



STAKEHOLDER ENGAGEMENT PLAN

Gabal El Zeit (GEZ) 580MW Wind Power Plant

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GEZ-WNDO&M-SOC-SEP

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GLOSSARY

TERM	DEFINITION
Community Liaison Officer	Professional who serves as liaison between the Project and communities, fostering communication, addressing concerns, and promoting collaboration.
Contracted workers	Employees engaged through third parties, such as the O&M Contractor or its subcontractors, to perform work related to core business processes for the Project's O&M phase.
Environmental and Social Management Plans (ESMPs)	The Plans issued by Alcazar Energy and the O&M Contractor addressing significant Environmental and Social aspects (as identified in the Environmental and Social Impact Assessment – ESIA) by defining specific management methods, mitigation measures, monitoring activities, reporting, auditing and review.
Quality, Health & Safety and Environmental Management System (ESMS)	The complete set of documents (including but not limited to: policies, manuals, plans, procedures, work instruction and records) developed to address, manage, monitor, audit and review the quality, environmental, social, health and safety aspects, aimed at mitigating potential associated risks and impacts and improving performance.
Gender-based violence and harassment	Includes, but is not limited to, sexual exploitation and abuse (SEA), sexual harassment (SH), sexual assault, intimate partner violence where linked to Project activities, trafficking for the purposes of sexual exploitation, and other forms of violence or harassment based on sex, gender, gender identity, sexual orientation, or other protected characteristics
Grievance	An official or informal expression of dissatisfaction or complaint, typically regarding perceived unfair treatment, violation of rights, or dissatisfaction with policies or practices. Grievances from community members are addressed through formal procedures involving investigation, mediation, and resolution to restore fairness and trust.
Grievance Mechanism	Procedure provided by a project to receive and facilitate resolution of affected communities' concerns and grievances about the project's environmental and social performance.
Information Disclosure	Disclosure means making information accessible to interested and affected parties (stakeholders). Communicating information in a manner that is understandable to stakeholders is an important first and ongoing step in the process of stakeholder engagement. Information should be disclosed in advance of all other engagement activities, from consultation and informed participation to negotiation and resolution of grievances. This will make engagement more constructive.
Internal Stakeholders	Individuals and organisations who participate in the actual operations of the Project.

TERM	DEFINITION
Query	Question concerning Project activities, e.g. maintenance schedule; employment opportunities.
Request	Request for support from members of local communities, e.g. for materials, infrastructure support or community investment.
Retaliation	Any direct or indirect act of intimidation, threats, harassment, discrimination, coercion, violence, adverse treatment, or other actions intended to discourage or punish participation in stakeholder engagement or the reporting of concerns
Stakeholders	Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project or the ability to influence its outcome, either positively or negatively.

ACRONYMS

TERM	DEFINITION
ATMP	Active Turbine Management Program
AEP	Alcazar Energy Partners
CL	Community Liaison
CLO	Community Liaison Officer
COD	Commercial Operations Date
E&S	Environment and Social
EBRD	European Bank for Reconstruction and Development
EEAA	Egyptian Environmental Affairs Agency
EETC	Egyptian Electricity Transmission Company
EHS	Environmental, Health, and Safety
EIB	European Investment Bank
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental & Social Management System
ESR	Environmental and Social Requirements
ESS	Environmental and Social Standard
GBVH	Gender-based violence and harassment
GPC	Egyptian General Petroleum Corporation
HEPCA	Hurghada Environmental Protection and Conservation Association
HSE	Health, safety and environment
IFC	International Finance Corporation
ILO	International Labour Organization
MCIT	Ministry of Communications and Information Technology
MOT	Ministry of Transportation

TERM	DEFINITION
MW	Megawatt
NCE	Nature Conservation Egypt
NCS	Nature Conservation Sector
NREA	New & Renewable Energy Authority
NREA	New and Renewable Energy Authority
NTS	Non-technical Summary
O&M	Operation & Maintenance
OECD	Organisation for Economic Co-operation and Development
PPA	Power Purchase Agreement
PS	Performance Standards
QHSE	Quality, Health, Safety and Environment
QHSEMS	Quality, Health & Safety and Environmental (QHSE) Management System
QHSSE	Quality, Health, Safety, Social and Environmental
RSWWC	Red Sea Water and Wastewater Company
SEP	Stakeholder Engagement Plan
SGRE	Siemens Gamesa Renewable Energy
UN	United Nations
WBG	World Bank Group
WTG	Wind Turbine Generator

1 INTRODUCTION

This document presents the Stakeholder Engagement Plan (SEP) for the Operation & Maintenance (O&M) phase of the Gabal El Zeit (GEZ) Wind Power Project, a 580 MW wind power project in Egypt and comprising three phases; Gabal El Zeit 1 with 240 MW capacity; Gabal El Zeit 2 with 220 MW capacity; and Gabal El Zeit 3 with 120 MW capacity (together, the Project). The Project is located approximately 370km southeast of Cairo, within Red Sea Governorate.

Alcazar Energy Partners (AEP) is currently in the process of acquiring the Project from its original developer. Following acquisition, the requirements and provisions of this SEP will be implemented by the Project and Siemens Gamesa for Renewable Energy, acting as Main O&M Contractor, and all its subcontractors involved in the Project implementation, as relevant.

1.1 PURPOSE

The overall aim of this SEP is to ensure that a consistent, comprehensive, and coordinated approach is taken in conducting stakeholder engagement and disclosure activities related to the Project's identified impacts and risks during its O&M phase. It is further intended to demonstrate the commitment of the Project and the O&M Contractor to meet the requirements of the applicable international standards and the International Good Practice approach to stakeholder engagement.

The SEP:

- Outlines the systematic approach that will be followed to maintain a constructive, strong and responsive relationship and for effective engagement with the Project stakeholders during the O&M phase, in particular with the Identified Local Communities;
- Presents the process and means for disclosing meaningful and relevant environmental and social information to different stakeholders;
- Clearly defines roles and responsibilities for implementation of the SEP; and
- Describes the community grievance mechanism, including the means for raising a Project-related grievance for identified communities and other stakeholders as well as the evaluation and management process.

1.2 PRINCIPLES

In alignment with Alcazar Energy's Stakeholder Engagement Procedure (Ref.: AE-QHSE-PRO-008), this SEP is based on the following key principles of stakeholder engagement:

Good Governance

- Upholding ethical business practices and integrity.
- Stakeholder engagement free from manipulation, interference, coercion, intimidation and retaliation.

Transparency and Access to Information

- Recognition of stakeholders' rights to: (i) public access to information; (ii) access to public consultation and the right of participation in decision-making; and (iii) access to justice.
- Fair, transparent, honest, timely and culturally appropriate communication.
- Protection of stakeholders' personal data and privacy throughout disclosure, consultation, grievance management and reporting.
- Engagement conducted on the basis of timely, relevant, understandable and accessible information provided in an appropriate format.

Meaningful and Inclusive Participation

- Principle of proportionality to determine the level of stakeholder engagement needed, being commensurate with the Project's E&S impacts, risks, and complexity.
- Understanding stakeholders' views, priorities and needs.
- Provision of sufficient opportunity to stakeholder to voice their opinions and concerns.
- Inclusive participation of disadvantaged and vulnerable groups of stakeholders.

Grievance Management

- Facilitation of effective mechanisms for grievance management and redress.
- Development and operation of mechanisms to receive and resolve stakeholder grievances.

1.3 SCOPE AND APPLICATION

This SEP applies to all Project activities undertaken during the Operations and Maintenance phase of Gabal El Zeit 580 MW Wind Farm, including standard operations, as well as preventive and corrective maintenance. It applies to Project personnel, the Contractors and all subcontractors, service providers and suppliers engaged in Project implementation, as relevant to their scope of work.

This SEP is a "living" document. It shall be reviewed at least annually and updated as necessary to accommodate any changes in Project circumstances and activities and to facilitate ongoing compliance against the applicable regulatory framework and lender requirements.

2 PROJECT OVERVIEW

2.1 PROJECT DESCRIPTION

The Gabal El Zeit Wind Power Plant is located in the Red Sea Governorate, Egypt, approximately 370km southeast of Cairo. The Project comprises the acquisition, operation and maintenance of three operational onshore wind farms with a combined installed capacity of 580 MW, comprising 290 Gamesa wind turbine generators, each with a rated capacity of 2 MW. The wind farms were commissioned in phases: GEZ 1 with 240MW and COD in December 2015; GEZ 2 with 220MW and COD in November 2017; GEZ 3 with 120 MW and COD in December 2018 and generate approximately 2.4 TWh of renewable electricity annually.

The Project was originally developed and owned by the New and Renewable Energy Authority (NREA). The transaction involves the acquisition of the operating wind farm assets by Alcazar Energy through an asset purchase arrangement as part of the Government of Egypt's privatisation programme.

Following acquisition, Alcazar Energy will assume responsibility for the operation and maintenance (O&M) of the facility and undertake a programme of maintenance works to extend the operational life of the wind farm and improve its long-term performance. O&M activities will be undertaken by Siemens Gamesa Renewable Energy (SGRE); the Project's O&M Contractor.

Electricity generated by the Project will continue to be supplied to the national grid under a 25-year Power Purchase Agreement (PPA) with the Transmission System Operator; the Egyptian Electricity Transmission Company (EETC). No additional grid interconnection works, or environmental permitting are anticipated as part of the acquisition and continued operation of the existing facility. The Project has an anticipated operational life of 25 years, extending to approximately 2042, subject to ongoing asset management and operational performance.

The Project supports Egypt's national strategy to increase the contribution of renewable energy to the electricity mix, diversify energy sources, and encourage private sector participation in the renewable energy sector.

