

DEWA Mohammed Bin Rashid Al
Maktoum Solar Park – Phase V
900MW Solar PV IPP
Dubai, UAE



Stakeholder Engagement
Plan

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APPENDIX A – EXAMPLE OF GRIEVANCE FORM

LIST OF ABBREVIATIONS

ABBREVIATION	MEANING
BOO	Build Own Operate
CSP	Concentrated Solar Power
DEWA	Dubai Electricity and Water Authority
DM	Dubai Municipality
DM-ED	Dubai Municipality-Environment Department
EHS	Environment, Health and Safety
EP	Equator Principles
EPC	Procurement and Construction
EPFI	Equator Principles of Financial Institution
ESIA	Environmental & Social Impact Assessment
ESMS	Environmental and Social Management System
IFC	International Financial Corporation
MW	Mega-Watt
PV	Photovoltaic
SEP	Stakeholder Engagement Plan
UAE	United Arab Emirates
5 Capitals	5 Capitals Environmental & Management Consultancy

1.1 Overview

The development of the solar park has been split into phases as follows:

- Phase I – a 13 MW solar photovoltaic (PV) plant which was successfully commissioned in October 2013 by DEWA;
- Phase II - a 200 MW solar PV plant which was successfully commissioned in April 2017;
- Phase III – an 800 MW capacity solar PV plant scheduled to be commissioned by April 2020; and
- Phase IV - a 950 MW CSP - PV Hybrid Power Plant scheduled to be commissioned by 2023.
- Phase V - a 900 MW Solar photovoltaic (PV) Plant, this Project

ACWA Power is seeking project finance from several Equator Principles Financial Institutions (EPFIs), signatories of the Equator Principles (EPs) (a voluntary set of principles established to manage environmental and social investment risks). As such, the Project has certain obligations to ensure relevant processes are in place for stakeholder engagement on an on-going basis in accordance with the requirements of the EP's, IFC Performance Standards and World Bank Group EHS Guidelines.

This SEP outlines the proposed methodology for stakeholder engagement throughout the construction and operational phases of the Project, with specific emphasis regarding the guidelines of the EPFI, as there is no statutory requirement in the UAE or the Emirate of Dubai concerning on-going engagement with stakeholders. As the SEP will remain relevant throughout the lifetime of the Project as a 'living document', it will act as a plan within the Project's construction and operational phase ESMS that will require updating as Project circumstances or stakeholder dynamics evolve; and to ensure continual improvement of the Environmental and Social Management System (ESMS).

This document is the Stakeholder Engagement Plan Report (SEP) prepared for the DEWA Mohamed Bin Rashid Al Maktoum Solar Park – Phase V: 900MW Solar PV IPP, Dubai, UAE.

This SEP has been prepared to align with applicable requirements of Equator Principle IV, specifically EP5 and EP6 that establish requirements for Stakeholders Engagement and Grievance Mechanism respectively.

The objectives of the SEP include:

- To identify the key stakeholders that may be affected by the Project or may influence the outcome of the project;
- To define processes to inform the identified stakeholders about the Project and to manage stakeholder expectations;
- To understand current and potential emerging issues and to capture views and concerns of the relevant stakeholders concerning the Project;
- To provide a basis for stakeholder participation in environmental and social impact identification, prevention and mitigation;
- To propose a platform for reporting back on mechanisms to address these impacts; and
- To establish a grievance mechanism that will be implemented for the Project.

2 PROJECT OVERVIEW

2.1 Project Location

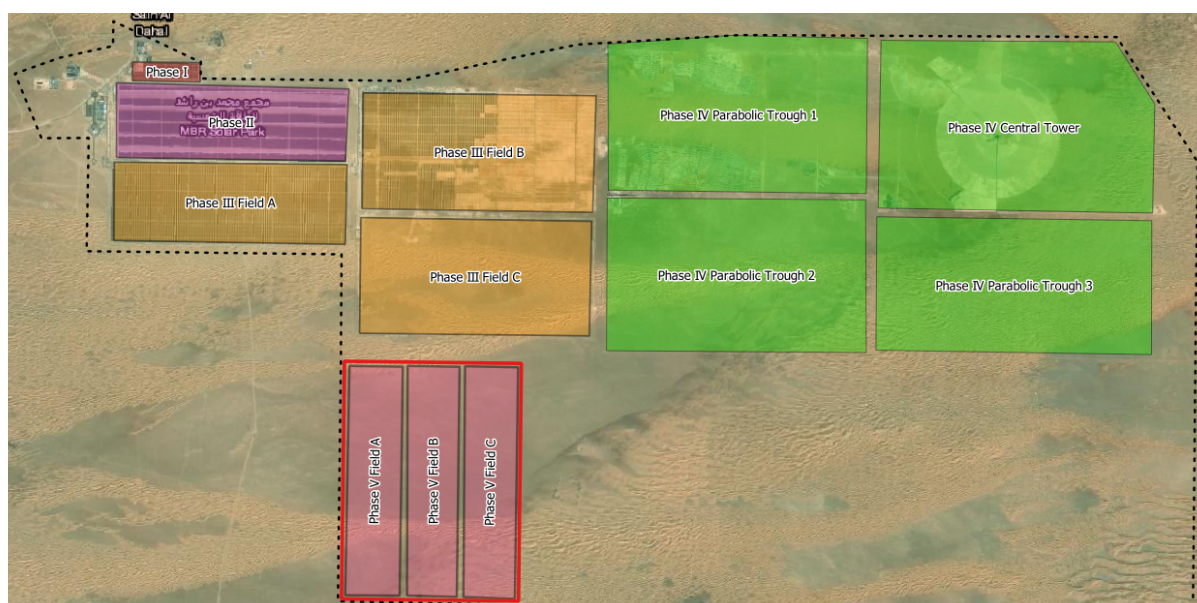
The Project will be located in the Saih al Dahal Area of Dubai, UAE, situated within the boundary of the Mohammed bin Rashid Al Maktoum Solar Park. The Solar Park is located about 53km south of the Dubai Creek, 21km south-east of Al Maktoum International Airport (Dubai World Central: DWC) and approximately 23km away from the Dubai - Abu Dhabi border.

Figure 2-1 Solar Park Location Within the Emirate of Dubai



The Phase V Project will have a rectangular shape (approximately 2,752m E-W x 3,696m N-S) with a total area of approximately 10.17km². The site's altitude is between 100 and 120 meters above sea level.

