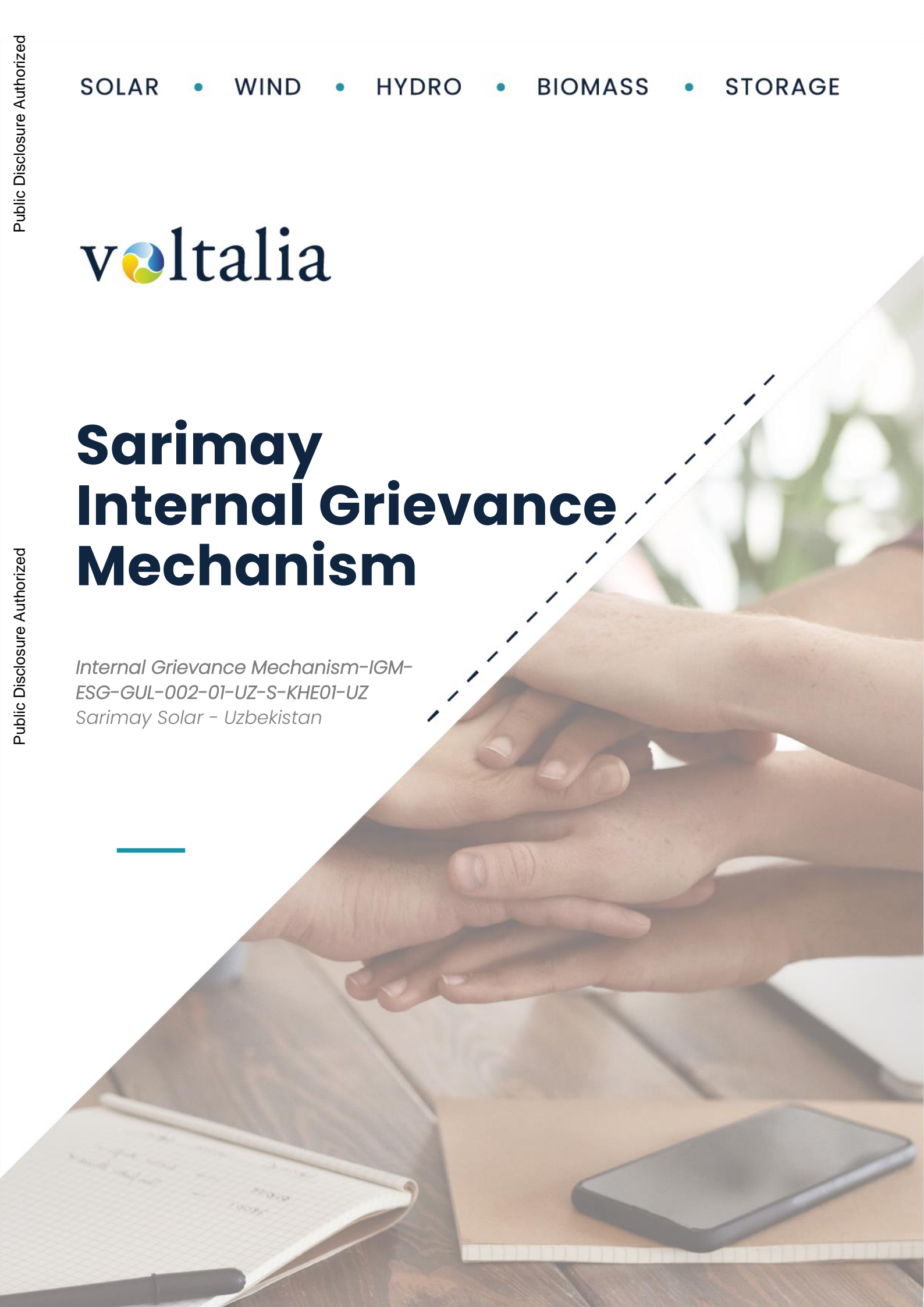


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Sarimay Internal Grievance Mechanism

*Internal Grievance Mechanism-IGM-
ESG-GUL-002-01-UZ-S-KHE01-UZ
Sarimay Solar - Uzbekistan*



RESPONSIBILITIES

	DATE	NAME	FUNCTION
ELABORATION	January 2024	Zukhra Sharipova	Social Coordinator
VALIDATION	January 2024	Margaux Houdayer	E&S Regional Officer
APPROVAL	January 2024	Nicolas Bergeret	Corporate E&S officer

REVIEW HISTORY

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1 INTRODUCTION

1.1 Scope and applicability

This Internal Grievance Mechanism (IGM) procedure applies to all Project personnel working for the Sarimay 100 MW Solar Project (hereinafter, the Project) during the design, construction, operation and maintenance activities. It includes the IGM procedures for processing all internal grievances submitted by any Project personnel working in the Project area including the offices, secondary and associated facilities, whether temporary or permanent, as well as the workers' camp during the whole Project lifecycle.

This IGM procedure is fully aligned with the Environmental and Social Management System (ESMS), Labour Management Plan (LMP), Workers' Accommodation Plan (WAMP), Stakeholders Engagement Plan (SEP) and the Health, Safety, Environmental and Social (HSES) Management Plan (MP). The IGM aims to ensure that every worker, including any marginalized, disadvantaged or vulnerable groups within the workforce is respected and treated with care throughout the Project lifecycle and especially during the grievance process. It provides a framework for receiving, recording, facilitating and resolving any grievances raised by any individual worker, trade union and/or group of workers.

This IGM applies to the Project and in effect to Voltage, the Engineering, Procurement and Construction (EPC) Contractor and their Subcontractors who are obliged to adopt and implement this IGM procedure to ensure the correct implementation at their respective level and area of activities.

1.2 Objectives

The main objective of the IGM is to ensure that the grievance process is simple to use, safe and confidential, and that any grievance that has been submitted will be resolved in a timely and transparent manner.

Additionally, the IGM procedure shall:

- Identify and manage workers' concerns and thus support effective risk management;
- Prevent adverse consequences of failure to adequately address grievances;
- Build and maintain trust with all workers while supporting the development of positive relationships between the project and its workforce.

This document is considered an integral part of the ESMS that will be implemented during the construction and operation phases of the Project. It includes a clear, formal and ongoing process for addressing any actions or decisions that violate the rights and legitimate interests of the Complainant(s) whilst the monitoring of grievances provides signals of any escalating conflicts or disputes. In accordance with the international lender's requirements (the IFC Good Practice Note on Addressing Grievances from Project Affected Communities, 2009 and IFC's CAO Advisory Note: A Guide to Designing and Implementing Grievance Mechanisms for Development Projects), the IGM shall be adopted and implemented at the earliest stage and preferably prior to the Project initiation according to Good International Industry Practice (GIIP).

The IGM will be established at the project level, considering the local legislation, applicable international standards and GIIPs on the resolution of grievances, and ensuring that Complainants are provided with the timely resolution of issues or concerns raised. Individuals and applicable legal entities in the Project areas will be fully informed of their rights and procedures to address grievances.

Votalia, the EPC Contractor and Subcontractors shall be responsible for putting in place appropriate provisions to ensure that IGM is made available to provides a clear and transparent framework accessible to all Project personnel at their respective entity levels (EPC Contractor /Subcontractors) to easily raise concerns, complaints, claims or suggestions including matters not relevant to the project and allow for their timely resolution.

1.3 Principles

The IGM adheres to the principles outlined in the IFC performance standards, EBRD performance requirements and other Votalia management plans and policies among them the Votalia HSE and Sustainability policies and Votalia Code of Conduct. The Management Team shall take the lead in promoting and encouraging workers to raise grievances (both positive and negative grievances) for the benefit of the Project.

