



LOCAL COMMUNITY GRIEVANCE MECHANISM

AMUNET WIND PROJECT

AWPC-E&S-LGM

RESPONSIBILITIES

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1 OBJECTIVE

The aim of this grievance mechanism is to establish a system to receive and facilitate resolution of the stakeholder's concerns and grievances about the Amunet Solar Project's environmental and social performance.

Thus, the overall objective of this grievance mechanism is to ensure that concerns, complaints / grievances / claims, and suggestions coming from PAPs, communities or other stakeholders involved in the implementation of the project are promptly received, recorded, analyzed and processed. This will make it possible to detect the causes and take corrective and / or preventive actions in order to avoid an aggravation, which could go beyond the control of the project.

Principles to an effective GM:

- a) Accessibility: establishing a route of communication between stakeholders
- b) Impartiality: the complaints must be treated seriously and a proper management must be installed to demonstrate the will of the company to handle grievances impartially.
- c) Confidentiality:
- d) Transparency: the process should be fully transparent for stakeholders to be able to express their concerns and file grievances.

Specifically, this GM aims to:

- establish a permanent dialogue between the project and the local communities on the project;
- recognize, promote and protect the rights of PAPs to voice their concerns and / or lodge complaints;
- give clear instructions on how to handle complaints by defining simple, practical and effective procedures that will be widely disseminated within the intervention communities to manage complaints and take appropriate action in accordance with human dignity;
- help to grasp and solve problems before they become more serious and spread, or degenerate into conflicts.

Clearly, the grievance mechanism defines procedures to receive, record, process and report any concerns of affected people and other stakeholders as part of the implementation of the project Amunet Wind and accessible way, transparent and diligent.

It is important to highlight that the GM does not replace existing administrative or judicial redress mechanisms.

This project specific grievance mechanism will be reviewed and updated after any change in the context in which the project operates during the all phases of the project.

2 SCOPE

The aim of the grievance mechanism is to establish 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 has the Affected Communities as its primary beneficiaries (a separate grievance mechanism for workers will be included in the Labour and Working Conditions Management Plan). It seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible at no cost and without retribution to the party that originated the issue or concern. The mechanism will not impede access to judicial or administrative remedies. The grievance mechanism was explained during the ESIA consultation meetings and will continue to be publicised during the project's lifecycle

The grievance mechanism applies to all phases of the project life cycle.

The Community Grievance Mechanism Procedure applies also to all requests and complaints that might arise from any person (community members or others) considering themselves affected by the Project, including but not limited to the following:

- damage to public / private assets;
- degradation / deterioration of local infrastructures (e.g. roads);
- waste and/or washing concrete dumping;
- disturbance from noise, dust, traffic accidents, pollution, excessive speed of project's vehicles;
- degradation of the environment and disturbance of wildlife;
- negative behaviour of construction workforce towards local communities and persons;
- gender-based violence and harassment;
- conduct of security providers;
- etc.

Generally, all claims from affected communities should be accepted and no judgment made prior to investigation, even if complaints are minor. However, according to best practice, the following claims should be directed outside of project-level mechanisms:

- Complaints clearly not related to the Project: it is sometimes difficult to determine which issues are related to the Project and which are not. If in doubt, grievances should be accepted and investigated;
- Issues related to governmental policy and government institutions;
- Complaints constituting criminal activity and violence: in these cases, complainants should be referred to the justice system;
- Labour-related grievances: a separate mechanism will be established through the Labour and Working Conditions Management Plan and include in its scope all grievances by the company employees, contractors, subcontractors and suppliers. This grievance mechanism will be aligned with IFC PS 2; and
- Commercial disputes: commercial matters should be stipulated for in contractual agreements and issues should be resolved through a variety of commercial dispute resolution mechanisms or civil courts. Suppliers will have access to the internal grievance mechanism stipulated in the previous point.

3 STANDARDS

The implementation of this grievance mechanism shall be carried out in accordance with the following standards:

National Legislations

- Ministry of Labor Decree 185/2003. Article 19 briefly addresses the issue of worker grievances stating that any work-related complaints should be raised to responsible company representative and should be addressed.

