



EBRD

AKMOLA WIND FARM, KAZAKHSTAN

Stakeholder Engagement Plan





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ACRONYMS

Abbreviation	Description
CBO	Community-Based Organisation
CLO	Community Liaison Officer
CPIH	China Power International Limited
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
GM	Grievance mechanism
HSE	Health, Safety and Environmental
MW	Megawatt
NGO	Non-governmental organisation
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
SPIC	Chinese State Power Investment Corporation
WPP	Wind Power Project



1 INTRODUCTION

This document is a Stakeholder Engagement Plan (SEP) developed by WSP UK Ltd, describing the key stakeholders and the information and communication plans applicable to a series of wind farm (WPP) development projects located in northern Kazakhstan. The European Bank for Reconstruction and Development (the “EBRD”) and the Asian Infrastructure Investment Bank (the “AIIB”, together the “Lenders”) are considering providing finance to these development projects, which comprise four already developed projects, the 100 MW Borey WPP, the 50 MW Energo Trust WPP, the 40 MW Sofievskaya WPP and the 15 MW Arkalyk WPP. Subject to internal approval, additional financing from the Lenders might be considered for a 15 MW extension of the abovementioned projects, Jasyl Jel Energy WPP. The projects are in aggregate of up to 220 MW (together the “Project”; and separately “Sub-projects”).

All projects have been constructed and are now connected to the grid. The sub-project trust companies are understood to be subsidiaries of the China Power International Ltd (“CPIH” or “the Client”).

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that the Client will adopt in relation to the Project. The overall approach for the SEP and the wider Environmental and Social reporting have been based on the EBRD Performance Requirements (PRs), Environmental and Social Policy, and Public Information Policy.

The SEP seeks to define a technical and culturally appropriate approach to consultation and disclosure. The goals are to ensure that adequate and timely information is provided to Project-affected people and other stakeholders, to allow groups to have sufficient opportunity to voice their opinions and concerns, and to ensure that these concerns influence Project decisions.

A SEP was originally developed for the Project in 2021 with this document replacing the former. The SEP is a ‘live’ document and will be reviewed and updated as necessary at each stage of the Project. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during Project implementation and updated as necessary.

The specific objectives of the SEP are as follows;

- The methods, procedures, policies and actions undertaken by the Client to inform stakeholders, in a timely manner, of the potential impacts of the Project are the key subject of this document.
- A level of stakeholder engagement has already taken place during the Project, and a brief summary of stakeholder engagement is presented in the SEP.
- Communication will continue following the completion of construction and during operation.
- Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact the Client and ask to be included in future communications/engagement opportunities. Furthermore, this document describes the way in which any concerns or grievances will be handled by the Client.

Stakeholder engagement activities are currently managed by FAN Chunfeng, cffan@cpibj.com.cn or +7 717 279 29 99.