The IGM complies with the following key principles:

- **Proportionality:** a mechanism scaled to the potential risks and adverse impacts that the Project may impose on the workers. Assignment of responsible person/s to organize the resolution of grievances.
- **Cultural appropriateness:** a mechanism designed in a culturally appropriate manner, including a diversity of languages to cater for all the workers cultural background;
- **Accessibility:** a clear and understandable mechanism that is accessible to all workers at no cost to them. Grievances may be received face-to-face, via telephone, website inquiries, email, post or through grievances boxes to be located at discrete locations in the Project site. Grievances and concerns are to be addressed promptly and effectively with timely investigation and resolution.
- **Transparency and accountability:** a mechanism that operates in a transparent way and that is accountable to all Project workforce.
- **Appropriate protection:** a mechanism that prevents retribution and does not impede access to other remedies, including public judicial or non-judicial mechanisms. The grievance mechanism shall not impede access to the country's judicial or administrative remedies. Complainants and affected persons are free to approach a court of law at any moment, independently of the project level grievance mechanism.
- **Confidentiality:** It is essential to handle confidentiality sensitively, the issue in accordance with its individual circumstances and to clearly communicate the way information and evidence will be handled at every stage of the process. This will help to ensure that all those involved are properly informed, avoids unexpected surprises and ensures that confidentiality does not derail the effective handling of the grievance process. As such, only the worker(s) directly involved in the grievance, or the person(s) responsible for processing grievances (e.g., the Votalia Social Advisor or Social Site Advisor), can have access to confidential information about the grievance..
- **Impartiality:** All parties have the right of expressing their viewpoints. Any assumptions or actions shall be taken until all relevant information has been collected and considered. All parties have access to support or representation if they want or need it.
- **Non-retaliation:** Management shall take the necessary steps to protect and encourage anyone for coming forward with the grievance or for helping to sort it out (e.g., acting as witness) are not victimized or targeted for involving or assisting in a grievance process. Any retaliation shall lead to disciplinary action. Moreover, using the grievance procedure for defamatory reason is not tolerated.
- **Timeliness:** All grievances shall be dealt with as quickly as possible. There are time limits for the different steps, as further indicated.

1.4 National Regulations and International Standards

The Sarimay Solar IGM is fully compliant with the requirements of *EBRD through the following Performance Requirements*:

- PR1 under paragraph 30;
- PR2 under paragraphs 10, 21 and 24;
- PR4 under paragraphs 43;
- PR5 under paragraphs 13, 40, 41,
- PR10 under paragraph 10.

Along with the international standards, the present grievance mechanism complies with the national legislation of Uzbekistan, in particular law “Labor Code of the Republic of Uzbekistan”.

Recently, the Government of Uzbekistan (GoU) has been working to establish a credible mechanism to receive their feedback and grievances, including a number of legal acts that have been adopted and revised to support these efforts:

- ***Law on introducing amendments and additions to the Law of the Republic of Uzbekistan “Queries of Citizens and Legal Entities”*** (No. 445, from Sept. 11, 2017). Sets procedures for sending feedback, suggestions, and grievances to state bodies; establishes operating procedures for public reception offices and the Virtual Reception of the President of Uzbekistan, a web portal.
- ***About Measures for Further Strengthening Work with Citizens’ Problems*** (No. 5633, from January 17, 2019). Sets procedures for collaboration between sectors for integrated socioeconomic development of regions, and procedures for public reception offices to publicize and address problems raised by citizens.
- ***Law of the Republic of Uzbekistan “On Personal Data” of July 2, 2019 No. ZRU-547 (entered into force on October 1, 2019)*** specifies that “personal data” should be understood as information recorded on electronic, paper and (or) other material media that relates to a particular individual or makes it possible to identify him. Following the new amendments (on January 14, 2021), Personal Data requires data localization as defined by the conditions and requirements for processing personal data for citizens of Uzbekistan. (Law on Amendments and Additions to Certain Legislative Acts art. 13; Law on Personal Data art. 27(1).) According to the new law, the personal data of Uzbek citizens must be processed “[b]y technical means physically located in the territory of Uzbekistan, and in databases duly registered with the data protection authority in Uzbekistan”—namely, the State Inspectorate for Control in the Field of Informatization and Telecommunications of the Republic of Uzbekistan (UzComNazorat). Furthermore, the data localization requirement applies to the collection, systematization, and storage of data, and to all types of data processing, including operations carried out using information technology and via the internet. (Art. 27(1).) The compliance obligation rests with the owner and/or operator of the database. The owner is any person who owns the database that includes the personal data. The operator is any person who processes the personal data. Under this law, infringements of the requirements are punished under provisions of the Administrative Responsibility Code and the Criminal Code of the Republic of Uzbekistan. (Art. 33.)

Other applicable requirements are as follows Voltalia Ethics Guide, Code of Conduct, Contractor Management Procedure, Environmental, Social, Health, and Safety (ESHS) Policy and specific workplace safety policies and sustainability policies.

2 DEFINITIONS, ACRONYMS AND RESPONSIBILITIES

2.1 Definitions

Term	Definition
Project Representative	Any person working for or on behalf of the Project or Voltage (including EPC Contractor/Subcontractors) who may be subject grievance or complaint against them filed by the Complainant(s), who may be the Affected Person(s), Affected Community(ies) or local stakeholder(s).
Complainant	Any Project Personnel (including Contractor(s) and Subcontractors) making a complaint or grievance against Sarimay Solar project. As noted earlier, this mechanism is applicable for any internal project related stakeholder group to raise a grievance throughout the construction and operations phase. This includes but is not limited to unions, labour organizations, etc.
Grievance	A grievance is a concern or complaint raised by an internal stakeholder to the project (individual or a group) affected by company activities or operations. The grievances can either real or perceived impacts of company's activities or operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or to a complaint may be in the specific approaches and the amount of time needed to resolve it. All grievances (whether submitted through a grievance form, e-mail, telephone, grievance box, etc.) will be recorded on a grievance log sheet by the Voltage Social Advisor as provided [REG 1: Grievance Register].

2.2 Acronyms

Acronym	Description
AP	Affected People
CAO	IFC Independent Accountability Mechanism
EBRD	European Bank for Reconstruction and Development
EPC	Engineering, Procurement and Construction
E&S	Environmental & Social
ESMS	Environmental and Social Management System
FGD	Focus Group Discussion
GIIP	Good International Industry Practice
GM	Grievance Mechanism
HSES	Health, Safety, Environmental and Social
HSE	Health, Safety and Environment
IFC	International Finance Corporation
IGM	Internal Grievance Mechanism
KII	Key Informant Interview
KPI	Key Performance Indicator
LMP	Labour Management Plan
MP	Management Plan
PAPs	Project Affected Persons
PR	Performance Requirement
RfC	Request for Clarification
RfI	Request for Information
SEP	Stakeholders Engagement Plan
WAMP	Workers' Accommodation Management Plan

2.3 Roles and Responsibilities

ROLE	ACCOUNTABILITY	Contact details
Volitalia – Corporate Level		
BUSINESS LINE MANAGER	<p>Ensure the Project IGM requirements are communicated and implemented effectively and consistently to the Project workforce;</p> <p>Allow sufficient time and adequate resources for the implementation of this procedure requirements;</p> <p>Foster leadership culture within the Project to provide full support for and promote the IGM procedure.</p>	TBD
HSES REGIONAL MANAGER	<p>Development and assurance of the implementation of the HSE Policies, Sustainability principles, procedures and best practices within the context of the IGM, transversely to Volitalia region;</p> <p>Keeping up-to-date with any changes in IGM regulations and standards;</p> <p>Overseeing, managing, and allocating adequate resources for the implementation of the IGM;</p> <p>Monitor and ensure that the Projects’ IGM objectives are achieved;</p> <p>Ensure the Projects’ IGM requirements and this procedure are communicated to, and implemented by the Projects’ personnel, including the Site Management Team and Contractors /Subcontractors;</p> <p>Liaise with the Lenders on Project IGM performance, to seek alignment between their expectations;</p> <p>Final approval of this procedure and contractors/subcontractors plans/procedures prior to their implementation.</p>	TBD