Figure 2-2 Project Location within the Solar Park Boundary



2.2 Local Context and Sensitivities

Note: Full details of receptors, local sensitivities, land users and site baseline are described in the ESIA. A summary of this has been included below for context in this SEP.

Land Use and Activities Within the Solar Park

In general, the Project is located in an isolated area of the Dubai desert with relatively few other land uses taking place. The land uses and activities in the surrounding area were identified during the primary and secondary data collection phases undertaken for the ESIA. This included site visits, review of satellite imagery and review of previous EIA's undertaken for the project within and the wider Solar Park.

Table 2-1 Land Uses Within the Solar Park

LAND USES	RECEPTOR TYPE	DISTANCE FROM THE PHASE V PROJECT SITE
Phase I - 13MW PV Project	Industrial	Approximately 5.2km to the northern boundary of the Project site
Phase II - 200MW PV project		Approximately 3.3km to the northern boundary of the Project site
Phase III - 800MW PV Project - Field A		Approximately 1.9km to the northern boundary of the Project site
Phase III - 800MW PV Project - Field B		Approximately 2.4km to the northern boundary of the Project site
Phase III - 800MW PV Project - Field C		Approximately 440m to the northern boundary of the Project site
Phase IV - 950MW PV & CSP Project- Parabolic Trough 1		Approximately 3km from the south boundary to the northern boundary of the Project site

LAND USES	RECEPTOR TYPE	DISTANCE FROM THE PHASE V PROJECT SITE
Phase IV - 950MW PV & CSP Project- Parabolic Trough 2		Approximately 1.3km from the south boundary to the northern boundary of the Project site
Phase IV - 950MW PV & CSP Project- Parabolic Trough 3		Approximately 5.5km from the south boundary to the northern boundary of the Project site
Phase IV – 950MW PV & CSP Project – Central Tower		Approximately 6km from the south boundary to the northern boundary of the Project site
Solar Innovation Centre	Educational/ Commercial	Approximately 5.4km to the northern boundary of the Project site
Research and Development Centre	Commercial	Approximately 5.8km to the northern boundary of the Project site
Al Marmoom Desert Conservation Area	Commercial / Ecological	Project located within the Conservation area
Ghaf Tree Nursery	Agricultural	Approximately 700m to the eastern boundary of the Project site
Farm	Agricultural	Approximately 2.8km to the eastern boundary of the Project site
Camel Farm	Agricultural	Approximately 8km to the eastern boundary of the Project site

Notable Land Uses in Proximity of the Solar Park

A limited number of isolated commercial and residential land uses were identified outside the Solar Park. The nearest residential area to the Solar Park is a private villa compound, known as the 'Falcon Majlis' and a small settlement incorporating a mosque. The area is located approximately 500m and 200m north from the Solar Park Boundary (over 5km from the Phase V Project site).

Just outside the Solar Park Boundary, there is a residential compound approximately 1.1km to the Northeast from the Solar Park (over 5km from the Phase V Project site).

Another residential compound is located approximately 10km north-west of the Solar Park boundary. Three (3) settlements called Al Lisaili, Murquab and Al Faqa are located approximately 18km north, 8km northeast and 9km east of the Solar Park boundary.

The Hadaybit Racing Stable and Bab Al Shams Desert Resort and Spa are approximately 10km and 14km to the north and northwest of the Solar Park respectively.

Table 2-2 Land Uses Outside of Solar Park

LOCATION	LAND USES	RECEPTOR TYPE	DISTANCE FROM THE PROJECT SITE
Outside the Solar Park	Residential Compound 1	Residential	Approximately 13.8km northeast of the Project Centre Point
	Falcon Majlis	Residential	Approximately 7.6km north of the Project Centre Point
	Mosque	Commercial	Approximately 7.6km north of the Project Centre Point
	Al Qudra cycling track	Recreational	Approximately 8.4km northwest of the Project Centre Point
	A small settlement with mosque	Residential	Approximately 7km north of the Project Centre Point
	Residential Compound 2		Approximately 16.5km northwest of the Project Centre Point
	Al Lisaili Settlement Community		Approximately 26.6km north of the Project Centre Point
	Murquab Settlement Community		Approximately 20.8km northeast of the Project Centre Point
	Al Faqa Settlement Community		Approximately 21.2km east of the Project Centre Point
	Hadaybit Racing Stable	Commercial	Approximately 18.1km north of the Project Centre Point
	Bab Al Shams		Approximately 22.2km northwest of the Project Centre Point