International Standards and Requirements

- International Finance Corporation (IFC) Performance Standard 2: Labor and Working Conditions. Paragraph 20.
- ISO 26000: 2010 on social responsibility;
- United Nations Guiding Principles on Business and Human Rights;

Project specific documents

- Environmental and Social Impact Assessment (ESIA)
- Environmental and Social Management System (ESMS) Manual

AMEA Power's Policies and Procedures

- AMEA Power's Procedure on Local Procurement and Employment (AP-QHSE-PRO-011)
- AMEA Power's Procedure on Labour and Working Conditions Management (AP-QHSE-PRO-006-rev00)
- AMEA Power's HR Policy (AP-HR-POL-001)
- AMEA Power's Gender Equality Policy statement (AP-HR-POL-002)

4 INTRODUCTION

Amunet Wind Power Company (AWPC) (hereafter referred to as ‘the Developer’ or ‘Project Company’), a wholly owned AMEA Power Ltd., responsible for the development, execution, and ownership of the Project.

The Project is located in the Red Sea Governorate of Egypt, around 230km to the southeast of the capital city of Cairo. More specifically, the Project is located near the Red Sea shoreline and within the Ras Ghareb District of the Red Sea Governorate, where the closest residential areas include Ras Ghareb city (located 9km to the southeast) and Zaafarana village (65km to the north) – refer to figure below.

The Project is located within a 284km² area that has been allocated by the GoE to NREA for development of wind farms (presented in green in the figure below). Within this, a land area of 69.4km² (presented in blue in the figure below) has been allocated to the Developer by NREA for the development of this Project.

AWPC will appointing an Engineering, Procurement, and Construction (EPC) Contractor for the Project. The EPC Contractor will be responsible for preparing the detailed design, delivery of project components to the site, and overall construction of the Project. EPC Contractor will be supported by a number of subcontractors whom have not been appointed at this stage.



Figure A: Project Location

The environmental clearance for this Project is governed by the Egyptian Environmental Affairs Agency (EEAA) as stipulated by the Law No. 4 of 1994 (Law on Protection of the Environment). Executive Regulations 1995 (Prime Ministers Decree 338) issued in accordance with the Law, classifies a wind farm development of such nature and capacity (i.e. this Project) as “Category C”, requiring a comprehensive Environmental and Social Impact Assessment (ESIA) in order to obtain the environmental clearance and permit, in order to commence with construction and operational activities.

5 PRINCIPLES

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

- Clarify at the outset what is the purpose of the procedure;
- Assure people that there will be neither cost nor retribution associated with lodging a grievance; and
- The entire process (i.e. how a complaint is received and reviewed, how decisions are made and what possibilities may exist for appeal) will be made as transparent as possible by putting it into written form, publicising it and explaining it to the stakeholders

To properly manage the potential impacts identified in the ESIA, a grievance mechanism based on the appointment of a Community Liaison officer in charge of managing community complaints has been designed.

6 METHODS TO ACCESS

The methods to access the grievance mechanism have been disclosed to the local communities during the ESIA consultations. The grievance mechanism will be publicised at the site gate, at the Local Community Chief's Offices, and at the Project Company's website.

All information about grievance procedures and grievance registers kept on site will be in English, but grievance forms can be filled in Arabic.

However, since the project-affected communities have no or minimal access to internet, but the great majority of them has a mobile phone, it's expected that a number of grievances will be received by phone. For such a reason the grievance mechanism's will provide a phone number that will be made available to the communities.

Access to the mechanism will be free of cost. No costs nor retributions will be associated with lodging a grievance.

In order to facilitate women's access to the mechanism, besides the CLO, the SPV (AWPC) has appointed a female CLO Assistant. Local women made no specific suggestions to improve access to the grievance mechanism. This will prevent situations where women might feel uncomfortable discussing a grievance with a person of the opposite sex.

7 TRANSPARENCY & ACCOUNTABILITY

Coming out with a complaint can pose risks for people, especially if it concerns issues such as corruption, misconduct, monetary compensation, or if it interferes with local social norms, including gender norms. The grievance mechanism includes precautions such as a clear non-retaliation policy, measures to ensure confidentiality and safeguarding of the personal data collected in relation to a complaint, as well as an option to submit anonymous grievances.

The grievance mechanism provides a feedback-system to inform and update the claimant on the handling of his/her complaint. Responses to anonymous complaints will be posted on Project's public channels (web site, social media, and handouts at CLO office).

8 TIMELINE

The community grievance mechanism aims at:

- acknowledge receipt of grievances/ complaints within 2 working days;
- inform about the decision taken within 10 working days; and
- close grievances within 4 weeks from receipt.