Project Level – Volitalia Site Management Team		
PROJECT MANAGER	<p>Overall delivery of the Project and HSES performance, and assurance of compliance with budget, schedule, project policies, plans and procedures;</p> <p>Ensure that the necessary resources, authority, information, permits and/or legal documents are provided to enable the execution of Project’s HSES management activities and HSES procedures;</p> <p>Ensure that HSES management issues, including IGM are included in periodic reports to be prepared by the Contractors to be sent to Site Management Team, and also in reports prepared by Site Management Team to be sent to the Project Owner;</p> <p>Submit periodic reports of grievances to the Project Owner.</p> <p>Supervision of the proper implementation of this procedure by the Site Management Team and subcontractors plans/procedures prior to their implementation through regular meetings and review of reports;</p> <p>Designating specific personnel on site or at the administrative level for the implementation of the E&S Management System;</p> <p>Present monitoring data on grievances to Volitalia’s Corporate Level and to the Lender;</p> <p>Liaise with the Project Owner, corporate level HSES team, and Contractors’ top management for implementation of this procedure; and,</p> <p>Follow-up on any grievances and non-Conformities, non-compliance or deviation from the requirements of this procedure.</p> <p>Ensure the guidelines provided by this procedure are adhered to accordingly right through the Project’s lifecycle;</p> <p>Provide the resources necessary for the effective implementation of this procedure;</p> <p>Ensures contents of this procedure are made available to the workers.</p>	TBD

	<p>Convene ad-hoc meetings to be attended by the Project Owner, representatives of Site Management Team and Contractors when grievances are raised or major non-conformance with this procedure has been identified.</p>	
<p>SITE MANAGER</p>	<p>Ensure that all employees adhere to good cooperation, consultation, workplace inspections, information, and instruction, work safely under statutory health, safety, and environmental regulations/legislations; and;</p> <p>Consult with and reports on matters related to grievances directly to the Project Manager and liaise with the Votalia Social Advisor;</p> <p>Support the Votalia Social Advisor and HR Coordinator by giving time off to workers subjected to grievances for interviews or clarification/verification of information;</p> <p>Ensure that new staff on the project holds the required training and understand fully all aspects related to grievances before starting work on the project.</p> <p>Present the IGM to the workforce during the employee induction training sessions and promoted the procedure during the ToolBox Talks.</p> <p>Carry out the role of reminding the personnel present in the induction trainings and toolbox talks that grievance forms can be downloaded or filled out directly on the website (https://sarimaysolar.com/).</p> <p>Delivery of all operational aspects of the Project and day to day management of the site, including oversight of the IGM;</p> <p>Supervise and ensure compliance with the Contractor management requirements at the different phases of the Project (pre-qualification reports, kick off meetings, periodic performance evaluations...);</p> <p>Ensure the dissemination of the updated version of this procedure to all Site workers, including the EPC Contractor and Subcontractors;</p> <p>Collaboration towards and supervision of this IGM's requirements implementation through regular site monitoring visits and EPC Contractor and Subcontractors documentation/reports review;</p> <p>Adoption and implementation of disciplinary actions upon failure to comply with requirements;</p>	<p>TBD</p>

	<p>Ensure that all workers have proper training to implement the requirements of this procedure;</p> <p>Actively participate in the grievance trainings, and grievance promotional campaigns.</p>	
<p>HSES MANAGER</p>	<p>Oversee performance and ensure compliance of the Project with requirements of this Plan through regular meetings with the E&S Site Management Team and review of E&S reports;</p> <p>Ensure that sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities;</p> <p>Work with the EPC Contractor to ensure their ESMS is in-line with the Project ESMS;</p> <p>Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the HSE specialist(s) and providing summary results of such reports to the Project Manager;</p> <p>Bringing Non-Conformities immediately to the attention of the Project Manager and ensuring that action/measures and monitoring activities are carried out timely and adequately according to this procedure's requirements;</p> <p>Programming inspections and audit activities to monitor the correct implementation of this procedure and of the Volitalia Social Advisor/Social Site Supervisor's tasks;</p> <p>Monitor the compliance of the activities by Site Team, Contractors and subcontractors, with the time schedule and conducting regular inspections and audits of the grievances retrieved to identify any non-conformances;</p> <p>Addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to the Project Manager, if necessary, amendments and/or updates to this procedure and issuing procedure revisions;</p> <p>Search for continuous improvement through audits and monitoring of the grievance KPIs and internal processes;</p>	

	<p>Advise and support the Project Manager and Site Manager on matters related to HSES;</p> <p>Develop HSES training and induction schedules and content and deliver the training and induction material such as site induction and toolbox talks, including trainings and campaigns to promote grievances;</p> <p>Review and approve H&S Management documents delivered by the Health & Safety Site Supervisor.</p> <p>Monitor the agreed resolution to grievances and ensure corrective actions for all HSE related aspects.</p> <p>Support the Voltalia Social Advisor/Site Manager/ Project Manager in case of need to clarify/verify grievances relevant to IGM aspects (e.g., safety regulations and standards, unsafe acts, or behaviours that are subject to grievances);</p> <p>Ensure the IGM dissemination to the EPC Contractor and Contractors/Subcontractors;</p> <p>Bringing Non-Conformities immediately to the attention of the Project Manager following grievance resolutions;</p> <p>Addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to the Project Manager, if necessary, amendments and/or updates to this Plan and issuing Plan revisions following grievance resolutions;</p> <p>Search for continuous improvement through audits and monitoring of the IGM KPIs and IGM processes.</p> <p>Support Voltalia Social Advisor with the grievance processing for level 2 and 3, with the objective of reaching a resolution through discussion or negotiation.</p> <p>During the evaluation process, collaborate with the Project Manager to consider all the evidence and meeting with all the relevant parties, in an effort to give the Complainant(s) every opportunity to present their views.</p>	
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	<p>Informally or through mediation. Liaise with the Voltage E&S Corporate Manager, in order to ensure impartiality, will select and agree with the person or company filing the grievance as a third party “mediator.” For this purpose, whenever possible, identify a list of potential mediators (e.g., member of the church, imam, leaders of the community, etc.).</p>	
HSES TEAM (SPECIALISTS)	<p>Provide support to the HSES Manager by providing (upon-request) relevant grievance monitoring data and monitoring reports if required for verification/clarification during grievance process;</p> <p>Be available to discuss required changes or corrective actions during or following grievance cases, and may propose changes and integrations to the monitoring activities which shall be evaluated and approved by HSE Manager and by the Project Manager.</p> <p>Effective execution of the specific tasks assigned in conformity with this procedure and with contractual arrangements;</p> <p>Provide relevant monitoring data and monitoring reports to as indicated in this procedure;</p> <p>Ensure compliance with HSE related grievance requirements are included in the ESMS;</p>	TBD
HR COORDINATOR	<p>Ensure that Contractors comply with the Project IGM through audits, and assessment of Contractor reports;</p> <p>Manage and implement the IGM;</p> <p>Collaborate with the Social Advisor to manage and implement the IGM.</p> <p>Ensure all project personnel, including contractors, are trained on the contents of this procedure;</p> <p>Ensure the workers are made fully aware of the contents of this procedure, including the process for submitting a grievance;</p> <p>Support the Social Advisor by ensuring availability of grievant/Complaint (to attend grievance meetings) and availability of those who are subject to grievance.</p> <p>Mediate in all grievances received by the site through proper channels;</p> <p>Provide all information necessary according to this procedure whenever there is a grievance; and,</p> <p>Collaborate with the Social Advisor to ensure easy, fast and conclusive resolution of grievances.</p>	TBD