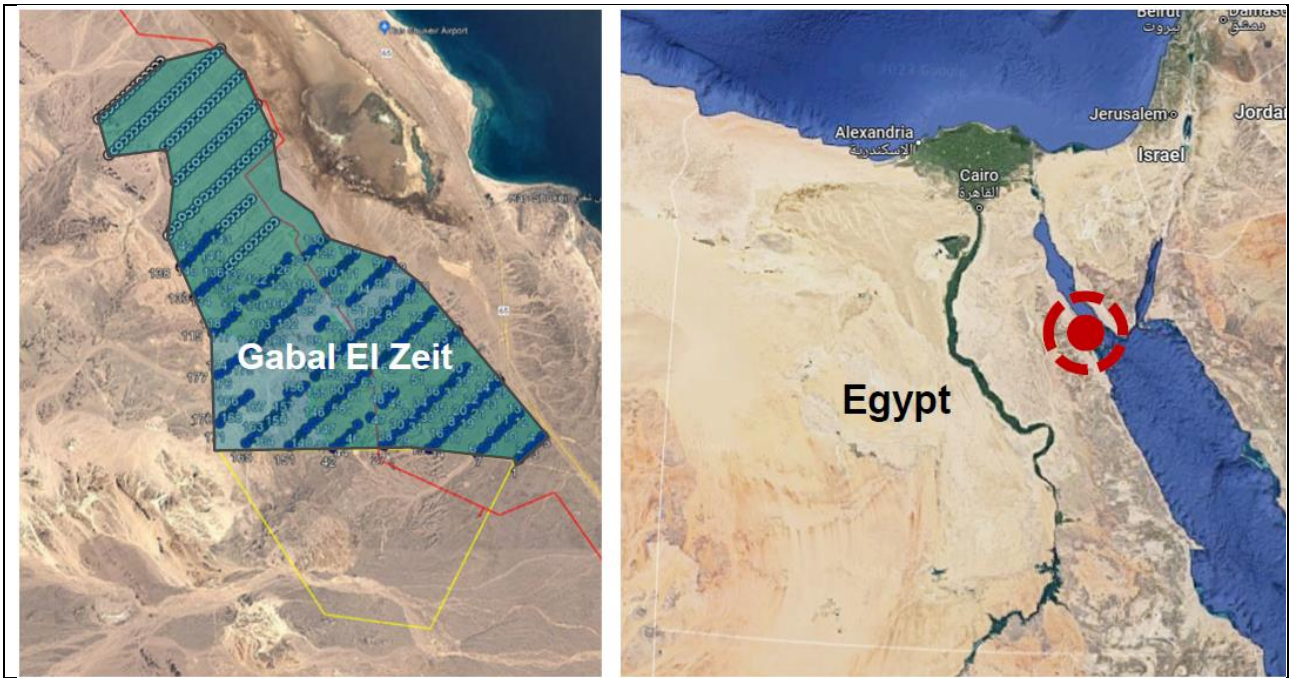


CHART 1: PROJECT LOCATION

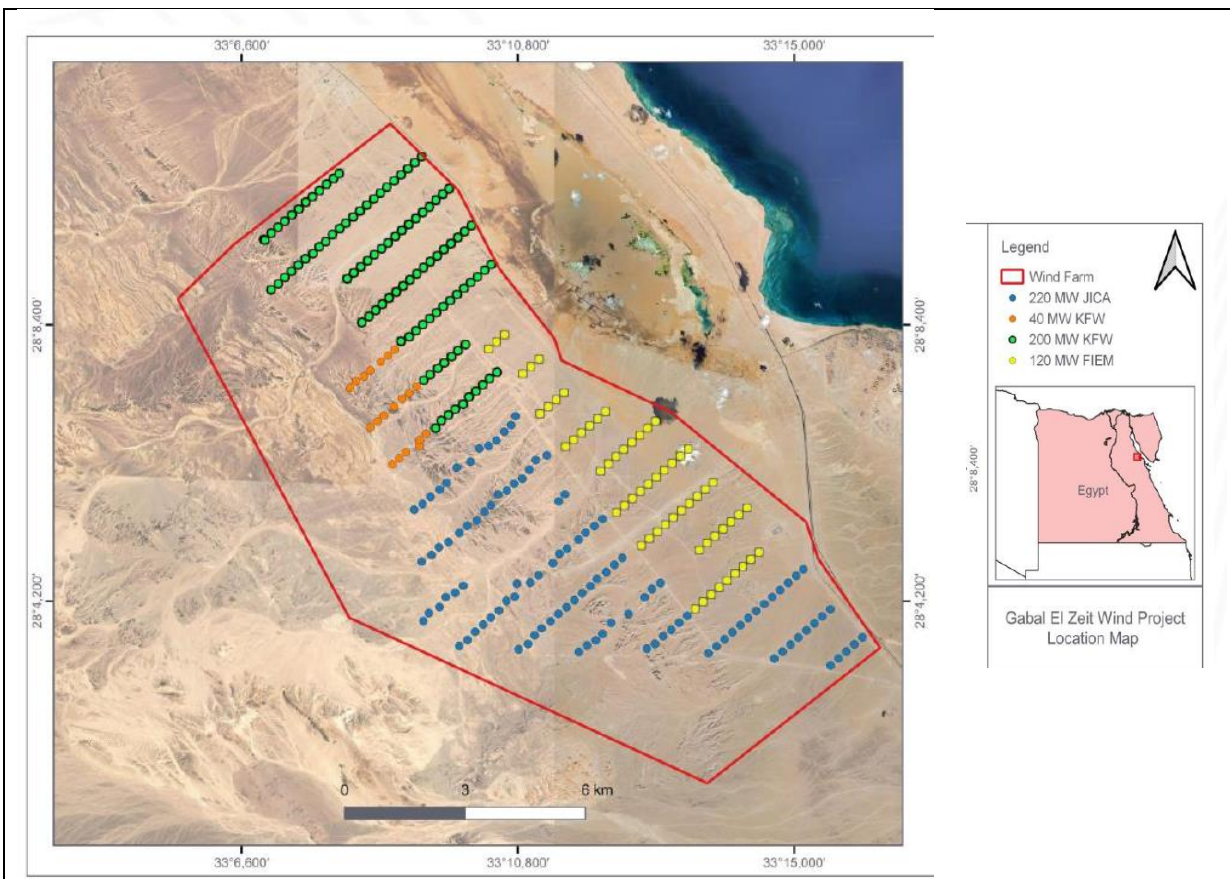


CHART 2: PROJECT LAYOUT, SOURCE: SLR

The main technical specifications of a single WTG selected for the Project are presented in the table below.

TABLE 1: MAIN TECHNICAL SPECIFICATIONS OF WIND TURBINE GENERATOR

PARAMETER	DESCRIPTION
Project Generation Capacity (MW)	580 MW
Technology Type	Onshore Wind Power Plant
Rated Power per Turbine (MW)	2.0 MW
Rotor Diameter (m)	80m
Hub Height (m)	60m
Tip height (m)	100m

2.2 LOCAL CONTEXT AND SENSITIVITIES

The Project is located in a desert area within the Red Sea Governorate on the western coast of the Gulf of Suez, where permanent settlements are generally limited. Within the immediate vicinity of the Project, the principal populated area is Wadi Dara, a small agricultural community made up of landowners, farm workers and caretakers, located approximately 15 km to the south of the Project site.. The wider Red Sea Governorate is known to have some dispersed Bedouin communities, mainly from the Al Sewelam and El Meayza tribes. While they are largely known to work in agriculture, in oil & gas projects or as guards for wind farms and other projects in the area, there may be some – especially in the southern parts of the Red Sea Governorate – who still use the surrounding desert for traditional grazing and other livelihoods. However, despite this limited permanent population, the area holds major ecological importance: the Project overlaps the Gebel el Zeit Important Bird Area (IBA) and Key Biodiversity Area (KBA), which sits at the narrowest point of the southern Gulf of Suez, where a major bird migration route; the Red Sea/Rift Valley flyway funnels huge numbers of soaring birds travelling between their breeding grounds in Europe and Western Asia and their wintering grounds in Africa. More than 1.5 million soaring birds from 37 species, plus many smaller migratory birds, use this route every year, and over 400,000 birds cross the Project area during each spring and autumn migration season enough to represent more than 1% of the world population for six species.

Other key stakeholders in the area include employees and contractors working at nearby oil and gas facilities, local fishermen operating along the Gulf of Suez coast, government authorities, environmental regulators, and emergency services.

2.2.1 PROJECT AREA AND LAND USE

In terms of land use, the Project footprint occupies undeveloped desert land allocated for wind energy development, within a wider coastal corridor along the Gulf of Suez that also hosts oil and gas concession areas and associated infrastructure such as pipelines, access roads and processing facilities. There is no formal urban or agricultural zoning within the Project area itself; the only cultivated land (located approximately 15 km south of the Project site) is the small-scale wadi-based farming around Wadi Dara.

2.2.2 KEY STAKEHOLDER SENSITIVITIES

During public hearings and consultations conducted as part of the national ESIA process in 2013, key stakeholder concerns were related to biodiversity impacts (refer to Section 6.1 for further details). Presently, given the operational nature of the Project, stakeholder interests are expected to focus on ongoing

environmental performance, traffic and road safety during major maintenance activities, land access, and employment and local procurement opportunities. Particular consideration will be given to maintaining effective engagement with local residents and authorities, any Bedouin households present in the area, seasonal workers and other potentially vulnerable stakeholders to ensure concerns are identified, appropriately addressed and incorporated into the Project's ongoing stakeholder engagement processes.

3 REGULATORY FRAMEWORK AND STANDARDS

The Project, the O&M Contractor and all its subcontractors must abide by the national regulations and international standards relevant to the Project's stakeholder engagement process and as summarized in the following sections.

3.1 NATIONAL REGULATIONS AND STANDARDS

The primary requirements of national law with respect to stakeholder engagement applicable to the Project are listed below.

TABLE 2: NATIONAL LAW REQUIREMENTS

TITLE	LAST AMENDMENT
Constitution of the Arab Republic of Egypt (2014, as amended 2019)	2019
Environmental Law No. 4 of 1994	Amended by Law No. 9/2009 and Law No. 105/2015
EEAA Environmental Impact Assessment Guidelines of 2009	-
Decree No. 338 of 1995 issuing the Implementing Regulation of Environment Law No. 4 of 1994.	Amended by Decision No. 2466/2024

Further details on specific requirements by law are listed in Appendix A.

3.2 INTERNATIONAL STANDARDS

The following international standards and guidelines are applicable to the Project.

TABLE 3: APPLICABLE STANDARDS AND GUIDELINES

STANDARDS AND GUIDELINES APPLIED TO THE PROJECT
International Finance Corporation's (IFC) Performance Standards (PS) on Environmental and Social Sustainability, 2012
World Bank Group (WBG) / IFC's Environmental, Health, and Safety (EHS) Guidelines, 2007
WBG / IFC's EHS Guidelines for Wind Energy, 2015
European Bank for Reconstruction and Development (EBRD) Performance Requirements, 2024
Asian Infrastructure Investment Bank (AIIB) Environmental and Social Framework (ESF), 2024
European Investment Bank (EIB) Environmental and Social Standards, 2022

STANDARDS AND GUIDELINES APPLIED TO THE PROJECT
Equator Principles IV, 2020
UN Universal Declaration of Human Rights, 1948 and UN Guiding Principles on Business and Human Rights, 2011
International Labour Organization (ILO) instruments including Conventions and Recommendations, Codes of Practice and Guidelines, specifically but not limited to ILO Fundamental Conventions and ILO Declaration on Fundamental Rights and Principles at Work
Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, 2023
Guidance Notes from leading Financial Institutions recognized as Best International Practice, including: IFC Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, 2007 Good Practice Note for the Private Sector: Addressing the Risks of Retaliation Against Project Stakeholders, 2021 Guidance Note for EIB Standard on Stakeholder Engagement in the EIB Operations, 2020 IFC Good Practice Handbook: Use of Security Forces – Assessing and Managing Risks and Impacts, 2017

The subsections below elaborate on the key international standards that are relevant for this SEP.