Figure 2-3 Land Uses within and near the Solar Park

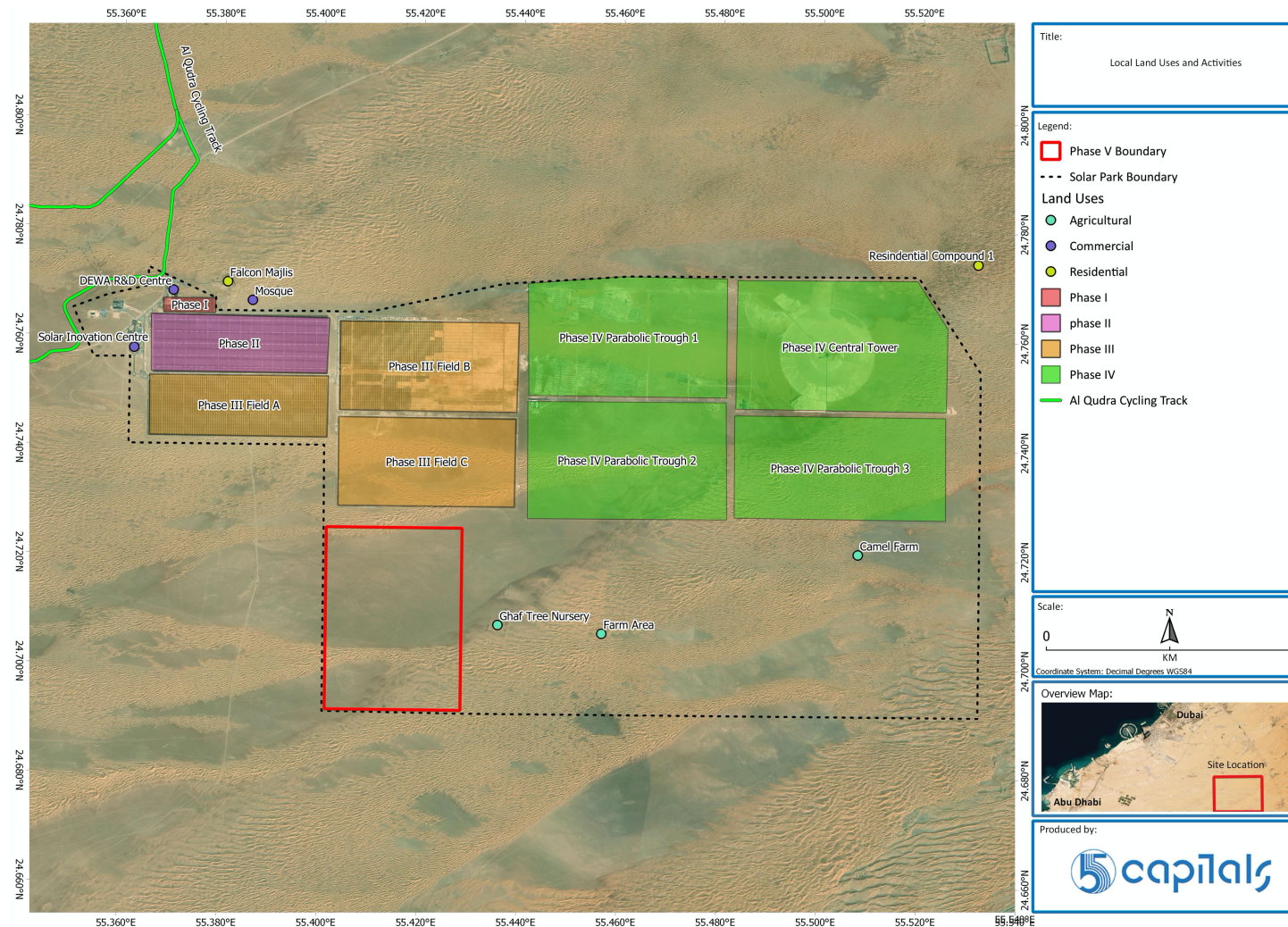
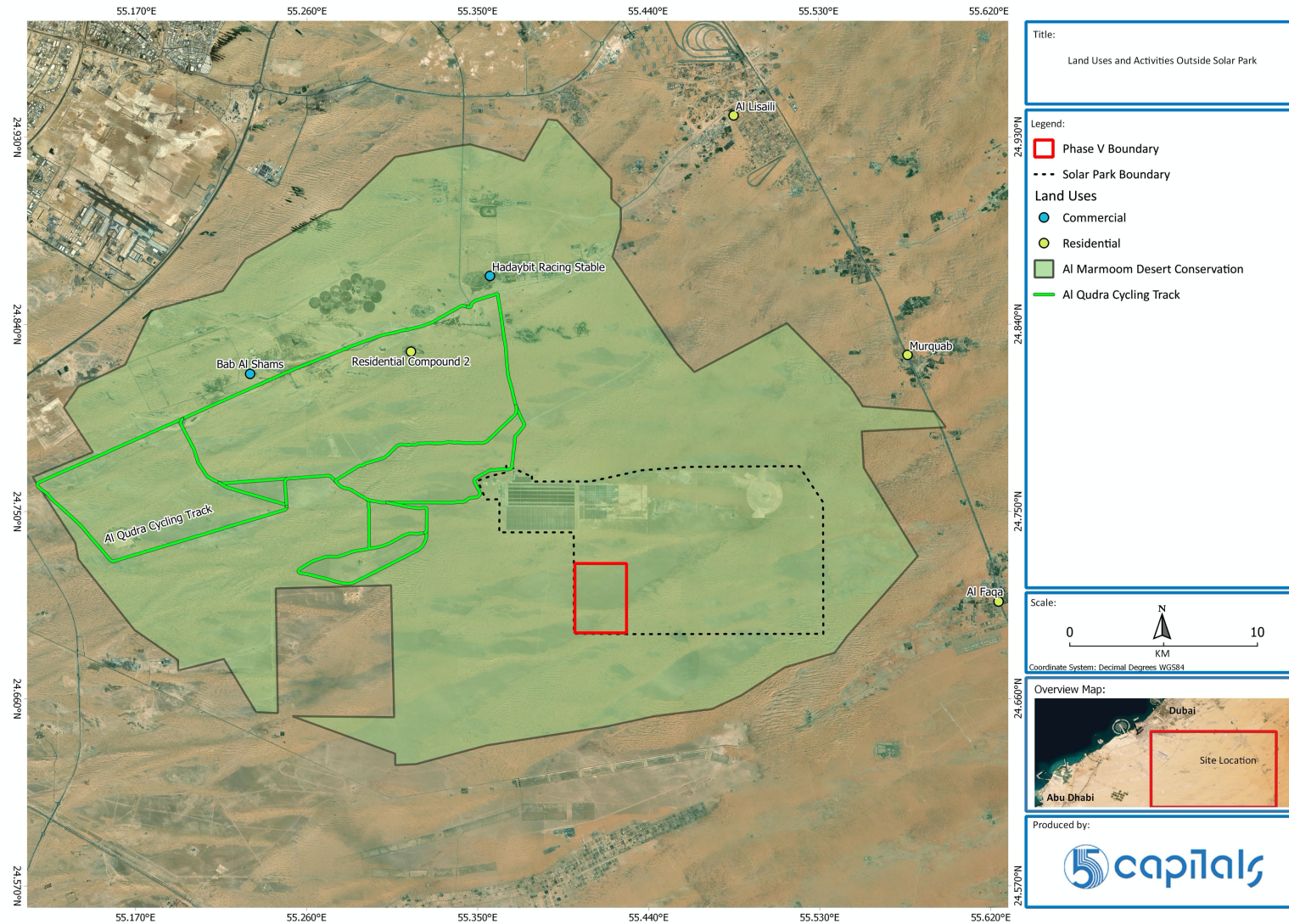


Figure 2-4 Land Uses Outside the Solar Park



2.3 Project Technology Overview

The Project will be using ground-mounted PV bi-facial technology on a single axis tracker, with a minimum accumulated installed DC capacity of 900 MWp, commissioned as 300 MWp (Phase A), 300 MWp (Phase B) and 300 MWp (Phase C), respectively.

The Maximum Power Output (active power) measured at the Electrical Delivery Point will not exceed 900 MW at any time. The units shall be connected and export its power through a 400/132 kV MBR SOLAR Substation that is built and operated by and a 400/132 kV SHAMS Substation that is currently under construction.

