1.0 07/18

Lekela North Wind Power Project

Community Feedback Procedure

Table of Contents

1.0 Introduction

The purpose of this Community Feedback Procedure (CFP) is to outline the process for receiving, investigating, responding to and closing out concerns, issues, complaints or grievances from affected communities and other stakeholders in a timely, fair and consistent manner.

The construction of the Gulf of Suez Build, Own and Operate (BOO) Wind Power Plant Project ('the project') is likely to generate interest within regional and local stakeholders and communities.

If applied effectively, a stakeholder or community feedback procedure can offer an efficient, timely and low-cost form of conflict resolution for all concerned parties. Used as an integral part of the project Stakeholder Engagement Plan (SEP), it can enhance local relationships by building trust and can have a positive impact on construction plans, schedules and costs, especially in the lead up to construction and during the construction phase when there is likely to be issues or grievances raised by local stakeholders and community members.

a. Scope

While this is a stand-alone procedure, it should be read and used in conjunction with the project Stakeholder Engagement Plan. Stakeholder engagement, impact management and grievance handling are mutually supportive and together will help to build trust and confidence between the project and its neighbours.

This procedure is specifically designed for use through the mobilisation and construction phases of the project, however it will be regularly reviewed and updated to account for feedback from stakeholders and updated prior to the operations phase.

For the purposes of this procedure, 'community feedback' may include the following:

- **Concerns or Issues**

Concerns or issues are questions, requests for information, or general perceptions that may or may not be related to a specific project impact or incident.

If not addressed satisfactorily, concerns may become complaints. Although concerns do not have to be registered as formal complaints, if raised they should be noted in an appropriate manner (in a management system) so that emerging trends can be identified and addressed through community engagement before they escalate.

- **Complaints or Grievances**

Complaints or grievances refer to allegation of specific incidents and of any damage, impact or dissatisfaction resulting from the project or contractor actions, whether perceived or actual. Complainants are defined as individuals or organisations submitting complaints or grievances via this procedure.

Complaints and grievances can vary in scale, complexity and / or seriousness.

No costs nor retribution will be associated with lodging a complaint or grievance.

This procedure does not cover workforce grievances. There is a separate Workforce Grievance Mechanism in place as part of the project's Labour Management Plan.

The Engineering, Procurement and Construction (EPC) Contractor will be required to implement this procedure, ensuring that there is only a single community feedback procedure covering the Lekela project. In due course and as other site developers commence construction, there may be a need to develop a more integrated and comprehensive procedure together with other project sponsors.

2.0 Community Feedback Procedure (CFP)

Given the nature and scale of the project and the proximity of the nearest population center, it is not anticipated that there will be a significant number of grievances and complaints over the life of the project provided project impacts are appropriately managed and the stakeholder engagement programme is consistently implemented.

It is critical that all stakeholders be informed of the CFP and its key objectives on an ongoing basis. This will be done as part of the SEP and communicated through one-on-one meetings with local organisations, authorities and community leaders, community consultations, social media and notice boards. Further information on the communications aspects are included in *Appendix 1.0*.

The below outlines the feedback procedure.

a. Receiving Stakeholder and Community Feedback

Given the way in which local stakeholders primarily receive and impart information, the CFP will support a number of different access points to ensure that all stakeholder groups are able to effectively interact with the project.

- Face-to-face with project representatives.

- Typically, community liaison staff will receive feedback by virtue of their presence and roles within the community however, there may be occasions when other project representatives are approached with issues or grievances.

- By email, letter, phone call or via our website.
    - The project will establish a dedicated email and phone number which stakeholders can use to register a grievance or issue. This will be managed by a dedicated community liaison officer. In addition, grievances can be registered on the project website: www.lekela.com/contact
- Social media.
    - Given the proliferation of social media, in the event that the project establishes a local Facebook page (or similar), this will be an important source of timely feedback.
- Via the Project Community Resource Office
    - The Community Resource Office will be located within Ras Gharib and open during normal business hours so that community members and stakeholders are able to 'drop in' and speak directly to a project representative. In addition to a community liaison officer, specialist staff and contractors may also be available to speak to local community members at pre-determined times.