3.2.1 INTERNATIONAL FINANCE CORPORATION (IFC) PERFORMANCE STANDARDS (PS) ON ENVIRONMENTAL AND SOCIAL SUSTAINABILITY, 2012

The below provides summary information regarding the requirements for stakeholder engagement and grievances as outlined under IFC PS1: Assessment and Management of Environmental and Social Risks and Impacts although all other PS (2-8) have specific consultation requirements embedded in the general requirements specified in PS1. Those include requirements related to information disclosure, external communications, periodic reporting to Affected Communities, and operating an external grievance mechanism. PS4 also states that Projects should provide information to Affected Communities related to emergency preparedness and response and security arrangements, while PS6 states that the Projects should disclose information related to biodiversity risks and management measures. Particularly, PS1 states that Stakeholder Engagement should:

- Start as early as possible in the Project cycle.
- Continue throughout the life of the Project.
- Be free of external manipulation, interference, coercion, or intimidation.
- Where applicable enable meaningful community participation.
- Be conducted on the basis of timely, relevant, understandable, and accessible information in a culturally appropriate format.
- Operate a grievance mechanism to respond to complaints from stakeholders.

3.2.2 EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT (EBRD) ENVIRONMENTAL AND SOCIAL POLICY AND ENVIRONMENTAL AND SOCIAL REQUIREMENTS (ESRS), 2024

EBRD's Environmental and Social Requirement (ESR) 10 – Information Disclosure and Stakeholder Engagement requires clients to establish and implement a Stakeholder Engagement Plan (SEP) that is proportionate to the project's environmental and social risks and impacts.

The SEP shall provide a framework for identifying stakeholders, undertaking meaningful and inclusive engagement throughout the project lifecycle, disclosing relevant environmental and social information in a timely and accessible manner, and ensuring stakeholder views are considered in project decision-making. Particular consideration shall be given to potentially vulnerable or disadvantaged groups to ensure they can participate effectively in the engagement process.

Clients are to maintain an accessible grievance mechanism for external stakeholders, monitor the effectiveness of stakeholder engagement activities, maintain appropriate records of engagement and grievances, and periodically review and update the SEP to reflect changes in project activities, stakeholder expectations, or environmental and social risks.

4 ROLES & RESPONSIBILITIES FOR SEP IMPLEMENTATION AND REVISION

AEP's team comprises a corporate team and a site-based team, the latter including the Project Manager, Local HSE Manager, Local E&S Specialist and Community Liaison Officer. The Contractors support implementation within their respective scopes of work and are responsible for their own worker grievance mechanisms. The following sections set out responsibilities by role.

TABLE 4: ROLES & RESPONSIBILITIES

Role / responsible party	Key responsibilities
AEP	
AEP Corporate QHSSE Team	• Overall oversight, monitoring and evaluation of SEP and grievance-mechanism implementation. • Review, approve and update the SEP; mobilise resources for implementation and corrective actions. • Keep Project documentation (biodiversity studies, SEP, brochure/poster) available on corporate website. • Manage the Complaint Management Platform and oversee site-based grievance management. • Lead investigation of Level 2 grievances and oversee Level 1 (Section 7). • Review engagement and grievance reports; give monthly input on the Stakeholder Engagement Log. • Support lender monitoring visits, E&S audits and due diligence, ensuring follow-up and closure. • Ensure compliance with E&S requirements, Project commitments, ESAP and lender requirements; address material gaps. • Contribute E&S content to lender/shareholder progress reports (QHSSE performance, incidents, emergencies). • Ensure workers are aware of grievance-mechanism responsibilities, including refresher training.
AEP O&M Manager (Site-Based)	• Oversee on-site SEP implementation; ensure adequate human and financial resources. • Ensure monthly performance reports (incl. engagement statistics) reach the corporate team.

Role / responsible party	Key responsibilities
	- Participate in the annual QHSSE management review and approve improvement resources. - Monitor environmental and social performance against national and international standards. - Coordinate with local, regional and national authorities as required.
AEP Local HSE Manager	- Manage day-to-day SEP implementation and oversee the CLO; coordinate with the E&S Specialist. - Hold stakeholder engagement meetings per the SEP schedule and deliver O&M-phase HSE commitments. - Ensure emergency response includes stakeholder/authority communication; coordinate EPRP disclosure and consultation. - Coordinate engagement with environmental regulators. - Oversee environmental-monitoring communication (biodiversity, birds, waste, pollution) where disclosure is required. - Coordinate advance notice of disruptive maintenance works (road closures, crane/night works) with Contractors and CLO. - Provide HSE information/training, including respectful community interaction and anti-harassment expectations. - Support grievance screening with site context; record grievances/enquiries on the Complaint Management Platform. - Ensure engagement activities are logged; prepare monthly QHSSE statistics within seven days of month-end. - Provide monthly engagement/grievance inputs to the Local E&S Specialist for reporting.
AEP Local E&S Specialist <i>Primary link between Corporate ESG and the site team; overall SEP-implementation responsibility; Project GBVH Focal Point</i>	- Track E&S legislation and lender requirements; advise the HSE Manager and CLO; flag implications. - Monitor implementation of management plans and ESAP; identify gaps and coordinate corrective actions. - Conduct E&S site inspections; document findings, risks and corrective actions. - Monitor contractor E&S compliance; escalate significant/repeated non-compliances to Corporate ESG. - Support periodic E&S reports, incident notifications and ESAP updates; report status, risks and incidents. - Support E&S audits, lender visits and due diligence, including documentation and follow-up. - Review the Stakeholder Engagement Log and grievance-data quality before corporate submission. - Screen and classify grievances by severity; manage HSSE-related grievances with the CLO/HSE Manager; escalate Level 2. - Review, manage and close grievances on the Complaint Management Platform. - Coordinate engagement strategy with the HSE Manager and CLO, consistent with the SEP; review SEP KPIs and reporting. - Identify SEP update needs and prepare draft revisions. GBVH Focal Point: first contact for GBVH reports; survivor-centred intake and referrals; keep GBVH cases separate; quarterly risk-register review; oversee investigations; verify contractor GBVH measures monthly; maintain the referral list annually; report GBVH indicators. - Support E&S awareness/training for personnel and Contractors.

Role / responsible party	Key responsibilities
Community Liaison Officer (CLO) <i>Primary day-to-day contact with affected communities; manages the grievance mechanism</i>	• Engagement & disclosure: run the community liaison office in Ras Ghareb City, with periodical visits to Wadi Dara; maintain community, NGO and local-government relationships; disclose Project information in Arabic (incl. media adverts); customise brochures/posters; organise and attend meetings, weekly Open Days and community sessions; keep meeting minutes; maintain the Stakeholder Engagement Log and media log. • Community insight & mapping: understand community expectations, needs and impacts; monitor attitudes/trends and report to the HSE Manager and E&S Specialist; support NGO engagement as directed (no independent sensitive NGO engagement). • Grievance management: acknowledge grievances within five working days in the complainant's preferred mode; agree steps with the HSE Manager/E&S Specialist and advise the complainant; maintain the grievance register and forward for logging; complete Closeout Forms; support women and vulnerable groups; manage anonymous grievance boxes/forms weekly; refer GBV grievances to the GBVH Focal Point; immediately report unrest, protests or serious incidents. • GBVH community interface: deliver awareness sessions in Arabic; forward community GBVH grievances to the Focal Point; monitor worker–community interactions; give warm referrals and accompany survivors on request. • Local recruitment: support maximising local recruitment; inform community members of recruitment processes and job opportunities.
O&M Contractor	
Contractor — SGRE	• Project Director: provide resources for stakeholder engagement within scope; nominate a primary point of contact with AEP; give AEP advance notice of works requiring stakeholder notification (major maintenance works, bringing cranes onsite, road closures/access restrictions); immediately notify AEP of incidents/near misses affecting external stakeholders; comply with the SEP and AEP procedures. • HSSE Manager: induct and train personnel on stakeholder engagement; minimise community disruption; ensure respectful public communication; avoid unauthorised disclosures or commitments; channel all external complaints to AEP's CLO without independently resolving them; cooperate with AEP investigations and corrective actions; implement corrective actions on time; keep records of stakeholder interactions for AEP. • Project Manager: support workforce engagement via meetings, inspections and training; notify AEP and the HSSE Manager of serious workforce complaints and ensure investigation/corrective action; brief personnel on the grievance mechanism (induction, awareness, toolbox talks); support use of the Complaint Management Platform.
Any additional contractors <i>To be reviewed annually or with the introduction of any new contractors</i>	• Project Manager will act as focal point for AEP HSE/E&S/CLO on engagement and external communications. • Give advance notice of disruptive works (road closures, oversized/abnormal loads, cranes, access restrictions, noise). • Immediately report community complaints, incidents or grievances to AEP's CLO. • Cooperate in stakeholder meetings and consultations and in emergency notifications/procedures. • Keep records of stakeholder interactions and complaints; support investigations and corrective actions. • Ensure subcontractors meet the same requirements; comply with the SEP and AEP procedures.

4.1 SUBCONTRACTORS AND SECURITY PERSONNEL

The Contractors shall ensure, through contractual requirements, that all subcontractors and service providers maintain appropriate capacity and comply with the Project's commitments related to stakeholder engagement and interactions with local communities.

In the context of this SEP, the Security Manager of the security subcontractor is responsible for immediately channelling and reporting any stakeholder complaints, enquiries or grievances received by security personnel to the CLO and/or local E&S specialist, refraining from independently resolving or formally responding to complaints unless authorised, and cooperating with AEP during investigations of stakeholder complaints, grievances and incidents related to security management. Security personnel (including Bedouin security) shall conduct themselves in accordance with the Security Management Plan (SMP), including the use of proportionate force principles, (in line with the IFC Good Practice Handbook: Use of Security Forces – Assessing and Managing Risks and Impacts, 2017) and shall interact with community members in a respectful and non-threatening manner at all times. As grievances may be submitted at Project entrances, security staff shall be trained on the grievance mechanism and have access to this SEP, the applicable forms and the contact details of responsible Project parties. Full responsibilities of the Security Manager and security personnel in relation to security management, patrolling and incident reporting are set out in the SMP.

4.2 TRAINING AND CAPACITY BUILDING

Training will be provided to the CLO on the key messaging the Project wishes to convey to stakeholders, as well as on implementation of the grievance mechanism and recordkeeping. The CLO, Local HSE Manager and other key members of the AEP site team will also be trained on important information to share with affected communities, including the Project schedule, Project description, maintenance activities, managing expectations, stakeholder engagement protocols and monitoring requirements.

During induction training, all Project workers will be instructed on how to respond to questions or complaints arising from community members and on the worker code of conduct, which includes aspects relating to respectful interactions with community members, prevention of GBVH, and the prohibition of retaliation. All staff will be advised of the availability of the grievance mechanism during Project induction, including its key features, how to submit GBVH-related reports, the process followed, and where to access it.

All personnel who handle grievances — including the CLO, the Local E&S Specialist and the Contractors' HSSE personnel — will receive dedicated GBVH training covering survivor-centred principles, confidentiality, referral pathways and the incident response protocol, before being assigned grievance-handling duties. A minimum of one trained GBVH Focal Point will be maintained at all times and refresher training will be delivered at least annually.

