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Stakeholder Engagement Plan (SEP) for Project Blade

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actis

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NOMENCLATURE

ACRONYM	MEANING
ATMP	Active Turbine Management Plan
APTEC	Altertec-Petrotec
CBOs	Community-Based Organisations
COD	Commercial Operation Date
CSR	Corporate Social Responsibility
DFC	Development Finance Corporation
CLO	Community Liaison Officer
EETC	Egyptian Electricity Transmission Company
EEAA	Egyptian Environmental Affairs Agency
EPC	Engineering, Procurement, and Construction
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESPP	Environmental and Social Policy and Procedures
EBRD	European Bank for Reconstruction and Development
IBA	Important Bird Area
ICP	Informed Consultation and Participation
IFC	International Finance Corporation
IFIs	International Financial Institutions
JICA	Japan International Cooperation Agency
KBA	Key Biodiversity Area
KFW	Kreditanstalt für Wiederaufbau
MV	Medium Voltage
MW	Mega Watt
M	Meter

ACRONYM	MEANING
NCE	Nature Conservation Egypt
NREA	New and Renewable Energy Agency
NGOs	Non-governmental Organizations
O&M	Operation and Maintenance
OHTL	Overhead Transmission Line
PR	Performance Requirement
PS	Performance Standard
PPA	Power Purchase Agreement
RCREEE	Regional Center for Renewable Energy and Energy Efficiency
SGRE	Siemens Gamesa Renewable Energy
KM²	Squared Kilometer
SEP	Stakeholder Engagement Plan
FIEM	The Corporate Internationalization Fund
TBD	To be Determined
TBT	Toolbox Talks
WPP	Wind Power Plant

1 INTRODUCTION

1.1 BACKGROUND

Actis (the “Company”) is considering the acquisition of a 580 MW wind power plant (WPP), owned by Egypt’s New and Renewable Energy Agency (NREA), located in Gabal El Zeit, Red Sea, Egypt (“Project Blade or the ‘Project’”). The Project has been developed to meet the requirements of the European Bank for Reconstruction and Development (EBRD) Performance Requirements (PR), and the US International Development Finance Corporation’s (DFC) Environmental and Social Policy and Procedures (ESPP), which includes the International Finance Corporation’s (IFC) Performance Standards (PS).

The Stakeholder Engagement Plan (SEP), which is part of the project’s ESMS, is to be implemented by Actis, with support from the Operation & Maintenance (O&M) contractor, during the operation phase of the Project. The purpose of the SEP is to provide a structured framework for Actis to engage with stakeholders. The SEP is a dynamic document that will be continuously updated throughout the project’s operation to ensure effective and ongoing engagement with stakeholders.

1.2 AIM AND OBJECTIVES

The objectives of the SEP are as follows:

- Comply with the requirements of the European Bank for Reconstruction and Development Performance Requirements, and the US International Development Finance Corporation’s (DFC) Environmental and Social Policy and Procedures, which include the International Finance Corporation’s (IFC) Performance Standards;
- Establish a structured framework for Actis to engage with stakeholders throughout the operation phase of the Project;
- Build and maintain constructive relationships with stakeholders;
- Address any concerns, feedback, or suggestions from stakeholders; and
- Facilitate transparent and inclusive communication with stakeholders, providing them with relevant information about the Project.

2 LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 EGYPTIAN LEGISLATION

In Egypt, stakeholder consultation and engagement are primarily associated with the Environmental and Social Impact Assessment (ESIA) study, as mandated by the "Law of Environment No. 4 of 1994 and its amendments in Law No. 9 of 2009." The ESIA system, according to the most recent executive regulation and ministerial decree No. 26 of 2016, classifies projects into four categories based on the severity of potential impacts and the location of the establishment in relation to residential areas.

Specifically, wind farm development projects generally fall into "Category C," which requires a comprehensive ESIA study and involves two phases of consultations: (i) an environmental and social scoping phase that necessitates targeted consultations, and (ii) a disclosure phase that includes a public disclosure session to present the ESIA outcomes.

During the scoping phase, targeted stakeholder consultations with key stakeholders relevant to the project should be conducted, while the public disclosure consultation must involve the following entities:

- Representatives from the Egyptian Environmental Affairs Agency (EEAA);
- Relevant governmental authorities;
- Representatives from the Governorate and local units where the project is located;
- Affected groups, including local businesses and communities; and
- Non-governmental Organizations (NGOs) and civil society groups.

The methodology provided by the EEAA guidelines identifies specific articles that cover the guidelines for conducting public consultations as part of the ESIA study. These articles include:

- Paragraph 6.4.3.1: Scope of Public Consultation;
- Paragraph 6.4.3.2: Methodology of Public Consultation;
- Paragraph 6.4.3.3: Documentation of the Consultation Results; and
- Paragraph 7: Requirement and Scope of the Public Disclosure.

2.2 LENDER REQUIREMENTS

Actis is considering financing for the Project from International Financial Institutions (IFIs). In doing, the Project will be designed to meet the E&S requirements of IFIs, as and where applicable. IFI standards for stakeholder engagement are summarized below.

