50mwp/40MW SOLAR PROJECT, BLITTA, TOGO

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Worker & Community Grievance Mechanism

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1. Applicability:

This Worker & Community Grievance Mechanism Plan is applicable at 50 MWp PV plant in Blitta-TOGO.

2. Roles and Responsibilities:

Any procedure or process completes only when responsibilities related to procedure are assigned and clearly defined. Below is the responsible key personal:

Responsible for preparation	M/s Jakson-O&M Team
Responsible for approval	M/s AMEA
Responsible for implementation	Site Manager
Responsible for Revision	Site Manager and Central O&M

Site Manager is responsible for:

- Formation of complaint management committee
- Reporting to AMEA on worker & Community grievance
- Implementation & Revision of this procedure

HSE & Social officer is responsible for:

- Recording the complaint
- Checking the validity of complaint
- Training & awareness
- Informing the complainant about receiving, progress and resolution of complaint

3. Applicable regulations:

At the national level

At the national level, the ESIA texts recommend that any promoter of a development project must take the necessary measures to prevent its project from harming any party. Measures must be taken to repair the damage at its fair value (Article 35 of Decree No. 2017-040 / PR of March 23, 2017 setting the procedure for environmental and social impact studies.

Internationally

The Bank will require the Borrower to establish a complaint management mechanism, process or procedure for receiving concerns and complaints from affected parties related to the project, particularly regarding the performance of the Borrower in environmental and social matters, and facilitate the settlement of disputes.

In accordance with NES n ° 4 “Employment and working conditions”, a complaints management mechanism will be made available to all direct and contract workers (and their organizations, if applicable) to express their concerns of order. professional. These workers will be informed of the existence of the complaints management mechanism at the time of hiring and of the measures taken to protect them from reprisals for having used it.

Care will be taken to ensure that the complaint management system is easily accessible to all. The complaint management mechanism will be proportionate to the nature and scope of the project and the risks and effects it may present. It will be designed to respond quickly to concerns through a transparent and easy-to-understand process that provides feedback to affected parties in a language they understand, without reprisal, and that will operate independently and objectively.

The complaints mechanism can use existing complaint investigation systems, provided that they are properly designed and applied, that they respond quickly to complaints and that they are easily accessible to project workers.

The existing complaint management mechanisms can be supplemented if necessary by project-specific mechanisms.

The complaint management mechanism must not prevent access to other judicial or administrative means of recourse that may be provided for by law or by existing arbitrationprocedures, nor replace the complaint management mechanisms established by the collective agreements.

Environmental and social standard No. 10 is also applicable to the project.

4. Context for developing the complaints management mechanism

The project as planned will affect property and people during its implementation and operation. During implementation, the project site or area will also host a large workforce andduring operation 25 people that will interact with the project and with local communities.

In order to prevent the occurrence of conflicts and their consequences, this mechanism is designed to provide a point of access for individuals, including workers, communities and businesses, to receive and deal with complaints. This mechanism aims to be effective, participatory and accessible to all stakeholders, to prevent or resolve conflicts by negotiation, dialogue, joint investigation, etc. It does not pretend to be a mandatory prerequisite even less to replace the legal channels for handling complaints.

The mechanism will deal with complaints that relate to the compliance of the implementation process, the impacts of the project, to commitments of a social, environmental, legal, fiduciary and technical nature, vis-à-vis workers, companies under -treaters and local communities affected by the project or a third party.

The JAKSON Company encourages the expression of honest complaints from workers, contracting companies and communities to draw lessons to capitalize on current and future interventions.

Objectives and advantages of the mechanism

The objectives of this mechanism are:

- make available to those affected or at risk of being affected, an accessible, fluid, easy, rapid and suitable approach for submitting their complaints or grievances in relation to the project;
- Identify, propose and implement fair and appropriate solutions in response to the complaints expressed.
- Through the achievement of these objectives, the complaints management mechanism will allow the project to:
- create an environment of trust between the stakeholders;
- manage risks before they become regrettable;
- rectify unintentional errors;
- Learn from experience by drawing out and analyzing the lessons learned from the complaints management process, in order to create added value for future interventions, drawing lessons from knowledge management from events likely to cause conflicts.