5 STAKEHOLDER IDENTIFICATION AND ANALYSIS

5.1 APPROACH TO STAKEHOLDER IDENTIFICATION

For the purposes of this plan, a stakeholder is defined as any individual or group who is potentially affected by the Project (positively or negatively) or who has an interest in the Project and its potential impacts. The identification of stakeholders considers the types of communication and media that each group is likely to use and be comfortable with. Modifications will be made over time to the list of stakeholders and methods of communication to meet changing circumstances. The Project will undertake periodic reviews — at a minimum, annually — of the stakeholder analysis, and the list will be kept up to date as new stakeholders are identified or express an interest in the Project.

5.2 STAKEHOLDER CATEGORIES

Stakeholders are grouped into three categories:

TABLE 5: STAKEHOLDER CATEGORIES

Identified Local Communities	Stakeholders who may be directly or indirectly, positively or negatively, affected by the Project.
Interest-Based Stakeholders	Broader stakeholders who may have interests in and/or the ability to influence implementation of the Project
Internal and Participatory Stakeholders	Stakeholders who participate in the implementation of the Project.

Internal stakeholders, including individuals and organisations who participate in the actual operations of the Project, have been considered as stakeholders since their engagement and consultation is key for the effective management of E&S risks. The methods of engagement with internal stakeholders differ from those used for external stakeholders.

5.3 STAKEHOLDER MAPPING

A list of the specific stakeholders identified to date in each of the groups is provided below, together with the analysis of potential project impacts they may experience and their potential influence on the Project.

TABLE 6: LIST OF PROJECT STAKEHOLDERS / STAKEHOLDER MAPPING

Classification	Stakeholder Groups / Names	Relevance to the Project
Identified Local Communities		
Local communities	Ras Ghareb township, located approximately 15km to the northeast from the eastern border of the Project site and head of the city council.	Interested in how they may be affected by the Project, especially during maintenance activities, and whether there may be any additional impacts in the future.
	Wadi Dara village, located about 15km to the south of the Project site, and head of Wadi Dara's Local Governorate Unit.	
	Bedouin community members in the area – the Al Sewalam, El Meayza tribes , residing Ras Ghareb and Wadi Dara and community leaders.	
	Vulnerable groups: elderly persons, persons with disabilities, illiterate persons, persons with chronic illness, households under the poverty line, single-headed households children.	All directly affected towns may include people from these groups. These groups may be affected differently, potentially more severely by the Project, and thus may require additional mitigation measures
Local businesses	Local small businesses in the area, including those located in Wadi Dara and Ras Ghareb	May be Interested in opportunities to support the Project and provide goods and services, and in how the Project may affect their business
Emergency services	- Red Sea Governorate - Ras Ghareb City Council - General Administration of Civil Protection - Egyptian Ambulance Authority - NREA's Operations Control Centre	- May be called upon in emergencies. - Emergency preparedness and response coordination; awareness of maintenance activities schedule, hazardous materials transport, and site emergency contact points.
Interest Based Stakeholders		
Current Project Owner	The New and Renewable Energy Authority (NREA)	- Project background and documentation - Land allocation

Classification	Stakeholder Groups / Names	Relevance to the Project
National authorities	Authorities with locations near the Project site: - Ministry of Petroleum and Mineral Resources - Ministry of Communications and Information Technology (MCIT) - Ministry of Defense Other national authorities - Egyptian Environmental Affairs Agency (EEAA) - Ministry of Environment – Nature Conservation Sector (NCS) – Biodiversity Department - Ministry of Transportation (MOT) - Ministry of Electricity and Renewable Energy - Ministry of Civil Aviation - Ministry of Tourism and Antiquities - Ministry of Interior	Permitting authorities, monitoring and oversight
Local and governorate authorities	- Red Sea Governorate - Environmental Administration - Labour Office - Roads Directorate - Public Health Directorate - Hazardous Waste Management Unit - Solid Waste Management Unit - EEAA – Red Sea Governorate's Environmental Unit - Red Sea Water and Wastewater Company (RSWWC) - Red Sea Traffic Department - Ras GharebGhareb City Council - Ras Ghareb City – Environmental Unit - Ras Ghareb Traffic Unit (Red Sea Traffic Department)	Governing directly and indirectly impacted population within the Project area of influence
Other Projects in the Area	- Egyptian General Petroleum Corporation (GPC) with operations in the vicinity of the Project site - DARA Petroleum Company - Neighbouring wind farms: - Gulf of Suez 1 252 MW Wind Farm - Suez Wind Energy 550 MW (Plot 2) - Egypt Green Hydrogen 200 MW Project - Amunet II 500 MW Wind Farm	May be interested in overall project management and avoiding cumulative impacts.
Civil society	- Hurghada Environmental Protection and Conservation Association (HEPCA) - Nature Conservation Egypt (NCE) - BirdLife International	May be interested in how the project impacts biodiversity, especially as related to migratory birds and waste management.
Media	National and local newspapers, news sites, television, radio channels and social media pages	Maybe interested in reporting project progress and news, including this transaction.
Internal & Participatory Stakeholders		
Direct employees	- Current NREA staff - Direct employees are those engaged by Alcazar Energy.	Change of project ownership, any future project plans
O&M Contractor and employees	- Siemens Gamesa for Renewable Energy - Contracted workers: Engaged through third parties, such as the O&M Contractor or its subcontractors, to perform work related to core business processes for the Project's O&M.	Additional requirements related to overall project ESHS management

Classification	Stakeholder Groups / Names	Relevance to the Project
Subcontractors and employees	Other project subcontractors	
Suppliers	Vehicles, machinery and equipment suppliers	
Project Lenders	- The International Finance Corporation (IFC) - The European Bank for Reconstruction and Development (EBRD) - The Asian Infrastructure Investment Bank (AIIB)	Financing the Project; require assurance of E&S compliance and effective stakeholder engagement
Energy Offtaker	Egyptian Electricity Transmission Company (EETC)	Technical details related to the Project's operations Implementation of the Project's Active Turbine Management Programme

'Internal Stakeholders', including individuals and organisations who participate in the actual operations of the Project, have been considered as stakeholders, since their engagement and consultation is key for the effective management of E&S risks. The methods of engagement with the internal stakeholders will differ from those used for external stakeholders.

6 APPROACH TO STAKEHOLDER ENGAGEMENT

6.1 PREVIOUS STAKEHOLDER ENGAGEMENT

Various ESIA processes have been undertaken for the wind power developments coordinated by NREA on the western coast of the Gulf of Suez. This includes:

- **300 km² Wind Power Development Area at the Gulf of Suez (Ras Ghareb):** Framework ESIA, 2013;
- **"European" 200 MW Wind Farm at the Gulf of El Zayt:** Feasibility Study and ESIA, 2008; and
- **"Spanish" 120 MW Wind Farm at Jabal El-Zayt (GEZ 3):** ESIA, 2011.

The below subsections describe the stakeholder engagement and consultations conducted as part of these processes.

Throughout the construction and operations phases, it is understood that no formal stakeholder engagement planning or activities in line with international standards took place for this Project, and no relevant records are available.

6.1.1 FRAMEWORK ESIA – 300KM² WIND POWER DEVELOPMENT AREA

As part of the framework ESIA conducted for the 300 km² Wind Power Development Area at Ras Ghareb, NREA and its ESIA consultants contacted and invited various stakeholders to provide comments on the Project Design Document in June 2013 and held a public hearing on the findings of the draft ESIA in October 2013, as shown below.

TABLE 7: PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES¹

Engagement Activity	Date	Stakeholders Engaged	Key Stakeholder Inputs
Written invitation to comment on the Project Design Document	June 2013	- Egyptian General Petroleum Corporation (GPC) - DARA Petroleum Company - Red Sea Governorate - Natural protected areas, Red Sea Governorate (EEAA)	No comments were provided by these stakeholders with the exception of the Egyptian General Petroleum Corporation (GPC) and the Egyptian Environmental Affairs Agency (EEAA): GPC

¹ Source: Environmental and Social Impact Assessment for an Area of 300 km² at the GULF OF SUEZ – New & Renewable Energy Authority (NREA) (2013)

Engagement Activity	Date	Stakeholders Engaged	Key Stakeholder Inputs
		- Egyptian Environmental Affairs Agency (EEAA) Environmental Research Biodiversity Department – Nature Conservation Sector (NCS) - Egyptian Environmental Affairs Agency (EEAA) (Evaluation unit) - HURGADA Society for Environmental - Ras Ghareb City Administration - Ras Ghareb Local Council - Ministry of Communication - Vodafone - Mobinil - Radio and TV Unit Ras Ghareb - Ministry of Defense - Ras Ghareb Directorate, Ministry of Defence - Ministry of Electricity and Energy - Egyptian Electricity Transmission Company (EETC) - Representative of Bedouin family (located approximately 15 km south of the Project site)	- Emphasized importance of cooperation with petroleum companies regarding the two gas pipelines in the vicinity and operations in the wider Ras Ghareb region. - Requested NREA to nominate a focal point. - Requested clearer project documentation. EEAA - Requested clearer project documentation.
Public Hearing, Hurghada	23 October 2013	60 participants from governmental organizations, non-governmental organizations, media, neighbouring communities to the project site, private sector organizations and consultants.	Main concerns presented by attendees included the following: - Concerns about operational impact on migrating birds and methods for monitoring and mitigation including turbine stoppage. - Construction impact on fauna including lizard habitats and the importance of monitoring. - Waste generation during construction activities. - Nose impact within and outside the Project site.

Throughout the construction and operations phases, it is understood that no formal stakeholder engagement planning or activities in line with international standards took place for this Project, and no relevant records are available.

6.1.2 "EUROPEAN" 200 MW WIND FARM AT THE GULF OF EL ZAYT

The consultants of the June 2008 ESIA noted there are no residents or affected stakeholders in or near the "European area", with the nearest stakeholders being a petrol workers' camp approximately 9 km. Thus, it was concluded that a public hearing would not be required. However, the August 2008 feasibility study states that EEAA had requested a full ESIA including public consultations to be carried out. There are no further updates on whether any consultation processes subsequently conducted.

6.1.3 "SPANISH" 120 MW WIND FARM AT JABAL EL-ZAYT (GEZ 3)

As part of the social impact assessment study, semi-structured interviews and focus group discussions were conducted across two field visits with the following stakeholders:

- Power operation and water distribution employees in the Wadi Dara Local Governorate Unit.
- Landowners in Wadi Dara;

- Farmers and guards on nearby farms;
- Small number of members of Bedouin communities; and
- Employees of businesses located in the area including NREA and petrol companies.

Formal public hearings had not taken place at the time of the publication of the ESIA report in 2011.

6.2 DISCLOSURE OF E&S DOCUMENTATION

Alcazar Energy recognises the importance of keeping stakeholders well informed about the Project throughout its lifecycle. Accordingly, information will be made accessible to the public, key stakeholders, and local communities through the dissemination of related documents. In accordance with IFC PS1 and EBRD ESR10/Access to Information Policy, the disclosure package will include the following key documents, which will remain publicly disclosed for a minimum period of 60 days prior to lenders' board meeting and will continue to remain accessible on the website for the life of the Project thereafter. The Project's ESIs were completed several years ago and are understood to have been disclosed in accordance with both local requirements and those of past Project Lenders. As part of this transaction, Alcazar Energy commissioned a set of biodiversity studies and plans to complement the existing project documents, and these studies form part of the current disclosure package.