2.2.1 IFC PERFORMANCE STANDARDS

The IFC Policy on Environmental and Social Sustainability, encompassing its Performance Standards (PS), is widely acknowledged as the international benchmark for assessing the environmental and social performance of projects seeking financial support. This policy, along with the Performance Standards and the Access to Information Policy, constitutes the all-encompassing IFC Sustainability Framework. Under this framework, "IFC Performance Standard 1 on Assessment and Management of Environmental and Social Risks and Impacts" provides the following guidelines for involving stakeholders:

- Stakeholder engagement is a continuous process that encompasses various elements such as stakeholder analysis and planning, information disclosure, consultation and participation, grievance mechanisms, and ongoing reporting to the communities affected.
- Project stakeholders refer to individuals or groups directly or indirectly impacted by the project or company operations. They hold interests in the project or parent company and have the potential to influence project outcomes or company operations.

- A Stakeholder Engagement Plan (SEP) will be created, tailored to the characteristics and interests of the affected communities, and implemented accordingly, taking into consideration the project's risks and impacts.
- Relevant information about the project's purpose, nature, scale, duration, risks, potential impacts, stakeholder engagement process, and grievance mechanism will be provided to the Affected Communities.
- When Affected Communities encounter identified risks and adverse impacts, a consultation process will be carried out to allow them to express their views on project risks, impacts, and mitigation measures, with the client considering and responding to them. The concept of "effective" or "meaningful consultation" is further detailed in Paragraph 30 of Performance Standard 1.
- The degree of engagement will be proportional to the project's risks, adverse impacts, and concerns raised by the affected communities.
- The consultation process will be adapted to the language preferences, decision-making processes, and needs of disadvantaged or vulnerable groups within the Affected Communities.
- Projects with potentially significant adverse impacts will undergo an Informed Consultation and Participation (ICP) process to ensure the informed participation of affected communities.
- A grievance mechanism will be established to receive and address concerns and grievances raised by the affected communities regarding the client's environmental and social performance.

2.2.2 EBRD PERFORMANCE REQUIREMENTS

EBRD's Environmental and Social Policy (ESP) (2019) considers public involvement an integral part of any business and corporate responsibility in relation to the public, and a way to improve the quality of projects. In particular, EBRD's PR 10 requires stakeholder engagement in the process of the project's development including the following:

- Stakeholder Identification. The first step to be made by the Project initiator to ensure successful relations with stakeholders is the identification of various individuals or groups who (a) are affected or will be affected directly or indirectly by the Project implementation or (b) can be interested in the Project ("other interested parties"). The Project proponent shall also identify whether vulnerable groups may be affected disproportionately by planned activities.
- Stakeholder Engagement Plan. The Project initiator will develop a plan defining a procedure for relations with the identified stakeholders at different stages of the Project preparation and implementation, including an appropriate grievance mechanism.
- Information disclosure. Information disclosure practices are built into the stakeholder engagement process as they help affected parties and other stakeholders embrace risks, impacts and benefits of the Project. PR 10 emphasizes the necessity to disclose information in the local language(s).
- Meaningful consultations. If the construction personnel and/or groups of the population are (or can be) exposed to significant risks or undesirable impacts by a project, the Project initiator should conduct consultations in a culturally appropriate and meaningful manner, with the objective of providing an opportunity for the affected parties to express their comments about the risks and impacts associated with the Project and relevant mitigation measures, as well as permit the Project initiator to consider such comments and respond to them.

Performance Requirement 10 also emphasizes on the necessity of continuous reporting to identified stakeholders during the Project's implementation. The proponent has to report additional adverse impacts and significant alterations to planned activities should they occur. If such impacts and alterations are significant, the proponent may need to carry out additional information disclosure and consultation.

Additionally, PR 10 sets the requirement to develop a fully-functioning grievance mechanism in order to be aware of and respond to stakeholder questions, comments and concerns..

2.2.3 DFC E&S POLICY AND PROCEDURES

The DFC's implementation of the Environmental and Social Policy and Procedures (ESPP) integrates relevant environmental and social requirements and procedures outlined in U.S. law, the International Finance Corporation's Performance Standards (IFC PS) on Social and Environmental Sustainability, and Industry Sector Guidelines. The ESPP mandates clients to engage stakeholders effectively in the context of Public Consultation

and Disclosure. This includes ensuring that individuals impacted by the project are sufficiently informed and involved in decision-making processes throughout project preparation and implementation.

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3 PROJECT DESCRIPTION

The New and Renewable Energy Authority (NREA) is the current Project owner, with Siemens Gamesa Renewable Energy (SGRE) acting as Operation & Maintenance (O&M) contractor since the commercial operation date of all three subprojects (see *Table 3-1 below*). SGRE is responsible for the maintenance of all turbines under three full-service agreements, including civil and electrical balance of plant up to the MV switchgear, and covering preventive and unscheduled maintenance, consumables and trouble shooting. SGRE is supported by the following subcontractors:

- Elmasrya for Maintenance Service: Switch gear and cable maintenance
- Altertec-Petrotec (APTEC): O&M contractor
- Petrotec Engineering: Waste management and security services (Bedouin security is contracted via Petrotec)
- Al Nisr: Air conditioning and civil work maintenance
- El Masrya Equipment: Crane service
- EgyWind: Spare part and consumable warehouse management

All three subprojects connect to the national grid via a substation and transmission lines. Infrastructure beyond the medium voltage (MV) switchgear is the responsibility of the Egyptian Electricity Transmission Company (EETC).