The Project will also include other ancillary and associated facilities. Reference to the ESIA should be made concerning further descriptions of all such facilities.

3.1 National Requirements

Furthermore, there are no established requirements for stakeholder engagement during project implementation. The only expected requirements for engagement are with the regulator as part of the EC application processes and on-going monitoring and reporting as a condition of the EC. This includes 'Environmental Performance Reports' (EPR), which are required on a frequency as specified in the EC. It is noted that the current EC does not state conditional requirements for EPR reporting frequency, however, based on previous ECs for the solar park, this is expected to be bi-annual (6-monthly).

ACWA Power is targeting finance from lenders that are signatories of the Equator Principles.

The Equator Principles IV establish key requirements for stakeholder engagement through the following principles:

- Principle 5: Stakeholder Engagement
 - *For all Category A and Category B Projects the EPFI will require the client to demonstrate effective Stakeholder Engagement, as an ongoing process in a structured and culturally appropriate manner, with Affected Communities, Workers and, where relevant, Other Stakeholders.*
 - *For Projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to: the risks and impacts of the Project; the Project's phase of development; the language preferences of the Affected Communities; their decision-making processes; and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation.*
 - There are also other requirements for facilitating engagement and engagement with indigenous peoples.

- Principle 6: Grievance Mechanism
 - *For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the ESMS, to establish effective grievance mechanisms which are designed for use by Affected Communities and Workers, as appropriate, to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance.*
 - *Grievance mechanisms are required to be scaled to the risks and impacts of the Project, and will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. Grievance mechanisms should not impede access to judicial or administrative remedies. The client will inform Affected Communities and Workers about the grievance mechanisms in the course of the Stakeholder Engagement process.*

IFC - Performance Standards

It is noted that under Principle 3, the applicable standards to apply to EPFI projects relate to the IFC Performance Standards and applicable World Bank Group EHS Guidelines.

All of the IFC Performance Standards include requirements for an amount of stakeholder engagement (either in the ESIA process or as part of the future project implementation) and therefore the Project will require a level of engagement.

In particular, IFC Performance Standard 1 on "Social and Environmental Assessment and Management Systems" states "Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts.

4 STAKEHOLDER ENGAGEMENT FOR THE PROJECT

Stakeholder engagement can be described as the systematic method to understand and involve stakeholders and their concerns in project activities and decision-making processes. It identifies the appropriate approach to be used for consultation and information disclosure.

The Stakeholder Engagement Plan (SEP) for the Project has been prepared to guide on-going stakeholder engagement. The Stakeholders included to this plan include persons or groups that may be directly or indirectly affected by the project, as well as those that may have interest in the project and/or those that may influence the outcome of the project either positively or negatively. These stakeholders may change over time and as such this plan will need to be updated as and when new stakeholders are identified, or the circumstances of stakeholders evolve.

The SEP has been prepared according to applicable elements of Equator Principles IV as well as good practice benchmarks (as applicable to the Project and cultural context) outlined in the IFC Handbook on Stakeholder Engagement¹ and will assist in managing communications between the Project and identified stakeholders.

It should be recognised that the SEP is a living document and will be utilised throughout the lifecycle of the project (within the ESMS) to guide the necessary engagement with identified stakeholders at the various project phases. In this instance, the SEP cannot be considered definitive for the lifetime of the project. As such, the SEP will evolve as the project progresses, and will be updated as necessary to include any relevant changes (e.g. new processes, requirements, affected stakeholders, changes to engagement methods, etc.).

¹ IFC, 2007, Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets.

5 STAKEHOLDER IDENTIFICATION AND ANALYSIS

5.1 Approach to Stakeholder Identification

A systematic approach to identify affected stakeholders has been used. This approach not only considers the projects but also put into consideration associated facilities, transport routes and areas potentially affected by cumulative impacts. The stakeholders identified have been classified into two categories:

- Impacted Stakeholders – those who can be potentially affected by one or more of the potential impacts of the project; and
- Interest-based Stakeholders – Stakeholders concerned with any of the procedures set by the project, the project's beneficiaries, national and international non-governmental organizations and the interested part of the civil society.

5.1.1 Impacted Stakeholders

The Impacted stakeholders are individuals or a group of people that can be potentially affected by the projects' environmental and social impacts either directly or indirectly. Potential environmental and social impacts of the project have been identified and assessed in the Environmental and Social Impact Assessment (ESIA). Such impacts can directly relate to stakeholders, including receptors that have been outlined above.

Table 5-1 Identified Potentially Impacted Stakeholders

IMPACTED STAKEHOLDERS	DESCRIPTION	JUSTIFICATION
Affected Communities		
It is noted that due to the remoteness of the Project site there are no populations, private land users or other people using the land in the Project footprint. As such there are no directly affected communities. Separately to this, there are no residential communities in proximity to the Project, that would be considered within the Project's area of influence. A camel farm is located 2.8km to the east of the Phase V project, however, this is not expected to be directly or indirectly affected by the Project and as such, is not listed below, but are considered wider public stakeholders that may have an interest in the Project.		
Directly Impacted		
Dubai Municipality (Al Marmoom Conservation Area management)	Conservation Area	Dubai Municipality manages the Al Marmoom Conservation area including the conservation efforts linked to protected species. The Project is located within this area and in the proximity of wild animals and certain feeding stations for Oryx, as well as Ghaf tree nurseries.
Staff for the Ghaf Tree Nursery	Conservation Area	Located approximately 700m to the east of the Phase V Project site within the Solar Park. There are basic structures at this location that may be used by employees (people tending to the

IMPACTED STAKEHOLDERS	DESCRIPTION	JUSTIFICATION
		nursery) periodically. As such, there may be impacts to such stakeholders for noise (primarily) and potentially dust and other air pollutants – from construction. It is also likely that staff to tend to the nursery will require a new route to the area once the Project site is fenced.
Project parties and staff at DEWA MBR Solar Park Phase 3	Industrial Project	The Project is located immediately south of the DEWA MBR Solar Park Phase III project and may directly be impacted due to dust from construction, particularly regarding the access road and electrical connection construction works.
Project parties and staff at DEWA (for substation operations)	Infrastructure	The Project is linking to the DEWA Substation(s) at the solar park and therefore will have a direct impact upon operations.
Users of the road network to the site	Road Users	Road users may potentially be directly affected by Project vehicle movements.
Indirectly Impacted		
DEWA MBR Solar Park Phase 1	Industrial Project	Project's within the solar park in proximity to the Phase V Project and may be subject to indirect impacts, which may relate to emergencies or other issues that are present external to the boundaries of the Phase V site.
DEWA MBR Solar Park Phase 2	Industrial Project	
DEWA MBR Solar Park Phase 4	Industrial Project	
Solar Innovation Centre	Commercial/Educational	Facilities within the solar park in proximity to the Phase V Project, and may be subject to indirect impacts, which may relate to emergencies or other issues that are present external to the boundaries of the Phase V site.
Research and Development Centre	Commercial/Educational	

5.1.2 Interest-Based Stakeholders

Interest-based stakeholders are groups or organizations that are not directly affected by the project but whose interests determine them as stakeholders. In addition, there are stakeholders outside the affected area, which can be identified through “interest-based” analysis. These are usually government authorities, NGOs and national, social and environmental public-sector agencies whose area of interest is related to the project, or where such organisations are undertaking projects with communities in these areas.