- Non-Technical Summary (NTS)
- Critical Habitat Assessment (CHA)
- Cumulative Effects Assessment (CEA)
- Offset Feasibility Study (OFS)
- Biodiversity Management Plan (BMP)
- Biodiversity Action Plan (BAP)
- Stakeholder Engagement Plan (SEP)
- Project's Environmental and Social Action Plan (ESAP))

The above documents are available at the following avenues:

- Developer Website (<https://alcazarenergy.com/>). The documentation above will remain at the website for the life of the project.
- Project Website (currently being developed)
- Soft copies can also be made available to stakeholders via email to Welmahalawy@ALCAZARENERGY.COM. In addition, any inquiries or comments can be directed to this email address.

Finally, it is important to note that all stakeholders can raise concerns or comments via the grievance mechanism provided in "Chapter 7" below.

6.3 STAKEHOLDER ENGAGEMENT PROGRAM

Information disclosure involves delivering information about the Project, its risks, impacts and opportunities to the Identified Local Communities and ensuring access to such information by other identified Stakeholder groups in a manner that is accurate, timely and understandable, which in return will facilitate future engagement and the resolution of potential grievances

The stakeholder engagement program presented here has been developed specifically for the O&M phase of the Project.

Following takeover by AEP, the Project will communicate to stakeholders the change of ownership and introduce new team members, primarily the CLO and HSE Manager. The location of the Community Liaison Office will be provided, and the Grievance Mechanism will be described. Since the Project Operator will be maintained, it is expected that some Project staff will continue in their roles. Staff members known to the community members will take part in such engagement to ensure continuity and a smooth transition. Additional SRGE staff members with relevant roles will also be introduced.

The Project will continue to provide stakeholders throughout the O&M phase with access to relevant information on:

- The purpose, nature, scale and timelines of the Project;
- Potential environmental & social risks and impacts on such communities and the relevant mitigation measures being implemented to manage those; and
- The grievance mechanism.

In addition, the Project will communicate any material changes which may result in additional adverse impacts and any particular issues or topics that may have been identified through the grievance mechanism as a concern to those Identified stakeholders, as a means to further engage and involve them in the environmental and social performance of the Project.

The following table presents information that is to be disclosed to the Identified stakeholders together with timelines and frequency of communication, as well as responsibilities within the Project.

TABLE 8: ONGOING ENGAGEMENT & INFORMATION DISCLOSURE

#	Information to Disclose	Stakeholder Group	Method of Disclosure	Timing and Frequency	Responsibility
1	Update on change of Project Ownership ✓ Introduction of the Sponsor, SPVs ✓ Introduction of Project Team, particularly CLO, office CL ✓ Office location, and methods of communication ✓ Description of stakeholder engagement process and Grievance Mechanism	✓ All stakeholders ✓ Local Communities ✓ Vulnerable groups	✓ Project brochures ✓ Stakeholder meetings ✓ Female only sessions, visual material and suitable meetings times and locations	Following takeover	Alcazar Energy Corporate ESG Team, Local E&S Specialist and AEP CLO
2	General Project information ✓ Updated biodiversity studies ESAP and Updated Stakeholder Engagement Plan ✓ Project brochure and/or posters ✓ Contact details including for the CLO and emergency contact number	✓ All stakeholders ✓ Identified Local Communities ✓ Vulnerable groups	✓ SEP and Project brochure and contact details available on Alcazar Energy's website ✓ Hard copy of all documents available at the CL office in Ras Gharib ✓ Female only sessions, visual material and suitable meetings times and locations	Ongoing basis – to be checked annually to ensure most updated versions are uploaded	Alcazar Energy Corporate ESG Team AEP CLO
3	Community grievance mechanism: ✓ How to submit a complaint ✓ Available communication channels ✓ Expected response times ✓ Confidentiality arrangements ✓ Appeals process ✓ Confirmation that grievances may be submitted free of charge, confidentially and without risk of retaliation.	✓ All stakeholders	✓ Grievance mechanism's simplified procedure in Arabic available at the CLO office ✓ Grievance box and grievance forms (in English and Arabic) available outside the CLO office to be used in case of anonymity ✓ QR Code to the Complaints Management Platform shown on Grievance Box ✓ Updated Grievance Log available at the CLO office ✓ Grievance submission form available on Alcazar Energy's website ✓ Signage in Arabic at Project site boundaries or entrance with details on contact details and ways to submit grievances	Grievance box to be checked at least two times a week	AEP CLO
4	Community health & safety risks including: ✓ Public safety around turbines ✓ Restricted access areas ✓ Importance of good housekeeping and avoiding litter including cattle carcass in the area ✓ Blade Throw: Inform them of the risk of blade throw and to stay away from the WTGs as far as possible in order to minimise safety risks	✓ Identified Local Communities, focusing on: Residents of Ras Ghareb, Wadi Dara, and dispersed Bedouin communities	✓ Engagement with Bedouins, local herders and users of the grounds for information disclosure through consultation (conversation on the ground)	Monthly, in particular during picks in herding season and at the beginning of the winter season accordingly	AEP CLO

#	Information to Disclose	Stakeholder Group	Method of Disclosure	Timing and Frequency	Responsibility
	✓ Noise: Inform them that the noise generated by the WTGs when in operation is normal and increases with wind speed and to stay away from the WTGs as far as possible to minimise nuisance				
5	Upcoming major maintenance activities at the Project site, e.g. ✓ Crane mobilization ✓ Delivery of over-sized turbine components ✓ Blade replacement ✓ Road closures ✓ Night works ✓ Major maintenance campaigns and scheduled maintenance ✓ Transmission outages ✓ Temporary road closures and access restrictions	✓ Identified Local Communities including local communities and authorities including Red Sea Traffic Department's Ras Ghareb Traffic Unit ✓ Internal & Participatory Stakeholders	✓ Posters on project site ✓ Emails to workforce ✓ Official communication through letters ✓ Phone calls to relevant community leaders	At least one week before start of the maintenance activities	AEP CLO / HSE Manager
6	Emergency Preparedness and Response Plan (EPRP) ✓ Different potential emergency scenarios and the level of emergency ✓ Coordination for Emergency drills ✓ Site access ✓ Emergency response arrangements ✓ Hazardous materials information	✓ Local emergency response and governmental bodies (e.g. Red Sea Governorate; General Administration of Civil Protection; Egyptian Ambulance Authority; NREA's Operations Control Centre) ✓ Neighbouring projects as necessary for mutual coordination ✓ Affected Communities	✓ Consultation and meetings ✓ Correspondence and official letters	Once EPRP is approved and afterwards only if there are significant changes to the EPRP	HSE Manager
7	EPRP Emergency notifications and communications e.g. in case of significant environmental or H&S incidents requiring external notification	✓ Local emergency response governmental bodies as per above row ✓ Identified Local Communities	✓ Phone calls and emails	When incidents requiring emergency notifications occur	HSE Manager
8	Biodiversity monitoring results ✓ Semi-annual summary of Avian and Bat Monitoring & Impact Mitigation Measure Report ✓ Operational raw data of avifauna monitoring ✓ Shutdown on Demand Protocol implementation reports	✓ National Governmental Entities: NREA, EEAA – NCS ✓ Project Lenders	✓ Electronic and hard-copy submission	Semi-annually as per Active Turbine Management Programme (ATMP)	AEP corporate ESG team
9	Project progress Progress Report including a review of Environmental & Social matters arising in relation to the Project including QHSE performance and details of any accidents, emergencies or other material events Annual Monitoring Report on Environmental & Social Performance including Impact Indicators (as per EBRD template)	✓ Project Lenders	✓ Electronic submission	As per agreement with Lenders	O&M Manager and AEP corporate ESG team

7 GRIEVANCE MECHANISM

The Grievance Mechanism presented herein describes the Project's Community Grievance Procedure which is also aligned to Alcazar Energy's Complaint Management Procedure (Ref: AE-QHSE-PRO-019).

For the purposes of the Stakeholder Engagement Plan, the Grievance Mechanism is intended to provide well functioning procedure for receiving and addressing concerns about the Project's environmental & social performance from stakeholders, in particular from members of the Identified Local Communities, whenever they may arise and facilitating resolution throughout the operational phase of the Project

7.1 KEY PRINCIPLES

The main principles on which the grievance mechanism is based are:

- Proportionality: a mechanism scaled to the Project's potential risks and adverse impacts;
- Cultural appropriateness: designed in a culturally appropriate manner and in suitable languages;
- Accessibility: a clear and understandable mechanism accessible to all stakeholder groups at no cost through multiple channels;
- Transparency and accountability: fully documented for transparency;
- Systematic efficiency: systematic process that addresses and resolves cases in a timely manner; and
- Suitable protection: a mechanism that is voluntary, allows for anonymity, prevents retribution and/or retaliation, and does not impede access to other judicial or administrative remedies.

The full set of general principles for the complaint management mechanism is provided in Appendix A.

7.2 SCOPE AND CLASSIFICATION

Different types of submissions may be received through the grievance mechanism, which are classified as follows.

TABLE 9: TYPES OF SUBMISSIONS THAT MAY BE RECEIVED THROUGH THE GRIEVANCE MECHANISM

Classification	Description
Grievance	Complaint concerning the adverse impacts of the Project's E&S performance; or complaint related to a potential non-compliance or non-conformity against applicable standards and Project commitments.
Request	Request for support from members of local communities, for example for materials, infrastructure support or community support initiatives. Managed as described in Section 8.
Query	Question concerning Project activities, for example operational activities, maintenance schedule or employment opportunities.

A grievance is considered eligible where it concerns an actual, perceived or potential environmental or social impact associated with the Project's activities, assets, personnel, contractors or subcontractors. Submissions that are not Project-related, or that constitute requests or queries rather than grievances, will be recorded and referred or otherwise addressed through the appropriate process.

7.3 SUBMISSION CHANNELS

The Community Liaison Office maintains a dedicated telephone number, an email address and a physical address where a grievance box together with forms in Arabic and English are available, to facilitate easy

access for members of the Identified Local Communities. The different channels for submission of grievances are listed below.

TABLE 10: CHANNELS TO SUBMIT PROJECT-RELATED GRIEVANCES

Channel	Details
Complaint Management Platform	https://alcazar.integrityline.com/ ; Available in Arabic, and English The platform allows for submission and responding to anonymous grievances
Community Liaison Office	Community liaison office, Ras Ghareb in: Villa 8, Takseem Elshabab, 100 Unit Area, Ras Ghareb. Grievance forms available in Arabic and English
Community Liaison Officer	TBC — Telephone: +201208441707— Email: grievance@alcazarenergy.com
Grievance boxes	One box at the CLO office located in Ras Ghareb, one at the Project site entrance and one box at Wadi Dara.
AEP website	Grievance submission form available online, alongside Project disclosure documentation
In person	Verbally to the CLO during village visits; the CLO will complete the grievance form on behalf of the complainant where required

If a grievance is received by another direct employee of AEP or the Contractors, or by a third-party employee, the employee will re-direct the complainant to file the grievance through the CLO or Complaint Management Platform. The recipient will request the complainant to complete a Project Grievance Registration Form (Appendix D), or will complete the form on the complainant's behalf if requested. Complaints submitted through other channels or where the complainant declines to use the platform must be forwarded to the CLO for logging. Escalations that may lead to a security incident will be managed under the Security Management Plan or EPRP in coordination with the CLO and the AEP E&S team.