Details of the subprojects are listed in *Table 3-1*, with an overview of the Projects' sites shown in *Figure 3-1*. The Project is located on the western side of the Gulf of Suez, approximately 150 km north of Hurghada and approximately 30 km south of Ras Ghareb, the closest settlement (based on Google Earth satellite imagery). The Project area can be accessed from the Suez-Hurghada road. The project is located within the wider NREA wind concession area.

The Project houses three consumable warehouses (storing grease, oils and other materials needed for maintenance activities) and five spare part warehouses.

Table 3-1 Details of the Subprojects

PROJECT	CAPACITY (MW)	AREA (KM ²)	NUMBER OF TURBINES	TYPE OF TURBINE	HEIGHT OF TURBINE (M)	INTERNATIONAL LENDER (S)	COMMERCIAL OPERATION DATE (COD)
Gabal el Zeit 1 (referred to as the KfW 240 MW WPP)	240	38.5	120	Gamesa G 80	100	Kreditanstalt für Wiederaufbau (KfW) & European Investment Bank (EIB)	08/2014 (200 MW) 07/2018 (40 MW)
Gabal el Zeit 2 (referred to as the JICA 220 MW WPP)	220	44.9	110	Gamesa G 80	100	Japan International Cooperation Agency (JICA)	03/2017
Gabal el Zeit 3 (referred to as the FIEM 120 MW)	120	107.2	60	Gamesa G 80	100	The Corporate Internationalization Fund (FIEM)	06/2018

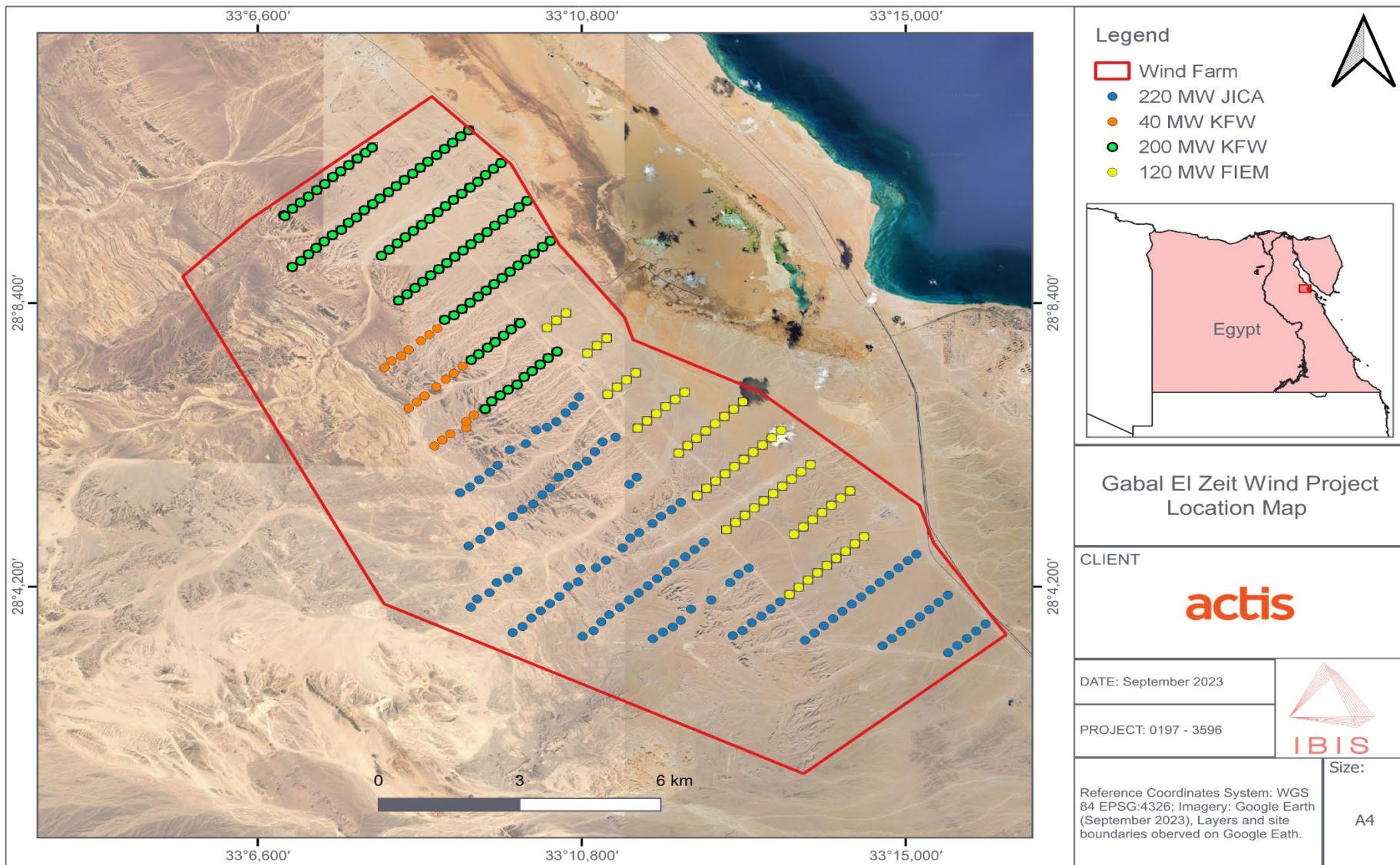


Figure 3-1 Overview of Project Site



Figure 3-2 Overview of Project Site Relative to Gabal El Zeit IBA/KBA (Image Source: NREA)

4 IDENTIFICATION OF STAKEHOLDERS

This section comprises the identification of stakeholders who hold significance in relation to the Project. It involves conducting a stakeholder mapping exercise to visually represent the various stakeholders involved. Stakeholder mapping is a valuable tool for comprehending the various individuals, groups, organizations, and entities with an interest in or potential impact on the Project. The process involves identifying and charting these stakeholders, facilitating a more straightforward analysis of their roles, interests, concerns, and potential influence on the Project.