Principles of the complaint management mechanism

The fundamental principles summarized in the following table will be observed in order to inspire user confidence.

Table 1: Principles of the complaints mechanism

Principles	Application measure	Indicator
Security	• Ensure the necessary confidentiality in the event of complaints of a sensitive nature, Protect the anonymity of complainants if Necessary	No reprisals following denunciations

Accessibilité and contexte	• Disseminate the mechanism widely to target groups, overcoming language barriers, • Clearly explain the complaint procedures, • Diversify the possibilities of depositing plains	Dissemination rate of the complaints management mechanism Variety of sources of complaints Rate of eligible complaints
Predictability	• Respond promptly to all complainants, • Present a clear processing process, with deadlines for each step,	Average processing time Response rate
Impartiality	• Ensure the impartiality of those involved in the investigation and / or resolution of complaints	Complaint team members challenge
Transparence	• Inform the parties concerned about the progress and results of the treatment	

Users of the mechanism

Any person from the community or workers or from a subcontracting company or a third party who is aware of an abuse or who has been directly injured in the course of implementing the activities of the plant construction&Operationproject50 MWp solar power plant in Blitta can transmit its complaint under this mechanism.

Steps for handling complaints

The steps for handling complaints are presented below.

Although the nature of complaints is different between communities and workers, the following steps will be followed for each category of complaint. Workers will file their complaints directly with the complaints management committee, while communities can file their complaints with the local complaint management unit or directly with the complaints management committee established on site. In any case, the local complaints management unit will transfer the complaints received at their level to the Complaints Management Committee.

Step 1: Receipt and registration of complaints

- ***Validity of a complaint***

Any complaint must relate to the project, its activities or questions that fall within the operational scope of the project.

- ***Recording of complaints***

All complaints received will be recorded upon receipt. Then their evolution will be traced and documented.

- ***Transmission channels***

By respecting the principle of accessibility and context, the method of filing complaints will be diversified. Thus, complaints will be received in several forms and in several ways:

- complaint boxes placed in chiefdoms of the districts and villages located in the surroundings of the site, at the level of the Municipality of Blitta 1 where people can file anonymous complaints or not in writing or orally;
- complaint boxes with the JAKSON company, which will have the complaint registration books on site;
- From the facts noted during the meetings, from a visit to the field.

- ***Accused of reception***

After registering a complaint, the Complaints Management Committee that will be set up will acknowledge receipt within a maximum of one (01) week (ie, 07 days). The letter will inform the recipient of the next steps. In this letter we will ask for clarification or additional information if necessary for a better understanding of the problem.

For unwritten complaints, the acknowledgment of receipt is simultaneous. In this case, the receiver locates the complainants the next step. Depending on the nature (serious or less serious), the receiver can advise the complainant to file his complaint in writing by filling in the complaint form.

The acknowledgment of receipt for complaints received by complaint boxes at chiefdom level will be through the issuance, to the complainant, of an acknowledgment of receipt sheet signed by the Chief or his designated representative. This sheet will be part of the complaints box which will be made available to chiefdoms in the surrounding villages.

- ***Step 2: Processing complaints***

The sub steps for handling complaints are as follows:

- ***Eligibility of the complaint to the mechanism***

In this sub-step, we ensure that the complaint is relevant to the activities or commitments of the project or including the workers. We will look for the link between the facts complained of and the activities and impacts of the project. The Eligibility Assessment will also determine whether the case should be dealt with within the complaints management mechanism or

referred to other mechanisms such as an internal audit, an anti-fraud unit, the police.