7.4 PROCESS

The grievance management process follows the seven steps described below.

7.4.1 STEP 1 — RECEIVING THE GRIEVANCE

Grievances may be received through the channels identified in Table 13. Stakeholders are encouraged to use the established channels to ensure formal receipt and acknowledgement by the CLO. Where needed, the CLO may assist complainants in submitting grievances through the online platform. The CLO shall acknowledge receipt of the grievance within 48 hours of the date of receipt. For paper-based grievances, acknowledgment may take longer, but shall not exceed five working days.

7.4.2 STEP 2 — RECORDING THE GRIEVANCE

All grievances shall be communicated to the Local E&S Specialist and recorded in the Project Grievance Log (Appendix E), with completed Registration Forms stored in the Project shared file system. Requests for anonymity shall be respected in the Grievance Log. Complaints submitted through the Complaint Management Platform are automatically acknowledged, with the process explained and the complaint and supporting documentation recorded.

7.4.3 STEP 3 — SCREENING FOR ELIGIBILITY

Grievances shall be screened and evaluated by the Local E&S Specialist to:

- Determine eligibility as per Section 7.2, consulting the CLO and AEP's corporate team as appropriate;
- Notify complainants within five working days if a complaint is ineligible, explaining the rationale.



- Refer requests or queries to the appropriate department and inform the complainant within five working days.
- For eligible complaints, assess the nature, magnitude, potential consequences, complainant sensitivity, and overall severity in accordance with Section 7.5.

7.4.4 STEP 4 — INITIAL RESPONSE

The CLO shall provide an initial response for each grievance within five working days of formal receipt according to the complainant's preferred communication method. The response date shall be recorded in the Grievance Log and shall include:

- A high-level summary of the understanding of the grievance;
- Explanation of the process and remaining steps to be followed;
- The first steps that will be taken by AEP and an estimated timeframe;
- An initial indication of potential actions to manage the expectations of the complainant; and
- Request for any clarifications or additional information as required.

7.4.5 STEP 5 — INVESTIGATION AND ASSIGNMENT OF RESPONSIBILITIES

The Local E&S Specialist, in coordination with AEP's Corporate QHSSE Team, shall assign complaints to the relevant Grievance Owner through the Complaint Management Platform based on the Step 3 screening. The Grievance Owner is responsible for managing the complaint and working towards compliance with Project-specific E&S requirements.

The Grievance Owner leads the investigation of the complaint, gathering information, consulting internal and/or external stakeholders and contacting the complainant for additional information as appropriate. The Grievance Owner is responsible to ensure that the identity of the complainant remains anonymous where applicable and that those involved in the investigation are aware of this requirement.

Records and evidence from the investigation shall be recorded and/or uploaded on the Complaint Management Platform and in the Project-specific folders. The investigation will:

- Identify the root cause of the complaint and evaluate whether the grievance is substantiated and actionable in line with AEP's ESMS, the Project's QHSSE management system and the QHSSE Employer's Requirements; and
- Determine whether the concern can be addressed through actions by AEP, the Contractors and/or subcontractors as applicable, with AEP retaining primary responsibility.

7.4.6 STEP 6 — ACTING ON THE GRIEVANCE

Following the investigation, the Grievance Owner, in coordination with relevant teams, shall develop an Action Plan outlining corrective and preventive measures in line with applicable legal and E&S requirements. Actions shall consider the nature and sensitivity of the grievance, protect confidentiality and anonymity where appropriate, and define clear responsibilities and reasonable timelines.

The CLO shall inform the complainant of the proposed actions and rationale, providing an opportunity for feedback and engagement as appropriate. AEP shall monitor implementation and adherence to deadlines. Agreed actions, responsibilities, and timelines shall be recorded in the Complaint Management Platform, Project Grievance Log, and relevant Project folders.

7.4.7 STEP 7 — FOLLOW-UP AND CLOSE-OUT

Once the Action Plan is implemented and verified by AEP and/or Contractor management, the Grievance Owner shall consider the complaint resolved and formally notify the complainant through the Complaint

Management Platform, verbally or in writing. The Grievance Owner shall complete and sign the Project Grievance Closeout Form (Appendix F) and record the closeout on the Platform. The CLO shall invite the complainant to review and sign the form and provide feedback on satisfaction with the outcome and process.

Where the complainant is dissatisfied, they shall provide feedback through the platform, with assistance if required. The complaint shall be reassigned to another, preferably more senior, Grievance Owner for review and potential reassessment. The review outcome and any additional actions shall be communicated to the complainant. If dissatisfaction persists, the complaint severity shall be raised by one level and the process repeated. If the complainant remains dissatisfied after this process, the complaint may be closed, with the outcome and feedback documented on the platform.

The grievance mechanism does not restrict access to judicial, administrative, collective, or other applicable grievance mechanisms, including those of Project investors and lenders. The CLO shall inform complainants that they may seek independent legal advice at their own expense.

7.5 SEVERITY LEVELS AND GRIEVANCE OWNERS

Determining the level of severity of a grievance is critical in order to determine who the Grievance Owner should be and how the grievance should be approached. Grievances that attract or risk attracting negative media or social media attention will be escalated to AEP's corporate communications and E&S teams for a coordinated response regardless of severity classification.

TABLE 11: GRIEVANCE LEVEL OF SEVERITY

Severity	Description	Grievance Owner
Level 1	The magnitude of the complaint is limited and possibly within Project operations and activities, and the complainant does not belong to a vulnerable group. The complaint may be managed at local level through the CLO and the site team.	AEP CLO, supported by the Local E&S Specialist
Level 2	The magnitude of the complaint may extend beyond the Project area of influence and operations. The complainant may belong to a vulnerable group or be a respected member or representative of the Identified Local Communities. The grievance may escalate to Project lenders and present E&S risks or potential non-compliance. It shall be managed at corporate level in coordination with the Corporate QHSSE Team.	AEP corporate ESG team supported by Local E&S Specialist
Level 3	The complaint may extend substantially beyond the Project's area of influence, be recurrent and/or irreversible. The complainant may be a vulnerable person, community representative, government representative, or lobbying group. The grievance may involve significant E&S risks, non-compliance with AEP policies or the Code of Conduct, legal action, or escalation to media/social media, creating significant reputational risk.	AEP Senior or Executive Management

7.6 TARGET PROCESS TIMELINE

Step	Action	Target Timeframe	Responsible
1–2	Receipt, recording of grievance in the Grievance Log and Complaint Management Platform and acknowledging receipt	Within 48 hours of receipt (up to 3 working days for paper-based grievances)	AEP CLO
3	Screening for eligibility and severity classification; notification where ineligible or reclassified	Within 5 working days of receipt	Local E&S Specialist
4	Initial Response	Within 5 working days of receipt	AEP CLO

Step	Action	Target Timeframe	Responsible
5	Commencement of investigation	Within 10 working days of receipt	Grievance Owner
6	Formal response and communication of proposed Action Plan	Within 30 working days of receipt, unless otherwise agreed with the complainant	Grievance Owner; AEP CLO
7	Implementation of corrective and preventive actions	By agreed due date in the Action Plan	Grievance Owner; Contractors as applicable
8	Close-out, completion of Closeout Form and satisfaction feedback	Within agreed timeframe following completion of actions	AEP CLO; Grievance Owner
Appeal	Reassessment by a more senior Grievance Owner where the complainant is unsatisfied	Within 20 working days of the complainant recording dissatisfaction	AEP corporate ESG team / Senior Management

7.7 GRIEVANCES FROM WOMEN AND VULNERABLE GROUPS

The CLO will encourage women and vulnerable groups to raise grievances verbally and will speak regularly to village representatives and religious leaders to understand any complaints or issues that arise. The CLO will lodge verbally raised grievances in the register on people's behalf so that they are tracked and closed within the appropriate timeframes and to the complainant's satisfaction. A female-accessible entry point will be maintained at all times.

7.8 GRIEVANCES RELATED TO GENDER-BASED VIOLENCE AND HARASSMENT

The Project is committed to preventing and responding to gender-based violence and harassment (GBVH) associated with its activities and to ensuring that affected persons have access to safe, accessible, confidential and survivor-centred grievance mechanisms. GBVH includes sexual exploitation and abuse, sexual harassment and assault, Project-related intimate partner violence, trafficking for sexual exploitation, and other sex- or gender-based violence or harassment.

GBVH grievances may be received through the SEP or workers' grievance mechanism but shall be managed separately under a dedicated procedure. AEP and Contractors shall implement the applicable Project documents governing GBVH prevention, reporting, and response:

- GBVH Risk Assessment Procedure and Response Protocol, incorporating the Project GBVH risk register, management measures, incident response protocol, referral services, roles and monitoring indicators;
- AEP GBVH Policy, developed in line with good international industry practice;
- Worker Code of Conduct, signed by all personnel before site access; and
- Contractor E&S management plans, into which the GBVH management measures are incorporated and verified monthly by the Local E&S Specialist.

This SEP does not duplicate the content of those documents. The provisions below describe how GBVH reporting interfaces with the grievance mechanisms and how separate management is assured.

7.8.1 SEPARATE MANAGEMENT OF GBVH CASES

GBVH cases are ring-fenced from the routine grievance process at the point of receipt. The following arrangements apply:

- Separate logging: Cases shall be recorded separately with a dedicated reference number and excluded from routine Grievance Logs and statistics;

- Restricted access: Records shall be accessible only to the Local E&S Specialist acting as GBVH Focal Point and AEP corporate ESG team on a need-to-know basis. The Contractor's HSSE Manager and CLO shall retain only information necessary for their roles;
- Separate handler: The GBVH Focal Point shall manage all GBVH cases, regardless of severity;
- No routine escalation path: Routine severity escalation and appeal procedures do not apply; escalation shall follow the incident response protocol in Section 7.8.3.;
- Separate reporting: GBVH indicators shall be reported to AEP corporate ESG and, where material, to lenders, separately from general grievance statistics; and
- Separate timeframes: Cases shall follow the GBVH Risk Assessment Procedure. Immediate safety concerns shall trigger the response protocol without delay.

7.8.2 GBVH REPORTING CHANNELS AND FOCAL POINTS

Multiple entry points are maintained so that a complainant is never obliged to report through their line manager, their employer, or a male contact. All channels will be available in English and Arabic.