4.1 STAKEHOLDER IDENTIFICATION

Stakeholders are identified as individuals, groups, or organizations who:

- May be directly or indirectly, positively or negatively impacted by the Project.
- May be interested in the Project, have environmental and social interests that may be impacted in the course of the Project, or may potentially influence Project decision-making and implementation in certain ways.

The following list includes the potential stakeholders of the Project that have been identified. A high ranking on the priority contact list signifies the importance of sustaining ongoing and frequent consultation and engagement with the stakeholder. Conversely, a medium ranking on the priority contact list does not diminish the stakeholder's significance but indicates that their involvement is necessary at specific stages or milestones of the Project. Their engagement is prompted for specific purposes, such as acquiring a particular service.

Table 4-1 Recognized Stakeholder Groups

STAKEHOLDER CATEGORY	STAKEHOLDER GROUPING	DEGREE OF STAKEHOLDER ENGAGEMENT AND INVOLVEMENT IN THE PROJECT	PRIORITY
Stakeholders who could experience either direct or indirect impacts from the Project	Nearby communities	Local community members residing in Ras Ghareb city who hold an interest in the Project mainly due to the prospective procurement opportunities and/or social	High
	Bedouin groups	The Bedouin groups are often engage to provide support, security, and protection in exchange for agreed financial compensation. In the case of the current Project, Bedouin security personnel are contracted through Petrotec, a SGRE subcontractor. Each subproject is guarded by a different tribe.	High
Stakeholders who have the potential to actively engage in the implementation of the Project	Investor/Lender	Potentially providing finance for the Project. Set environmental and social requirements for the Project to abide by and periodically monitor the Project's E&S performance.	High
	Workers	The Project's workforce, including personnel from Actis, SGRE and other and subcontractors engaged in the Project.	High
Stakeholders who possess the capacity to influence and make decisions regarding the implementation of the project and/or demonstrate an interest in the Project	Central Government	The Egyptian Environmental Affairs Agency (EEAA) will be responsible for overseeing the Project's performance against Egypt's environmental laws and regulations. This agency is mandated to perform random inspections of the Project.	High
		Egyptian Electricity Transmission Company (EETC) will be the off-taker signing the Power Purchase Agreement (PPA) with Actis. They are also responsible for operating the associated interconnection facilities, such as the Overhead Transmission Line (OHTL).	Medium
		NREA is the national focal point for expanding efforts to develop and introduce renewable energy in Egypt	Medium

STAKEHOLDER CATEGORY	STAKEHOLDER GROUPING	DEGREE OF STAKEHOLDER ENGAGEMENT AND INVOLVEMENT IN THE PROJECT	PRIORITY
Governmental Institutions		and entrusted to plan and implement renewable energy programs in coordination with other concerned national and international institutions	
		Ministry of Labor: Responsible for monitoring conditions of the workplace and mediating any conflicts between workers and employers.	Medium
		Armed Forces Operations Authority: Responsible for issuing access permits for Project workers and visitors. They are also responsible for issuing the permits to operate the radars used during bird migration seasons.	Medium
		Ministry of Interior: Responsible for national and local security, as well as approving emergency response and fire-fighting plans for establishments/projects	Medium
		General Petroleum Company: As a government-owned enterprise at the national level, the General Petroleum Company is involved in exploring, producing, and developing hydrocarbons on behalf of the State. They oversee the activities related to oil and gas exploration and production in both the Project area and its surrounding regions.	Low
		Ras Gharib Local City Council: Offers assistance to the Project as required, which includes issuing essential permissions. Moreover, the Council is tasked with overseeing and ensuring compliance with environmental regulations, working in partnership with the Egyptian Environmental Affairs Agency (EEAA) and the Red Sea Governorate. They also bear the overarching responsibility for managing and disposing of solid waste within their sphere of influence.	Low
		Directorate of Social Solidarity Ras Gharib: Responsible for overseeing, coordinating, and officially recording local community associations, foundations, and non-governmental organizations (NGOs). They may have a keen interest in any social responsibility initiatives linked to the Project.	Low
		Red Sea Water and Wastewater Company: Assigned with the management of water and wastewater in the Red Sea Governorate. Additionally, it will be accountable for meeting the water needs of the Project and managing the disposal of wastewater.	Medium
	Non-Governmental Organizations (NGOs) and Other Community Based Organizations (CBOs)	Non-governmental organizations (NGOs) are entities with a vested interest in the Project and hold valuable data or knowledge concerning local issues pertinent to the Project. These organizations possess the potential to influence the perspectives of individuals, both domestically and internationally, regarding the Project. Typically, NGOs play a role in disseminating information to the community.	Medium
		Nature Conservation Egypt (NCE): NCE Acknowledged as one of the leading and noteworthy non-governmental organizations (NGOs) in Egypt, it specializes in the preservation and safeguarding of biodiversity. Serving as the Egyptian counterpart of Bird Life International, it underscores its commitment to the conservation of avian species.	Medium
		Media outlets such as newspapers, television, and internet platforms have the ability to provide information and share updates related to the	Low

