Local Community Grievance Mechanism

AMEA Power 1GW "Abydos for Renewable Energy" Solar Plant Project in Egypt

REV-1

February 2025

ECO Consult

Issue and Revision Record:

Template Code		**QF-PM-01-15**	**Template Revision No.**	**REV-0**
Version	**Date**	**Description**	**Prepared By**	**Approved by**
REV 0	01 Dec 24	Draft LGM	1. ECO Consult	Ibrahim Masri / Project Manager
REV 1	27 Feb 25	Draft LGM	1. ECO Consult	Ibrahim Masri / Project Manager

Disclaimer:

This report should not be relied upon or used for any other project without an independent check being carried out as to its suitability and prior written authority of AMEA Power being obtained. ECO Consult accepts no responsibility or liability for the consequence of this document being used for a purpose other than the purposes for which it was commissioned.

This report is confidential to AMEA Power, and the Consultant accepts no responsibility of whatsoever nature to third parties whom this Report, or any part thereof, is made known. Any such party relies upon this report at their own risk.

TABLE OF CONTENTS

Table of Contents **3**

1. Objective **5**

2. Scope **6**

3. Standards **7**

4. Introdution **9**

5. Principles **10**

6. Examples of Grievances Typically Encountered **11**

7. Community Expectations **12**

8. Methods to Access **12**

9. Timeline **12**

10. Publicizing Grievance Mechanism **13**

11. Grievance Mechanism Procedure **15**

11.1 Submitting a complaint 15

11.2 Receiving Complaints 15

11.3 Reviewing and Investigating Grievances 17

11.4 Grievance Resolution options and responses 17

12. GBVH and Modern Slavery Grievances **20**

12.1 GBVH 20

12.2 Modern Slavery 21

12.3 Principles of GBVH and Modern Slavery Grievance Assessment 22

12.4 Survivor-Centered Approach 22

12.5 Investigation 23

12.6 Investigator Requirements 25

12.7 Investigator Requirements 23

12.8 Maintaining Confidentiality 26

12.9 Response 26

13. Roles and Responsibilities **27**

13.1 Community Liaison Officer 27

13.2 Social Specialist 27

13.3 Site Manager 28

13.4 EPC Contractor 28

14. Training **30**

15. Monitoring, Audit and Reporting **30**

16. KPI **31**

17. Annexes **33**

17.1 Annex I – Grievance Sheet 33
17.2 Annes II – Grievance Closeout Form 34
17.3 Annes III – Grievance Log Sheet 35
17.4 Grievance Resolution Form 36

1. OBJECTIVE

The aim of this Grievance Mechanism (GM) is to establish a system to receive and facilitate resolution of the stakeholder's concerns and grievances about AMEA Power 1GW "Abydos for Renewable Energy" Solar Plant Project in Egypt's (hereafter referred to as "the Project") environmental and social performance.

Thus, the overall objective of this grievance mechanism is to ensure that concerns, complaints / grievances / claims, and suggestions coming 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.

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 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 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 Labor 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 will be explained during the ESIA disclosure meetings and will continue to be publicized during the project's life cycle

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

The Community Grievance Mechanism Procedure applies also to 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 behavior 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;
- Labor-related grievances: a separate mechanism will be established through the Labor and Working Conditions Management Plan and include in its scope all grievances by the Developer's 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:

International Standards and Requirements

The main international guidelines applicable to Grievance Management which the Developer, EPC Contractor and subcontractors will be basing their Grievance Management Procedure (GMP) against are the Equator Principles and those from the International Finance Corporation (IFC, Performance Standard (PS) 1 and 2).

IFC PS1 require that a grievance mechanism be established "designed to receive and facilitate resolution of concerns and grievances about the Developer, EPC Contractor and subcontractors' environmental and social performance". The procedure should be disseminated to the Affected Communities through the stakeholder engagement process. The process should not impede access to any judicial or administrative remedies.

IFC PS2, Labor and Working Condition also requires that the Developer, EPC Contractor and subcontractors provides a grievance mechanism for contractors (and their organizations where they exist) to raise workplace concerns. This procedure should be made available during recruitment / appointment and make it easily accessible to them, with no retribution and should not restrict access to judicial or administrative remedies through legislation or substitute any grievance mechanism through collective agreements. Note: as discussed earlier a separate grievance mechanism for workers will be included in the Labor and Working Conditions Management Plan

The other international standards include:

- ISO 26000: 2010 on social responsibility;
- United Nations Guiding Principles on Business and Human Rights;
- ILO adopted Convention No. 190 and Recommendation No. 206 to combat violence and harassment, including GBVH;
- United Nation Global Compact SDG5 – Gender Equality.