TABLE 12: GBVH REPORTING CHANNELS AND FOCAL POINTS

Channel / Focal Point	Access and Contact	Anonymous Submission
Online platform	https://alcazar.integrityline.com/ - available 24/7; managed by the AEP corporate ESG team	Yes — personal information need not be provided
Complaint boxes	Site gate; Wadi Dara, CL office.	Yes — personal information need not be provided
GBVH Focal Point (Local E&S Specialist)	TBC	Case may be recorded anonymously on request, although contact is required to progress a referral
Community Liaison Officer	TBC	Case may be recorded anonymously on request
Female community focal points	Named female contacts maintained in Ras Ghareb and Wadi Dara, identified in consultation with the communities and disclosed at awareness sessions. Contact details to be confirmed and posted at village notice boards prior to site mobilisation	Yes — may pass a report to the GBVH Focal Point on the complainant's behalf
Workers grievance mechanism	Channels posted in near offices and welfare facilities, and site security office; managed by the O&M Contractor but GBVH submissions transferred to the GBVH Focal Point on receipt	Yes — personal information need not be provided
External services	Complainants may report directly to the police or access support services independently at any time. The Project does not impede this and does not require the complainant to use a Project channel first	Not applicable

7.8.3 INCIDENT RESPONSE AND NOTIFICATION

Where a GBVH incident is reported or suspected, involving Project workers or community members, the following sequence applies.

TABLE 13: GBVH INCIDENT RESPONSE PROTOCOL

Step	Action	Detail	Responsible
1	Immediate safety	Ensure the survivor is safe and removed from the proximity of the alleged perpetrator; provide first aid if needed. Do not question or investigate at this stage	First person notified; Contractor HSSE Manager
2	Notify within 2 hours	Notify the GBVH Focal Point and record the case separately from general E&S grievances with a dedicated reference number	GBVH Focal Point (Local E&S Specialist)
3	Survivor-centred intake	Speak privately with the survivor, using a same-gender interviewer and interpreter where possible. Explain available options, including that reporting to authorities is the survivor's choice	GBVH Focal Point; CLO
4	Immediate referral	Offer referral to medical, psychosocial and legal services, with a warm referral where safe; provide transport if needed	CLO; GBVH Focal Point
5	Notify AEP within 24 hours	Notify AEP corporate ESG and, where material, lenders in accordance with their requirements	Local E&S Specialist; AEP O&M Manager
6	Interim measures	Suspend the alleged perpetrator from site pending investigation, restrict access to the survivor's work area, and prevent retaliation	AEP O&M Manager
7	Investigation	Initiate an impartial investigation within 72 hours. Apply the HR disciplinary procedure for employees and refer criminal matters to police without restricting the survivor's right to report	Local E&S Specialist; Contractor HR Manager
8	Outcome and closure	Document the outcome, apply appropriate sanctions up to termination, confirm that no retaliation occurred, and record closure in the GBVH case file	Local E&S Specialist; AEP corporate ESG team

Where a GBVH allegation involves a Project worker and a community member, AEP and the Contractor are involved from the outset, with AEP leading engagement with the affected community member and the Contractor leading any disciplinary process. Confidentiality and non-retaliation obligations apply to both parties and to any witnesses.

7.9 INDEPENDENT ACCOUNTABILITY MECHANISM FOR EBRD PROJECTS

All EBRD-financed projects must be structured to meet the requirements of the [EBRD's Environmental and Social Policy \(2024\)](#), which includes ten ESRs in key areas of environmental and social sustainability that projects must meet, including ESR 10 on stakeholder engagement.

In addition, the [EBRD's Independent Project Accountability Mechanism \(IPAM\)](#) – as an independent tool of last resort – aims to facilitate the resolution of social, environmental, and public disclosure issues raised by project-affected persons and civil society organizations regarding EBRD-financed projects among project stakeholders, or to determine whether the Bank has complied with its Environmental and Social Policy and the project-specific provisions of its [Access to Information Policy](#); and, where appropriate, to remedy any breaches of these policies, while preventing any future breaches by the Bank.

8 COMMUNITY REQUEST MANAGEMENT

Identified Local Communities may contact the Project through the Grievance Mechanism channels to request community investment support. Such requests will be evaluated by the Project using a pre-established set of criteria in addition to other operational and financial benchmarks. Such criteria may include feasibility, contributions to local communities' social wellbeing, and prioritisation of support for women and vulnerable groups. All such requests, together with the Project's response, will be logged for record-keeping and monitoring purposes.

9 MONITORING AND REPORTING

9.1 MONITORING AND AUDITING

The implementation of this SEP shall be monitored through:

- Periodical review of the Stakeholder Engagement Log (Appendix B) to be updated and submitted by the CLO to Alcazar Energy's ESG Team on a monthly basis.
- Continuous review of the Grievance Log and Compliant Management Platform, to identify any trends in grievances, recurrences and effectiveness of the process and corrective actions.

Implementation will also be audited through quarterly inspections conducted by the QHSE Team to identify any non-conformance, gaps or recommendations for improvement. The review of documentation shall include for instance an on-the-ground assessment to determine whether the Project-related and Grievance Mechanism related documentation are available at the designated locations and registers are being sufficiently kept up to date.

Monitoring will be based on the key performance indicators (KPIs) shown in the below table. Failure to achieve KPI targets will trigger investigation and, where appropriate, corrective and preventive actions.

TABLE 14: SEP MONITORING KEY PERFORMANCE INDICATORS (KPIs)

ID	KPI	Target	Monitoring Frequency	Responsible	Evidence
Stakeholder Engagement					
SE-01	Stakeholder register remains up-to-date	Reviewed at least annually and following significant operational changes	Annually	AEP CLO	Stakeholder Register
SE-02	Planned information disclosure and engagement activities completed as per established schedule	100% completed	Monthly	AEP CLO	Stakeholder Engagement Register; Meeting minutes
SE-03	Advance notifications issued before planned maintenance activities	100% issued at least one week prior	Per event	Local HSE Manager; AEP CLO	Stakeholder Engagement Register
SE-04	General stakeholder queries and requests acknowledged	100% within 3 working days	Monthly	AEP CLO	Grievance Register
SE-05	Queries and requests resolved or forwarded onto relevant parties	≥90% within 20 working days unless otherwise agreed	Monthly	AEP CLO	Grievance Register
SE-06	Public information is current on the Project website	Updated within 30 days of significant change	Quarterly	AEP ESG team	Website
SE-07	Community notifications issued before significant operational activities	≥95% compliance	Per activity	Local O&M Manager	Stakeholder Engagement Register
SE-08	Annual operational/community update published	100% annually	Annual	AEP corporate ESG team	Website and CL office
SE-09	Stakeholders notified for emergency communications in accordance with EPRP	100%	Per incident	Local HSE Manager	Incident Records; Stakeholder Engagement Register
SE-10	Stakeholder engagement register remains up-to-date	100% completed within 10 working days of stakeholder engagement activity	Monthly	AEP CLO	Stakeholder Engagement Register
Grievance Mechanism					
GM-01	All complaints received are entered into register	100%	Monthly	AEP CLO	Grievance Register
GM-02	Grievances acknowledged	100% within 48 hours and up to 3 working days for paper-based grievances	Monthly	AEP CLO	Correspondence and Grievance Register
GM-03	Investigation commenced	100% within 10 working days	Monthly	AEP CLO	Grievance Register
GM-04	Formal response issued	≥90% within 30 working days unless otherwise agreed	Monthly	AEP CLO	Response Letters
GM-05	Corrective actions completed	≥90% by agreed due date	Monthly	Grievance Owner	Grievance Register
GM-06	Grievances formally closed	≥90% within agreed timeframe	Monthly	AEP CLO	Grievance Closeout Form
GM-07	Recurring complaints received on same issue	Zero recurring complaints caused by failure to implement corrective action	Quarterly	AEP CLO	Grievance Register
GM-08	Appeals resolved	100% investigated	As required	AEP CLO	Grievance Register

9.2 REPORTING

As part of the Project's Monthly QHSE Performance Statistics to be prepared by the HSE Manager using the template as provided by Alcazar Energy and shared within seven (7) days following the end of each month, main progress updates on SEP implementation will be provided including details on:

- Stakeholder engagement
 - Engagement activities conducted during the reporting period;
 - Summary of main inputs provided by stakeholders; and
 - Any relevant non-conformances, non-compliances and incidents recorded during this period.
- Grievance mechanism
 - Summary of grievances received during the reporting period;
 - Breakdown of grievances received by category;
 - Status of grievances (open, under review, closed);
 - Summary of actions taken and outcomes; and
 - Identification of any trends, recurring issues or material concerns.
- Monitoring and auditing
 - Any outcomes of monitoring or audits conducted on the SEP implementation.

Additionally, the following information shall be made continuously available at site ready for inspection:

- Stakeholder Engagement Log and Grievance Register (including data from previous months to assess trends);
- Inspection reports and Audit Reports, and Corrective Action Plan including evidence of corrective actions implementation.

Project progress reports including a review of stakeholder engagement and E&S performance will be submitted to the Project Lenders on an annual basis.

9.3 RECORDING

The following records will be maintained and updated on an ongoing basis to facilitate recordkeeping, monitoring and auditing processes:

TABLE 15: SEP RECORDKEEPING

Document	Frequency	Linked Document	Appendix
Stakeholder Register	To be completed once Project O&M takeover is done and reviewed annually.	-	Appendix C
Stakeholder Engagement Log	To be completed and filed each time an engagement activity is conducted.	Data to be uploaded monthly to SOC-Grievance Log (part of Alcazar QHSE statistics)	Appendix B
Minutes of Meetings	To be completed and filed each time an engagement activity is conducted, within five (5) working days of the event.	Data to be uploaded to the Stakeholder Engagement Log	Appendix G

Document	Frequency	Linked Document	Appendix
Grievance Log	To be updated each time a new case is logged or updates are available on an open case.	Data to be uploaded to: SOC-Grievance Log (part of Alcazar QHSE statistics); Complaint Management Platform	Appendix E
Grievance Closeout Form	To be filed when a grievance is closed out by the Grievance Owner.	Data to be uploaded to Grievance Log	Appendix F

All records, in particular the Grievance Log and supporting documentation, shall be maintained in a secure and organised manner. Where personal data is collected, it shall be handled in accordance with applicable data protection requirements. Access to grievance records shall be limited to authorised personnel only.