STAKEHOLDER CATEGORY	STAKEHOLDER GROUPING	DEGREE OF STAKEHOLDER ENGAGEMENT AND INVOLVEMENT IN THE PROJECT	PRIORITY
		<p>Project.</p> <p>The Regional Center for Renewable Energy and Energy Efficiency (RCREEE) is likely to be entrusted with managing specific aspects of the overall operation process on behalf of Actis. During the operational phase, RCREEE would potentially assume responsibility, particularly for implementing the Active Turbine Management Plan (ATMP).</p>	
			High

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5 OVERVIEW OF PREVIOUS STAKEHOLDER ENGAGEMENT INITIATIVES

Egyptian EIA guidelines require public consultations be undertaken for Category C (equivalent to Category A projects under IFC and EBRD classification) projects. Consultation with governmental stakeholders, such as the Ministry of Energy, Ministry of Petrol, Ministry of Defence, the Red Sea Governorate and the General Petroleum Authority (GPC) were carried out prior to the definition of the NREA concession area as a whole, including the footprint of the Project, and the results were summarised in the Agreement for the NREA concession area. In addition to this, the ESIA for the Japanese International Cooperation Agency (JICA) 220 MW WPP was classified as a Category C and a public consultation had been organized following both Egyptian and World Bank guidelines for public consultation. The public consultation for the JICA 220 MW WPP took place on 02 March 2009 in the Red Sea governorate, and attended by different stakeholders, including local community members, NREA, Egyptian Environmental Affairs Agency, Egyptian Electricity Holding Company. The public consultation was an opportunity to present the Project and address any concerns raised by the public in the ESIA. The main concerns raised during the public consultation and addressed in the ESIA included the impact of low frequency noise on the local community, the impact on telecommunication services, the impact on birds and compliance with Egyptian regulatory standards, particularly wastewater.

6 STAKEHOLDER ENGAGEMENT PLAN

The type of information disclosed and the specific method of communication to be undertaken by Actis for the Project are summarised in Table 7-1 below. The objective of engagement is to provide local communities that are directly affected by the Project and interested stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.

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Table 6-1 Stakeholder Engagement Plan

STAKEHOLDER CATEGORY	STAKEHOLDER	OBJECTIVES	COMMUNICATION METHODS AND TOOLS	TIMEFRAME	RESPONSIBILITY
Individuals or groups who could experience direct or indirect impacts as a result of the project	Ras Ghareb City	Communication on environmental and social concerns (where applicable), as well as corporate social responsibility (CSR) initiatives implemented.	An Arabic-language leaflet will be developed to deliver any environmental and social aspects relating to the Project. This may involve details on the Project such as Corporate Social Responsibility (CSR) initiatives, and other relevant information. The leaflet will be available at locations such as the Red Sea Governorate and Ras Ghareb Local Governmental Unit. Moreover, regular updates will be posted on the company's website and social media channels.	As required	Actis
		Communication of the SEP containing the grievance mechanism.	Actis will share the SEP and grievance mechanism with the Red Sea Governorate and Ras Ghareb Local Governmental Unit	On request	Actis
	Bedouin Groups Managing Security Onsite	Communication of the SEP containing the grievance mechanism.	Arrange targeted meetings with the leaders of these tribal groups managing security onsite to offer them in-depth explanations of the Stakeholder Engagement Plan (SEP) and the grievance mechanism.	Once after concluding the acquisition of the Project by Actis	Actis
	Lenders / investors	Progress reports on the Project will be generated, covering environmental and social aspects, including environmental performance, implementation of the grievance mechanism, community development plan, and more.	Targeted meetings with lenders	TBD	Actis
			Environmental and social monitoring reports	TBD	Actis
	Workers (including Bedouin Security Guards)	Provide information on employment contract details, outlining specifics such as duration, salary, leave policies, and other pertinent requirements.	Conduct individual or internal meetings as needed.	Onboarding and during employment	O&M Contractor
		Communicate the grievance mechanism	Dedicated training session to existing employees. Induction for new employees	Onboarding and during employment	

STAKEHOLDER CATEGORY	STAKEHOLDER	OBJECTIVES	COMMUNICATION METHODS AND TOOLS	TIMEFRAME	RESPONSIBILITY
			Display grievance mechanism onsite (e.g., posted on grievance boxes distributed onsite)		
		Communicate Project HR policies.	Dedicated training session to existing employees. Induction for new employees	Onboarding and during employment	
Central Government					
Stakeholders who possess the potential to exert influence and make decisions regarding the implementation of the Project and/or have a vested interest in its outcomes	<ul style="list-style-type: none"> EEAA EETC NREA Ministry of Interior Ministry of Labor Ministry of Health 	Periodic compliance related inspections	Official correspondence in the event of non-compliances	As required	O&M Contractor
		Bi annual health and safety statistics	Submission of bi annual health and safety statistics to the labor office	Bi annual	O&M Contractor
General Petroleum Company					
Local Government	General Petroleum Company	Ensure close coordination regarding any potential activities in the Project area by GPC. =	Conduct individual or internal meetings as needed. Written communication and formal letters.	As required	Actis, NREA, RCREEE
		Liaise the collection of solid waste from the site and its transportation to the authorized municipal landfill	In person meetings	Once after concluding the acquisition of the Project by Actis	O&M Contractor
	Ras Ghareb Local Unit	Obtain a list of approved private contractors responsible for the collection of hazardous waste from the site to a licensed hazardous waste facility			
	Ras Ghareb Water Company	Obtaining a list of authorized private contractors for the collection of wastewater from the Project site.	In person meeting.	Once after concluding the acquisition of the Project by Actis	O&M Contractor