Table 5-2 Identified Interest-Based Stakeholders

STAKEHOLDERS GROUP	INTEREST-BASED STAKEHOLDERS	PROJECT INTEREST/STAKE HOLDING
UAE Government	Ministry of Climate Change and Environment	The federal government regulator for climate change and the environment in the UAE and likely to have an interest in the development of renewable energy technology.
Local Government	Dubai Municipality (DM) Environment Department (DM-ED)	DM is the Emirate of Dubai governmental authority. Besides for Al Marmoom Conservation Area (above), DM-ED will specifically have an interest in the permitting of the wider solar park and on-going EPR reporting for the Phase V Project.
	Other Dubai governmental authorities and emergency services	Other DM departments and emergency services will have a vested interest in the success of the project, and also in its security, as well as a potential response to emergencies.
Project Parties and Government Operators	Dubai Electricity and Water Authority (DEWA)	The Project proponent, off-taker and landowner, with various project agreements for compliance. DEWA is also responsible for construction and operation of transmission substation and will operate & maintain the electrical connection to/from the Project once constructed.
	Roads and Transport Authority (RTA)	RTA will be the operator of the Project access road once constructed.
External Parties	Members of the Public	Interest in the development of the project. Interest may include potential environmental and social risks related to project development and operation.
	International and Local NGO's	
	International & Local Research Institutions	
Project Lenders	Financial Institutions	Key interest in project development and project success. Interest includes potential environmental and social risks related to project financing.

6 STAKEHOLDER ENGAGEMENT PROGRAMME

Stakeholder engagement is an on-going process that will be undertaken during the construction and operational phases of the project. The process intends to be transparent, free of intimidation, interference and coercion. This section aims to describe what information will be disclosed, in what formats, the types of methods that will be used to communicate information and the consultation methods to be used with each of the stakeholder groups identified in the previous sections.

6.1 Engagement Methods

The following methods may be used to inform stakeholders about the on-going stakeholder engagement process during the construction and operations of the project:

- Letters, Phone calls and email - Suitable to engage interest-based stakeholders and to notify them of the engagement and disclosure mechanisms.
- Posters or Notices - Signboards and Illustrative posters (infographics) will be placed at the project entrance gate, including direct access to the grievance mechanism.
- Bilateral meetings - Suitable to engage impacted and interest-based stakeholders as identified, to allow these stakeholders to provide their views and opinions and to notify them of the engagement and disclosure mechanisms.
- Online – Useful for Interest-based Stakeholders. The engagement and disclosure mechanisms for the ESIA package during the construction and operational phases of the project will be advertised on ACWA Power's website with a contact point provided for comment. The same may be available on the lending institution website.

6.2 Disclosure of E&S Documents

As stated above, there are no statutory requirements in the UAE or Dubai for stakeholder engagement or consultation processes, including disclosure of EIA (or other related E&S studies).

In accordance with Equator Principles IV, Principle 10: Reporting and Transparency:

- *The client will ensure that, at a minimum, a summary of the ESIA is accessible and available online and that it includes a summary of Human Rights and climate change risks and impacts when relevant.*

It is therefore intended that the ESIA Non-Technical Summary (as a minimum) will be disclosed online.

Table 6-1 E&S Disclosure SEP Timetable

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Disclosure of ESIA Non-Technical Summary	All Stakeholders	Online disclosure at the ACWA Power website	Upon completion of the ESIA and left for a period of at least 30-days.

6.3 Stakeholder Engagement During Construction

Stakeholders most likely to be affected by construction activities will be engaged leading up to and during the physical construction of the Project. Stakeholder engagement during construction will allow stakeholders to assess whether measures are working as intended if grievances are being responded to and identifying alternatives where there are failings. Effective management of stakeholder engagement during the construction phase is important as it can set the tone for the remainder of the project (ref. IFC, Handbook for Stakeholder Engagement).

Construction-related engagement processes are set out below and will be the responsibility of the EPC Contractor, although support from the Project Company is expected (to provide a local cultural context).

Table 6-2 Construction Phase SEP Timetable

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Notify stakeholders of construction activities and construction timeline	Directly and Indirectly Impacted Stakeholders	Official notices will be posted at the site entrance to advise of construction commencement.	Before the start of construction and updated as necessary within the construction phase if there are changes to construction activities or processes.
	Project Parties and Government Operators	Official emails or letters in coordination with applicable local authorities will be sent to provide information on construction activities and timelines	
	Members of the Public International and Local NGO's International and Local Research Institutions	Notification of the project construction activities and timelines on ACWA Power's website.	
Communication of emergency preparedness and action plan	Project Parties and Government regulators Local Government (i.e. DM for Ghaf tree nursery staff)	Official emails or letters informing the stakeholders about the emergency response procedures in place and any required co-	Before the start of construction and updated if key changes to the plan occur.

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
		ordination for specific events. Bilateral meetings will be held where necessary.	
	DEWA MBR Solar Park Phase III Project	Bi-lateral meeting with the relevant project management to inform of the emergency plan and to optimise with any concerns from their side.	
Independent Environmental & Social Monitoring & Reporting	Project Lenders	Environmental and Social auditing to evaluate projects compliance with applicable standards, lender requirements and loan covenants.	Quarterly throughout the construction phase of the project.
Implementation of the grievance mechanism	All identified stakeholders	As described in the grievance mechanism section of this SEP (Section 7).	Established at the start of construction and updated throughout the construction phase to facilitate a rapid and effective response.

6.4 Stakeholder Engagement During Operation

Stakeholder engagement during the operational phase of the project will be the responsibility of the O&M Company, although it is expected that the Project Company will provide key support to ensure local cultural context during engagement activities.

It will be important for the Project Company and O&M Company to ensure a smooth transition between stakeholder engagements from the construction phase to the operational phase of the project by understating the techniques that have been most effective during construction. It will be important to continue these techniques to avoid a decrease in the frequency of stakeholder engagements, as the stakeholders are already familiar with the typical processes for engagement.

Table 6-3 Operational Phase SEP Timetable

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Notify stakeholders of the transition from construction to operations	Directly and Indirectly Impacted Stakeholders	Official notices will be posted at the site entrance to advise of operations commencement.	At least 2 months before the commencement of operations.
	Project Parties and Government	Official emails or letters in coordination with	

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
	Operators Local Government	applicable local authorities will be sent to provide information on the transition timeline	
Upon development of and any updates related to the emergency preparedness and action plan, or other HSE related matters that may affect local external parties.	Project Parties and Government Operators And Ghaf tree nursery staff (via DM)	Official emails or letters informing the stakeholders about the emergency response procedures in place and any required co-ordination for specific events. Bilateral meetings will be held where necessary.	2 months before the commencement of operations and updated if key changes to the plan occur.
	DEWA Phase III Project	Bi-lateral meeting with the relevant project management to inform of the emergency plan and to optimise with any concerns from their side.	
Independent Environmental & Social Monitoring & Reporting.	Project Lenders	Environmental and Social auditing to evaluate projects compliance with applicable standards, lender requirements and loan covenants.	On an annual basis throughout the operational phase of the project.
Implementation of the grievance mechanism	All identified stakeholders – including project workforce	As described in the grievance mechanism section of this SEP (Section 7).	Established at the start of operations and managed throughout the entirety of the operational phase to facilitate a rapid and effective response.

6.5 On-going Disclosure of Environmental and Social Information

6.5.1 Environmental Performance Reporting – For DM-ED

In accordance with the applicable EC for the wider solar park the project will be required to prepare and submit Environmental Performance Reports (EPRs) to Dubai Municipality – Environmental Department on a bi-annual (6-monthly) basis.

Such reports will provide details on the progress of the Project's implementation as well as the effectiveness of its environmental monitoring and management program.

6.5.2 Periodic Independent Monitoring – For Lenders

In accordance with Principle 9 of Equator Principles IVI, 'Independent Monitoring and Reporting' of the project will be required to be undertaken periodically, during construction and operational phase of the project, at least annually for the term of the loan agreement.

It is expected that this will require quarterly independent E&S audits to be undertaken during construction and annual audits during operations. This has been included to the SEP timelines above. The purpose of these audits will be to evaluate compliance with project requirements, including those in UAE and Dubai, as well as for the lenders and those linked to E&S elements of the loan covenants.

All audit reports will include a Non-Technical Summary (NTS) describing the auditing process, any identified non-conformances, how non-conformances identified in the previous audits have been corrected (or if they remain open). The reports will be submitted to the Project Company and then further disclosed to the Project Lenders.

7 GRIEVANCE MECHANISM

The Project activities may result in potential nuisances for stakeholders or environmental and social impacts and as such it is required to establish a grievance mechanism to address potential complaints from affected parties. The aim of the grievance mechanism is establishing a system to receive and facilitate the resolution of the stakeholder's concerns and grievances about the project's environmental and social performance.

The grievance mechanism is an important part of stakeholder engagement and will be in place from the E&S disclosure process, throughout construction and operations through the end of the project life. The grievance mechanism will use an understandable and transparent process that is culturally appropriate and readily accessible at no cost; so, all stakeholders/affected parties will have the opportunity to raise a complaint.

The overall responsibility and accountability for the grievance mechanism will be held by the Project Company. However, the implementation may be delegated and fall under separate parties depending on whether the grievance is related to the construction or the operational phases, i.e. EPC Contractor during construction and O&M Company during operations.

7.1 Key Principles of Grievance Mechanism

The grievance mechanism for the project will comply with the following principles:

- The purpose of the grievance mechanism procedure will be clarified at the outset;
- The process will be scaled to the risks and impacts of the project;
- The process will be transparent and accountable to all stakeholders by putting it into writing, publicising it and explaining it to relevant stakeholders;
- The grievance mechanism will be made clear, understandable and easily accessible by providing information in the applicable local language(s);
- Complaints or concerns will be rapidly resolved;
- The mechanism will not involve any costs nor retribution associated with lodging a grievance;
- Precautionary measures such as clear non-retaliation policy, confidentiality measures and safeguarding of personal data collected about a complaint, as well as an option to submit grievances anonymously will be in place.

7.2 Scope of Grievance Mechanism

The scope of the grievance mechanism is to evaluate and address stakeholders' problems and concerns regarding project activities, the implementation of mitigation and compensation measures as per the ESIA and environmental and social performance of the project.

All relevant claims from stakeholders will be accepted and no judgment made before the investigation, even if complaints are minor. However, according to good practice, the following claims will be directed outside of project-level mechanisms:

- Complaints not related to the project based on the assessment of its legitimacy;
- Issues related to government policy and government institutions;
- Complaints constituting criminal activity and violence, which will be referred to the judicial system;
- Commercial disputes: Commercial matters will be stipulated for in contractual agreements and issues will be resolved through a variety of commercial resolution mechanisms or civil courts.

In such grievances, the complainant will be advised of this screening decision.

7.3 Steps in Managing Grievance Mechanism

7.3.1 Publicising Grievance Management Procedures

The grievance mechanism of this project will be publicised using the means outlined and as linked to the disclosure process. Also, notices will be provided at the project entrance regarding how to lodge a grievance and the process related to following up. The information provided will be available in both English and Arabic and will include the following:

- What project-level mechanisms are capable of delivering and what benefits complainants can receive from using the company's grievance mechanism, as opposed to other resolution mechanisms;
- Who can raise complaints (i.e. all stakeholders);
- Where, when, and how community members can file complaints;
- Who is responsible for receiving and responding to complaints;
- What sort of response complainants can expect from the company, including the timing of response; and
- What other rights and protection are guaranteed.

7.3.2 Submitting a Grievance

Upon raising awareness and publicising the mechanism, grievances may be submitted by:

- Direct delivery to a sealed grievance box at the project site entrance;
- Submission by email; and
- Directly received by project personnel, including security personnel (security personnel at the project's gate must be aware and trained to deal with any grievances appropriately).