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 Labor 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)
- AMEA Power's Anti-Modern Slavery Policy (AP-HR-POL-003).

4. INTRODUTION

The Project site is located in Aswan Governorate around 650 km southeast of the capital city of Cairo. Aswan Governorate is divided into 7 Marakez (Aswan, Daraw, Kom Ombo, Nasr Al Nuba, Edfu, Abu Simbel, and New Toshka), 12 cities, and 33 rural local units with 72 affiliated villages[1].

The Project site is located within the Daraw District, where the closest village is Al Raqaba Local Unit, located at a distance of around 6.5 km, while Daraw city (the capital city of Daraw District) is located around 11 km from the Project site.

Administratively, Al Raqaba Local Unit is under Daraw District and is divided into two villages: (i) Al Raqaba Foaniyeh (Upper Al Raqaba); and (ii) Al Raqaba Tahtaniyeh (Lower Al Raqaba).

- Al Raqaba Foaniyeh is further subdivided into several hamlets, including El Aliqat (El Bahri and El Qabli), Nagaa Al Arab, Abu Shoura, Hegaziyeh, Sheikh Zayed, El Harbiat El Gadida, El Bashab, Garagos, and Sheikh Fadl.
- Al Raqaba Tahtaniyeh is subdivided into several hamlets, including El Gama'ab, El Bayaidh, and El Hanawi, El Wansab, El Ganib, and El Rahmab; El Gharibah, El Hamidat, El Amin, and El Hassan; El Salwawiyah Bahriyyah, El Qibliyyah, and El Ezbah; El Awsar and El Mu'ayrab; El Mansi, El Zamrab, El Awnab, El Gabrab, and El Sararif.

In addition, the Project site is located within a vacant desert land around 1 km east of the Luxor-Aswan Highway and about 8.5 km west of the River Nile.

The Developer will be 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 who have not been appointed at this stage

The ESIA undertaken for the Project is required to meet local Egyptian permitting requirements to gain construction and operation permission and comply with the requirements laid out in the Egyptian Environmental Law No. 4 of 1994, as amended by Law No. 9 of 2009. The Project is also seeking finance and will therefore be completed to conform to international good practice including the International Finance Corporation (IFC) Performance Standards (PS), the Equator Principles (EPs) and the World Bank Group's (WBG) Environmental and Social Guidelines.

[1] Urban Planning Authority, future vision and projects supporting the development of Aswan Governorate, 2017.

5. PRINCIPLES

The United Nations Guiding Principles (UNGP) on Business and Human Rights lists several "effectiveness criteria" for the successful implementation of a Grievance Mechanism (GM). The UNGP states that it should always be:

- Legitimate: it must have a clear transparent and sufficiently independent governance structure to ensure that no party to a grievance process can interfere with the fair conduct of that process;
- Accessible: it must be publicised to stakeholders who may wish to access it and provide adequate assistance for aggrieved parties who may face barriers to access, including language, literacy, awareness, finance, distance, or fear of reprisal;
- Predictable: it must provide a clear and known procedure, with time frames for each stage; clarity on the types of process and outcome it can (and cannot) offer, and means of monitoring the implementation of any outcome;
- Equitable: it must ensure that aggrieved stakeholders have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair and equitable terms;
- Rights-compatible: it must ensure that its outcomes and remedies accord with internationally recognised human rights standards; and
- Transparent: it must provide sufficient transparency of process and outcome to meet the public interest concerns at stake and should presume transparency wherever possible.

Additionally, 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 local communities 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.
- 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 proper manage the potential impacts identified in the ESIA, this grievance mechanism has been designed based on the appointment of a Community Liaison officer (CLO), in charge of managing community complaints.