9 PUBLICIZING GRIEVANCE MECHANISM

The grievance mechanisms will be publicized in the following ways:

- Posters at the site entrance and at the location of the grievance boxes (Chiefs offices);
- Stakeholder Engagement Activities; and
- Online.

The information provided online and on printed material will be available in English and Arabic, and will include at least the following:

- What the Grievance Mechanism is and its key characteristics;
- Who can raise complaints (i.e. all stakeholders);
- Where, when, and how community members can file complaints (to agree during the stakeholder engagement process);
- Who is responsible for receiving and responding to complaints;
- What sort of response complainants can expect from the company, including timing of response; and
- What other rights and protection are guaranteed.

The CLO will clarify in Arabic language any of the points above, if required, during stakeholder engagement activities and engagement with grievants.

The CLO will inform the local communities about this mechanism, arranging face-to-face meetings at the following levels:

- villages around the Project site;
- local administrations / health care unit; and
- sensitive areas, such as mosques, market areas, schools.

In addition to the explanation provided verbally, the Community Officer Desk will provide the communities with printed materials (e.g. posters) to be affixed in prominent areas, providing the key facts about the mechanism and contact information, consisting in a dedicated phone number.

Communication and awareness raising activities regarding the Grievance Mechanism will be repeated in regular intervals.

10 GRIEVANCE MECHANISM PROCEDURE

Handling grievances encompasses a step-by-step process as well as assigned responsibilities for their proper completion, as detailed in the sections below.

10.1 Submitting a complaint

The grievance mechanism will allow for complaints to be filed in several ways:

- By post;
- By phone;
- Online: By email and/or through an online form;
- At the project gate;
- At the Mailboxes (project gate, Chief's Offices) and
- During meetings with the Community Liaison Officers.

Written complaints will be received by post, email and mailboxes. Verbal complaints will be received at the project's gate and during meetings with the CLO. Therefore, the security personnel have to be aware and trained to deal with the complainant appropriately. The training of security personnel will be addressed through a Project-specific Security Management Plan, in compliance with the requirements of the Community Health and Safety chapter of the ESIA. Security personnel should communicate to the Community Liaison Officer that a stakeholder wants to submit a grievance. For complainants from stakeholders that prefer to submit their complaints verbally, the Community's Liaison Officers will meet them at the company's gate (or could offer them to go into the company's offices, if the complainant is comfortable to do so) and will take notes on the details of the complainant and read them out loud to the complainant to confirm that the key elements of the complaint have been captured.

The community liaison officer will regularly meet stakeholders during construction, operation and decommissioning. Specific details on meeting frequency are provided in the following sections.

A female CLO will be available to discuss with women any grievances related to gender based harassment or violence.

10.2 Receiving complaints

The company will publicly commit to a certain time frame in which all recorded complaints will be responded to. By letting people know when they can expect to be contacted by company personnel and/or receive a response to their complaint the uncertainty related to the grievance resolution process may be reduced.

The following receipt procedure will be followed for grievances:

- All incoming grievances will be acknowledged as soon as possible, preferably at the time of submission, and no later than two days from submission. A formal confirmation—with a complaint number, or other identifier, and a timeline for response— assures the complainant that the organization is taking the grievance seriously, and it gives the project a record of the allegation. As a good practice, complaints received in person will be acknowledged on the spot;
- Once a comment/complaint has been received it must first be logged in a Stakeholder Grievance Register (document present within the 'QHSE Statistics' report that will be submitted monthly to Lenders and available on site for consultation).

- If a more complex investigation is required, the complainant will receive an update within two weeks of the grievance being received, explaining the actions required to resolve the complaint, and the likely timeframe; and
- The Project Company will explain in the first letter of acknowledgment which claims are clearly outside the scope of the mechanism and what alternative mechanisms communities can use to address these potential issues.

10.3 Reviewing and Investigating grievances

To ensure that all grievances are adequately investigated and closed out, a grievance log will be kept, documenting all the actions taken to address each grievance.

An extensive investigation may be required when grievances are complex and cannot be resolved quickly. The company will take full responsibility for investigating the details of grievances coming through its grievance mechanism, following the principle of “no cost to communities”.

In cases of sensitive grievances - such as those involving multiple interests and a large number of affected people - it may help to engage outside organizations in a joint investigation, or allow for participation of local authorities, only if the complainants agree to this approach.

For complex grievances an investigation team will have to be appointed. If the investigation team is formed internally, issues that will be taken into consideration include potential conflicts of interest, qualifications, gender composition, and budget.