Information will be provided at the project entrance and at the location of grievance boxes to inform complainants about the process and timeline to follow up their grievances.

For illiterate complainants or those that prefer to submit their grievances verbally, they will have the possibility to meet with the relevant site E&S/HSE Manager who will take notes on the details of the complainant and read them out loud to the complainant to confirm that the key elements of the complaint have been captured. Where the respective manager is not available, security staff will take the grievances and ensure these are registered via the formal grievance process.

If an anonymous grievance (e.g. letter or email without details about the complainant) or the complainant requests to remain anonymous is submitted, the grievance will also be accepted and processed.

7.3.3 Keeping Track of Grievances

Upon receipt of a grievance, the steps below will be followed to ensure all grievances are adequately investigated to avoid leaving any issues or concerns raised opened.

- The grievance will be recorded in a form of register. The register will contain (as a minimum):
 - Details of the grievance;
 - The personnel/division(s) responsible for resolving the grievance; and
 - Process tracking fields (receipt dates, status, result dates).
- The grievances will be acknowledged as soon as possible (no later than a week from receipt) by sending a formal confirmation with a complaint number and a timeline for a response to the complainant to assure the complainant that the organisation is responding properly.
- In cases of sensitive grievances, such as those involving multiple interests and a large number of affected people, where a more complex investigation is required, the complainant will receive an update within two weeks of the grievance being received, explaining the actions required to resolve the complaint, and the likely timeframe;

- The Project Company will explain in the first letter of acknowledgement, which claims are clearly outside the scope of the mechanism and what alternative mechanisms communities can use to address these potential issues.

7.3.4 Reviewing and Investigating Grievances

Depending on the circumstances of complaints made, various departments may need to be involved in resolving the complaints. The person(s) responsible for handling grievance will organise the process to validate the complaints legitimacy and arrange for investigation of details.

When grievances are complex and cannot be resolved quickly, an extensive investigation may be required to prevent escalation of the issue. The responsible and accountable party remains the Project Company, although the investigation and review may be delegated to the EPC Contractor or O&M Company respectively. The grievance mechanism must conform to the principle of “no-cost”. If the investigation team is formed internally, issues that will be taken into consideration include potential conflicts of interest, qualifications, gender composition, and budget. Meetings with complainants and site visits will be undertaken, as appropriate.

All grievances will be investigated by the responsible Project party within 2 weeks of submittal. Where grievances require a longer duration for investigation, the complainant will be informed of this delay and advised of the expected timeline for a response.

In cases of sensitive grievances - such as those involving multiple interests - it may help to engage outside organizations in a joint investigation or allow for the participation of local or national authorities only if the complainants agree to this approach.

7.3.5 Grievance Resolution Options and Response

The approach used in resolving various types of grievances will be different depending on the nature of the issue, frequency of occurrence and the number of grievances. Rather than prescribing a specific procedure for each particular type of complaint, the flexibility of the grievance mechanism allows for resolution options appropriate for different types of grievances to be provided. For example, these options may include altering or halting harmful activities or restricting their timing and scope (e.g. for construction dust or access road noise), providing an apology and revising the stakeholder engagement strategy.

The resolution to the grievance will be communicated to the complainant either in written format or verbally depending on what format the complainant has selected as preferred, but in all cases, a written record will be kept by the Company. In cases where the grievance/claim is rejected or where the company does not require action, the company representative will be diplomatic when informing the complainant about the outcome of the eligibility review

process to prevent conflict from escalating. Where the claim is accepted, a proposed solution will be provided and communicated to the complainant within a stipulated period (this will be recorded in the grievance register). If the complainant does not accept the proposed resolution, the company would re-assess the situation, discuss and clarify the finding with the complainant and make sure that all alternatives within the grievance mechanism are explored. If the complainant is still not satisfied with the proposed resolution, the complainant will be allowed to take the dispute resolution mechanism outside of the company grievance mechanism (an external mechanism).

Where a proposed solution is accepted or agreed upon by all parties involved, the case will be closed out and proof that necessary actions have taken place will be collected. Such proof includes:

- Conducting a meeting with the complainant to reach a collective agreement or get a confirmation and file it along with the case documentation to close out the claim and;
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how they were resolved.

Where the complainant is not satisfied with the outcome of the proposed resolution, actions concerning further discussion and re-assessment shall be completed and advised within 2-weeks of notification of dissatisfaction by the complainant.

7.4 Internal Parties/Worker Grievance Mechanism

7.4.1 Construction Phase

The internal grievance mechanism will be made available for all construction personnel associated with construction activities to enable them to make work-related concerns. This includes all those employed by the Project Company, EPC contractor, sub-contractors, any other related contractors and project site visitors. All construction personnel will be made aware of the grievance mechanism during their employment inductions at the project site and in employment documents.

Grievances will be made in writing to the EPC Contractor via a specific grievance form (see example grievance form in Appendix A). The grievance form will be made available at key locations on-site (e.g. administration block and office locations) as well as at any staff accommodation area. The grievance form will be available in Arabic, English and other applicable languages of project staff. Where the complainant is illiterate or requires translation, the complaint can be made verbally in confidence to their E&S/HSE Manager, so that the Manager will complete the grievance form on behalf of the complainant.

Grievance forms will include contact details of the complainant; however, a grievance can be raised anomalously if desired. Grievance forms will be posted in a sealed and locked 'post box', located at all key locations where grievance forms are available. The post box will be checked on a regular schedule several times a week.

Responses to grievances will be transparent and free of retribution. The follow-up to grievances will be completed on a grievance follow up form and signed off by the responsible in-house party for grievance management. The follow-up form will state all actions taken to resolve the grievance and any further dialogue that had ensued, as well as any future monitoring of the situation or other planned actions. The completed and signed off forms will be kept in a dedicated grievance mechanism folder on-site, which will be made available for review to the external independent environmental and social auditors during the periodic environmental and social audits required during the construction phase.

7.4.2 Operational Phase

The grievance mechanism in the operational phase of the project will be similar to that of the construction phase. The grievance mechanism will be available for both internal parties (site workers) and external parties.

A member of staff will be assigned and responsible for managing internal and external grievances received (recording, reviewing, investigating and responding) appropriately. Internal grievance forms will be made available in Arabic and English at key locations on-site with a sealed and locked 'post box' available for posting grievance at every location. The post box will be checked regularly.