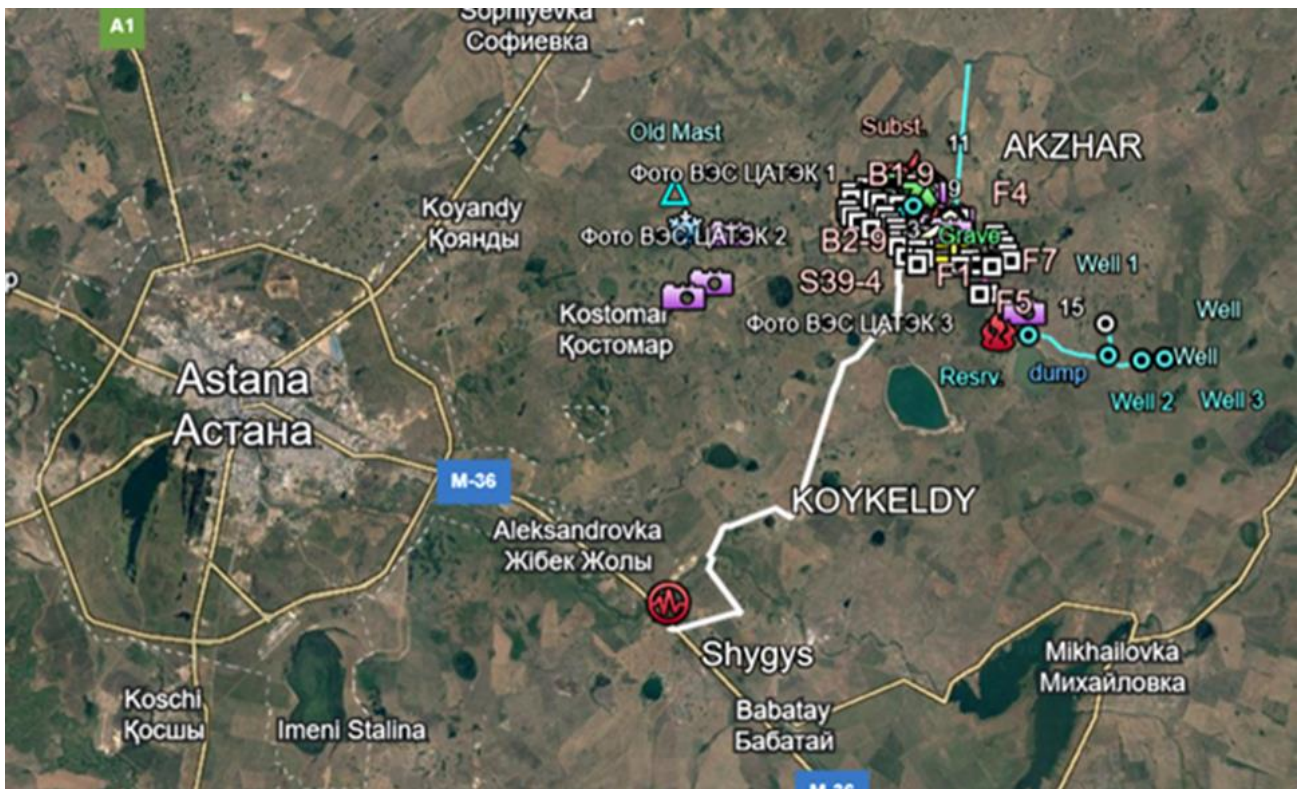
2 PROJECT DESCRIPTION

The Project is a greenfield development of a 220 MW installed capacity wind farm located near the villages of Bulaksay and Saryoba in the Akmola Region of Central Kazakhstan, approximately 30 km northeast of Astana (Figure 2-1).

The Project site is accessible throughout the year by a mixture of asphalt and gravelled roads, although some of these are in very poor condition, with access affected by poor weather. The area is also accessible by railway.

The surroundings are flat farmland and pastureland used to graze livestock including sheep, goats and cows. Total land area for the Project is 343.15 ha. Land rights have been secured, land state registration acts have been obtained, and land lease was approved for a period of 49 years.

Figure 2-1 - General Location of the Project Site



The nearest residential areas surrounding the Project are:

- The village of Bulaksay surrounded to the north-west, west and south by Project components with the closest point approximately 1 km south-east of turbine A10-1;
- The village of Saryoba surrounded to the north-west, north, east and south-east by Project components with the closest point approximately 750 m south-east of turbine S39-9;
- The village of Saryoba Station, surrounded to the north-west, north, east and south-east by Project components with the closest point approximately 1 km north-west of turbines B1-13 & B1-14.

The Project is comprised of the following key components:

- 44 Windey WD172-5000 turbines, each with rated power 5 MW,



- Medium voltage underground cabling of 35k kV,
- New Step-Up Substation 35/110kV including administrative facilities (admin and control building),
- Overhead Transmission Line linking Borey Step-Up Substation with national grid (Shygys substation), and
- Access roads.

The Project sponsor is China Power International Holding (CPIH), a wholly owned subsidiary of the Chinese State Power Investment Corporation (SPIC). The Project is divided into several companies, each assigned to a separate sub-project:

- Borey Energo LLP (Borey),
- Energo Trust LLP (Energo Trust),
- Sofievskaya Wind Power Plant LLP (Sofievskaya),
- Arkalyk Wind Power Plant LLP (Arkalyk), and
- Jasyl Jel Energy (JJE).

Construction activities have now been completed, and all sub-projects have been connected to the grid.

3 ROLES AND RESPONSIBILITIES

Responsibilities of parties of the Project are as follows:

The Project proponent is CPIH, the Client.

The Client has the overall responsibility of developing, reviewing, and updating the SEP and ESMP. The Client will also be responsible, as the Project Developer, for day-to-day management and implementation of the SEP, ESMP and related contract obligations of the Contractors. It will also on a regular basis, monitor and audit the implementation of the SEP and ESMP. The Client will provide appropriate training for their staff in relation to implementing the SEP and ESMP.

The Engineering, Procurement and Construction (EPC) contractor will carry out the detailed Project design, source plant and materials and construct the Project. Given the role in the Project, the EPC Contractor shall have the responsibility of managing the HSE performance of the majority of the workforce. The EPC contractor and all sub-contractors shall comply with the provisions of the SEP and any subsequent revisions.

The Lenders and Shareholders will require compliance with the respective standards as set out in Section 4.

The Client will appoint a Community Liaison Officer (CLO) who will be responsible for community liaison and arranging communications with local communities. The CLO will be available throughout the Project, and be largely responsible for implementing the SEP, as well as managing the grievance mechanism. The CLO will be located in the vicinity of the Project and easily accessible to local stakeholders.