6. EXAMPLES OF GRIEVANCES TYPICALLY ENCOUNTERED

Type	Complainant(s)	Examples	Risk
Relatively minor and onetime problems related to company operations	An individual or family	A company truck damaging a community member's fence; a one-time disrespectful encounter between a company employee and a community member	Low
Relatively minor but repetitive and widespread problems	Multiple individuals, families, or larger groups	Company-related Road traffic raising dust that settles on clothes hung out to dry	Medium
Significant and larger repetitive problems	Community groups, nongovernmental or Community-based organizations, or local governments	Company activities allegedly causing noise or dust to nearby receptors, including public roads	High
Major claims that company activities have resulted in significant adverse impacts on larger populations of people	Community groups, nongovernmental or community-based organizations, or local governments	Company operations adversely impacting a community's water supply, making it unsafe for drinking, livestock, and/or irrigation	Very high
Major claims over policy or procedural issues	Non-governmental organizations, community groups or community-based organizations, or local governments	A company's noncompliance with its own policies; failure to follow guidelines of multilateral lenders for adequate consultation to achieve prior and informed consent; inadequate resettlement and compensation of affected populations	Very High
Any grievance related to GBVH issues	Individual or group of individuals	Reporting of sexual discrimination, direct or indirect, sexual discrimination or harassment on the basis of sexual orientation or gender identity, bullying of a nature to ridicule a person's masculine or feminine identity, sexual abuse or sexual exploitation.	Very High

7. COMMUNITY EXPECTATIONS

When local people present a grievance, they generally expect to receive one or more of the following:

- Acknowledgment of their problem
- An honest response to questions about company activities
- Modification of the conduct that caused the grievance
- Some other fair remedy (options include: an apology /compensation)

In voicing their concerns, they also expect to be heard and taken seriously. Finally, the Developer, contractors, or government officials must encourage people that they can voice grievances and work to resolve them without retaliation. Stakeholders are to be informed that the grievance mechanism can be used to submit complaints anonymously.

8. METHODS TO ACCESS

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).

9. TRANSPARENCY AND 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).

10. TIMELINE

The community grievance mechanism aims at:

- Acknowledge receipt of grievances/ complaints within 2 working days;

- Inform about the decision taken within 15 working days; and
- Close grievances within 4-weeks from receipt.

11. PUBLICIZING GRIEVANCE MECHANISM

The grievance mechanisms will be publicized in the following ways:

- Al Raqaba Local Unit Office Bulletin Board;
- Daraw District Office Bulletin Board;
- Aswan Governorate office Bulletin Board;
- Selected key Community Based Organizations (CBO's) to include Women CBO's (list of CBOs where disclosure sheet will be posted will be updated once this is undertaken);
- Entrance Office of the Project Site;
- Stakeholder Engagement Activities; and
- Online.

Stakeholders willing to lodge a grievance should be able to use the following avenues:

- Grievance Sheets (Annex II – Grievance Sheet) with grievance boxes will be made available at the locations listed below:

- Al Raqaba Local Unit Office
- Project Site

Direct Contact through the following:

Community Liaison Officer (CLO) – Abydos for Renewable Energy

Address: AFRE Site, AL raqaba Village, Daraw City, Aswan Governorate, Egypt

Telephone: +20 1147425005

+201060306510

E-mail: Abdallah.Negm@abydossolar.com

ahmed.fathy@abydossolar.com

The information provided online and on printed material will be available in English and the local language (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 English or local language (Arabic) any of the points above, if required, during stakeholder engagement activities and engagement with grievant.

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; 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.

12. 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.

12.1 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;
- Al Raqaba Local Unit Office; 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 (CLO) that a stakeholder wants to submit a grievance. For complainants from stakeholders that prefer to submit their complaints verbally, the Community's Liaison Officers (CLOs) 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 (CLO) will regularly meet stakeholders during construction, operation and decommissioning. Specific details on meeting frequency are provided in the following sections.

12.2 Receiving Complaints

Upon receiving, grievances shall be assigned a case number, and records of communication/consultation shall all be attached with the relevant entry and filed. The database shall be monitored regularly for recurring grievances so that appropriate mitigation can be developed.

The Developer anticipates that the following direct impact grievances could be categorized as follows:

- Job and procurement issues.
- Third party injuries or conflicts.
- Damages to infrastructure.
- Damage and temporary interruption of access roads.

- Road congestion.
- Nuisance caused by noise or dust.
- Unplanned use / damage to land.
- Environmental issues (soil and water contamination, erosion, damage to wildlife or vegetation, hunting and fishing, improper right of way restoration etc).
- Behaviour of personnel.
- Community health and safety.
- Cultural issues.