Meetings with complainants and site visits can be useful for grievance investigation and will be undertaken, as appropriate.

The CLO shall discuss the grievances that have been received, the investigation progress and the proposed / agreed resolution with the with the Project Company (AWPC). For complex grievances, AMEA Power will participate in the grievance investigation and resolution.

Complainants will be informed weekly of the status of their grievance.

10.4 Grievance Resolution options and responses

One of the potential advantages of a grievance mechanism is its flexibility. Rather than prescribe a specific procedure for each particular type of complaint, a list of possible options appropriate for different types of grievances will be provided. Options may include altering or halting harmful activities or restricting their timing and scope (e.g. for construction noise), providing an apology, replacing lost property, providing monetary compensation, revising the community’s engagement strategy, and renegotiating existing commitments or policies.

The grievance investigation team will provide a proposal to resolve the complaint, which will have the backing of the Senior Management. The Community Liaison Officer will then contact the complainant to get an agreement on the proposed solution.

If all parties accept the proposed solution, the agreed actions will be implemented in the established timeframe. In the case that complainant does not accept the proposed resolution, the Project Company shall re-assess the situation and make sure that all alternatives within the grievance mechanism are explored. If agreeing on a solution

acceptable to all parties is not possible within the grievance mechanism, the complaint will be referred to external mechanisms.

Close-up monitoring of a complaint will be undertaken, if possible, by collecting proof that the necessary actions have taken place. For example:

- If the issue was resolved with the satisfaction of the complainants, get a confirmation and file it along with the case documentation; and
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how these were resolved.

11 ROLES AND RESPONSIBILITIES

11.1 Community Liaison Officer

The Community Liaison Officer is appointed by the Project Company. He/she is responsible for the overall administration of the Community Grievance Mechanism, for coordination with Developers and Contractors on community grievances, and for overall Project's community relations. As such, he/she is the first point of contact for community members with complaints and grievances. The CLO reports directly to the Project Company Social Specialist. The CLO will be supported also by a CLO assistant (woman) that will assist the CLO with all his responsibilities.

In relation to the grievance mechanism procedure CLO shall:

- implement the grievance mechanism during the project's lifecycle, under the supervision of the Social Specialist;
- inform and consult project-affected communities about the grievance mechanism procedure provision and its access modalities;
- fill and record the received complaints in Grievance Forms and the Grievance Management Database;
- engage with complainants. This could include providing complainants with information or clarification on any issues of concern;
- communicating with the complainants, giving updates about the examination process and resolution process;
- investigate the grievance and assigning an appropriate resolving officer or Developers/ Contractors responsible;
- inspect the areas, if needed, in order to assess the reported grievances;
- report the grievances to the AWPC Social Specialist;
- promptly inform the Site Security about the complaint, if security risks may arise; and
- define corrective actions, in coordination with social specialist and Managers of the involved departments.

11.2 Social Specialist

The Social Specialist is appointed by the Project Company. The Social Specialist reports directly to the Site Manager and functionally to the AMEA Power's Head of ESG.

In relation to the grievance mechanism procedure, the Social Specialist shall:

- provide training to Project Company's staff on grievance mechanism for its implementation
- coordinate the management of complaints at all levels;
- assist to disseminate information among the local community;
- ensure the traceability of the management of complaints;
- ensure that the complainant is returned with an action that acceptable to the community;
- follow-up on effective resolution and/or closure of the grievance according to this mechanism;
- communicating the outcome to the complainant;

- update the community grievance mechanism when it is need after assessment the implementation; and
- prepare, review, update and submit the grievances registers, grievance notification, grievance close-out forms to Project Company and AMEA Power on a monthly basis.

11.3 Head - ESG

The Head of ESG is appointed by AMEA Power. The HEAD of ESG reports directly to the AMEA Power's Chief Technical Officer (CTO).

In relation to the grievance mechanism procedure, the Head-ESG shall:

- ensure the overall coordination of the GM and formulates guidelines for its implementation
- guarantee the implementation of the Grievance Mechanism Procedure through the ESMS;
- allocate necessary resources at all levels to ensure effective management of community grievances;
- ensure that all received complaints are thoroughly considered and reported to identify causes, trends and propose mitigating measures; and
- ensure that the mitigating measures are followed through to completion.

11.4 Site Manager

The Site Manger is appointed by the Project Company. His main role is to participate in the investigation of all grievances that are related to activities under EPC / O&M / Decommissioning Contractor scope, including activities related to the subcontractors and suppliers.