STAKEHOLDER CATEGORY	STAKEHOLDER	OBJECTIVES	COMMUNICATION METHODS AND TOOLS	TIMEFRAME	RESPONSIBILITY
Non-Governmental Organizations (NGOs)/Community Based Organization (CBOs)					
	Nature Conservation Egypt (NCE) and other NGOs/CBOs	Discuss potential additional conservation actions/offsets Discuss CSR initiatives when relevant.	Emails and/or targeted in person meetings.	As required	Actis

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7 GRIEVANCE MECHANISM

The procedures of the grievance mechanism are designed to promptly and effectively address concerns in a transparent and culturally appropriate manner, accessible to all workers without cost or fear of retaliation. The outlined procedure applies to all on-site workers, including permanent and casual workers, service providers, consultants, suppliers, subcontractors, and external stakeholders. While the grievance mechanism is a participatory tool for internal and external stakeholders, it is a mandatory process for Actis.

This mechanism will handle suggestions, concerns, and grievances related to any issues arising from Project-specific activities. It is not intended to impede access to other judicial or administrative processes available under Egyptian law.

Figure 7-1 illustrates a process diagram outlining the stakeholder grievance procedure, which is further elaborated on in the sections below.

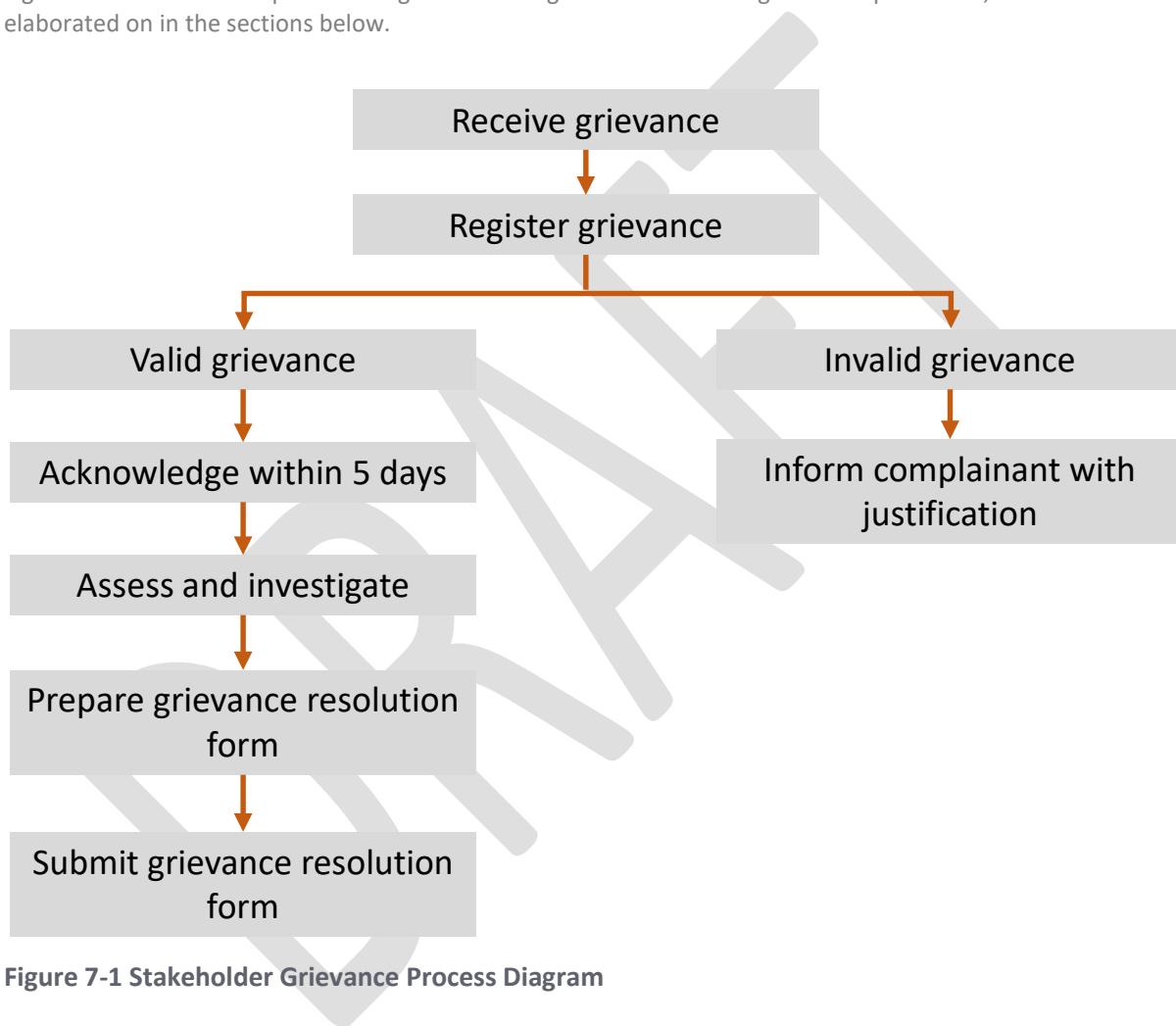


Figure 7-1 Stakeholder Grievance Process Diagram

7.1 STAKEHOLDER GRIEVANCE PROCEDURE

Actis will disclose its grievance mechanism at the Project site, local governmental units in Ras Ghareb and Actis' office in Cairo for external stakeholders. Stakeholders wishing to lodge a grievance can utilize the following avenues:

- Grievance Sheets (**Annex 1**) with designated grievance boxes will be placed at multiple locations such as:
 - Ras Ghareb Local Governmental Unit
Location: Al-Mina Street, Ras Ghareb – Red Sea, 11432
Tel: 01001318480 – 0120195877
 - Project Office: TBD
Location: TBD
Tel: TBD
- Direct contact through the following means will be established:
 - Community Liaison Officer (CLO)
 - Address: Suite 405, Galleria 40 East Tower, El-sheikh Zayed, Giza, Egypt (updated details available on the project's webpage)
Telephone: +2 0237966044-48 (updated details available on the project's webpage)
Email: info@act.is (updated details available on the project's webpage)
 - Company Website: Grievances can be submitted through the website www.act.is.
- All grievances, regardless of how they are submitted (grievance form, email, telephone, etc.), will be recorded on a grievance register by the CLO (**Annex 2**).
- This grievance mechanism is applicable to all stakeholder groups related to the project, including national/regional governmental entities, local communities, NGOs, media, research and academic institutions, and others.
- Internal stakeholders are encouraged to discuss any problems, complaints or suggestions with their immediate supervisor or manager, explaining the nature of the problem and the relief sought. The grievance form should be completed as part of this process and submitted to the Human Resources department by the individual's manager. Relevant Human Resources processes will be followed once the grievance has been formally made if appropriate.
- External stakeholders are encouraged to lodge grievances in writing, telephonically or verbally directly with the local company Community Liaison Officer (CLO). The **Public Grievance Form** should be used to communicate all grievances. For verbal grievances in person, the CLO should as far as possible complete the grievance form with of help the complainant. For grievances by telephone, the CLO shall register the grievance by completing the Grievance form on behalf of the complainant. The following information is required as a minimum for each grievance:
 - Complainant's name and contact details ();
 - Date of grievance; and
 - Details of grievance.
- The CLO is responsible for logging grievances in the Grievance Register (the entity that received the grievance or individual company). The following must be recorded for each grievance entered into the register as the information becomes available:
 - Grievance case number;
 - Grievance status (open, resolved, unresolved or abandoned);
 - Complainant's name and contact details;
 - Date of grievance;
 - Details of grievance;
 - Level of grievance (see assessing grievance section below);
 - History of other grievances / queries / questions (if known);
 - Resolutions discussed and agreed with the party(ies) in question;
 - Actions implemented (including dates) and;
 - Outcome of the actions implemented.
- Receipt of grievances will be formally acknowledged in writing not more than five (5) days from the date it was submitted. The initial response should inform the complainant regarding the timeframe in which a formal response can be expected. A full response should then be provided no later than one

calendar month from receipt of the grievance. For level C and D grievances, response times may be longer but this will be assessed on a case by case basis and communicated to complainant.

- Each grievance must be assessed to determine the type of response required. This will also determine the appropriate individual to manage the response. Actis have identified four (4) levels of risk associated with grievances which are used to assign responsibility and define the type of response required. The CLO should consider these levels when assessing each grievance. The table below outlines the four (4) levels and associated detail.

Table 7-1 Categorisation of Grievances

LEVEL	DETAIL
Level A	<ul style="list-style-type: none"> • Positive feedback requiring acknowledgement and thanks • Feedback that is not related to Project Blade and needs to be directed elsewhere
Level B	<ul style="list-style-type: none"> • Question or request for information only.
Level C	<ul style="list-style-type: none"> • Grievance, but it is not related to a recurrent question /request for information • Grievance, but there has been no regulatory breach • Grievance, but there has been no Actis or Project Blade policy breach • Grievance, but it is not related to death or serious illness or pollution
Level D	<ul style="list-style-type: none"> • Repeated or widespread grievance • Grievance that is a regulatory breach • Grievance that is a breach of Actis and/or Project policy • Direct accusation of breach of human rights • Grievance related to death or serious illness or pollution

- All level C and D grievances require the involvement of the senior management of Actis and the Project) Level D grievances received must be reported within two (2) days to the Actis E&S Manager. The Actis E&S Manager will liaise with Actis senior management
- Once responsibility of a grievance has been assigned to an individual, it should be investigated and resolved. Where necessary the investigation may require others to be involved.
- When resolving any grievance, records of all correspondence must be kept. Any follow up monitoring required must be documented and an implementation plan developed and actioned.
- The Grievance Register must be completed detailing resolutions discussed and agreed with the party(ies) in question, actions implemented (including dates), follow up monitoring requirements and the outcome of the actions implemented.
- A response should be provided to the complainant in all cases explaining the action taken or not taken to resolve the complaint. Responses must be provided to the complainant in written form and explained verbally if required. Should the grievance be of level C or D, the response or update may need to be provided directly by senior management and should provide clear information on the proposed final corrective action and detail any related commitments made by both parties.
- If the complainant is not satisfied with the proposal they are free to seek resolution through a formal external dispute resolution mechanism.
- A grievance is closed out when no further action can be or needs to be taken. When closing out any grievance, the following should be ensured:
 - The Grievance Register is complete;
 - The Grievance Resolution Form is completed (refer to **Annex 3**); and
 - All documented evidence including written confirmation of the complainants' agreement with the resolution is saved appropriately.