Issues or complaints may or may not be received anonymously but all feedback will be treated confidentially unless otherwise agreed with the complainant. It is critical that all parties understand that retaliatory action again complainants will not be tolerated.

A *Feedback Form* (refer *Appendix 2.0*) will be completed as the issue or grievance is being received.

b. Register / Acknowledge Receipt

Once the Feedback Form is completed and if the complainant is present, a duplicate copy of the form (with a unique identification / reference number) will be provided to the individual for their records.

Where an email is received, the CLO will seek any clarifying details, complete the Feedback Form and scan a copy in return (and within 24 hours) to the complainant.

Where a phone call is received, a Feedback Form will be completed and a SMS / Text Message sent to the complainant's mobile number acknowledging receipt. The SMS will include the unique identification / reference number and how the complainant can follow up on the status of their issue or grievance.

Note, all written correspondence (internal or external) pertaining to the feedback received will reference the unique identification number.

c. Assess and Assign

The project representative receiving the feedback, will make a rapid assessment of whether:

a) The issue can be immediately addressed and closed out. For example, a simple request for information on how to find a job should be dealt with immediately by providing this readily available information.
b) The issue requires specialist technical expertise to resolve, in which case it should be referred to the relevant department; or
c) The issue is complex or of a criminal nature and needs to be escalated without delay.

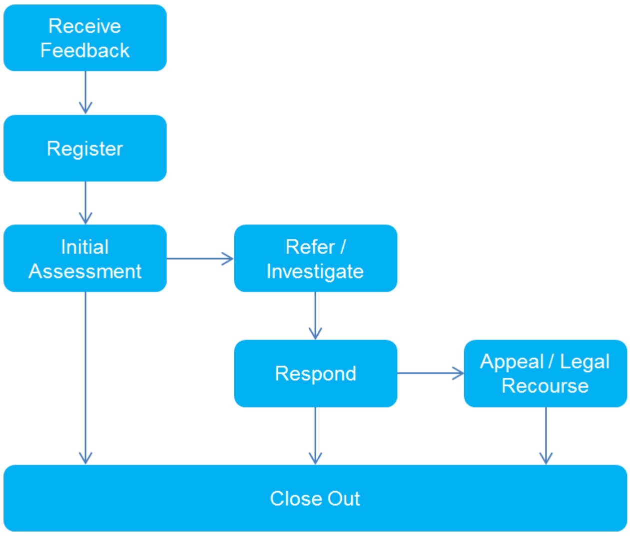
Where the feedback does not fall within the scope of this CFP, the following may apply.

Type of feedback	Options for referral / redirection
Not related to the project	▪ Ras Gharib City Council or organisation responsible
Vexatious complaints	▪ If determined after investigation to be vexatious, refer to GM or close the case
Contractual / commercial project issues	▪ General Manager or Contracts and Procurement Department
Employee / worker issues	▪ Human Resource Department or EPC Contractor
Criminal issues / Business Integrity / Ethics	▪ General Manager

The initial assessment will be completed within 24 hours and, if possible, the issue closed out.

Where the initial assessment determines a referral is required (to another department, technical expert or the EPC contractor), this will occur within 24 hours with clear timelines provided for an initial response or close out.

Where the initial assessment determines further investigation is required, this will commence within 48 hours.



d. Investigate

Severe or technically complex issues or grievances may require further information or investigation in order to support an appropriate resolution.

This process will begin by seeking to understand the complainant's perception of the issues and what they believe should be done about it. Typically, an examination of the facts and circumstances is required and this can be done by consulting with relevant stakeholders. In most cases, the department which is associated with the nature of the issue or grievance has the relevant technical expertise and therefore will be appointed to manage the investigation. The investigation team may include representatives from other departments or from the EPC contractor. For some matters, it may also be appropriate to include a representative from the Ras Gharib City Council.

Where possible, the **initial investigation will be undertaken within 10 working days**. If further time is required, this will be communicated to the complainant before the expiration of the initial 10 day time allocation.

During the investigation process it is important to:

a) Be clear about the process which will be undertaken, the timeframes involved, roles and responsibilities and any budget required;
b) Take steps to build confidence in the fact-finding process (i.e. be transparent);
c) Establish and document the facts;
d) Ensure coordination between the investigating team and the complainant.