4 REGULATIONS AND REQUIREMENTS

NATIONAL REQUIREMENTS

The key legislation in Kazakhstan, relating to public participation in environmental decision making, is the Environmental Code of the Republic of Kazakhstan. The most recent Environmental Code entered into force in July 2021 and ensures that members of the public affected by an environmental decision have the right to participate in environmental assessments and other environmental decision-making processes. Stakeholder engagement for environmental impact assessments (EIA) is undertaken via public hearings which involve the representatives of the concerned stakeholder state bodies and public.

Public hearings are announced in Kazakh and Russian in at least one newspaper and via at least one television or radio channel distributed or broadcasted within the affected area. Information provided should include the subject of the hearing, the place, date, and time of the hearing, a weblink to where the draft EIA can be viewed, the details (including contact information) of the promoter of the planned activity, information (including contact details) on how to request further information and contact details for the environmental body where comments and suggestions on the proposed activity can be sent. Anyone can participate in a public hearing, regardless of where they live, and make comments and suggestions on the draft EIA.

Comments and suggestions made on the draft EIA (and not withdrawn during the public hearing process) should be used to revise the draft EIA. Following the revision of the draft EIA, the public hearing process will be repeated to review the changes made in response to the comments received.

EBRD REQUIREMENTS

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy (2019)¹ which includes ten PRs for key areas of environmental and social sustainability that projects are required to meet, including PR 10 Information Disclosure and Stakeholder Engagement.

In addition, EBRD's Independent Project Accountability Mechanism (IPAM)² aims to facilitate the resolution of disputes between Project-affected people, the Bank, and EBRD Clients. Another purpose of this mechanism is to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy³.

PR 10 promotes the principle of strong stakeholder engagement as a focal point to achieve and build strong, constructive and responsible relationship essential for the successful management environmental and social impacts and issues.

The overall objectives of PR 10 are to:

- Outline a systematic approach to stakeholder engagement that will help clients build and maintain a constructive relationship with their stakeholders, in particular with directly affected communities.
- Promote improved environmental and social performance of clients through effective engagement with the project's stakeholders.

¹ Environmental and Social Policy (ebrd.com)

² Independent Project Accountability Mechanism (IPAM) (ebrd.com)

³ EBRD Access to Information Policy

- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and to ensure that meaningful environmental and social information is disclosed to the project's stakeholders.
- Ensure that grievances from affected communities and other stakeholders are responded to and managed appropriately.

The goal of consultation is to ensure that adequate and timely information is provided to interested parties and to those potentially affected by Project and policies that guide operations, and that these groups are given sufficient opportunity to voice their opinions and concerns.

Stakeholder engagement should be conducted with the aim of providing local communities that are directly affected by the project and other relevant stakeholders, with access to timely, relevant, understandable and accessible information, in a cultural appropriate manner, free of manipulation, interference, coercion and intimidation.

The engagement of stakeholders shall incorporate the following elements:

- Stakeholder identification and analysis.
- Stakeholder engagement planning.
- Disclosure of information.
- Consultation and participation.
- Grievance mechanism.
- Ongoing reporting to relevant stakeholders.

The nature and frequency of stakeholder engagement shall be commensurate to the Project scale and avoid engagement fatigue.

EBRD PR10 requires that engagement continues during project implementation, meaning throughout the project cycle, and that a grievance mechanism is established to receive and facilitate resolution of stakeholders' concerns and grievances.

Regular reports to interested stakeholders are to be provided on the environmental and social performance by the project developer. These updates should be available and accessible to the affected communities.

AIIB REQUIREMENTS

The Project will be jointly financed by EBRD and AIIB. The Project's environmental and social (ES) risks and impacts have been assessed in accordance with the EBRD's Environmental and Social Policy (EBRD's ESP) and related Performance Requirements (PRs). To provide for a coordinated approach to addressing the ES risks and impacts of the Project, and as permitted under AIIB's Environmental and Social Policy (AIIB's ESP), EBRD's ESP and PRs will apply to the Project in lieu of AIIB's ESP. There this SEP has been prepared in accordance with EBRD PR10 as described above.

5 IDENTIFICATION OF STAKEHOLDERS

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation during each stage of the project, taking into consideration the range of engagements that have already been completed. Stakeholder identification is an ongoing process, and potentially new stakeholders will continue to be identified during different stages of the Project.

A stakeholder is defined as any individual or group who is potentially affected by a project or who has an interest in the Project and its potential impacts. The objective of stakeholder identification is therefore to establish which organisations and individuals may be directly or indirectly affected (positively and negatively) by, or have an interest in, the Project.

Stakeholder identification is an ongoing process, requiring regular review and updating of the stakeholder database as the Project progresses.