APPENDIX A – NATIONAL REGULATIONS AND STANDARDS

Type	Regulation Reference	Reference Link	Issuing Authority	Last Amendment	Enforcement	Main Relevant Requirements
Law	Constitution of the Arab Republic of Egypt (2014, as amended 2019)	Official Gazette (Constitution)	President of the Arab Republic of Egypt	2019	Constitutional Court and all public authorities	Guarantees access to information where provided by law, protection of the environment, public participation principles, equality and non-discrimination, and the right to submit complaints and petitions.
Law	Environmental Law No. 4 of 1994	EEAA Environmental Law Portal	Parliament / Egyptian Environmental Affairs Agency (EEAA)	Amended by Law No. 9/2009 and Law No. 105/2015	EEAA and Competent Administrative Authorities	Requires Environmental Impact Assessment (EIA), environmental management measures, environmental monitoring, maintenance of environmental records, and compliance with permit conditions.
Guideline	EEAA Environmental Impact Assessment Guidelines of 2009	EEAA Environmental Law Portal	EEAA	Periodically updated	Applied through EEAA review process	Specifies public participation methodology, stakeholder identification, and documentation of consultation outcomes as part of environmental assessment.
Prime Minister Decision	Decree No. 338 of 1995 issuing the Implementing	Executive Regulations	Prime Minister	Most recently amended by Prime Minister	EEAA	Establishes detailed EIA procedures, including

Type	Regulation Reference	Reference Link	Issuing Authority	Last Amendment	Enforcement	Main Relevant Requirements
(Executive Regulation)	Regulation of Environment Law No. 4 of 1994.			Decision No. 2466/2024		environmental monitoring and reporting obligations.
Prime Minister Decision	Prime Minister Decision No. 2466 of 2024	2024 Amendment to Executive Regulations	Prime Minister	2024	EEAA	Updates environmental approval procedures, strengthens environmental review processes, modernises environmental registers and electronic submissions, and updates monitoring requirements.
Law	Labour Law No. 14 of 2025 <i>(or Law No. 12 of 2003 if project governance predates implementation)</i>	Ministry of Labour – Laws and Legislations	Ministry of Labour	2025	Ministry of Labour	Provides requirements relating to employer–employee consultation, occupational safety and health, workers' rights, complaints, dispute resolution and labour representation relevant to worker engagement interfaces.
Law	Trade Union Organizations and Protection of the Right to Organize Law No. 213 of 2017	Ministry of Labour – Laws and Legislations	Parliament / Ministry of Labour	Amended	Ministry of Labour	Recognises workers' rights to representation and consultation through trade union organisations and worker representatives.

APPENDIX B – STAKEHOLDER ENGAGEMENT LOG

No	DATE	TOPIC OF ENGAGEMENT	METHOD OF COMMUNICATION	STAKEHOLDER GROUP	PARTIES / STAKEHOLDERS INVOLVED	SUMMARY OF INFORMATION PROVIDED DISCUSSION	FEEDBACK RECEIVED FROM STAKEHOLDERS	FOLLOW-UP ACTIONS (IF ANY)	LOGGED BY

APPENDIX C – STAKEHOLDER REGISTER

No	Stakeholder Category*	Name / Organisation	Contact Person	Relationship to Project	Potential Project Impact	Vulnerable Group? (Y/N)	Preferred Communication Method	Engagement Frequency	Last Engagement	Next Planned Engagement

*Identified Local Communities; Interest Based Stakeholders; or Internal & Participatory Stakeholders

APPENDIX D – GRIEVANCE REGISTRATION FORM

GENERAL	
Project	
Complainant's Full Name	Or tick the box if choose to remain anonymous ☐
Relationship to the Project (e.g., worker, landowner)	
Contact Information Please mark how you wish to be contacted	☐ Telephone: _____ ☐ Email: _____
STATEMENT OF CONCERN / INCIDENT / GRIEVANCE	
Please provide a detailed account of the concern / incident / grievance	
What happened?	
When did it occur?	
Where did it occur?	
Who was involved?	
Why is this a grievance? What rules were not followed?	
RELIEF SOUGHT	
What would you like to see happen to resolve your concern / grievance?	
COMPLAINANT'S SIGNATURE	DATE
RECIPIENT'S PRINTED NAME AND SIGNATURE	DATE
☐ If prefer to remain anonymous, please submit this form to the Project's Grievance Box	

APPENDIX E – GRIEVANCE LOG

GRV #	STEP 1 – RECEIVING GRIEVANCE & STEP 2 RECORDING					STEP 3 – SCREENING FOR ELIGIBILITY	STEP 4 – ACKNOWLEDGING GRIEVANCE			STEP 5 – INVESTIGATE AND ASSIGN OWNER		STEP 6 – ACTING ON GRIEVANCE			STEP 7 – FOLLOW UP & CLOSE OUT		
	DATE RECEIVED (dd-mm-yyyy)	NAME OF COMPLAINANT (if no anonymity requested)	ACCESS POINT AND/OR RECIPIENT (i.e., Grievance box, CLO Office, Manager)	GRIEVANCE TYPE	GRIEVANCE DESCRIPTION (as explained by the Complainant)	SEVERITY CLASSIFICATION	GRIEVANCE OWNER	DATE OF ACKNOWLEDGEMENT OF RECEIPT & INITIAL RESPONSE	WHO ACKNOWLEDGED THE GRIEVANCE? (i.e., Recipient or Grievance Owner)	INTERNAL REVIEW - DESCRIPTION OF THE EVALUATION AND ROOT CAUSE	GRIEVANCE FOUND SUBSTANTIATED & ACTIONABLE?	CORRECTIVE & PREVENTIVE ACTIONS	TIMEFRAME FOR ACTIONS	SATISFACTION WITH PROCESS	DATE CLOSED (dd-mm-yyyy)	COMMENTS	STATUS
1																	
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	

APPENDIX F – GRIEVANCE CLOSEOUT FORM

GENERAL	
Project	
Grievance Number #	
Complainant's Full Name	

GRIEVANCE INVESTIGATION	
To be completed by Alcazar Energy (i.e. CLO or Grievance Owner)	
Internal Review – Description of the evaluation and root cause of the Grievance	
Grievance found substantiated & actionable?	☐ Yes ☐ No

RESOLUTIVE ACTIONS & SATISFACTION		
To be completed by Alcazar Energy Representative		To be completed by Complainant
Corrective & Preventive Actions	Implemented by:	Satisfied, Unsatisfied, N/A? Why?

COMPLAINANT'S SIGNATURE ON COMPLAIN CLOSE OUT	DATE
RECIPIENT'S NAME AND SIGNATURE ON COMPLAIN CLOSE OUT	DATE

APPENDIX G – MINUTES OF MEETINGS

Instructions for Completion

1. Complete the meeting record within **five (5) working days** of the meeting.
2. Record discussions objectively and accurately. Avoid subjective opinions unless attributed to the relevant stakeholder.
3. Record any complaints or grievances in accordance with the Grievance Mechanism and assign a unique grievance reference number.
4. Attach supporting documents, including attendance sheets, presentations, photographs and correspondence where applicable.
5. Store the completed meeting record as a controlled document in accordance with Alcazar Energy's document management procedure.
6. Information containing personal data shall be handled in accordance with applicable privacy legislation and Alcazar Energy's data protection requirements.

1. Meeting Information

Item	Details
Meeting Ref.	
Meeting Title	
Date / Time	
Location	
Stakeholder Group	☐ Identified Local Communities ☐ Interest Based Stakeholders ☐ Internal & Participatory Stakeholders
Stakeholder Name	
Meeting Purpose	
Meeting Type	☐ Face-to-face ☐ Virtual ☐ Telephone ☐ Email ☐ Community Meeting ☐ Site Visit
Project Representative	
Minute Taker	

2. Participants

Name	Role	Organisation	Signature (optional)
Meeting Ref.			
Meeting Title			

3. Agenda and Summary of Discussion

Agenda Item	Discussion Summary

Agenda Item	Discussion Summary

4. Project Information Disclosed

Tick or describe information provided during the meeting.

- ☐ Operational update
- ☐ Planned maintenance activities
- ☐ Environmental monitoring results
- ☐ Biodiversity monitoring results
- ☐ Community investment activities
- ☐ Grievance mechanism
- ☐ Health and safety
- ☐ Emergency preparedness
- ☐ Other: _____

5. Follow-up Actions

Ref	Action Required	Responsible	Due Date	Completion Date	Status

6. Supporting Documents

Attached? (Y/N)	Description

Examples: Attendance sheet; presentation; maps; photographs; handouts; notification letters.

7. Approval

Prepared By

Name:

Position:

Signature:

Date:

Approved By

Name:

Position:

Signature:

Date:

APPENDIX H – GENERAL PRINCIPLES FOR COMPLAINT MANAGEMENT MECHANISM

Process transparency and fairness

- Ensures process transparency through procedures that are easy to understand and accessible to all stakeholders, including migrant workers;
- Establishes multiple and clear communication channels both in English and in the local language and any other language used by the workforce through which workers can voice their concerns, grievances, and/or suggestions freely;
- Ensures complainant confidentiality;
- Protects complainant from discrimination or sanctions ensuring that stakeholders can report grievances without fear of dismissal or reprisal of any kind;
- Defines clear roles, clear line of accountability, responsibilities, and process steps including monitoring and evaluation;
- Actively provides information on the existence and functioning of the mechanism in a way that is consistent to the context and audience for whose use it is intended to;
- Ensures ethical and impartial behaviour of the Grievance Owner responsible for the Grievance process in taking fair and just actions to resolve the grievance; and
- Allow submissions of both collective and individual grievances following the same step by step process described in this document.

Migrant workers and vulnerable groups

- Provides access to all workers indistinctively, whether migrant workers or workers from vulnerable groups such as women or minority ethnic groups, to a transparent and fair grievance management system that allows them to voice concerns without fear of punishment or retribution;
- Ensures process transparency through a mechanism that is easy to understand, culturally appropriate, and accessible to all workers; and
- Provides multiple communication channels to ensure that stakeholders find an avenue with which they are comfortable registering concerns.

Staff Training and Awareness

- Provides appropriate training to direct employees and contracted workers to ensure adequate awareness and understanding of the grievance mechanism; and
- Ensures ethical and impartial behaviour of the Grievance Owner responsible for the Grievance process and investigation in taking fair and just actions to resolve the grievance.

Rights of Workers

- Respects the rights of workers to be accompanied at formal grievance resolution meetings by a work colleague or worker representative who has not been involved in the case; and
- Assesses any complaint on its possible human rights implications and ensures that outcome does not infringe on the rights of the complainant.

Improved Communication

- Promotes the collaboration and joint effort of the complainant and Management in the satisfactory and timely resolution of the grievance whilst preventing escalation; and,
- Allows better communication between workers and supervisors or Management through the promotion of a working culture that allows for address concerns before they might result in formal grievances.

Feedback and Reporting

- Ensures reporting back to complainants on the grievances submitted; and
- Enables complainants to monitor the status of complaints.

Resort to Justice

- Does not impede access to existing judicial or administrative remedies or other grievance mechanisms established through collective agreements or that of other involved Organisations in the projects, such as for example investors and lenders complaint mechanisms.

Process Review and Monitoring

- Keeps a centralized record of complaints and concerns;
- Records all details of evidence, investigations, commitments and agreements arising; and,
- Monitors and assesses the performance of the mechanism on a regular basis to integrate key learnings into the process to strengthen its effectiveness where possible.

Compliance

- Complies with national and international standards including applicable laws and regulations, and in particular with IFC PS1: Assessment and Management of Environmental and Social Risks and IFC Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, 2007.
- Complies with national and international labour norms and standards, including applicable laws, rules and regulations in the country (and region) where work is to be carried out, and International Finance Corporation Performance Standard 2 on Labor and Working Conditions as well as best industry practice.

Zero Tolerance to Reprisal and Retaliation

- Adopts a zero-tolerance approach to retaliation against any individual or group who engages with the Project in good faith.
- Communicates this commitment to all stakeholders, in particular the Project's internal and participatory stakeholders, and takes prompt, appropriate corrective and disciplinary action where retaliation is identified.
- Gives particular attention to stakeholders who may face heightened risks when they raise Project-related grievances due to their vulnerability, advocacy activities, or human rights work.