The categorization of grievances will allow the Developer to establish trends and adapt its own, and EPC Contractor's management system where needed to improve environmental and social performance and reduce the overall number of grievances resolved. If a grievance is the result of a non-compliance to project environmental and social project commitments and could result in harm to people or serious environmental impact, the Community Liaison Officer (CLO) and Social Specialist will consult directly with the Construction Management Team and may recommend a temporary suspension of an activity. Any member of staff or contractor has the right to refuse or stop work that is unsafe.

The Developer 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.

In addition to categorizing a grievance, the following information will also be collected in a standards format:

- Name, address, contact number, place or community of residence.
- When and where the grievance was received.
- Name of the person who received the grievance.
- Basic information about the party making the grievance for providing feedback.
- Corrective actions and dates when they were initiated and completed.
- Dates when the required notifications and feedback were given to the affected party.
- Date when all parties agreed the grievance was closed out.

It is voluntary for the individual making the grievance to provide personal information.

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 (2) 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 Developer 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.

12.3 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 Developer. For complex grievances, AMEA Power will participate in the grievance investigation and resolution.

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

12.4 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 Developer 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.

The system for responding to the complainant should specify who communicates and how. In some cases, it may be appropriate that feedback be provided by the staff member responsible for assessment accompanied by the coordinator of the complaints' procedure.

The Developer Senior Management may participate in feedback, depending upon the seriousness of the complaint. Any complaint classed as high seriousness would include the Developer Senior Management. Medium complaints would include the Developer Senior Management were deemed appropriate.

When formulating a response, the Developer will ensure that:

- The complaint coordinator or relevant department may prepare 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 complaint coordinator, 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.
- If the case is complex and a resolution time frame cannot be met, provide an interim response—an oral or written communication—that informs the person of the delay, explains the reasons, and offers a revised date for next steps.

All comments and complaints will be responded either verbally or in writing, 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 Developer will respond to the complaint within two (2) days. It is possible that some responses may take longer than two (2) days to implement, but even in those instances the Developer will inform the complainant what actions will be taken and when.

13. GBVH AND MODERN SLAVERY GRIEVANCES

13.1 GBVH

Gender-Based Violence and Harassment (GBVH) is an umbrella term that covers a range of behaviors, including sexual, physical, psychological and economic abuse. What sets it apart from other types of violence and harassment is that it is directed at people because of their sex or gender, or disproportionately affects people of a particular sex or gender.

The ILO adopted Convention No. 190 and Recommendation No. 206 to combat violence and harassment, including GBVH, in the world of work.25 Convention No. 190 recognizes that GBVH can constitute a human rights violation or abuse, that it is a threat to equal opportunities and is incompatible with decent work. Violence and harassment are also explicitly referenced in UN Sustainable Development Goal (SDG) 5 on achieving gender equality.

Construction, particularly of major infrastructure projects, can be a high-risk environment for GBVH affecting community members, workers and service users.

GBVH risks can intensify within local communities when there are large influxes of male workers from outside the area. Such workers often come without their families and have large disposable incomes relative to the local community and can pose a risk in terms of sexual harassment, violence and exploitative transactional relationships. These risks are higher where workers come into close contact with the local community, for example on access routes or when living together in remote areas.

During the construction phase, workers are also vulnerable to various forms of harassment, exploitation and abuse, aggravated by traditionally male working environments.

Risk factors that increase the potential for GBVH in construction include:

- Large-scale influx of transient male workers into small and often rural host communities with low capacity to absorb the sudden increase of workers.
- Remote locations where people have limited access to resources to report GBVH and receive support.
- Presence of security personnel, who can provide protection but can also abuse their positions of power and status to perpetrate GBVH.
- Male workers transporting goods (e.g. truck drivers), who can perpetrate GBVH on routes and at truck stops associated with the project, even if not on the project site.
- Poorly designed or maintained physical spaces on project sites and in worker accommodation. For example, bad lighting in and around grounds and access routes.
- Informal workers, whose informality means they may either be more vulnerable to GBVH due to lack of contracts or that potential perpetrators may go unidentified due to lack of background checks.
- Income-earning opportunities for women through direct employment in construction or operations, or indirect employment (e.g. catering, traders), which may also increase household tension and create community backlash against women in areas where the perception is that they should not work outside the home.

