worker's grievance mechanism:

- **Step 1 - Receive**

- Workers may submit grievances through any available channel outlined in 6.1.2, or through directly reporting to the complainant workers' direct manager or supervisor.
- Anonymous grievances will be accepted, and all grievances, including those related to GBV, will be handled with strict confidentiality and sensitivity as described in section 6.1.3.1

- **Step 2 - Acknowledge**

- The direct manager/supervisor will acknowledge receipt of the grievance. If resolved, the direct manager will log the grievance into the grievance register (**Annex B**) and close the case. If not resolved, the grievance will be directed to the EPC's LCO.
- EPC's LCO will acknowledge receipt of a lodged grievance within five (5) working days and log the grievance into the Grievance Register (**Annex B**).
- The acknowledgment will include:
 - Explanation of the grievance process and next steps.
 - Ensuring confidentiality and cultural appropriateness.
 - Providing grievance tracking details, including grievance number, registration date, authorized recipient, and a contact number/email for inquiries.

- **Step 3 - Assess**

- The LCO will assess grievance and find a resolution within 10 working days.
- If the grievance is not resolved or requires further investigation, the process moves to Step 4.

- **Step 4 - Examine**

- For grievances unresolved in Step 3, the LCO will escalate the case to the Project's E&S Supervisor, who will conduct an independent investigation and propose a resolution.
- If unresolved, the grievance will be escalated to the FMC, which will coordinate follow-up actions with the EPC's LCO and Project's E&S Supervisor until a final resolution is reached.
- Grievances related to GBV will be handled with special sensitivity as outlined in section 6.1.3.1
- The complainant will be updated regularly on the status of their grievance.

- **Step 5 - Respond**

- The FMC will determine and communicate the most suitable resolution
- The response will be communicated in a culturally appropriate manner, and the complainant will have the opportunity to provide feedback on the resolution.

- If additional time is needed to resolve the grievance, the complainant will be informed of the reasons and given a new response date.
- **Step 6 - Resolve or Appeal**
 - If the complainant is satisfied, they will sign the Grievance Resolution Form (**Annex C**), and the case will be closed.
 - If the complainant remains unsatisfied, any independent external party or a mutually agreed-upon mediator will facilitate further examination.
 - If unresolved, the complainant may proceed to judicial proceedings.
 - All grievance records, agreements, and materials will be securely stored for future audits.
- **Step 7 - Follow-up and Closeout**
 - FMC ensures proper documentation, collects investigation documents, and closes out the case.
 - The LCO will follow up on the implementation of agreed resolutions, ensuring effectiveness and completeness before closing the case.
 - Grievance status will be documented in the register as:
 - Pending: Under review or in the process of resolution.
 - Closed: Resolved and documented.
 - Withdrew: The complainant withdrew the grievance.
 - Unresolved: No resolution reached and further remedial or judicial action will be taken
 - Abandoned: The complainant is unresponsive after one month of follow-up attempts.

Figure 3 below shows the Workers' Grievance Mechanism Process:

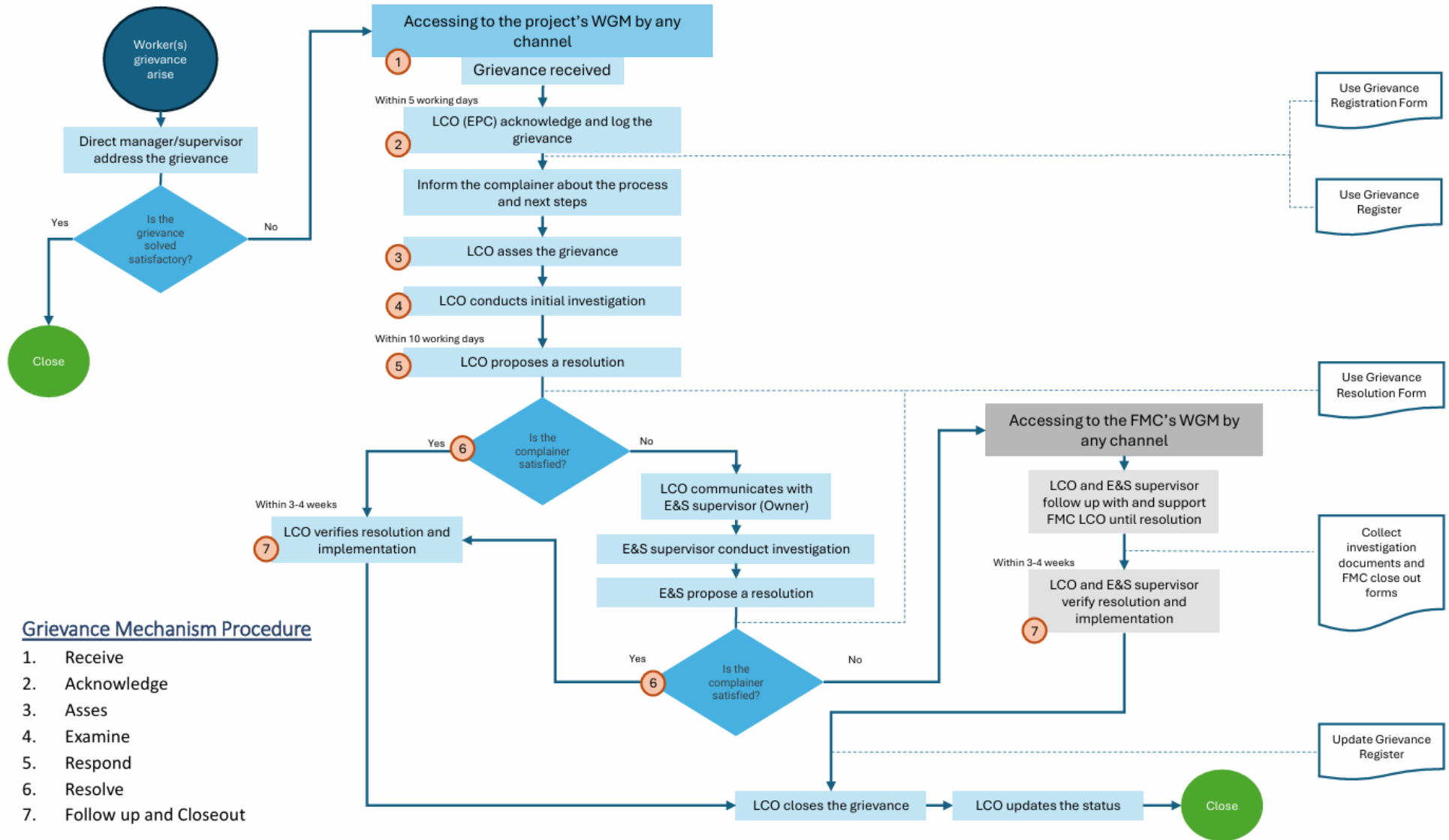


Figure 3 WGM Flow Chart as provided by IH consortium.

6.3.2 Operational Phase

The grievance mechanism during the operational phase of the project will follow a structure similar to that of the construction phase, ensuring accessibility for both site workers and external parties. During the operations phase, the Asset Manager will be responsible for handling unresolved workers' grievances taking over the role of the EPC LCO⁵ in the construction phase.

6.4 TRAINING

- It is the responsibility of SPV project management to endorse the grievance mechanism and ensure that all 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.
- The grievance mechanism process, including access points, will be communicated through induction training, toolbox talks, by the EPC LCO and the Project's Sr. HSE Supervisor
- These personnel will 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.
- All staff will receive training on identifying and appropriately handling GBV grievances to ensure sensitivity and confidentiality during intake of grievances.

7 PERFORMANCE MONITORING

The objective of performance monitoring of this plan is to ensure that tangible evidence is in place that demonstrates whether stakeholder engagement is undertaken effectively, and that Project's environmental and social commitments are effectively met. Monitoring activities of this plan, thus, aims to:

- Monitor timely implementation of this plan
- Assess staff performance in implementing this plan
- Ensure that all stakeholders are aware of this plan and communication methods related to them

To do so, the following methods will be used:

- Ongoing monitoring
- Internal and External audits
- Recording and reporting

7.1 ONGOING MONITORING

Project's' HSES team will undertake:

- Tracking Grievances on a weekly basis
- Regular evaluation of SEP to be conducted by E&S Supervisor
- Quantitative and qualitative methods, questionnaires and interviews will be used to gather data from stakeholders to evaluate their level of engagement.

⁵ As communicated by MIH consortium representative.

