



LOCAL COMMUNITY GRIEVANCE MECHANISM

ABYDOS SOLAR PV PLANT

RESPONSIBILITIES

PHASE	DATE	NAME	FUNCTION
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1 INTRODUCTION

Abydos Solar Power Company (ASPC) (hereafter referred to as 'the Developer') was selected for the development of a 500-Megawatt (MW) Solar Photovoltaic (PV) facility in Aswan Governorate (hereafter referred to as 'the Project').

The Project Site is located in Aswan Governorate around 600 km southeast of Cairo. More specifically, from an administrative perspective, the Project site is located at the most southern border of Kom Omo District (adjacent to Daraw District which is located just south of the Project site). The closest villages to the Project site include: (i) Fares Village which is administratively under Kom Ombo District and is located 20km from the Project site to the east; and (ii) Al-Mansourieh Village which is administratively under Daraw District and is located 25km from the Project site to the east. Refer to the figure below which indicates the location of the Project site in relation to the nearby villages. The Project site has an area of around 10km².

ASPC 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.

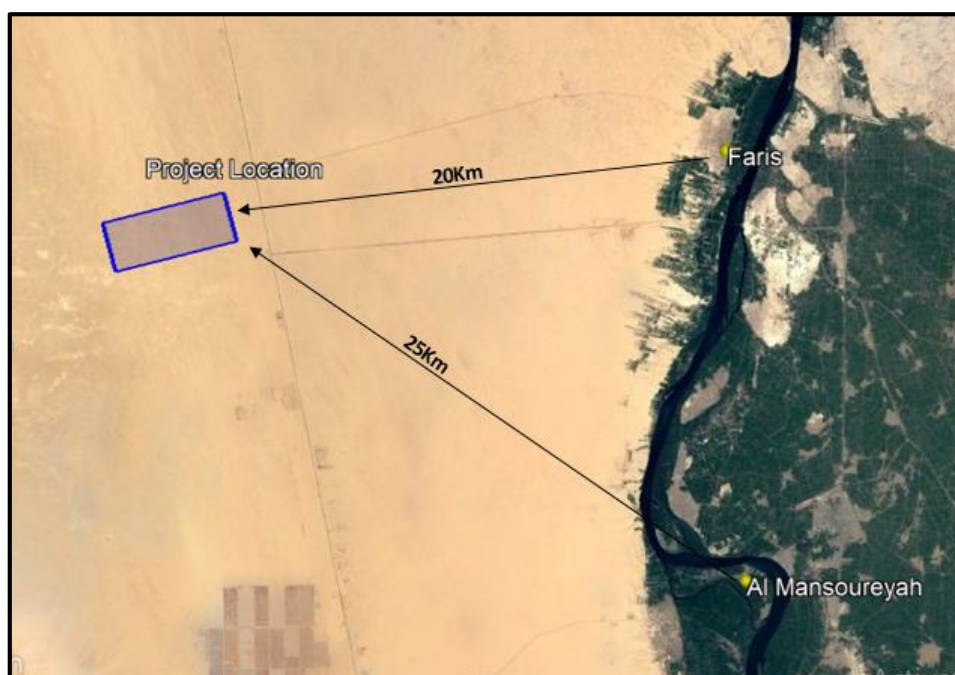


Figure A: Project Location

ASPC has undertaken a comprehensive Environmental and Social Impact Assessment (ESIA) for the development of the Project. The ESIA was undertaken in accordance with the Egyptian requirements mainly "Law No. 4 of 1994, the Law on Protection of the Environment and its Executive Regulation 1995 (Prime Ministers Decree 338)" as well as good international industry practice and standards – this includes mainly the International Finance Corporation's (IFC) Environmental & Social Sustainability Performance Standards and EHS Guidelines.

2 OBJECTIVE

This document is a project specific grievance mechanism that identifies a transparent and fair mechanism that is accessible to all construction workers, communities around the project and any stakeholders feeling adversely impacted by the project and for managing any reasonable workplace related grievance or concern in a timely manner, to be implemented by ASPC throughout the project's construction phase.

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

3 APPLICABILITY

The Community Grievance Mechanism Procedure applies to all requests and complaints that might arise from any person (community members or others) considering themselves affected by the Project (i.e. the access roads, the lands around the PV site or farms and the PV site itself), including but not limited to the following:

- damage to public / private assets;
- degradation / deterioration of local infrastructures (e.g. roads);
- 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;
- conduct of security providers;
- land acquisition.

4 POLICIES AND STANDARDS

The relevant policies and standards that are related to the grievance mechanism are identified below:

4.1 ASPC

The following company policies and documents guide the grievance mechanism and/or are referenced within this document:

- Environmental and Social Impact Assessment (ESIA)
- Environmental and Social Management System (ESMS) Manual
- 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-revoo)
- AMEA Power's HR Policy (AP-HR-POL-001)
- AMEA Power's Gender Equality Policy statement (AP-HR-POL-002)

4.2 Relevant Laws and Standards

ASPC adheres to the following national Egyptian legal requirements and international standards and which have been taken into account where relevant as part of this worker grievance mechanism.

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.

5 PRINCIPLES

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.

5.1 Cultural appropriateness

The project-affected communities are composed of villagers and their representatives, both are not acquainted with grievance resolution mechanism. Based on that, one from the local community will be appointed as CLO, in order to understand the claimants' culture and language and inform about the existence of the GMP.

The Project will employ a CLO and a CLO Assistant. It's expected that the CLO Assistant role will be covered by a woman, while the CLO role will be covered by a man. This splitting of gender for the CLO team will prevent situations where women or men might feel uncomfortable discussing a grievance with a person of the opposite sex.

5.2 Accessibility

The project-affected communities have no or minimal access to internet, while the great majority of them has a mobile phone. Based on that, the grievance mechanism's contact details will consist in a phone number made available to the communities and the possibility to fill the Grievance Form (Annex A).

5.3 Transparency & Accountability

The grievance mechanism provides for 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),

5.4 APROPRIATE PROTECTION

The grievance mechanism consists in a ready-to-use system to solve complaints. Project-affected communities and their representatives are free to use other remedies. No costs nor retributions will be associated with lodging a grievance.

5.5 TIMELINE

The community grievance mechanism aims at:

acknowledge receipt of grievances/ complaints within 5 working days;

inform about the decision taken within 10 working days; and

close grievances within 4 weeks from receipt.

6 IMPLEMENTATION

The appointed Community Liaison officer will inform the local communities around Abydos project about this procedure, 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.

During the meetings, the Community Liaison officer will explain The methodology for operationalizing and disseminating the complaints management mechanism include:

- informing the community about the implementation of the GM
- information of technical, municipal and administrative authorities on the GM
- where, when and how community members can file complaints;
- who is responsible for receiving and responding to complaints;
- the establishment of committees
- capacity building for GM stakeholders
- dissemination and popularization of tools and procedures
- what kind of response complainants can expect from the company, including timing of response; and
- posters in Arabic language, based on illustrations and easily understandable concepts.

In addition to the explanation provided verbally, the CLO 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.

7 RESPONSIBILITIES

Identified below are the responsibilities of the key personnel involved in implementing the worker grievance mechanism.

7.1 ASPC Community Liaison officer

The Community Liaison officer 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 ASPC Social Specialist.

In relation to the grievance mechanism procedure CLO shall:

- 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 ASPC Social Specialist;
- promptly inform the Site Security about the complaint, if security risks may arise;
- define corrective actions, in coordination with social specialist and Managers of the involved departments;

7.2 ASPC Social Specialist

- Provide training to ASPC staff on grievance mechanism for its implementation
- coordinates the management of complaints at all levels.
- it ensures the traceability of the management of complaints and
- ensures 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 the Procedure; and

- communicating the outcome to the complainant.
- Update the **community grievance** mechanism when it is need after assessment the implementation.

7.3 QHSE Director

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

8 STEPS FOR GRIEVANCE SUBMISSION

8.1 STEP 1 - RECEIVE A COMPLAINT

There are different ways to receive a grievance from the community e.g. verbal (e.g. face to face or by phone) or in written form and during meetings with the Community Liaison Officers and this can be received by different members of ASPC.

Complaints from can most likely be received by community agents, social specialists and registered and processed through grievance mechanisms. Regardless of how a grievance is received, it is the responsibility of the recipient to invite the complainant to complete a Grievance Registration Form or to complete the form on his / her behalf if the complainant being illiterate.

8.2 STEP 2 - REGISTER THE GRIEVANCE

All formal grievances should be collected by CLOs and communicated to the social Specialist and then communicate to ASPC QHSE Dept. and to the EPC Contractor, if applicable. The grievance must be recorded in the grievance register database by the CLO. Any documentation associated with the grievance should be saved to Abydos's Community Grievance Register for record keeping purposes. In the event that the complainer has requested to remain anonymous, this should be noted accordingly in the grievance log.

All incoming grievances will be acknowledged as soon as possible, preferably at the time of submission, and no latter 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.

8.3 STEP 3 - GRIEVANCE SCREEN

Complaints will be reviewed and assessed based on the nature and extent of the complaint and / or associated consequences, the sensitivity of the complainant (s) and the combined severity of the complaint. Determining the severity level of a grievance is essential in determining who should own the grievance and how the grievance should be approached.

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

ASPC 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.

8.4 STEP 4 - ADMISSIBILITY OF THE GRIEVANCE

A grievance must be admissible through the project's complaints mechanism within two working days of the official receipt of the grievance. The grievance is considered admissible if it is related to one of the phases of the project or to one of the activities of the project. Communication should be made orally or in writing, depending on the preferred method of communication if the complainant so states.

The acknowledgment of receipt of a grievance should include a summary of the understanding of the grievance, the first steps in dealing with the grievance and an estimated time frame. The acknowledgment also provides an opportunity for the grievance owner to request clarification or additional information related to the grievance in question. The date and details of the acknowledgment will be noted accordingly in the grievance log.

8.5 STEP 5 - INVESTIGATION OF THE GRIEVANCE

The person who receives the complaint is responsible for directing the complaint to the CLO who coordinating the investigation of the grievance. The investigation may involve consultation with other PAPs , " direct employees " , " contract workers " or external stakeholders, as appropriate. Minutes of meetings, discussions, activities and documented evidence during the investigation should be recorded. The information gathered during the investigation should be analysed to help identify the root cause of the grievance and assess whether the grievance is valid and can lead to action in accordance with company policies and the applicable legal framework. It is also the responsibility of the person registering the grievance to ensure that the identity of the complainant remains anonymous, if applicable, and that those involved in the investigation are informed.

It is expected that most construction phase grievances will be related to construction, under the management control of the EPC, so the grievance investigation should be carried out by ASPC CLO and ASPC Social Specialist with the involvement of EPC E&S Manager and resolution process if the EPC or its subcontractors' activities are related to the content of the grievance.

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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 Community Liaison Committee (CLC) [to be defined]. For complex grievances, CLC members can participate in the grievance investigation and resolution.

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

8.6 STEP 6 - ACT ON THE GRIEVANCE

Following the investigation, the Social Specialist, will determine how the grievance is to be handled with proposed steps to be followed, including well-defined responsibilities and reasonable time frames on a case-by-case basis. The proposed steps should take into account the nature of the grievance and the sensitivity of the complainant, so that confidentiality and anonymity are respected, where appropriate. The complainant must be informed of the proposed actions and engaged in the process to the extent deemed appropriate on a case-by-case basis.

The social specialist will be responsible for monitoring the implementation of actions taken and meeting deadlines. The achievable actions to follow, including responsibilities and deadlines, will be strictly recorded in the complaints log by the social specialist.

8.7 STEP 7 - CLOSING AND FOLLOW-UP

Once all the proposed actions have been effectively implemented, ASPC CLO considers that the grievance has been processed and that the social specialist has verified its implementation. The CLO will formally inform the complainant via his method of preferred contact for the implementation of these actions, and ask for feedback on the level of satisfaction with the result and the process followed. These should be documented and recorded in the grievance log by the Social Specialist.

The grievance closure form must also be completed and signed. the complainant is invited to review and sign it. It should be noted that a complainant may or may not be satisfied with the outcome and the process followed to deal with the grievance depending, for example, on their expectations, personal interests, or understanding of the issue. Even in these cases, a grievance can be considered "closed". This should be documented in the grievance log and grievance closure form, including comments on the grievance owner's assessment of the process and level of satisfaction.

9 TRAINING REQUIREMENTS

ASPC Social Specialist shall ensure that all personnel 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.

10 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 Abydos social specialist to the AMEA Power's Corporate QHSE 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, ASPC Social specialist will provide a report on the status of complaints received through this complaints mechanism to AMEA POWER'S Senior Management.

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 4 – Grievance Resolution Form

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:	<p><i>What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i></p>
Date of Grievance	
Has the Grievance been Resolved?	<input type="checkbox"/> Yes <input type="checkbox"/> No; <i><u>If not provide a justification below</u></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 Implementation	for	
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CLO Signature:

Project Manager Signature:

Date:

Date:

nex 5 – 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