The Project will adopt the following actions:

- Appoint senior focal points in both the Developer and EPC contractor with responsibility for ensuring that commitments and policies to prevent GBVH are implemented.
- Increase women's representation, including at senior and decision-making levels in engineering, procurement and construction (EPC) companies.
- Put in place monitoring systems at the highest levels for regular reporting on GBVH.
- Ensure codes of conduct are publicly disclosed in local languages and are widely accessible to all workers and all groups of people in project areas.
- Develop confidential grievance reporting, referral and support systems for workers.
- Establish safe, confidential and accessible grievance mechanisms for local communities.
- Include options to report anonymously, if preferred
- Assess and revise HR policies, materials and training to encourage male and female applicants and improve female retention and promotion.
- Ensure all workers have contracts and background checks including references from most recent employers.
- Use robust recruitment processes to select, train, manage and monitor security companies and personnel.
- Deliver periodic mandatory training on GBVH to all workers, including contractors, subcontractors and core suppliers, as well as relevant consultants and clients;
- Provide safe, secure and separate living spaces for male and female construction workers.
- Provide lighting around project sites, including around latrines and access routes.
- Install separate, lockable latrines for female construction workers.

13.2 Modern Slavery

Child Labor

Child labor, as defined by the ILO Convention is "work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under of age of 18 that is hazardous to the physical or mental health of the child. In conducting its business, the Project:

- Will not employ children that falls into the definition as stipulated by the ILO Convention, notwithstanding any national law or local regulation.
- Will comply with all other applicable child labor laws, including those related to wages, hours worked, overtime and working conditions.
- Is against all forms of exploitation of children. The company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities.

- Expects its business partners and associates to have and uphold similar standards and abide by country-governing laws in countries wherein they operate. Should violation of these Principles become known to The Developer and not be remediated, The Developer will take action including discontinuation of the business relationship.

Forced Labor

The Developer expressly prohibits any form of work or service, not voluntarily, obtained under threat of any punishment or that is requested as a way of cancelling a debt. Moreover, it is not required, under any circumstances, that employees leave any kind of deposit during the working relationship maintained.

13.3 Principles of GBVH and Modern Slavery Grievance Assessment

The assessment, monitoring and response measures need to be underpinned by these fundamental principles:

- Survivor-centred: The rights of GBVH survivors need to be consistently prioritised and used as the starting point for all decisions on efforts to assess, prevent, monitor and respond to GBVH. Maintaining confidentiality and checking with whom survivors want information to be shared are important aspects of a survivor-centred approach. When responding to reports of GBVH, it is important to listen to and respect survivors' wishes and decisions in order to help their recovery.
- Safe: Survivors, witnesses and those who report and seek to address GBVH can be at risk of retaliation, including threatening and violent behaviour, often from those who do not like their position of power being challenged. The threat of retaliation may be used to silence those who speak out about GBVH. This can leave those who report GBVH in a vulnerable position and fear of reprisal can deter people from reporting incidents or raising concerns. It is important to prioritise the safety of those who have experienced, witnessed and/or reported GBVH. Confidentiality and checking with survivors and witnesses about sharing identifiable information are important aspects of ensuring safety.
- Context-specific: All measures need to be rooted in a thorough understanding of the local context. As such, it is important to first understand the legal and social context and identify the support mechanisms that are in place.
- Non-discriminatory: All survivors need to be listened to and treated equally.

13.4 Survivor-Centered Approach

The Developer Senior Management will ensure a survivor-centered approach is followed for all GBVH or Modern Slavery grievances reported.

Key elements of a survivor-centered approach are to:

- Treat survivors with dignity and respect, taking time to listen to what they have to say rather than rushing to take action.

- Enable survivors to make informed decisions about what they want, providing them with information about support options available.
- Help survivors to be safe, including keeping their information confidential.
- Treat all survivors equally and non-judgementally, making sure their experience is not unfairly dismissed, for example, because they are young, old, disabled, a sexual or gender minority, or work in prostitution.
- A survivor-centred approach is to be used in addressing GBVH. It helps to reduce the potential for further harm to survivors and, the likelihood of further financial and reputational risk to companies. Anchoring decision-making in a survivor-centred approach is, therefore, in the interests of companies and investors

13.5 Investigation

When a report of GBVH or Modern Slavery is received, the Developer CLO or Social Specialist will receive the Grievance. The Developer CLO or Social Specialist will receive appropriate training from an authorized Gender-based Violence (GBV) Service Provider; The Women's Complaints Office of the National Council for Women in Egypt is an important center for receiving complaints and helping to solve problems facing women, as part of the ongoing efforts to enhance the role of women and protect their rights in Egypt..