The Site Manager additionally shall:

- ensure that there is a well-staffed and trained Community Liaison Officer, and that the required resources (e.g. vehicles, company phones, office materials) are provided to them;
- supervise the processing and resolution of all grievances;
- supervise the disclosure of Project information;
- oversee that the grievance mechanism is complied with; and
- ensure that the grievance mechanism is publicised.

12 TRAINING

The Project Company shall ensure that all site personnel (including security staff) are informed about this procedure and are made aware of the possible impacts on the project-affected communities.

Particular attention shall be paid in training personnel that also work outside the project site, such as the drivers (linkage to the Traffic Management Plan). Such personnel will be provided with copies of the grievance mechanism form and contact details of the CLOs.

13 MONITORING, AUDIT AND REPORTING

The implementation of this grievance mechanism will be monitored through the periodic review of the complaints register which will be updated and submitted by Project Company (AWPC) to the AMEA Power's Corporate ESG team on a monthly basis (or more often as needed), to assess whether engagement activities under this plan are being undertaken successfully and in a timely manner.

The implementation of this plan will be monitored through ongoing monitoring of the email access channel and review of the grievance register. The performance of its implementation and the timely resolution of complaints are assessed monthly and also during semi-annual and annual internal audits by evaluating:

- The extent to which the grievance mechanism is functioning effectively and is being implemented as intended;
- Any particular trend revealed by the nature of the grievances received, the root cause of the grievances and the effectiveness and level of satisfaction in resolving them; and
- Potential areas for improvement and concern.

As noted, the following documents must be properly retained for each grievance received in the Project Sponsor:

- Grievance Registration Form (Annex 1)
- Grievance Close out Form (Annex 2)
- Grievance log (Annex 3), which consolidates all recorded grievances as well as commitments, agreements and feedback from complainants until resolution and closure of the grievance.
- Grievance Resolution Form (Annex 4)

On a monthly basis, the Project Company will provide a report on the status of complaints received through this complaints mechanism to AMEA POWER that in cascade will inform the Lenders and Advisors.

ANNEX 1 – GRIEVANCE SHEET

PUBLIC GRIEVANCE FORM

Reference No.	
Full Name:	
Contact Information Please mark how you wish to be contacted and add contact details	<input type="checkbox"/> By Post: <input type="checkbox"/> By Telephone: <input type="checkbox"/> By E-mail: <input type="checkbox"/> Other (please specify)
Description of Concern, Incident or Grievance	What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of concern, incident, or 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 insert this form in one of the grievance boxes	

ANNEX 2 – GRIEVANCE CLOSEOUT FORM

GRIEVANCE CLOSE-OUT FORM

Reference No:	
Full Name	
Description of Concern, Incident or Grievance:	
Description of Actions Taken to Resolve the Grievance	
Date of Submission of Grievance	
Date of Communication of Solution to Grievance	
Has the grievance been resolved (Yes/No)	

CLO

Name:

Date:

Signature:

Complainant

Name:

Date:

Signature

ANNEX 3 – GRIEVANCE LOG SHEET

Ref No.	How Was grievance submitted	Date of Submission of Grievance	Name and Contact Information	Description of Grievance	Actions Taken to Resolve the Grievance	Date of Communication of Solution	Has grievance been resolved (Y/N) if not explain why

ANNEX 4 – GRIEVANCE RESOLUTION FORM

How was grievance received	<input type="checkbox"/> Grievance Box (specify which box) <input type="checkbox"/> Directly contact with CLO
Reference No:	
Description of Concern, Incident or Grievance	<i>What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>
Date of Grievance	
Has the Grievance Been Resolved?	<input type="checkbox"/> Yes <input type="checkbox"/> No; <i>if not provide a justification below</i>
Fill Out Either Section 1 OR Section 2 below	
Section 1	
Summary of Actions Undertaken to Resolve Grievance	
Date of Implementation	
Section 2	
Summary of Proposed Actions to be Implemented to Resolve Grievance	
Timeline for Implementation	

CLO Signature:

Project Manager Signature:

Date:

Date:

ANNEX 5 – GRIEVANCE CLOSEOUT FORM

Reference No:	
Full Name	
Description of Concern, Incident or Grievance:	
Description of Actions Taken to Resolve the Grievance	
Date of Submission of Grievance	
Date of Communication of Solution to Grievance	
Has the grievance been resolved (Yes/No)	

CLO

Name:

Date:

Signature:

Complainant

Name:

Date:

Signature