Where possible, stakeholder participation in the resolution process should be encouraged as this supports ownership and a more collaborative process.

e. Respond

Timely, clear and accurate responses to issues and complaints are important to build trust in the feedback process. The response developed will be reasonable, proportional to the issue or grievance and account for cultural norms.

The outcome of any investigation will inform the proposed resolution and response. To avoid any conflicts of interest, the party investigating the issue will be different from the party recommending a project response. The proposed resolution must be approved by Lekela's General Manager prior to implementation.

It is important to ensure that the project's response meets any relevant international standards, particularly those which protect human rights. The proposed resolution should address the root cause of the issue or grievance to ensure that it minimises the chance of a recurrence.

The results of the investigation and the proposed response will be discussed with the complainant before it is closed out so that there is an opportunity to discuss the proposal. However, if an issue or grievance is proven to be false, the project is justified in providing a unilateral response in writing addressing the claim.

It is important that any resolution and agreement (including action items) is clearly documented and signed off with signatures (or thumb prints) by both the project representative and the complainant. The project should aim to **close out all issues and grievances within 30 days** of receipt. Where this is not possible, a new timeframe should be agreed with the complainant.

The project should respect confidentially at all times however, accept that the complainant may choose to disclose the details. The project should consider the implications of this if they choose to do so.

Where appropriate, agreed actions may be publicised through social media, community notice boards or stakeholder engagement activities.

f. Recourse or Appeal

In the event that the resolution proposed is not acceptable to the complainant, a local third party mediator may facilitate a conflict resolution process to help the parties meet a mutually acceptable outcome. Third party mediators will be agreed on a case by case basis in agreement with the complainant. Either the complainant or the project may also wish to engage a representative from the Ras Gharib City Council if appropriate.

The complainant may pursue a legal avenue at any time, in these circumstances the case should be referred to and managed by Lekela's legal team.

g. Follow Up and Close Out

Once the resolution has been agreed, the decision will be implemented and monitored. The issue or grievance will only be closed out once the resolution has been implemented. Formal notification of close out will be provided to the complainant.

Experience from the follow up will also be used to inform and refine the feedback procedure.

3.0 Roles and Responsibilities

Given that the EPC contractor will be responsible for site mobilisation, civil site preparation and construction activities, it will have a critical role in developing and implementing appropriate resolutions.

It will be important that the CFP is integrated by the EPC contractor into the construction management system.

Below is a summary of key roles and responsibilities.

Accountability	Role
Custodian of the Community Feedback Procedure	Lekela Egypt General Manager
Communicating the CFP to stakeholders	Community Liaison Officer (CLO) - either on the client side or EPC side
Receiving feedback (issues and grievances) and completing initial Feedback Form	CLO Any project employee (should refer to the CLOs)
Conducting initial assessment	CLO
Referring the case	CLO
Assigning an investigator within the department / function	Head of department / function
Ensuring the complainant is kept informed during the investigation process	CLO
Ensuring the investigation is completed within the allocated timeframe	Head of department leading the investigation
Agreeing the project's proposed solution / response	Head of department leading the investigation, investigator and CLO
Approving the project's response	EPC contractor Site Manager (or most senior on site manager) Lekela General Manager
Capturing agreed resolutions / actions in project's commitment register	CLO
Escalating a case (through recourse)	Complainant and Lekela legal representative

Providing project reporting data in accordance with agreed KPIs	CLO Administrator

4.0 Training

All staff and contractors will be made aware of the CFP during the initial site induction process.

Senior managers, GMs, Site Managers, CLOs, Government Relations, EHS and the senior EPC contractor representatives must be trained in managing claims, be proactive when managing them to ensure timely responses and adopt culturally-acceptable language and behaviour when dealing with stakeholders face-to-face.

It is important that all project managers understand that CLOs are not fully responsible for the effectiveness of the CFP. But rather, they work in close cooperation with site management to facilitate resolution.

The CLOs will be trained in all aspects of the procedure including basic investigation skills.

5.0 Monitoring & Reporting

Monthly status reports on feedback received will be provided to Lekela corporate via the site construction manager. Lekela will also provide a quarterly report to its Environment, Social & Governance (ESG) team.