The various stakeholder groups include (but not limited to):

Government agencies – National, regional and local / district Government agencies are important stakeholders within the Project’s engagement process, both as sources of information, and as those issuing the necessary permits for the Project, and for their role in informing local communities and citizens and contributing to the management of local concerns and expectations. It is therefore important to engage with all appropriate regulators from an early stage and to maintain relationships with these agencies throughout the Project lifecycle.

National and International Non-Governmental Organisations (NGOs) and Community-based Organisations (CBOs) – NGOs and CBOs, particularly those who represent communities directly affected by a project, can be important stakeholders for companies to identify and engage on a proactive basis. NGOs may have expertise valuable to effective stakeholder engagement. For example, they can be sources of local knowledge, sounding boards for project design and mitigation, conduits for consulting with sensitive groups, and partners in planning, implementing and monitoring various project-related programs⁴.

Local Workforce and Local Businesses – This includes the local workforce required for the operation of the Project.

Vulnerable Groups - Vulnerable people may require special assistance measures because they are less able to cope with potential economic displacement compared with others.

Lenders – Any lending institution financing the project.

The following stakeholder groups have been defined for this Project:

⁴ Stakeholder Engagement: A Good Practise Handbook for Companies doing Business in Emerging Markets (IFC) 2007.

Table 5-1 – List of Project Stakeholders

Stakeholder	Role
Rural area councils	Local governments representing the Bulaksay and Saryoba communities directly affected by the Project. The local councillors for each village ⁵ will play a key role in identifying local needs and problems related to the Project, and raising these concerns on behalf of their constituents.
District council departments	Akimat of the Arshaly District
Regional regulatory bodies	The Office of the Akim for the Akmola Region
Suppliers	Companies providing goods and services to the Project.
Job seekers	Individuals seeking employment
Local project workers	Employees working on the Project (including those employed directly by the Client as well as those employed by contractors).
Local residents	Individuals living with the local communities of Bulaksay and Saryoba directly affected by Project activities, with impacts arising from the landscape, roads and pastures, shadow flicker, noise and vibration, construction activities, and job opportunities.
Vulnerable groups	Individuals in the local communities who may be more sensitive to Project activities, e.g. disabled and older people.
Media	Digital and print media reporting on activities of interest to the general public. These include the national television channel KTK, Newspapers in the Arshaly District (Vperiod and Arshaly Arnasy) as well as bloggers including K_Asia and Akmola Media.
Local and international NGOs	Independent organisations with an interest in the Project including ASBK, GreenNGO, AcoAlliance, and EcoJer.
Lenders	European Bank for Reconstruction and Development (EBRD) Asian Infrastructure Investment Bank (AIIB)

⁵ At the time of writing there was one councillor temporarily representing both Bulaksay and Saryoba communities.

6 PUBLIC CONSULTATION AND DISCLOSURE

STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement is an ongoing process of sharing Project information, understanding stakeholder concerns, and building relationships based on collaboration. Stakeholder consultation is a key element of engagement and essential for effective project delivery. Disclosure of information is equally as vital. If there are risks or adverse impacts from a project, consultation must be inclusive and culturally appropriate and provide stakeholders with opportunities to express their views.

The stakeholder engagement process is designed to conform to the Kazakhstan EIA requirements and EBRD Performance Requirements.

Prior to construction, several stakeholder activities were undertaken which are summarised below.

Table 6-1 – Stakeholder Activities

Date	Description
25/02/2020	The Arshaly District Council held a meeting in Bulaksay, which was advertised on the village noticeboard, for attendees to review the allocation of land required for the 156MW extension. The meeting was chaired by the Bulaksay rural area council, with the head of the Arshaly District Council Entrepreneurship Department and attended by 19 village residents. While the land required for the project is designated State Reserve land, because it is located in the Bulaksay rural area the District Council needed to gain approval from local villagers for it to be allocated to the Project. During this meeting the villagers approved the land allocation for the Project, which was documented and included as part of the application for the land lease.
03/11/2020	The Arshaly District Council, along with representatives from the project, held a meeting with residents from Saryoba Station to explain the Project, a video was used which was prepared by the national television channel KTK. 30 residents attended.
30/09/2021	Collages of images showing the visual impact from various locations in Bulaksay and Saryoba were shared in three local WhatsApp chat groups. No responses were received from the Saryoba village chat group, 58 out of 60 responses from the Saryoba Station chat group were against the development, and 17 out of 18 responses from Bulaksay residents chat group were against the development. The two key concerns raised by these consultations were about how residents were worried about the loss of their current rural view (reduced visual amenity) and that they didn't see what benefits the Project would bring. Following this consultation exercise the Client engaged further with the affected residents and has provided social assistance to these communities, though full details of what this included have not been documented (example projects funded by the Client are listed below).
20/09/2023	WSP held a meeting with the current Councillor from Saryoba, who was also covering the role for Bulaksay, to understand how the local communities engage with the Project, what issues have arisen recently, and whether there were any issues outstanding. The interview concluded that there were no current outstanding concerns amongst the communities, and past issues had been resolved in a satisfactory manner. Two examples discussed in the interview included a complaint by Saryoba residents about heavy good vehicles (HGVs) using the local roads, which was resolved by the Client who worked to establish two routes; one for HGVs and one for light vehicles. There was also an instance where the Councillor had requested a number of crossings over the trenching work to allow for agricultural machinery and animals to cross safely. The Client worked with six herders to determine where best to situate these crossings to meet the herders needs.