- ***Cases of unfounded complaints***

Some complaints may not meet the criteria due to lack of necessary information. Others may be rumored. Complaints of this kind can damage the reputation of the project, the company or a worker if not handled with care. In such situations, it will be necessary to trace the source of the complaint to find out if it does not hide an unspoken problem, a question that people do not openly express and why they do not openly express it.

- ***Proposal of responses***

The handling of complaints will result in three possible responses, namely:

- direct response and action by the Complaints Management Committee to resolve the complaint;
- need for a broad and thorough verification, which may require the enlargement of the team as well as the extension of processing time. Can lead to a joint investigation, dialogues, and negotiations for a consequent resolution. For sensitive cases, the complaint management mechanism may resort to an independent investigation for an appropriate resolution based on the opinions of the experts;
- agree that the complaint is not eligible for the complaints management mechanism because another mechanism would be more appropriate to deal with it.

The complainant is informed of the response or the resolution taken by the complaint management committee. If the complainant agrees, we move on to implementing the proposed responses, namely, either direct action, or a detailed examination, or the transfer of the file. If the complainant rejects the proposed resolution measures, the complaint management committee must do the following:

- record the reasons for its refusal;
- provide additional information;
- If possible review the proposed approach.

If the disagreement persists, the complainant should be informed about other remedies outside the complaint management mechanism.

- ***Step 3: Implement complaint resolution measures***

If there is an agreement between the complaints management committee and the complainant to implement the proposed response, it will intervene after clarification of the following points:

- the problem or event giving rise to the complaint;
- the stakeholders involved in the problem or event;

- the interests and concerns of stakeholders in relation to the problem ;,
- the constitution of the Commission of Inquiry (If necessary);
- the work and logistics planning required;
- course of the investigation (depends on the case);
- Identification of measures for resolving grievances;
- proposing measures to resolve grievances;
- The implementation of the resolution.

- ***Step 4: Revise the responses in the event of non-resolution***

In the event of non-conciliation, the complaints management committee will try to find a proposal for alternative measures and will indicate other available remedies; including administrative, judicial mechanisms ... It must however favor amicable resolution than judicial. Whatever the outcome, the Complaints Management Committee must document all discussions and the choices offered.

- ***Step 5: Completion of the complaint and filing***

The procedure will be closed if the mediation is satisfactory for the parties and leads to an agreement. Satisfactory resolution will need to be documented. Similarly, it will be necessary to document the lesson learned.

The resolution and the closure of the file must take place within 45 days of receipt of the initial complaint. The Complaints Management Committee will in all cases propose the possibility of resorting to independent mediation or finding another means of resolving the complaint.

5. Organization and responsibilities in the management of complaints

- ***Organization in the management of complaints***

The structure to deal with complaints can be composed as follows:

- at the Plant level: a Complaints Management Committee (Consist of Site Manager and HSE & Social officer) , responsible for entering, recording, filing complaints, handling each complaint know the analysis, interpretation, appreciation of the basis of the remedies and the solutions envisaged;
- At the level of the surrounding villages, a local complaints management unit composed, for information purposes, of a representative of the local administration, a notable, a representative of the Village Development Committee (CVD), a representative of women, a representative of young people. These Cells

will constitute the transmission belt for people who do not have the possibilities to draft, to forward their grievances and works in close collaboration with the local populations.

Each entity will have a register for recording complaints lodged. The contact details of the members of the Complaints Management Committee will be disseminated to the local population and on the project website.

- ***Responsibilities in complaint handling***

The Complaints Management Committee will:

- Coordinate the complaints handling procedure;
- Gather and examine the information available on the subject of the complaint;
- Centralize and process all complaints filed;
- Focus on resolving questions that give rise to complaints;
- Propose answers intended for complainants.

The local complaints management unit at the neighborhood and village level should:

- Receive handwritten complaints;
- Transcribe complaints into the register if the complaint is verbal;
- Propose solutions, if the complaint is not sensitive or major;
- Forward complaints to the Complaints Management Committee for processing;
- Receive the solutions found to complaints to the complaints management committee and their dissemination to complainants.