8 MONITORING AND REPORTING

8.1 MONITORING REQUIREMENTS

This SEP shall be periodically revised and updated as necessary during Project implementation. This will help ensure the validity and adequacy of the information presented herein, and that the identified methods of engagement remain appropriate in relation to the legislative requirements or standards and specific activities of the Project. Any major alterations to the Project activities shall be duly reflected in the SEP in future.

The focal point shall compile summary reports for Actis' senior management on all of the engagement activities held by the Project during the reporting period. The report shall include:

- Summary of engagement activities with local communities, entities and non-governmental organizations (**Annex 4**);
- Summary of contacts with authorities and nature of such contacts;
- Summary of press statements released and other contacts with media (e.g. interviews or TV entries regarding the Company);
- Number of grievances received, their nature and progress on their resolution if appropriate corrective measure were agreed to be taken.

9 ROLES AND RESPONSIBILITIES

This SEP will be implemented by the focal point appointed by Actis whose main responsibilities will be:

- Provision of responses to the queries from the public, authorities, media and non-governmental organizations;
- Ensuring timely approvals and dissemination of responses and satisfaction on grievances closure;
- Control over implementation of the corrective actions addressing the grievances of third parties;
- Regular monitoring of the effectiveness of the mechanism of interaction with stakeholders;
- Grievance mechanism administration, including collection, registration, keeping of the grievance database, keeping up with the deadlines set for response, sending mail responses and posting information on information boards;
- Managing information for public disclosure on Actis' website;
- Participation in discussions of grievance responses and disputes resolution;
- Assistance in the annual report preparation and the environmental and social action plan implementation;
- Regular implementation and update of this SEP; and
- Report on SEP implementation progress to Actis' senior management.

The Company's contact information, namely e-mail, phone and address of the Project office, shall be available to the key stakeholders.

The focal point is also in charge of internal communication with personnel, including collection of internal grievances from workers, including those of subcontractors/suppliers. The contact details for the focal point, namely office address, e-mails and phone numbers, shall be made available to the Project workforce, including contractors' personnel.

10 ANNEXES

ANNEX 1: Grievance Form

Reference No:	
Full Name <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	My first name _____ My last name _____ <input type="checkbox"/> I wish to raise my grievance anonymously (note in this case a response will not be provided) <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information <i>Please mark how you wish to be contacted (mail, telephone, e-mail).</i>	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> Arabic <input type="checkbox"/> English
Description of Incident or 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: _____	
Please return this form to: [name], Grievance Mechanism Focal Point, [company name], Address _____: Tel.: _____ or E-mail: ____@____.com.	

ANNEX 2: Grievance Register

No.	Reference No.	Registration Date	Name of Complainant, Location and Contact Information	Gender	Occupation	Company & Site Location (if complainant is a Project worker)	Complaint Category	Details of Complaint	Frequency	Report of the Investigation	Resolution/Management Status	How Was the Issue Resolved / Managed	Date Issued Was Resolved	Duration to Closure	Complaint Closure Signed Off by:
	Month-Year-Case Number	When was the grievance reported?	What is the full name of the complainant? Where are they from? What is their mobile number or email address?	Is the complainant a male or female?	What does he/she work?	What is the name of his/her company? Which site is he/she located on?	What is the category of the complaint?	How did he/she describe the complaint?	Is the complaint filed for the first time?	Did the focal point issue any investigation reports?	What is the current status?	How was the issue resolved by the focal point?	When was the case closed?	How long did take the focal point to close the case?	Who signed off the closure of the case?

ANNEX 3: Grievance Resolution Form

COMPLAINT ACCEPTED (Y/N):		
Complaint not accepted		
Action Taken		
Complainant notified (Y/N):		
Method of Notification:		
Date of closure:		
Complaint Accepted:		
Please, describe the event/circumstance leading to the grievance:		
Please, provide a detailed account of the occurrence (please include names of persons involved and any documentary evidence e.g., photographs, if any):		
Has any corrective action been taken to address the grievance?		
What is the proposed corrective action to address the grievance (including persons to be assigned responsibility)?		
Post-closure monitoring required (Y/N):		
Method and frequency of monitoring required:		
Administration Information		
The responsible person who handled the complaint:	Name:	Signature:

Complainant notified (Y/N):	
Method of Notification:	
Complainant satisfied or appealed:	
Case Number:	
Level of Grievance:	
Date of closure:	

Annex 4: Project Stakeholder Register Form

STAKEHOLDER ID	NAME/POSITION/ORGANIZATION	LEVEL OF INTEREST (LOW, MEDIUM, HIGH)	INFLUENCE CAPABILITY (LOW, MEDIUM, HIGH)	ENGAGEMENT PRIORITY (LOW, MEDIUM, HIGH)	OBSERVATIONS	FOLLOW UP	TIMELINE	RESPONSIBLE PARTY