Date	Description
12-14/10/2023	<p>EcoSocio Analysts, on behalf of WSP, undertook meetings with representatives in both Bulaksay and Saryoba communities to understand how residents raise issues or concerns, and whether they have any outstanding concerns, related to the Project. Generally, the local population did not have any complaints and reported that issues raised in previous consultations had been resolved positively through social assistance (for example; the sports complex in Saryoba was reconstructed, the school at Saryoba station was reconstructed and a sports ground was built near it, the water tower in Saryoba was reconstructed, and water was supplied to the house of a lonely elderly woman in Saryoba). The interviews highlighted that there was no mechanism to raise concerns or grievances anonymously.</p> <p>EcoSoci Analysts also interviewed a selection of construction workers to understand their views on working conditions, including accommodation. Workers seem generally satisfied with appropriate contracts in place and salaries paid on time. However, and with the local community, workers were not aware of how to raise anonymous grievances.</p>

FUTURE STAKEHOLDER ENGAGEMENT

To ensure meaningful and relevant communications as the Project stages progress, the Client CLO will be responsible for providing information to stakeholders, collecting and feedback, and be involved in providing responses to incoming communications (e.g., emails and post). The CLO will be responsible for maintaining this SEP and keeping it up to date, with particular attention paid to maintaining Table 5-1 (List of Project Stakeholders). The CLO will hold records of all forms of communication between Project stakeholders, including dates and participants/audience, issued raised, and resolutions achieved (where applicable).

During all future stakeholder engagement activities, a Stakeholder Engagement Log shall be used to record the date of the engagement, key findings, details of any additional actions necessary, the date these additional actions were completed, and any other relevant information. A template Stakeholder Engagement Log is provided as Appendix A.

The common language for all identified stakeholders is Russian, and therefore any information will be displayed and published in Russian. Documents forming part of the ESIA Disclosure package are also available in English.

The CLO will ensure that the following information is disclosed on the Client's or its related parties' website, and kept up to date:

- Project Non-Technical Summary,
- This SEP including the grievance mechanism (GM),
- Answers to Frequently Asked Questions about the Project, and
- Annual report to the Lenders on the ESMP implementation.

The CLO will ensure that the following information is disclosed on information boards accessible to stakeholders (e.g., in villages, in the substation building) and updated regularly:

- Project Non-Technical Summary,
- Grievance Mechanism including location of the closest grievance post-box,
- Vacancies and employment policies and procedures,
- Contact details for the CLO, and

- Project bulletins describing planned and completed tasks, mitigation measures for any identified impacts, and responses to stakeholder comments with any corrective actions taken.

Annual reports on the environmental and social performance of the Project will be prepared by the Client for EBRD which will include a summary of grievance handling. The CLO will provide village Councillors with the periodic updates and status of all issues raised by local communities and other stakeholders to ensure further distribution among their constituencies.

In addition to using the Client's website and information boards, other methods of communication will include:

- WhatsApp or other chat app chats including groups established for the local villages,
- Direct emails to contacts including the village Councillors,
- In person visits to members of the community and/or organised community meetings, and

Information about the Project that should be communicated to Stakeholders could relate to both the benefits and impacts that have been identified as being associated with the Projects operations.

These are summarised as follows:

- The Project is important in supporting Kazakhstan as it seeks to increase the amount of renewable energy generated in the country and meet increasing energy demands.
- Current livestock activities (primarily unsupervised grazing) are not anticipated to be affected by the Project.
- While road conditions are poor around the Project site, once the Project is operational, Project-related traffic is not anticipated to affect road conditions.
- The visual impacts of the turbines will be high, and any negative impact will be monitored and required measures will be implemented under the corporate social responsibility programme.
- There should not be any noise impacts resulting from the Project, however complaints relating to noise can be raised via the Grievance Mechanism (detailed below).
- There are times when shadow flicker (when the rotating wind turbine blades cause a flickering shadow) could affect residents in Bulaksay. Project operators will manage this by switching off specific turbines if necessary, during those times when the shadow flicker is expected to occur and where negative impact is assessed and verified. Any complaints relating to shadow flicker can be raised via the Grievance Mechanism (detailed below).
- . Re-seeding and planting will take place in areas where topsoil was disturbed during the construction stage, and rehabilitation of topsoil in these areas will be monitored.