The training for the CLO or Social Specialist will include how to collect GBV cases confidentially and empathetically (with no judgement). It is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs, and wishes are prioritized in every decision related to the incident. The survivor who has the courage to come forward must always be treated with dignity and respect. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's informed consent. These steps serve to minimize the potential for re-traumatization and further violence against the survivor.

- Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.
- No identifiable information on the survivor should be stored including in particular the grievance log register. In addition, if a grievance is submitted through a grievance form it will be kept confidential.
- Should the grievance be received by the CLO or Social Specialist through a grievance form, telephone, email or other, the CLO or Social Specialist should not ask for, or record, information on more than three aspects related to the incident and which include the following:

- Nature of the complaint (what the complainant says in her/his own words without direct questioning)
- If, to the best of their knowledge, the perpetrator was associated with the project; and,
- If possible, the age and sex of the survivor.

- The CLO or Social Specialist should assist the survivor by referring them to the GBV Services Provider for support immediately after receiving a complaint directly from a survivor. It is up to the survivor, and only the survivor, whether to take up the referral. The details of the service provider are included below:

- The Women's Complaints Office of the National Council for Women in Egypt

- Option 1 is the Women's Complaints Office Hotline: 15115, The first method is to communicate with the Women's Complaints Office by phone, as the office provides a hotline through which you can speak with consultants specialized in women's rights issues. This type of communication is characterized by confidentiality and ease.
- Option 2 is communication via WhatsApp: 01007525600
- Option 3 also allows the women to visit the office in person to submit their complaints or request assistance, where they are received and provided with the necessary support to solve their problem. There is a branch of the office in many governorates and different centers across the republic.
- Details for the Aswan Branch of the National Council for Women is:

  Address: Aswan Nile Corniche Al Aqqad Culture Building, Floor No. (3)

  Telephone: 097/2454368

  Fax: 097/2454860

  Branch Official: Prof. Dr. Hoda Mustafa Abdel-Wahab Mukhtar

  Email of Dr. Hoda: hodamoustafa20016@yahoo.com

- The GBV Services Provider provides the necessary support to the survivor until it is no longer needed. Survivors may need access to police, justice, health, psychosocial, safe shelter and livelihood services to begin healing from their experience of violence. This will be arranged by the GBV Services Provider on their behalf in accordance with the survivor's wishes.
- The CLO or Social Specialist will immediately notify the AMEA Power Head of ESG (if the consent of the survivor is obtained). The survivor must give consent to data sharing and know what data will be shared, with whom and for what purposes.
- The CLO or Social Specialist, AMEA Power Head of ESG and GBV Services Provider will meet immediately to agree on a plan for resolution as well as the appropriate remedy for the perpetrator in accordance with the below. Note: The survivor must give the service provider representative consent to participate in the resolution mechanism on her behalf.
- Reviews the case and collectively agree upon the appropriate actions to be taken and sanctions, if any.
- Refers the case to the police as appropriate.
- Assigns the appropriate 'Focal Point' to implement the actions—with the assistance of the GBV Services Provider.
- Upon resolution, the Focal Point and GBV Services Provider advise that it has been resolved, who in turn advise the CLO or Social Specialist.
- The CLO or Social Specialist notes the resolution and closes the cases and submits a close-out report to AMEA Power Head of ESG whom in turn reviews and approves the report.
- All entities involved above in case resolution, need to understand their legal obligations when it comes to reporting cases to the police. Reporting should be done in accordance with the law, especially in cases that require mandatory reporting of certain types of incidents, such as sexual abuse of a minor.

When there is no legal obligation to report the case according to the local law, survivors hold the decision of whether to report cases for resolution and other service providers and reporting of a case to anyone can only be made with the consent of the survivor.

- If a case is first received by the GBV Services Provider, a report should be sent to the CLO or Social Specialist to ensure it is recorded in the system. If any follow up is required by the CLO or Social Specialist, it will be provided immediately with the consent of the survivor as applicable.
- If the survivor does not wish to place an official complaint through the grievance mechanism, the complaint is considered closed.