<p>SOCIAL SITE SUPERVISOR</p>	<p>Oversee and implementation of this procedure;</p> <p>Collaborate with the Social Advisor/HR Coordinator during Level 2 and 3 grievances;</p> <p>Ensure the correct implementation of the IGM; and,</p> <p>Work with the Social Advisor to address internal grievances through the IGM procedure and ensure corrective action as per the mechanism.</p> <p>Oversee and implement this procedure;</p> <p>Ensure the social components of the Project are compliant with this procedure, permit requirements, local legislation, and Lenders' requirements;</p> <p>Ensure that this grievance mechanism during construction is in line with Lender's requirements and national regulations.</p> <p>Ensure the correct implementation of the stakeholder engagement plan and grievance mechanism;</p> <p>In coordination with the HSE site supervisor, ensure the implementation of the community health and safety management measures including HSE related grievances;</p> <p>In coordination with HR Coordinator, verify that all social measures from this procedures are implemented on site;</p> <p>Address grievances through this procedure and ensure corrective action as per the mechanism;</p> <p>Liaise with local authorities regarding community issues/grievances and refer this back to Project Owner, Project Manager, Environmental Site Supervisor and Social Advisor.</p> <p>Provide regular feedback in the form of progress report(s) (as needed) to the local authorities, specifically as it relates to local employment and economic development investment.</p>	

<p>SOCIAL ADVISOR¹ (Receptor)</p>	<p>Collaborate with the HR Coordinator to manage and implement the IGM;</p> <p>Receive, log and process the complaints/grievances;</p> <p>Contact the Complainant in case further clarification is required;</p> <p>Explain to the Complainant the process and timelines for the remaining steps in the procedure and inform on how the complaint will be handled.</p> <p>Ensure confidentiality of the Complainant from the lodging of a grievance onwards and inform the Complainant that the grievance can also be lodged anonymously should the complainant prefer it.</p> <p>Liaise with the Complainant from the moment the grievance is retrieved (reception) until grievance close-out.</p> <p>Ensure that the complaint/grievance is clearly defined/verified and fully understood without any ambiguity;</p> <p>Communicate/Verify with the Complainant based on the preferred method of communication as specified by the complaint in the grievance form.</p> <p>Update this information into the grievance form and send to the Complainant through an agreed method (e.g., email, fax or similar) for the Complainant to sign and send back. All additions will be explained verbally to the Complainant in this case as well.</p> <p>Complete this examination and investigation in line with the requirements of Section 3.4.2 Investigation process.</p> <p>Identify the root cause of the grievance, investigate if the grievance is correct or not, identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable).</p> <p>In case of high sensitivity grievances, the Social Advisor shall hold the power to escalate the grievance level through:</p> <ul style="list-style-type: none"> - Increased security for the grievant/complainant; - Increased involvement of other main actors (HR Coordinator/E&S Regional Manager); - Increased prioritization of the grievance case; 	<p>TBD</p>
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¹ It is encouraged to have a mix of staff genders and backgrounds to facilitate response to communities in a safe, timely and confidential manner.

	<ul style="list-style-type: none"> - Make decision to deploy a specialised investigator to work on highly sensitive case (e.g., grievances that could affect the Complainant's safety or security); - Fill out/Verify grievance forms and log complaints/grievances including updating the Grievance register; and, - Resolve grievances in a timely manner. <p>Ensure all project personnel, including contractors, are trained on the contents of this procedure;</p> <p>Ensure the community and project-affected stakeholders are made fully aware of the contents of this procedure, including the process for submitting a grievance;</p> <p>Prepare and file all grievance forms;</p> <p>Mediate in all grievances received by the site through proper channels;</p> <p>Provide all information necessary according to this procedure whenever there is a grievance;</p> <p>Ensure easy, fast and conclusive resolution of grievances; and,</p> <p>If grievance is unresolved, the Receptor shall be responsible for helping Complainant identify other avenue to file the grievance externally.</p>	
EPC Contractor/Subcontractors		
EPC CONTRACTOR/ SUBCONTRACTORS	<p>Adhere to the steps provided by this procedure;</p> <p>Create a conducive environment for community to be able to raise grievances without fear or prejudice; and,</p> <p>Ensures that employees are well informed about the IGM and know how to use their rights in case of grievances and during the grievance process.</p>	TBD
All Project workers		
WORKERS	<p>All workers are expected to attend IGM trainings.</p> <p>They must be aware of the IGM and their rights to file grievances,</p>	-

	<p>Have the freedom to choose a representative or a trade union group speak on their behalf if they prefer to remain anonymous.</p> <p>Workers shall be encouraged to raise complaints/grievances during the Project lifecycle.</p>	
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3 GRIEVANCE MECHANISM PROCESS

The Project Management Team shall be responsible for publishing and distributing the grievance mechanism within the AoI, including communicating the grievance mechanism to all personnel and ensuring all stakeholders are aware that the IGM is operational during the Project lifecycle. provide the notification flow during the publication of the grievance mechanism.

Upon reception of the grievance/complaint and subsequent validation of the grievance/complaint submitted, the grievance process will begin with the Social Advisor working closely with the Complainant with the aim of reaching a resolution. For higher severity levels (see section 3.4 for more details) the Project Management Team will be required to support the grievance process in order to reach an acceptable resolution.

provides the notification flow during the grievance process.

Investigation of grievances is undertaken in order to verify the validity of the complaint, determine its causes and develop corrective actions to minimize or avoid recurrence of the causes. If the grievance requires a more thorough investigation, the Complainants will be notified by Voltage's Social Advisor of the process to be followed and who will be the people in charge of investigating.

Depending on the priority level of the issue raised, the actions and accountability of managing every grievance will be different. The **Social Advisor** will perform this process according to the process in **Figure 3-2** and within the timeframe presented Table 2.

The company is obliged to:

- Have a formal grievance procedure in place;
- Ensure that the IGM is operational to effectively handles environmental, social, and occupational health and safety aspects or concerns of the workers and any other applicable stakeholders.
- Communicate the procedure to the worker including the procedure to redress, and/or resort to administrative or judicial procedures.
- Investigate all grievances promptly;
- Treat all employees who file grievances equally;
- Preserve confidentiality at any and all stages of the process;
- Resolve all grievances in a timely manner;
- Respect its no-retaliation policy;
- Make sure the workers understand and support its purpose and the benefits to them; and
- Make sure other stakeholder groups understand why the grievance mechanism is not open to them or their issues and concerns (such as commercial or political disputes) and be informed of the available methods for them to raise their complaints such as the External Grievance Mechanism (doc. Xxx xxxx xxx), the *mahallas* grievance or through Lenders' grievance mechanism.

The Complainant and all stakeholder groups will have the opportunity to file complaints and queries on any aspect of the Project, including any of the following reasons:

- Workplace harassment or discrimination.
- Health and safety related issues or observation (identified unsafe act);
- Supervisor behavior; and,

- Adverse changes in employment conditions, among others.

The grievance management process is illustrated **Figure 3-2** and a detailed description can be found in the following sections.