STAKEHOLDER ENGAGEMENT PROGRAMME

Future stakeholder engagement activities shall be undertaken during the operation of the Project:

The outcomes of future stakeholder engagement activities will be documented in the Stakeholder Engagement Log. Future stakeholder engagement should be built upon the activities that have taken to date and include the full range of stakeholders identified in Table 5-1. Recommended methods for consultation with these groups are set out below.

Table 6-2 - Engagement Methods

Stakeholder	Methods to engage	When	Who
Rural area councils	Telephone, email, formal letters and/or meetings at the local Council office with the local Councillor	Monthly	Client CLO
District council departments	Telephone, email, formal letters and/or meetings	Quarterly	Client CLO
Regional regulatory bodies	Formal submission of information (e.g., accident reports) through community centres as required by legislation.	As required	Client EHS Lead EPC Contractor
Suppliers	Information on the Company website and through emails (following subscribing to early warnings).	As needed	Client Procurement Lead
Project workers	Information board at WPP onsite office, company website, during Induction, and via Client HR	As needed	Client CLO Client HR
Local residents	Rural areas WhatsApp chats, project information boards in local communities, company website, local council meetings, and via the local Councillor(s)	Monthly	Client CLO
Vulnerable groups	In-person visits, WhatsApp messaging, phone calls	Monthly	Client CLO
Media	Emails to point of contact and press-releases published on company website	As needed	Client CLO
Local and international NGOs	Information on the Company website and through emails if registered to receive updates.	As needed	Client CLO
Lenders	Regular (at least annual) reports providing updates on the Project's environmental and social performance.	As required by the ESAP	Client CLO Client EHS Lead

7 MONITORING AND REPORTING

Stakeholder engagement during operations will relate to the ongoing operational and maintenance activities.

Where any significant works are required during operations, this may necessitate additional stakeholder consultation prior to the works commencing.

Engagement with stakeholders during operations is primarily about involving stakeholders in assessing whether previously identified mitigation measures are working as intended, being responsive to grievances and identifying alternatives where there are failings.

The monitoring KPIs that shall be used are set out below.

Topic Area	Monitoring KPIs
Provision of Project information	Number of public announcements made to provide accurate information on the current status of the Project, using social and other types of traditional media.
Community Meetings (every 12 months)	<p>Number community meetings held as planned, per year in both Bulaksay and Saryoba villages.</p> <p>Number of people attending each monthly public consultation meeting, broken down by gender.</p> <p>Number of high/medium-priority and repeat actions for the Client outstanding each month.</p>
Annual Environmental and Social updates for Village Councillors	Provided annual environmental and social updates to stakeholders via the Village Councillors
Grievance mechanism	<p>Number and type of grievances raised per month and their status: open/processed/closed.</p> <p>Number of grievances resolved to the satisfaction of the grievant.</p> <p>Number of grievances resolved within the agreed timeline.</p>
General	The CLO will keep track of complaints and requests to identify if there are repeat complaints/requests, related to certain topic areas/stakeholder groups. This will allow for analysis of key positive or negative trends.

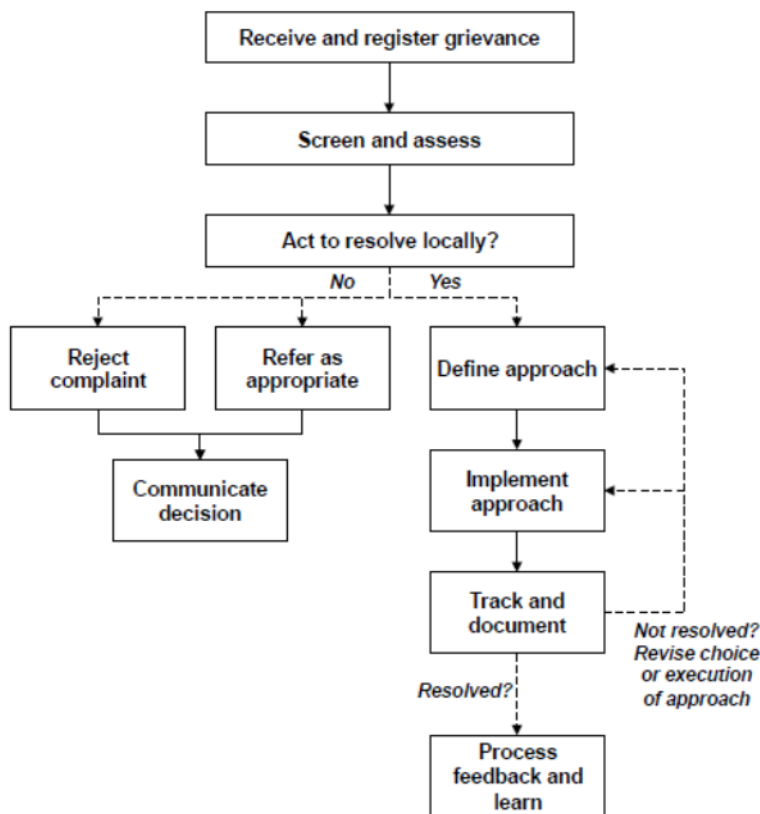
8 GRIEVANCE MECHANISM

The EBRD PRs emphasize that a grievance mechanism should help the Client understand the community’s perception of Project risks and impacts so as to adjust its measures and actions to address the community concerns.