External grievance forms will be made available in both English and Arabic at the site entrance gate. Sealed and locked 'post boxes' will be made available at the project site entrance for grievance form submission. The process for recording, reviewing, following up and responding to will be the same as detailed above. All grievances during operations will be recorded for a minimum of 5 years, with records being kept on site.

Where external complaints are received by letters or email these will also be formally recorded and followed up appropriately by the designated representative. The contact details of the E&S/HSE Manager will be advertised at the notice board at the site's main entrance gate, once the individual has been appointed.

7.5 Process Flow and Timeline

Table 7-1 Grievance Process and Timeline

STAGE	TIMELINE
Grievance Received/Submitted	-
Grievance logged and acknowledged	Within 1 week of the grievance being submitted
Grievance investigated	Within 2 weeks of the grievance being submitted*
Proposed resolution conveyed to Complainant	Within 2 weeks of the grievance being submitted
If applicable following dissatisfaction of resolution by Complainant	
Actions to re-assess grievance/propose new solution/inform Complainant of final decision	Within 2 weeks of notification of dissatisfaction by Complainant

* Where complex grievances or other factors are extending the investigation time, the Complainant will be informed of this delay and advised of an updated expected timeline for response.

7.6 Training

- It will be the responsibility of project management to endorse the grievance mechanism and ensure that they are aware of the availability of this process. It is also necessary for project management to ensure that personnel are allocated to manage the grievance mechanism.
- The personnel shall be made fully aware of the outlined grievance mechanism and have access to this document to ensure that they can undertake the necessary duties for effective implementation.
- As grievances can be submitted/taken at the Project entrance, it will be necessary to ensure that security staff are trained regarding this process and have access to this document and any applicable forms, contact details of responsible project parties etc.
- All staff will be advised of the availability of the grievance mechanism in the Project induction, including its key features, processes and where to access it.

8 IMPLEMENTATION PLAN

In order for this stakeholder engagement plan to function effectively, it is important to determine a management structure and assign suitable personnel(s) to implement and manage this Stakeholder Engagement Plan.

8.1 Roles and Responsibilities

Note: The roles below will need to be revised upon finalisation of Project staff and responsibilities on-site.

At this stage, the Project staff member who can be contacted in regard to this Project (covering these elements) is below.

NAME	Zakaria Ramram
CONTACT DETAILS	zramram@shuaaenergy3.ae +971 521731683

The responsibilities of the HSE Manager, Environmental and Social Manager and Community Liaison Officer are to be outlined below once confirmed by the EPC Contractor and O&M Company respectively.

8.1.1 HSE Manager

The HSE Manager is responsible for:

- Ensuring stakeholders are recognised as partners in the development and delivery of strategic goals;
- Assisting the stakeholder management unit to effectively consult and engage stakeholders;
- Advising Senior Management of issues and/or risks to stakeholder relationship as soon as they arise so the risk can be managed effectively;
- Supporting the implementation and management of the SEP;
- Getting involved in stakeholder engagement activities that relate directly to HSE concerns or emergency planning and;
- Engaging with any external stakeholders with respect to emergency planning, drills, and instances of emergency as appropriate.

8.1.2 Environmental and Social Manager

The EPC Contractor will employ/nominate the Environmental and Social Manager during the construction phase and the O&M Company during the operation phase. The Project

Company HSE Manager will oversee the Environmental and Social Manager. The Environmental and Social Manager is responsible for:

- Implementation of all aspects of the SEP ensuring that the project is compliant with lenders requirements;
- Identifying stakeholder issues and acting appropriately to address those issues.
- Ensuring that the SEP and the available engagement methods are publicised by the Community Liaison Officer;
- Ensuring that project personnel are well briefed regarding the SEP and grievance mechanism (including security personnel) and that the required resources (e.g. vehicles, company phones, office materials) are provided;
- Ensuring stakeholder meeting and disclosure of information are managed properly.
- Supervising the processing and resolution of all grievances; and
- Supervising the independent periodic monitoring and disclosure of the non-technical summary of the audit reports and the full reports if required.

8.1.3 Community Liaison Officer (TBC)

In order to maintain regular communication with affected stakeholders, a Community Liaison Officer (CLO) will be employed/nominated (this role may be shared by the nominated E&S Manager). The CLO will be knowledgeable about the project region and will be able to speak the local language. The responsibilities of the CLO include:

- Identifying, informing and recording public views, opinions & grievances and or relaying them to the necessary personnel for follow up;
- Setting up a grievance complaint tracker system to keep track of the type of complaints filed, the complainant and status of each complaint;
- Publicising & Distributing information to applicable stakeholders and translation of the material into applicable languages;
- Handling minor, straightforward issues such as those related to a complainants request for information;
- Obtaining clarification from other members of management in regard to dealing with specific grievances, such as a need to notify the Project Company (or other Project parties) in regard to the content or response to specific grievances.
- Ensuring all received external grievances are properly recorded, addressed and managed within the specified timelines as detailed in this procedure and;
- Keeping up to date with any changes in compliance obligations with respect to stakeholder engagement and grievances.

9 REVIEW

As stated herein, the SEP is a living document that will be utilised in the ESMS throughout the project's lifecycle as a reference document. As such, there is a need to continuously update the SEP as necessary to include any relevant changes such as changes in projects circumstances, new requirements, new affected stakeholders, reviews of techniques, changes to engagement methods, changes of relevant personnel, changes to grievance mechanism, etc.

As a minimum, the SEP will be reviewed on an annual basis, to achieve continual improvement.

APPENDIX A – EXAMPLE OF GRIEVANCE FORM

GRIEVANCE FORM <i>To be used for grievance(s) only. Shall not be used to raise comments, suggestions, or/and inquires or any other matters</i>	
INSTRUCTIONS	Please fill in this Grievance form in clear handwriting and submit through one of the following means: - Directly to Environmental & Social / HSE Manager - By email to: - Deposit in the letterbox at the Project main entrance
Full Name	First Name:
	Last Name:
Contact Information Please mark how you wish to be contacted (mail, telephone, email).	☐ I wish to raise my grievance anonymously (You can remain anonymous if you prefer but we will not be able to contact you with a response to your concern)
	☐ By Post: Please provide a mailing address:
	☐ By telephone:
Preferred Language of Communication	☐ By email:
	☐ English ☐ Arabic
Description of Incident/Grievance	<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>
	☐ One-time incident/grievance (date...)
	☐ Happened more than once (how many times?....)
Date of Incident/Grievance	☐ On-going (currently experiencing the problem)
What would you like to see happen to resolve the problem?	
Signature:	
Date:	