Key Performance Indicators

- Number of new / closed cases
- Trends in grievances by type
- Severity
- Recurrence
- Percentage of cases that were not acknowledged within the specified time frame

The project commitments register and lagging claims data will be reviewed at monthly operations meetings to ensure accountability and responsiveness.

Recording questions, claims and actions allows for outcomes to be incorporated into the management system and for the procedure to be revised accordingly.

6.0 Appendix 1.0 – Communicating the Community Feedback Procedure

It is critical that all stakeholders be informed of the CFP and its key objectives on an ongoing basis. This will be done as part of the SEP and communicated through one-on-one meetings with local organisations, authorities and community leaders, community consultations, social media and notice boards.

To ensure stakeholders are clear about the process supporting communications literature will be produced including posters, leaflets, and advertisements which can be used on social media sites. Copies of the procedure will be made available on request and a simple schematic will be produced to illustrate the process.

Contact cards with details on how to access the CFP will also be readily available and distributed to key local outlets. They will be provided in project vehicles and to transportation contractors. If contractors are approached by members of the community they can provide a contact card.

The contact cards will include as a minimum:

- Full name of the project.
- Short explanatory note on the Community Feedback Procedure.
- Office phone number, mobile phone number and email address.
- Social media details (in the event that the project develops a Facebook page).

All printed materials must be produced in the local language and illustrations used as a way to manage messaging for vulnerable groups.

The Project will adopt the requirements set out in OPIC's 2017 Environmental and Social Policy Statement which states environmental and social requirements and procedures contained in US law. Furthermore, OPIC established the Office of Accountability in 2005 to provide an independent mechanism to address complaints or concerns that can arise around the environmental or social dimensions of OPIC-supported projects.

The office helps ensure that project workers and local communities have a voice in the projects that OPIC supports. To that end, it provides two primary services upon request: It convenes problem-solving processes for parties to a conflict and it investigates how OPIC applied relevant environmental and social policies in providing financial support for a project. The OA can be contacted in the following ways:

Through written requests – in English or in a native language – letters can be sent to:

Director
Office of Accountability
Overseas Private Investment Corporation

1100 New York Avenue
NW
Washington DC
20527 USA

Through email – accountability@opic.gov

By filling a request form on the OPIC website https://www.opic.gov/who-we-are/office-of-accountability/a-guide-for-communities and sending it as an email attachment to the above email/

7.0 Appendix 2.0 – Community Feedback Form

The form will be produced in triplicate copy:

- Original: kept for project action and records.
- First copy: record for complainant.
- Second copy: may be requested by local authorities.

The Feedback Form will include information for the complainant as to how they can follow up on the status of their issue or complaint. It will be issued in Arabic.

LEKELA GULF OF SUEZ BOO WIND POWER PROJECT COMMUNITY FEEDBACK FORM			
Full name of person / organisation representative registering the issue / complaint		Reference Number	[Unique identification / reference number]
		Date Received	DD/MM/YYYY
Organisation name (if applicable)			
Address (for contact)			
Telephone number			
Email address			
Feedback received via	☐ Face to face (in field) ☐ Project office ☐ Social media ☐ Telephone ☐ Letter ☐ Email		
Confidential	☐ Yes ☐ No ☐ Unknown (and therefore should be treated confidentially until clarified)		
Preferred method of communication for correspondence / response	☐ Face to face (in field) ☐ Project office ☐ Telephone ☐ Letter ☐ Email ☐ Via selected representative (please provide details)		
Acknowledgement provided	▪ DD/MM/YYYY		

Details of Issue / Complaint	▪ [Who, what, where, when, how, why?]
Received by	▪ [Project staff member name and position]
Assigned to	▪ [Which department and staff member has the issue / complaint been referred to for resolution?]
Resolution action/s undertaken	▪ Note: for complex issues / grievances a supporting file note may be kept documenting actions and correspondence. This file note should reference the feedback form reference number and the existence of the file note should be captured here.
Date of resolution	DD/MM/YYYY
Approved by	[Signatory, authorized manager's name and position]

To follow up on the status of your issue or complaint, please note your reference number (top right hand corner) and contact: xxx