The objective of the Client’s grievance procedure is to ensure that all comments and complaints from people directly affected by the Project, including local communities, farmers and their families are processed and considered in an appropriate way. Furthermore, the grievance mechanism (GM) should contain the corrective actions needed to be implemented in relation to complaints received with guarantees that the complainant is being informed of the outcome. The means by which stakeholders may make comments and complaints must be appropriate to their culture.

The flowchart shown in Figure 9-1 below illustrates a general mechanism of processing the complaints.

Figure 8-1 - Grievance Mechanism Flowchart



Local people need a trusted way to voice and resolve concerns linked to a project’s operations. A locally based grievance resolution mechanism provides a promising avenue by offering a reliable structure and set of approaches where local people and the company can find effective solutions together.

The Client has developed and implemented a grievance mechanism which:

- Increases the likelihood that small disputes can be brought to a resolution relatively quickly.



- Offers an early, efficient, and less costly way to address concerns.
- Promotes a responsible business climate for companies and enhances accountability to and acceptance by the host community.

A successful grievance mechanism helps achieve the following goals:

- Open channels for effective communication.
- Demonstrate that a company is concerned about community members and their well-being.
- Mitigate or prevent adverse impacts on communities caused by company operations.
- Improve trust and respect.
- Provide structures for raising, addressing, and resolving issues that reduce imbalances in power.
- Promote productive relationships.
- Build community acceptance of a company's "social license" to operate.

At all times, the Client will accept comments and complaints concerning the Project in both verbal and written formats. Anonymous grievances shall also be accepted, recorded and investigated.

A Community Liaison Officer (CLO) will be used to raise awareness of the grievance mechanism, provide practical assistance to people who wish to raise a concern, and shall provide support in resolving grievances as well.

The responsibilities specifically associated with grievance management are summarised below.

Entity	Responsibilities
Client Project Manager	Ensure that the Client Community Liaison Officer has the necessary resources and personnel required to meet the commitments described in the SEP and GM. Approve before their release, all external communications such as posters, press and media releases, etc. Support the resolution of grievances. Ensure that grievances raised are used to improve the Project's environmental and social performance in the future, so that similar grievances do not re-occur over time.
Client Community Liaison Officer	Take ownership of the SEP and GM including the Grievance Register (which is kept updated with each grievance raised). Oversee the assessment and resolution of grievances. Raise awareness of the GM Provide practical assistance to people seeking to raise a grievance. Support the investigation and resolution of grievances in close coordination with other concerned parties, including the person/group raising the concern.
Contractor Representatives	To direct any grievances made by a person or group in contact with a member of the Contractor's workforce present on site, to the Client CLO for formal recording, investigation and resolution. To provide their full support during the process of the Client investigating and resolving any grievances that occur.



RECEIVING AND REGISTERING GRIEVANCES

Any written and/or verbal complaint will be recorded by the Client CLO, and potentially other Client representatives. Grievance boxes will also be in place within the Bulaksay and Saryoba communities to enable anonymous grievances to be raised, which shall be checked at a reasonable interval by the Client CLO. These boxes should be locked, with only the Client CLO having access to them, to avoid unauthorised parties access to complaints.).

In addition to the above, a post-box will be provided at the entrance of the Administrative Building located at the sub-station to allow local people to raise grievances in a more informal way, and this shall be checked daily. This box will also be locked to prevent unauthorised access to grievances submitted in this way.

In all cases, the date of gathering the grievance from a post-box will be the date the form is collected as this is the date from when it is received.

Any comments and complaints received either from the Councillors on behalf of their constituents, directly from community members or workers, via phone calls, chat app messages, SMS texts or a post-box, will be summarised and listed in a Grievance Register, containing the name/group of commenter/complainant (if provided), date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate) and the date of response sent to the commenter/complainant.

The Client will maintain all records in confidence by ensuring that paper records are kept stored in a locked file, and a secure password shall be used to keep electronic records confidential.

SCREENING AND ASSESSMENT OF A GRIEVANCE

Following a grievance being recorded, the Client will acknowledge the grievance, in writing, within a period of up to five working days and state that this is now being investigated in accordance with the grievance mechanism.