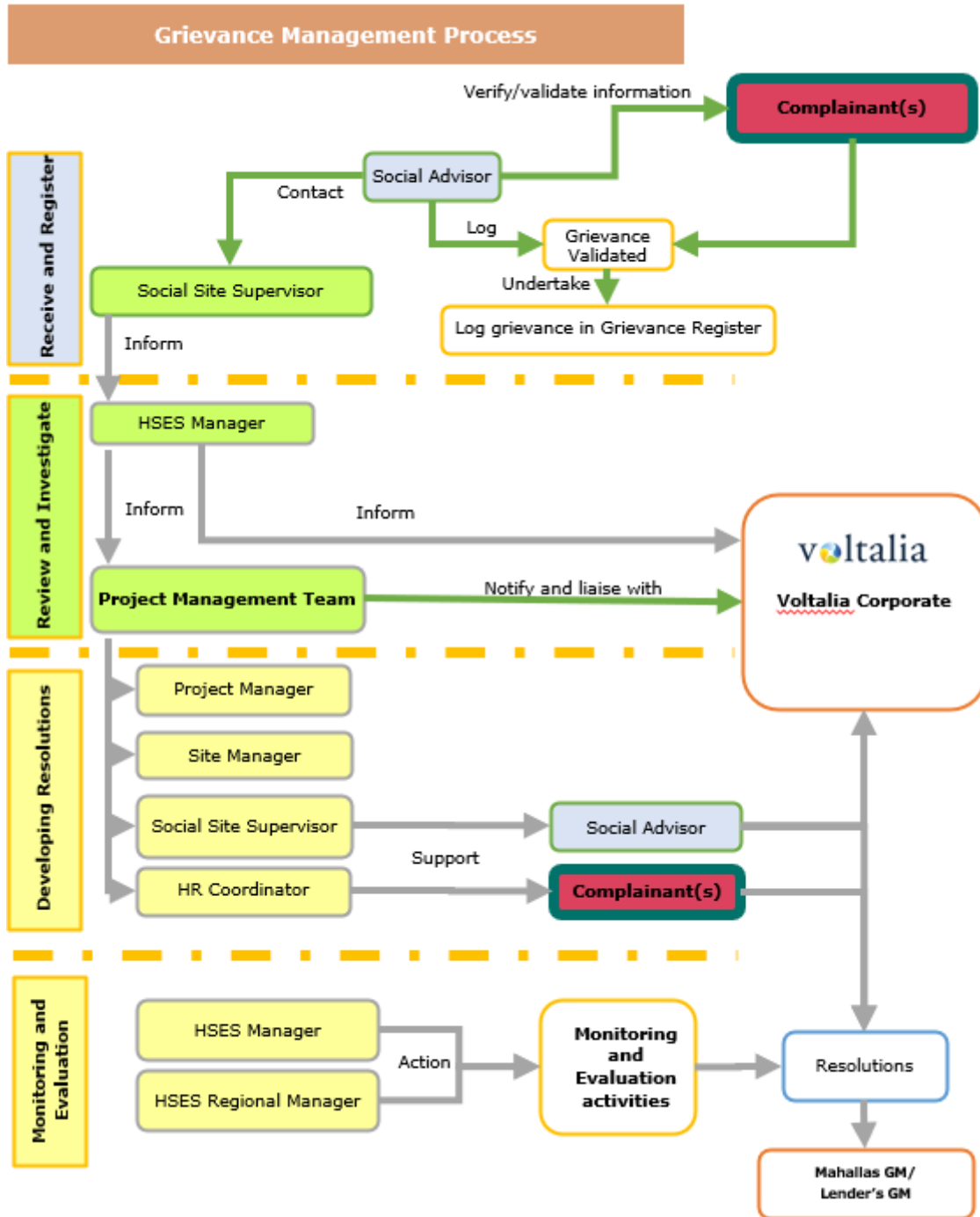


FIGURE 3-1 COMMUNICATION FLOW DURING PUBLICATION OF THE GRIEVANCE PROCESS

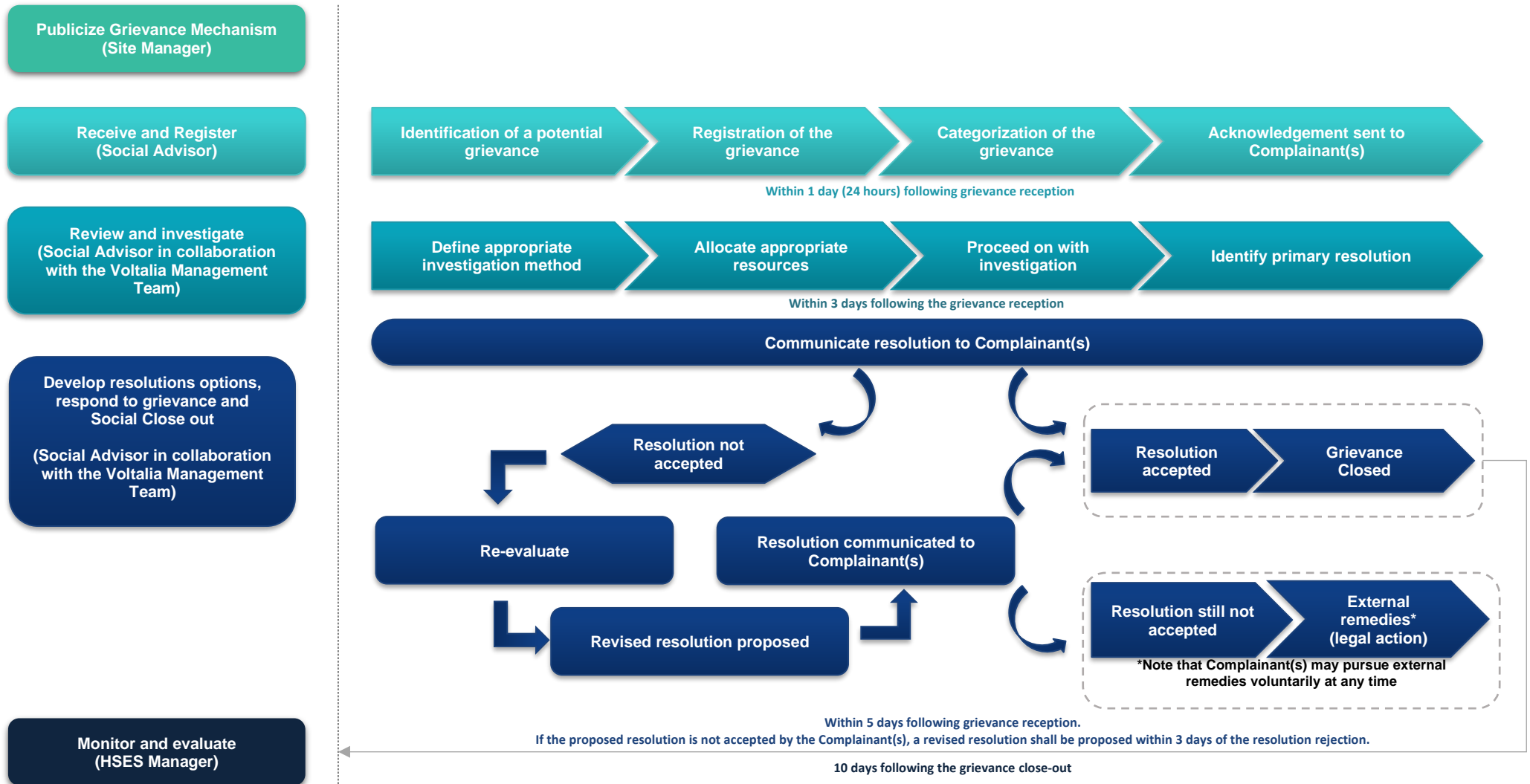


Figure 3-2 - Grievance Management Process

3.1 Grievance Mechanism Publication

The IGM shall be presented to the workforce during the employee induction training sessions and promoted during the ToolBox Talks, which shall be conducted by the **Site Manager**. The grievance forms shall be made available and easily accessible by all personnel. The **Site Manager** shall carry out the role of reminding the personnel present in the induction trainings and toolbox talks that grievance forms can be downloaded or filled out directly on the website (<https://sarimaysolar.com/>)

The following IGM materials shall be present and promoted in all work areas within the Project area and made accessible to all personnel:

- Internal Grievance Mechanism posters that include instructions on how to fill out grievance forms and the timeframe for processing grievances, including the location of the grievance boxes within the Project area; and,
- Information on how to access Grievance Forms (indication of the physical locations and how to access them online from the website).

Information to be shared with the workers includes the following:

- General principles of the IGM;
- What benefits complainants can receive from the IGM;
- When, where, and how workers can file complaints/grievances;
- Who is responsible for receiving and responding to complaints/grievances; and,
- Nature of the response the Complainant can expect, including timing.

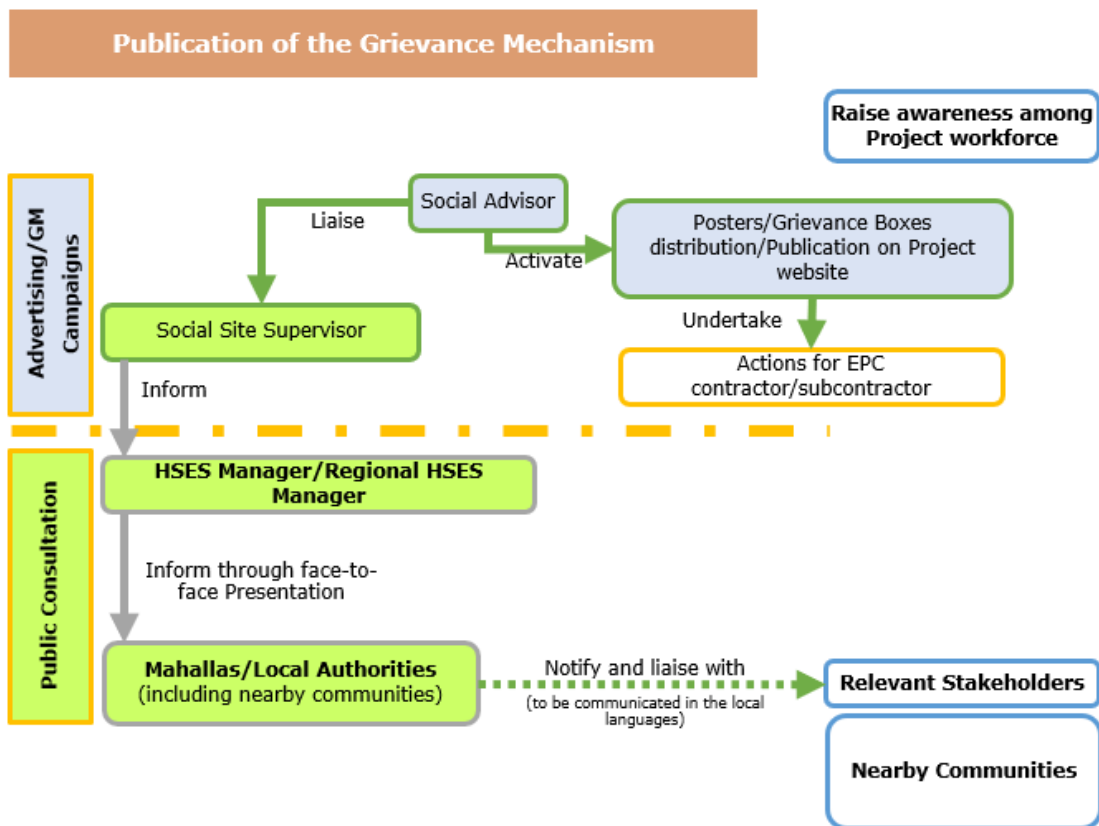


FIGURE 3-3 COMMUNICATION FLOW DURING PUBLICATION OF THE GRIEVANCE MECHANISM

3.2 Grievance Submission and Reception

The IGM is designed to allow and encourage every Project worker to raise grievances irrespective of their literacy level, access to technology, level of seniority or position within the Project hierarchy.

All personnel shall be able to raise grievances in local dialects, Uzbek, Russian or English and anonymously through the submission of a written grievance to be placed in the grievance boxes to be installed within the Project Site and the accommodation areas. The Complainants shall be able to submit the grievance through the following methods:

- Grievance box: In order to allow anonymous grievances, sufficient grievance boxes shall be installed throughout the Project Site including all access points, workers camp or workers lodging premises, if applicable, and related facilities. The location of the grievance boxes shall be discrete and away from all surveillance cameras.
- E-mail: Email addresses for Votalia grievance management staff will be outlined on the information boards: sarimay@votalia.com
- Mailing Address (Letter): **TBD**
- In-person submission: directly at the Social Advisor's office
- SMS: to the dedicated GM of Sarimay solar park: +998933161631;
- Phone number: to the dedicated GM of Sarimay solar park: +998933161631;
- Company's website: The IGM will be published on the Sarimay Solar website (www.Sarimaysolar.com) and the grievance form can be accessed, downloaded and submitted through the grievance form submission, which is available on the website.
- Verbally: This shall be done to the HR Coordinator, Social Advisor, Site Manager or corresponding contractor.

3.3 Grievance Registration

Upon reception of the grievance form or grievance by other forms as indicated in section 3.2 above, the Social Advisor shall register the grievance immediately (with one day or 24 hours) in the Grievance Register [**Annex 5 – Grievance register**] according to timeframe indicated in the Table in section 3.7.

The Grievance Register shall be a Microsoft Excel file or equivalent, which shall be used for logging, tracking and managing the complaints/grievances. This will assist in tracking the overall trends and patterns in grievances, allowing emerging issues to be flagged and understood at an early stage. The information or data collected shall be updated online via the Votalia corporate Grievance Management Tool, which is available and active throughout the Project lifecycle.

The Receptor (Social Advisor) shall ensure confidentiality of the Complainant from the lodging of a grievance onwards. Only those directly involved in the examination process will be provided with the grievance's details. Sensitive information will only be disclosed upon users' knowledge and approval. In case of any emergency, the person who is in the site (employee of the company or contractor/subcontractor) should call the Social Advisor who is in charge of processing the internal grievance.

The Social Advisor can contact the Complainant if:

- The information provided is unclear or lacks the necessary description/details; and,
- The information provided needs further clarification/verification for validation purposes.

Upon retrieval of the updated/verified information, the Social Advisor shall send the Complainant (via the preferred and agreed method of communication) the revised/updated grievance form to be signed and accepted by the Complainant with a signature, which will be validated by the Social Advisor.

Upon successful identification and validation of the grievance received, the Social Advisor shall proceed to logging the complaint/grievance and initiate the grievance process.

3.4 Grievance Categorization

In order to define the investigation methods, Voltage Social Advisor needs the following information about the grievance retrieved:

- Grievance category; and,
- Priority level.

Upon reception and registration, the grievance will be assessed and classified by the Social Advisor as follows:

- **IG0:** Request for information or clarification on the following (but not limited to) infrastructure, construction site, personal relations, contractual rights, customary rights or human and labour rights, including topics not directly related to the Project;
- **IG1:** Questions / concerns (any concern, unhappiness, or discontent that a worker might have in the workplace or related to accommodation conditions);
- **IG2:** Requests / Petitions; and,
- **IG3:** Complaints (includes but not limited to pay and benefits, bullying, work conditions and discrimination).

All grievances will then be given a priority levels (low, medium and high) defined according to the following criteria:

Category	Description
Low	Concern, claim or grievance regarding lack of information or unclear information provided.
Medium	Concern, claim or grievance from the workers (individual or as a group) that could compromise the projects development at medium term.
High	Concern, claim or grievance involving the workers, collective group of workers and: <ul style="list-style-type: none"> • Breach of the Code of Conduct • Reports a breach to human rights; • Reports a breach to the labour law; • Relates to a legal non-compliance; Pose a short-term risk to the project continuity.

The initial review, classification and validation of grievances received will be performed by the Social Advisor identifying and categorizing the grievances according to their severity levels as defined in Table 1 below, which reports the grievance severity level matrix based on the grievance categories against the grievance priority levels.

TABLE 1: GRIEVANCE SEVERITY LEVEL.

Grievance Category \ Priority Level	Low	Medium	High
	IGM0	Level 1	Level 1
IGM1	Level 1	Level 1	Level 1
IGM2	Level 1	Level 2	Level 2
IGM3	Level 1	Level 2	Level 3

Based on 3.4 Grievance Categorization, the Social Advisor shall define the appropriate grievance investigation methods through the above matrix.

The investigation methods are defined as follows:

- **Level 1** grievance requires the Social Advisor to respond to employees' Request for Information (RfI) or Request for Clarification (RfC), which can be quickly addressed with an official dispatch of a written letter.
- **Level 2** grievance includes concern, claim or discontent expressed by Complainant(s) (individual or as a group) that could compromise the projects development at medium term. Such grievances require the Social Advisor to inform the Project Manager immediately about the potential Level 2 grievance and start collaborating with the Social Site Supervisor/Site Manager and HR Coordinator resolve the issues in a timely manner. Such level could involve grievance meetings to resolve or meet the request of the Complainant(s).
- **Level 3** grievance entails high priority level that could involve disciplinary cases or the need for deeper or extended investigative activities such as:
 - o The need to involve witnesses;
 - o The need to use of CCTVs and other media as proof of evidence; and,
 - o The potential psychological impacts on the Complainant/grievant and the person being investigated, internal and external resources (Site Manager/HR Coordinator/Social Site Supervisor/Corporate level competencies/External Investigator) might need to be mobilized.

3.5 Grievance Acknowledgement

All incoming grievances will be acknowledged according to Figure 3-2 and the timeframe presented in Table 2 below of grievance reception. The Complainant shall be shared an acknowledgement form via SMS or email as soon as the Receptor (Social Advisor) opened the complaint/grievance. When grievances are submitted in person, the acknowledgement form will be provided to the Complainant immediately using the form presented in **Annex 1**.

The acknowledgement form shall include:

- Formal confirmation, date and a complaint number;
- Name and Title of the Complainant;
- Name of the person who received the complaint;
- Contact details including phone number in case the complainant has any question; and,
- Brief description of the process and timelines for the remaining steps.

3.6 Review and Investigation

3.6.1 Definition of Investigation Methods

Upon completion of the Grievance Acknowledgement step (under Receive and Register grievance) as reported above, the Social Advisor shall start reviewing and investigating the grievance through the following the steps as indicated below:

- **Define appropriate investigation methods** as described in this subsection 3.6.1;
- **Allocate appropriate resources** (in case of high priority grievance requiring additional resources/expertise) as described in subsection 3.6.2;
- **Proceed with the investigation** as swiftly, confidentially and effectively as possible as described in subsection 3.6.3; and,
- **Identify primary resolution** (as priority) as described in subsection 3.6.3.

3.6.2 Allocation of Appropriate Resources

A **Level 1** grievance case only require the review of the information to be provided by the Complainant(s) before proceeding to response and/or grievance resolution, which can be completed by the Social Advisor without intervention from other figures within the Management.

For **Level 2** and **Level 3** grievance cases, the Social Advisor may require additional support. As such, the Social Advisor shall have the option to consider mobilizing additional resources (usually higher up the Organizational Chart and external expertise (if needed a third party can be included) to during the grievance review and investigation process. For this level of grievance, **Volitalia E&S Manager** refers to **Volitalia E&S Corporate Manager** would be included in the grievance process.

3.6.3 Investigation Procedures

The Volitalia Social Advisor, upon definition of the grievances and consideration of additional resources (if needed), shall carry out the investigation according to the correct investigative methods based on the grievance levels.

Level 1:

- Review information to be provided before proceeding to response and/or resolution
- A unilateral approach would be considered.

Level 2:

- Seek advice internally before proceeding to respond and/or finding resolution(s)
- A bilateral approach would be considered.

Level 3:

- Seek advice internally (e.g., Site Manager/HR Coordinator/Project Manager) from Volitalia Company Management
- If necessary, form an investigation team to collect evidence on the grievance and come up with a status report.
- In instances when impartiality is important or complex technical matters are involved, the Social Advisor shall seek support from the Site Manager/HR Coordinator/Project Manager to designate third-party experts to investigate the complaint/grievance before circumstances could change or escalate to a conflict impacting the Project's continuity.

Conduct meetings with the Complainant(s) and visit the site before proceeding to respond and/or find resolution(s).

In coordination with the relevant personnel, the Social Advisor will analyze the root cause of the grievance, investigate if the grievance is valid or not, identify the required actions to be implemented in order to deal with the issue and identify the timeline for their completion (if applicable). This will include any personnel from the Company, EPC Contractor, subcontractors, or supplier staff as applicable and depending on the nature of the complaint/grievance. The relevant personnel will be promptly contacted to seek their cooperation during the investigation with the aim to resolve the grievance.

For other more complex grievances, a third party(ies) shall be involved in the investigation as applicable. Specific examples on this includes the following:

- Grievances that entail safety concerns such as personal threats might require the involvement of local Police;
- Grievance against the management team or the Project activities; and,
- Grievances that entail unsafe work behavior that resulted in personal injury.
- Grievances involving work-related concerns involving maltreatment, workplace harassment, discrimination and gaslighting etc.

If the Complainant/grievant refuses to attend formal grievance meetings, they should be entitled to having a representative attend the meeting instead (e.g., a staff representative or an external figure from the Trade Union).

3.6.4 Identification of Primary Resolution

The Social Advisor shall keep the Complainant informed of the grievance process and liaise with the senior figures within the organization to identify resolutions.

Grievance may be resolved through the following resolutions:

- Reach an agreement with the Complainant(s) through informal channels (informal meetings/discussions between the Complainant(s) and the senior figure within the Organization.
- Reach an agreement with the Complainant(s) through formal channels (through IGM procedures as indicated in the following section 3.7).

3.7 Grievance Response

Resolution process will adapt to the type of complaint/grievance and to the Complainant/grievant as well. Grievance resolution approaches are defined here below:

Approach	Description
Unilateral	Social Advisor shall address the source of the problem in liaison with the relevant project team (e.g., conducting an assembly to highlight issues that have been captured/detected).
Bilaterally	Voltalia E&S Manager refers to Voltalia E&S Corporate Manager and the complainant, reaching a resolution through discussion or negotiation. As during the evaluation process, Voltalia E&S Manager and Project Manager are committed to considering all the evidence and meeting with all the relevant parties, in an effort to give the Complainant(s) every opportunity to present their views.
Through a third party	Informally or through mediation. The Social Advisor shall involve Voltalia E&S Manager refers to the Voltalia E&S Corporate Manager who, in order to ensure impartiality, will select and agree with the person or company filing the grievance as a third party “mediator.” For this purpose, whenever possible, Voltalia E&S manager should identify a list of potential mediators (e.g., member of the church, imam, leaders of the community, etc.).

Voltalia E&S Manager shall perform this resolution process and the **Social Advisor** shall inform the Complainant about the development in writing and verbally if required, including the grievances resolution status, which could be:

- 1) **Preliminary:** resolution aims at informing the Complainants about the assessment and/or status of their claim; or,
- 2) **Conclusive:** resolution aims at communicating a decision (including rationale) and ask for complainant’s agreement to close out the claim (refer to **Annex 3**)
- 3) **Non-conclusive:**
 - 3.1. If the Complainant(s) is not likely to be satisfied with the outcome of the preliminary resolutions, the **Social Advisor** shall invite the Complainant(s) to collect additional evidence, obtain additional arguments, conduct further investigations and clarify the company’s position. **Voltalia E&S Manager** could get direct support from **Voltalia Country Manager, Voltalia E&S Corporate Officer, Voltalia Head of Projects and/or the Director**.
 - 3.2. If Complainant(s) is not satisfied with the outcome of a conclusive resolution, Voltalia will appeal to external dispute-resolution mechanism (extra-legal party).

The proposed solutions to the grievance shall be communicated to the Complainant(s).

All responses to the Complainant(s) shall be preferably in writing, although a verbal response may also be provided where appropriate.

The resolution timeframe will also be communicated to the Complainant(s). The **Social Advisor** will also communicate the summary of what is planned and when it is likely to be implemented,

or an explanatory note clarifying why action is not required. Feedback from the Complainant(s) will be requested.

The Social Advisor will prepare a grievance resolution form as [Annex 2 – FORM 2: Grievance Resolution Form], which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance along with the timeline for their completion. The Grievance resolution form will be submitted within five (5) days of the grievance reception.

In the case the grievance resolution form identifies proposed actions to be implemented, the Social Advisor will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form. The actions in specific should be registered and included within the [Annex1 – FORM 1: Grievance Register]. The Social Advisor will contact the Complainant(s) once such actions are completed in accordance with the preferred method of communication specified.

Upon resolving the grievance, a grievance Closeout form as provided in [Annex 3 – FORM 3: Grievance Closeout Form] will be prepared to be signed off by the Social Advisor and the Complainant(s) who will provide the details of the solution that was implemented to resolve the grievance.

Any further response from the Complainant(s) will be recorded to help assess whether the grievance is closed or whether further action is required. The Social Advisor will use appropriate communication channels to confirm whether the Complainant(s) has understood the proposed solution and is satisfied with the response. This communication will also be recorded in the grievance register.

If the Complainant(s) accepts the proposed resolution, the agreed actions are implemented. Such resolutions are recorded in the Grievance Register with supporting documentation. Hence, the grievance will be then formally closed out.

If the grievant 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 redressal mechanism are explored. The company will be open to follow other avenues as follows:

1. Grievance shall be escalated to Voltage HQ;
2. If no resolution is reached after 1., the unresolved grievance shall be brought up in a dedicated discussion between Voltage HQ, EPC Contractor and the relevant Contractor/Subcontractors with the view to provide the best available solutions;
3. Should no solution be reached through the approaches mentioned above, complainants will have an option to involve a further extra-legal yet credible third party. The company will always be cooperative to find the best solution for the project and for the person filing the complaint. In any case, the right solution will be sought.
4. If the complainant is still not satisfied with the proposed resolution, the grievant will be allowed to take the dispute resolution mechanism outside of the company grievance redressal mechanism in accordance with National Regulatory Framework and escalate it to the Level 3 bringing the case to the Court of Law.

When corrective actions are agreed upon by Voltage and the Complainant, the responsible manager will be responsible for ensuring corrective actions are implemented. The **Social Advisor** shall inform the Complainant on the progress of corrective actions being implemented. If no further attention is required, then the **Social Advisor** shall close the grievance and record this in the Grievance Register log.

3.8 Grievances Processing Timing

The timeframes for all the steps involved in the grievance resolution are detailed below:

TABLE 2: GRIEVANCE PROCESSING TIMES.

Grievance Level	Action	Accountable	Investigation Time	Registration time	Acknowledgment time	Resolution Time	Social Close out time
High	<ul style="list-style-type: none"> Seek advice internally from Voltalia Company Management If necessary, form an investigation team to collect evidence on the grievance and come up with a status report. In instances when impartiality is important or complex technical matter are involved, designate third-party experts to investigate complaint before circumstances change or conflict escalates. Conduct meetings with complainants and visit the site before proceeding to response and/or resolution. 	Social Advisor E&S Manager	3 days from reception	1 working day	1 day from reception	5 days from reception	10 days from reception
Medium	<ul style="list-style-type: none"> Seek advice internally before proceeding to response and/or resolution. 	Social Advisor	3 days from reception	1 working day	1 day from reception	5 days from reception	10 days from reception
Low	<ul style="list-style-type: none"> Review information to be provided before proceeding to response and/or resolution. 	Social Advisor	3 days from reception	1 working day	1 day from reception	5 days from reception	10 days from reception

4 REVIEWING AND MONITORING THE GRIEVANCE MECHANISM

In an effort to measure the effectiveness of the grievance mechanism and the efficient use of its resources, the IGM will be regularly monitored and evaluated by the **HSES Manager** and **HSES Regional Manager** based on the Complainants' satisfaction (resolution acceptance rate), the non-recurrence of the aspect that prompted the grievance in the first place, and the absence of recourse to external remediation process by the Complainant(s).

Reviewing and monitoring the grievance mechanism will help identifying common or recurrent grievances that may require structural solutions or a policy change and enabling Voltalia to capture improvement opportunities and any "lesson learned" while assessing grievances.

The grievance mechanism efficiency will be assessed based on the following KPIs:

TABLE 3: KPIs TO MONITOR THE IGM'S EFFICACY

Performance Indicator	Limits / Objective to achieve
Number of grievances communicated / logged (including HSES related grievances)	Achieve over 50% percentage of grievances coming from the Project workforce
Proposed resolution rate	A resolution was proposed to all Complainants
Timing for grievance resolution	All grievances receive a resolution proposition within the defined timeframe
Resolution acceptance rate	Proportion of resolution accepted and considered satisfactory by the complainant following the resolution evaluation process
Recourse to external remedy system	Number of complaints not solved though the IGM going to administrative, judicial or third-party remedy systems.
Grievances are properly recorded and followed through	All grievances are registered and addressed within the agreed or predefined timelines.
The grievance mechanism for submitting comments and complaints, on the website and on information boards are properly published and advertised	Grievance publication and collection are distributed throughout the Project Site including the accommodation camp.

ANNEX 1 GRIEVANCE REGISTRATION FORM

LOCAL GRIEVANCE/CONCERN FORM 1

GRIEVANCE REGISTRATION FORM AND ACKNOWLEDGMENT

Project name		Region	
Grievance reference		Date (dd/mm/year)	
Complainant name			
Complainant phone number			
Complainant address			
Complainant e-mail			
Complaint/Concern detail	<i>Attach relevant documents and supporting evidence</i>		
Complainant expectations for Grievance resolution			
Complainant signature		Date	
Signature of Voltalia representative		Date	
Signature of EPC Contractor Representative (if applicable)		Date	
Name of Subcontractor Representative (if applicable)		Date	
<i>Please detach the section here above and give the original to the complainant</i>			
FEEDBACK ACKNOWLEDGEMENT RECEIPT			
Project		Region	
Grievance reference		Date	

Complainant name		Name of Voltage representative	
		Name of EPC Contractor Representative (if applicable)	
		Name of Subcontractor Representative	

This receipt is to certify that your complaint has been registered and will now be examined by Voltage.

The project team commits to contacting you within 3 days of this acknowledgement. Questions can be shared with Voltage using the following contacts:

- Environmental and Social Advisor contact details: Zukhra Sharipova, Sharimay@voltage.com, tél : XXX

ANNEX 2 GRIEVANCE INVESTIGATION AND RESOLUTION FORM

LOCAL GRIEVANCE FORM 2

INVESTIGATION AND RESOLUTION FORM

Project name		Region	
Grievance reference		Date (dd/mm/year)	
Complainant name		Examiner name	
Meeting notes			
Investigation findings			

Proposed resolution			
Examiner signature			
For internal use only			
Amendments			
Signature of HSES Manager		Date	
Signature of Project Manager		Date	

ANNEX 3 GRIEVANCE CLOSE OUT FORM

LOCAL GRIEVANCE FORM 3

GRIEVANCE CLOSE OUT FORM

Project name		Region	
Grievance reference		Date (dd/mm/year)	
Complainant name		Examiner name	
Voltalia response			
	Action(s)	Deadline for implementation	

Actions resolution for				
This section is completed upon completion of all agreed actions.				
Action implementation date				
Action satisfactory to the complainant	Yes No	Outcome satisfactory to the complainant	Yes No	
Complainant signature		Examiner signature		
Additional observations				
Complainant signature on complaint Closing date		Examiner signature on complaint closing date		

ANNEX 4 INTERNAL GRIEVANCE POSTER

Solar Farm
Sarimay
100 MW

			
250 GWh annual production	200 000 solar modules	60 000 homes with clean energy	100 000 tons of CO ₂ emissions avoided

voltalia

 **MINISTRY OF ENERGY**
of the Republic of Uzbekistan

 **MINISTRY OF ECONOMY AND
FINANCE OF THE
REPUBLIC OF UZBEKISTAN**

 **JSC UZBEKISTAN
ELECTRIC GRID**

 **wsp**
WSP CONSULTING

 **NBT**
NATIONAL BATTERY TECHNOLOGY

 **UzAssyem**
UzAssyem

ANNEX 5 - Grievance Register

Ref No.	How was Grievance was received (website or other channels)	Date of Submission of Grievance	Location (origin) of the Grievance	Name and Contact Information	Preferred means of communication	Description of Grievance	Severity Level	Department/Person Responsible for Resolution	Status (Resolved?)	Actions Taken to Resolve the Grievance	Date of Communication of Solution	Has grievance been resolved (Y/N) if not explain why	Has grievance been repeated (Y/N)