- Random interviews to be conducted with complainants to ensure their grievance has been addressed
- Weekly review of stakeholder engagement records to ensure stakeholders' concerns have been addressed.

Corrective actions will be identified by Project's E&S Supervisor, given a due date, and formally communicated to concerned persons. They will also be logged by the E&S Supervisor in a corrective action tracker and followed up on until closed. The tracker will include:

- The issue that needs to be corrected
- Corrective action
- Date of follow up
- What has been achieved
- Date of closure

7.2 INTERNAL AND EXTERNAL AUDITS

7.2.1 Internal Audits

Following the mobilization of the construction team to the site and the commencement of construction, a program for periodical internal audits will be established throughout the project's life cycle with the aim of:

- Verifying the implementation of the stakeholder engagement plan
- Identifying any possible non-conformities, non-compliance issues, or violations
- Managing possible issues encountered on ground during SEP implementation
- Determining additional actions and opportunities for ensuring compliance with this plan

The internal audits will be conducted by qualified personnel from IH consortium or hired external consultant.

Each audit cycle is to result in a Corrective Action Plan (CAP) dedicated to managing all corrective actions that need to be implemented. This CAP will also include actions recommended during audit and will be used to track progress and to close out any pending items.

7.2.2 External Audits

The project is to undergo periodical external monitoring visits by the lenders' third-party consultants. The visits are to result in monitoring reports, recording non-compliance detected and a corrective action plan for closing out non-compliance issues in relation to the stakeholder engagement plan.

Each monitoring visit is to follow-up on the implementation of the corrective action plan and closing out of the issues.

7.3 RECORDING AND REPORTING

7.3.1 Recording

Stakeholder Engagement Plan progress, violations and achievements will be recorded by the Project staff, through the following methods:

- Grievance Register
- Stakeholder Engagement Records Table, which is to be kept up to date on all public consultation, information disclosure, feedback received, and responses provided.

7.3.2 Reporting

The Project's E&S Supervisor will be responsible for developing reports based on the results of the performance monitoring process. These reports are to be made available for circulation with the Project management, post review by the Head of Delivery. The reports developed are to include the following:

- Monthly reports on training activities conducted
- Monthly reports on performance monitoring activities carried out
- Quarterly report on internal audit activities and outcomes

The E&S Supervisor will also develop weekly reports to be shared with the HSES teams, which include:

- Summary of recorded grievances through the week
- Status of unresolved grievances

8 COMMUNICATION

This management plan and the associated mechanisms and tools are to be communicated to the relevant stakeholders as well as internally within the Project's team.

Communication and information dissemination with regards to this plan is expected to happen on three distinct levels:

- Internal communication, within the Project's teams
- Internal communication, between the Project and its contractors and subcontractors
- External communication, between the Project and external stakeholders, such as regulators and the community

8.1 COMMUNICATION WITHIN PROJECT MANAGEMENT

Communication within the different levels and functions within the Project will vary based on whether communicated issues are project-based or company-wide. Additionally, communicating project-based issues is to be carried out during weekly progress meetings and/or internal management meetings.

Communication with workers will be carried out through the noticeboards on site, inductions, toolbox talks and morning meetings, and the set-up grievance mechanism – for collecting and managing complaints and concerns raised by workers during construction.

8.2 COMMUNICATION WITH CONTRACTORS

Communication on contractual issues with contractors shall be conducted through the contracts department of the Developer.

Communication on general and HSES performance of all main and sub-contractors shall be through the project director and HSES manager. Non-conformity reports and/or violations will be communicated to the contractors by the HSES manager, who will also act as the focal point for any related issues. Additionally, periodical meetings shall be conducted to discuss HSES issues on the project.

8.3 COMMUNICATION WITH REGULATORS AND THE COMMUNITY

Any communication with the community shall be performed within the context outlined in the community engagement procedure. A community grievance mechanism is also set up for the purpose of collecting and managing any complaints or concerns raised by the community in relation to the project activities.

A plan for external communication has been developed in Table 2. The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the activities, performance, development and investment plans and their implementation.

Communication records will be maintained by the project clearly from local community (i.e. general questions, complaints, and queries via the Project's CLOs along with a summary of the actions taken.

Furthermore, communication with regulators will be conducted through the community liaison office.

A **stakeholder engagement log** (Annex D) will be kept up to date on all public consultations and information disclosure that is undertaken with the community.

9 ROLES AND RESPONSIBILITIES

This section sets out roles and responsibilities of the different project team members related to stakeholder engagement. Below is an organization chart (Figure 4) showing Project's Organization Chart.

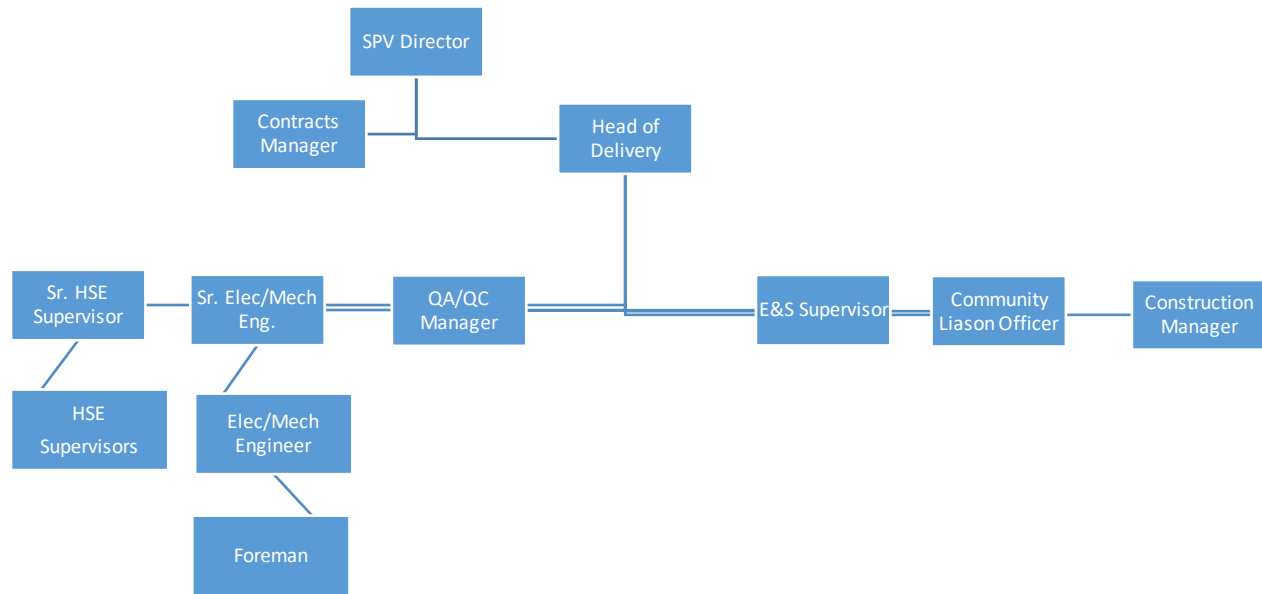


Figure 4 Project Staffing Chart as provided by IH consortium. Chart Source is in Annex F

9.1 PROJECT OWNER – SPV ROLE

This section describes the roles and responsibilities of the **SPV Staff relevant** to the SEP.

9.1.1 SPV Director

- Provide overall leadership and strategic direction for the implementation of the SEP
- Ensure adequate resources are allocated for stakeholder engagement activities.
- Report to key stakeholders, including investors and regulatory bodies, on stakeholder engagement progress.
- Manage grievances with external third parties (such as court system), if situation requires so.

9.1.2 Head of Delivery

- Oversee the implementation of this plan
- Ensure stakeholders are recognized as partners in the development and delivery of strategic goals;
- Advise SPV Director of issues and/or risks to stakeholder relationship as soon as they arise so risk can be managed effectively,

- Support the implementation and management of the SEP;

9.1.3 Environmental and Social Supervisor

The Project's Head of Delivery oversees the Environmental and Social Supervisor. The Environmental and Social Supervisor is responsible for:

- Leads the resolution of grievances when unresolved by EPC LCO for worker grievances.
- Coordinates with the FMC to address and resolve workers' grievances.
- Ensures that grievance data is properly recorded, categorized, and reported.
- Supervise the independent periodic monitoring and disclosure of the non- technical summary of the audit reports and of the full reports if required.

9.1.4 Project Community Liaison Officer (CLO)

This role belongs to the CLO appointed by the SPV company under the management of the projects' Head of Delivery.

- Act as the project's single point of contact for day-to-day engagement with any community members
- Coordinate with FMC's CLO team receipt of community related grievances that are related to the IH consortium/SPV project.
- Engage and maintain constant communication with FMC's CLO team, with regards to any community grievances received about the project from FMC.
- Keep a copy of records of project community related grievances received or sent from FMC

9.1.5 All SPV Management

- Responsible for making sure this plan is implemented
- Receive complaints from their direct supervisees and attempt at resolving it
- Direct any unresolved workers' grievances to EPC's LCO.

9.2 EPC ROLE

9.2.1 EPC's Labor Compliance Officer

- Work with SPV management to resolve any unresolved workers' grievances,
- Receives, registers, and tracks worker grievances, ensuring confidentiality and fair treatment.
- Escalates unresolved grievances to the E&S Supervisor and FMC as needed.
- Ensures worker grievance forms and grievance boxes are accessible at key locations.

9.2.2 EPC Contractor

The EPC Contractor is responsible for ensuring that all construction activities comply with this SEP and applicable national and international standards. The EPC Contractor's key responsibilities include:

- Implement this management plan with their workers and as related to their lines of work
- Coordinate with SPV Management to ensure that all EPC contractors' workers are provided with the needed training to implement this plan
- Monitor the work of their workers to ensure that they follow the requirements of this plan as relevant to their lines of work

9.3 FMC ROLE

The FMC has a Labor Compliance Team that is in charge of handling all workers' grievances that are not resolved by the Project Owners. Moreover, they also have a Community Liaison Team who are responsible for managing all community grievances at BSP. The FMC is responsible for:

- Handling all community grievances, ensuring that concerns raised by community members are appropriately addressed.
- Coordinate with IH Consortium (SPV Project) the community grievances related to the project for resolution
- Supporting the resolution of escalated grievances from workers' when they remain unresolved at the project level, ensuring an independent review process.
- Coordinating follow-up actions **with the EPC's LCO and the SPV Project's E&S Supervisor** to ensure grievances are properly addressed and resolved.
- Conducting independent investigations in cases where the complainant remains unsatisfied with prior resolutions and ensures fair and transparent grievance handling.
- Verifying the implementation and effectiveness of proposed grievance resolutions in collaboration **with the E&S Supervisor and EPC LCO.**
- Collecting and maintaining investigation documents, ensuring proper documentation before grievance closure.
- Updating the grievance register with outcomes of resolved cases and maintains compliance with reporting standards.

10 ANNEXES

ANNEX A: GRIEVANCE FORM

Date: _____

1. GRIEVANCE IDENTIFICATION NUMBER (to be filled by recipient): _____

2. DETAILS OF COMPLAINT

2.1 When it occurred: _____

2.2 Where it occurred: _____

2.3 Who was involved: _____

2.4 Description of the complaint:

3. PROPOSED CORRECTIVE ACTION

4. CONTACT INFORMATION (optional):

Name: _____

ID: : _____

Telephone Number: _____ Email: _____

5. COMPLAINT RECIPIENT DETAILS:

Name of the person received the complaint (Direct Manager/ EPC LCO)

Signature :

5. Please send your complaint to:

Title: SPV Project Management

Number: 0100xxxx/ 02xxxxxx

Email: xxx@spvproject.com

ANNEX B: GRIEVANCE REGISTER

Name & Contacts of Complainant/Anonymous	Date & Means of Submission	Grievance Category	Company Involved	Description of Grievance	Responsible Person	Date and method of Acknowledgment	Corrective Action & Date	Acceptance & Closure Date

ANNEX C: GRIEVANCE RESOLUTION FORM

1. **GRIEVANCE IDENTIFICATION NUMBER:** _____

2. **Date of issuing resolution:** _____

3. **Complainant Details (Optional- leave empty for anonymous grievances)**

- Name: _____
- Position (if worker): _____
- Contact Information:
 - Phone: _____
 - Email: _____
- **Preferred Mode of Contact:** Phone Email In-person Anonymous

4. **Investigation & Action Taken**

- **Date of Investigation Initiation:** : _____
- **Investigating Person:** _____
- **Investigation Findings:**

5. **Description of Resolution (Specify corrective measures, responsible parties, and timeline):**

6. **Provide justification of identified resolution :**

7. **Follow-up & Closure**

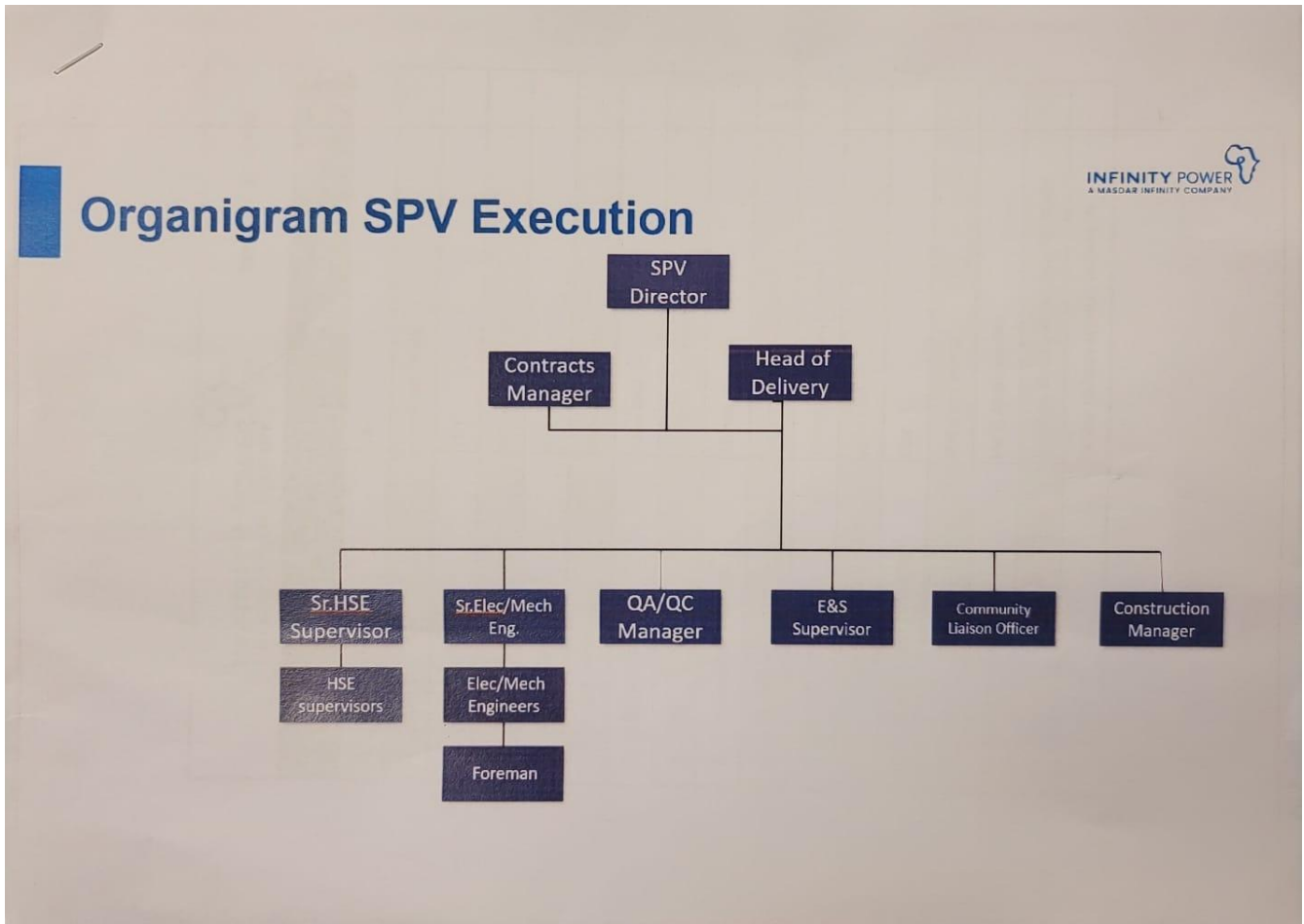
- **Follow-up Actions (If required)**

- **Final Decision Taken By:** _____
- **Signature of Investigating Officer:** _____
- **Date of Closure:** // _____

ANNEX D: STAKEHOLDER ENGAGEMENT LOG

Date/Place	Company Staff in Attendance	Contact Person/Organization	Meeting Summary	Follow-up Action	Progress on follow up action

ANNEX E: PROJECT ORGANIGRAM



ANNEX F: FMC'S COMMUNITY GRIEVANCE MECHANISM