During the assessment, the complaints team shall gather information about the case and key issues and concerns and help determine whether and how the complaint might be resolved. The Client will:

- Determine who will conduct the assessment. Typically, the CLO performs this task or directs it to an appropriate staff or department for assessment (production, procurement, environment, community relations, human resources).
- Select a company member to engage directly with the complainants to gain a first-hand understanding of the nature of the complaint.
- Clarify the parties, issues, views, and options involved:
 - Identify the parties involved.
 - Clarify issues and concerns raised by the complaint.
 - Gather views of other stakeholders, including those in the company.
 - Determine initial options that parties have considered and explore various approaches for settlement.
- Classify the complaint in terms of its seriousness (high, medium, or low). Seriousness includes the potential to impact both the company and the community.



Issues to consider include the gravity of the allegation, the potential impact on an individual's or a group's welfare and safety, or the public profile of the issue. A complaint's seriousness is linked to who in the company needs to know about it and whether senior management is advised.

Rather than resorting to a purely unilateral "investigate, decide, and announce" strategy, the Client will engage more directly with the complainant in the assessment process, and involve the complainant in influencing the resolution process to be selected, and settlement options.

RESPONDING TO A GRIEVANCE

The system for responding to the complainant should specify who communicates and how.

The Site Manager may participate in feedback, depending upon the seriousness of the complaint.

When formulating a response, the Client will ensure that:

- The Client CLO prepares the response. The response should consider the complainants' views about the process for settlement as well as provide a specific remedy. The response may suggest an approach on how to settle the issues, or it may offer a preliminary settlement.
- To present and discuss the response to the complainant, consider holding a meeting with the Client CLO, relevant company manager, and the complainant. If a direct meeting is not possible, consider meeting with a neutral third party serving as facilitator. The group would also discuss appropriate next steps during this meeting. If the proposal is a settlement offer and it is accepted, the complaint is resolved successfully and there is no need to proceed to the next step of selecting a resolution approach. If the complainant is not happy with the response about a resolution process or substance, the group should try to reach an agreement that would be mutually acceptable.

All comments and complaints will be responded to either verbally or in writing, by the CLO, in accordance with preferred method of communication specified by the complainant in the Comments and Complaints Form. Comments will not be considered as complaints and may not, therefore, be responded to unless the commenter requests a response.

The Client will respond to the complaint within a period of up to fifteen (15) working days with a proposed resolution to the grievance. If the proposed resolution cannot be sent to the complainant within this time for any reason, then the CLO will inform the complainant about the reason for the delay and indicate a target date as to when a proposed resolution will be submitted to them.

MONITORING

Grievances need to be tracked and monitored as they proceed through the system. Effective tracking and documentation accomplish several goals:

- Document the severity of a complaint (high, medium, low) according to specific criteria. The level of severity guides requirements for alerting senior management and determines the seniority of management oversight needed.
- Provide assurance that a specific person is responsible for overseeing each grievance—from receipt and registration to implementation.
- Promote timely resolution according to the time periods specified in the SEP.
- Inform all concerned (the complainant and appropriate company personnel) about the status of the case and progress being made toward resolution.
- Document the company's response and outcome(s) to promote fairness and consistency.
- Record stakeholders' response(s) and whether additional research or consultation is needed.



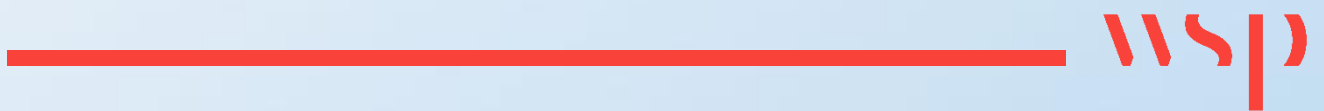
- Provide a record of settlements and helps develop standards and criteria for use in the resolution of comparable issues in the future.
- Monitor the implementation of any settlement to ensure that it is timely and comprehensive.
- Provide data needed for quality control measures, to assess the effectiveness of the process and action(s) to resolve complaints.
- Identify learning from specific cases to be used later to assess the effectiveness of the mechanism or address systemic issues that may require changes in company policies or performance.

In order to ensure that grievances are tracked and documented, the Client has provided for the following:

- Tracking forms and procedures for gathering information from company personnel and complainant(s).
- The CLO will routinely update the database of grievances.
- Periodically review information so as to recognize grievance patterns, identify any systemic causes of grievances, promote transparency, publicize how complaints are being handled by the company, and periodically evaluate the overall functioning of the mechanism.
- Processes for informing stakeholders about the status of a case (such as written status reports).
- Procedures for provision of regular reporting of grievances and resolutions.

Appendix A

STAKEHOLDER ENGAGEMENT LOG TEMPLATE





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