If the alleged perpetrator is an employee of the Developer, EPC Contractor, or subcontractor, to protect the safety of the survivor, and the workplace in general, the worker, in consultation with the survivor—and with the support of the GBV Services Provider—should assess the risk of ongoing abuse to the survivor. Reasonable adjustments should be made to the alleged perpetrator's work schedule and work environment—preferably by moving the perpetrator rather than the survivor—as deemed necessary.

The lead person's responsibilities are:

- Report all safeguarding grievances to the AMEA Power Head of ESG within 24-hours of receipt.
- Ensuring the GBVH or Modern Slavery report is appropriately and securely logged in the company's internal system and that confidential records are kept.
- Ongoing monitoring of the support and safety needs of survivors and any witnesses and/or whistleblowers.
- Ongoing communication with survivors to ensure their wishes inform all decisions about the company's response to the report, including initial decisions on how to proceed.

13.6 Investigator Requirements

The Developer's Senior Management ensure that the investigator is trained / experienced in:

- Comprehensive training on company grievance mechanisms and investigation procedures, including scenarios and group exercises (such as role playing) to ensure staff are prepared to respond effectively.
- Understanding how GBVH or Modern Slavery risks can be exacerbated by various factors (such as seasonal deadlines or the presence of temporary workers).
- Thorough understanding of a survivor-centred approach and the importance of confidentiality.
- Comprehensive understanding of the local support services available to survivors and witnesses.
- Knowledge of GBVH or Modern Slavery and legal protection expertise available to the company and the qualified third-party providers the company has identified to undertake investigations.
- Basic training on psychological first aid to guide interactions with survivors

13.7 Maintaining Confidentiality

It is crucial that confidentiality is maintained in relation to reports of GBVH or Modern Slavery to protect survivors, witnesses, whistleblowers and alleged perpetrators. It is critical that all details of the report – and any subsequent investigation and associated interviews be kept confidential. The identities of everyone involved, including any investigators, will need to be protected.

To do this:

- The number of people with whom information is shared will be limited.
- The timing and location of any investigation activities, including interviews, will be conducted so that they are away from worksites and not observed by others.
- All paper and electronic information in is to be filed in secure locations.
- Failure to maintain confidentiality will be linked to disciplinary procedures and communicated to all parties involved.
- Rumours are to be control by ensuring that managers who are informed about the report are aware of what they are/are not allowed to communicate to others.

13.8 Response

When a GBVH or Modern Slavery grievance is reported, the Developer Senior Management will ensure that the immediate priority is to enable survivors to access the professional support they want and to work with survivors, witnesses and whistleblowers to identify safety measures to protect them from further harm.

The Developer Senior Management will need to provide private spaces where support options and potential safety measures can be discussed with survivors (or witnesses and whistleblowers). This is an important aspect of maintaining confidentiality and enabling any concerns to be discussed.

Support options and safety measures offered to survivors, witnesses or whistleblowers ought to be:

- Independent of any other action taken in response to the report of GBVH or Modern Slavery.
- Proactively offered, rather than only made available on request.
- Presented in a way that gives survivors (and witnesses and whistleblowers) choice and control, so they can make informed decisions.
- Provided by trained staff, so as not to cause further harm.

It is important that survivors, witnesses and whistleblowers are able to access support services during working hours so there is no additional cost to them

14. ROLES AND RESPONSIBILITIES

14.1 Community Liaison Officer

The Community Liaison Officer will be appointed by the Developer. He 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 Developer Social Specialist.

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 Developer 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.

14.2 Social Specialist

The Social Specialist to be appointed by the Developer. 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 Developer'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 Developer and AMEA Power on a monthly basis.

14.3 Site Manager

The Site Manger will be appointed by the Developer. Their 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.

14.4 EPC Contractor

EPC Contractor has the responsibilities to:

- Direct any grievances made by a person or group in contact with a member of the EPC Contractor's workforce, to the Developer CLO for formal recording, investigation and resolution.
- Provide their full support during the process of the investigating and resolving any grievances that occur.
- Adherence to all Developer policies and plans, including this procedure.
- Developing and executing their own grievance mechanism, in accordance and aligned with this Grievance Management Procedure.
- Receiving grievances directly from the individuals or groups concerned, including community members, employees and workers, or through sub-contractors.
- Handling grievances resolution through their own Community Liaison (CL) teams but in close coordination with the Developer Community Liaison Officer and Social Specialist.
- Reporting to the Developer Social Specialist regarding grievances tracking (received, registered, in process and resolved) on a daily and weekly basis.