If the complaint can be resolved at the level of the local unit, it will still first inform the complaints management committee before communicating the decision to the complainant. The local cell draws up the resolution report in the complaints management notebook. The deadline for the local Complaints Management Unit to respond to complaints brought to its attention will be no more than 15 days. If the solution cannot be found by the local management unit, responsibility for handling the complaint will be transferred to the Complaints Management Committee. The complaint management committee has a maximum of 30 days to satisfy the complainant, in the event that a thorough examination or investigation is not necessary and 60 days in the event that a detailed examination or investigation is necessary.

The management of the mechanism will be based on other entities, notably the National Environment Management Agency (ANGE), the AT2ER, and the experts. The following table presents the stakeholders and their role.

Table 2: Roles of stakeholders involved in the implementation of the complaints management mechanism

Speakers	Number / Composition	Role
Complaints		- Coordinates the complaints handling procedure;

Management Committee	JAKSON Site Manager, One of the Subcontractor managers (rotating during committee meetings) HSE& Social officer	- Gather and examine the information available on the subject of the complaint; - Centralize and process all complaints filed; - Attaches to resolving the questions which give rise to complaints; - Proposes answers intended for complainants.
Cell local complaint managemen t	- 1 member of the local administration, - 1 notable or a representative ofthe chef, - 1 representative of CVD / CDQ - 1 woman - 1 Young	- Receives handwrittencomplaints; - Transcribes complaints into the register if the complaint isverbal; - Proposes solutions, if the complaint is not sensitive or major; - Transmits complaints to the Complaints Management Committee forprocessing; - Receives the solutions found to complaints from the complaints management committee and distributes them to thecomplainants.
Institutions	- ANGEL - AT2ER	- Ensures that the mechanism is disseminated and the channels for receiving complaints arefunctional; - Consult the complaints register andresolutions - Convene, if necessary during the visits, the complaints management committee during thevisits, - Ensures that all complaints aresatisfied - Provision of an expert consultant ifnecessary
Control	Site Manager Central O&M team AMEA Team	- Ensures the effectiveness of the complaints management mechanism;
		- Ensures that the mechanism is disseminated to communities,workers; - Control the execution of the resolution of thecomplaint

investigative committee	As needed without exceeding 5 people	Examination of sensitive issues or requiring special expertise

6. Assessment, assignment, recognition

If the complaint or complaint does not fall within the scope of the project's operational attributions, but relates to the general development policies of the country, the Complaints Management Committee will guide the complainant by indicating the competent authorities.

If it relates to World Bank policies, AMEA may, if necessary, invite a representative from the Togo office to participate in the complaint process.

7. Control and Monitoring of the implementation of the complaints management mechanism

At the operation site, site manager will monitor the effectiveness of the complaint management mechanism and ensure that all complaints have been fairly satisfied. In addition Jakson Central O&M team and AMEA team shall support the site manager for effective implementation and monitor.

In accordance with the regulations in force, the ANGE is responsible for monitoring the implementation of the Complaint Management Mechanism. In the quarterly reports sent to the ANGE as part of the implementation of the ESMP, JAKSON will provide an update on the complaint management mechanism. During site visits, the National Agency for environment management (ANGE) will visit the complaint management documents. In case of doubt, the ANGE will summon the complainants to ensure that he has been satisfied.

- ***Capacity building***

The local complaint management units will benefit from working sessions with the complaint management committee to master the process and be able to interpret it to any complainant who comes before them.

- ***Dissemination of the complaints management mechanism***

Once approved, the complaints management mechanism will firstly be disseminated on the plant level to subcontracting companies, workers or anyone working on the site. It will then be disseminated at the level of the surrounding villages (neighborhoods, villages) as well as at the level of the municipality and any other stakeholder Involved in the project. Physical copies will be available at the local authority level (Municipality, Villages surrounding the project).