- Resolving a grievance immediately in the field when practicable.
- Informing the Developer Social Specialist in writing of all grievances received, including those immediately resolved in the field.
- Proposing alternative approaches to activities which may result in an impact of concern to stakeholders, in order to avoid and to reduce the number of grievances received.
- Attending all coordination meetings requested by the Developer Social Specialist on a daily and weekly basis, and as needed.
- Reporting to the Developer Social Specialist on a daily and weekly basis and as needed to manage social incidents and other community relations issue.

It is important that all members of the team are adequately trained in stakeholder engagement and grievance mechanism.

15. TRAINING

The Developer 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.

16. 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 the Developer 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 Developer will provide a report on the status of complaints received through this grievance mechanism to AMEA Power that in cascade will inform the Lenders and Advisors.

17. KPI

The KPIs that should be implemented are summarized in the table below and should be included within the reporting requirements identified within the Construction ESMS Manual as applicable

No.	KPI	Measurement Action	Frequency	Goal
1	Number of public consultation meetings held to provide accurate updates on project status and manage expectations regarding job requests and local electrification.	Submission of log sheet	Monthly	To be agreed prior commencement
2	Number of unresolved complaints	Submission of log sheet	Monthly	ZERO
3	Grievances submitted to the Project via the Project Grievance Mechanism.	Submission of log sheet	Monthly	All grievances resolved through the Project Grievance Mechanism
4	Resolution: Number of complaints resolved in the first and second reviews;	resolution	Monthly	The target is to resolve at least 80% of complaints
5	Number of complaints receiving effective and timely response	effectiveness	Monthly	target is 100%
6	number of complaints by categories. The intention is to learn from grievances and respond to them in a manner that, over time, reduces their rate of occurrence influence	Recurrence Reduction	monthly	The target is to gradually reduce the number of complaints in each category by 50%
7	Number of incidents and/or non-compliances in relation to this plan	Submission of incident report and/or Non-Compliance Report (NCR)	Monthly	ZERO

The following reporting requirements will be fulfilled by the Community Liaison Officer (CLO) to support the implementation of the SEP:

- Monthly Submission of Stakeholder Register: The stakeholder register form, as provided in the SEP, will be completed and submitted on a monthly basis.
- Monthly Submission of Stakeholder Grievance Form: The stakeholder grievance form, as provided in Annex I – Grievance Sheet, will be completed and submitted each month.
- SEP Updates: The Stakeholder Engagement Plan (SEP) will be reviewed, updated, and resubmitted semi-annually during the construction phase and annually during the operation phase.
- Monthly Reporting of Key Performance Indicators (KPIs): Relevant KPIs will be tracked and reported on a monthly basis to monitor SEP effectiveness and stakeholder engagement outcomes, displayed in the table below:

No.	KPI	Measurement Action
1	Number of stakeholder engagement activities undertaken	All communication to be reported in stakeholder register
2	Number of stakeholders involved	All communication to be reported in stakeholder register
3	Number of vulnerable groups engaged (including women groups)	All communication to be reported in stakeholder register

4	Number of requests for information via websites, CLOs and local information centers	All communication to be reported in stakeholder register

18. ANNEXES

18.1 Annex I – Grievance Sheet

PUBLIC GRIEVANCE FORM

Reference No.	
Full Name:	
Contact Information Please mark how you wish to be contacted and add contact details	☐ **By Post:** ☐ **By Telephone:** ☐ **By E-mail:** ☐ **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	
☐ **One-time incident/grievance (date)** ☐ **Happened more than once (how many times?)** ☐ **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	

18.2 Annex II – 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	**Social Specialist**
Name:	Name:
Date:	Date:
Signature:	Signature

18.3 Annex III – Grievance Log Sheet

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

18.4 Annex IV – Grievance Resolution Form

How was grievance received	☐ Grievance Box (specify which box) ☐ Directly contact with CLO
Reference No:	
Description of Concern, Incident or Grievance	*What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?*
Date of Grievance	
Has the Grievance Been Resolved?	☐Yes ☐No; ***If not provide a justification below***
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: