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Sarimay External Grievance Mechanism

External Grievance Mechanism-EGM-XXX
Sarimay Solar - Uzbekistan



RESPONSIBILITIES

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REVIEW HISTORY

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1 INTRODUCTION

1.1 Scope and applicability

This External Grievance Mechanism (EGM) procedure applies to the Sarimay 100 MW Solar Project's (The Project's) design, construction, operation and maintenance activities. It includes the grievance procedures for processing external grievances filed by any Affected Person (AP), Affected Community (AC) and stakeholder that wishes to file complaints/grievances or raise concerns, claims or suggestions regarding the Project activities. and allow for their timely resolution. on the Project's footprint (within and beyond the Social Area of Influence (Aol)¹.

This EGM procedure is fully aligned with the Stakeholders Engagement Plan (SEP), Health, Safety, Environmental and Social (HSES) Management Plan (MP), Community Health, Safety and Security Management Plan (CHSS MP) and ensures that all the relevant and interested stakeholders, the ACs/APs as well as any marginalized, disadvantaged or vulnerable groups, hereinafter "the Complainant(s)," are 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 or group through the submission of an official grievance form (distributed to all local shops and petrol stations), e-mail, letter, SMS or the website, which will be duly retrieved, processed and resolved within the agreed timeframe.

This EGM applies to the Project, Volitalia, the Engineering, Procurement and Construction (EPC) Contractor and their Subcontractors. These entities shall adopt and implement the EGM and ensure the correct implementation at their respective levels of management during the Construction Phase.

1.2 Objectives

The main goals of the EGM are to ensure the free submission and timely redress of grievances and concerns submitted by project affected persons, as well as to resolve grievances at the Project level, including:

- To identify and manage stakeholder concerns and thus support effective risk management;
- To prevent adverse consequences of failure to adequately address grievances; and,
- To build and maintain trust with all stakeholders.

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 EGM shall be adopted and implemented at the earliest stage and preferably prior to the Project initiation according to Good International Industry Practice (GIIP).

The EGM will be established at the project level, considering applicable international standards and the local legislation on the resolution of grievances, and ensuring that all Acs/Aps are provided with timely resolution of the complaint/grievance that have been raised as a result of the Project's activities. All individuals and legal entities within the Social Aol shall be fully informed of their rights and procedures to address grievances.

This document is considered part of the ESMS that will be implemented during the construction and operations phase of the Project. It provides a clear process for addressing any actions and

¹ According to the ESIA, the Social Aol is an area with a radius of 5 km that includes all the social receptors.

decisions that violate the rights and legitimate interests of the citizens affected by the Project, hereinafter the ACs/APs within the Social AoI and beyond.

1.3 Principles

The EGM shall adhere to the principles outlined in the IFC performance standards, EBRD performance requirements and other Voltage management plans and policies among them the Voltage HSE and Sustainability policies and Voltage Code of Conduct.

Participation in the grievance mechanism is voluntary and free and shall allow for anonymous grievances.

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

- **Proportionality:** a mechanism scaled to the potential risks and adverse impacts that the Project may impose on affected communities. 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 segments of the affected communities at no cost to them. Grievances may be received face-to-face, via telephone, website inquiries, email, post or grievance boxes to be placed at the site access points. 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 stakeholders.
- **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 time, independently of the project level grievance mechanism.

1.4 National regulations and national standards

This EGM is developed for the Sarimay Solar Project and is fully compliant with the following EBRD's 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, which is further described below.

Recently, the Government of Uzbekistan (GoU) has been working to strengthen engagement with citizens and 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.
- **About Measures to Improve the Status of Mahallas in Work Related to Citizens' Problems** (No. 5700, from April 2, 2019). Establishes an interaction model, mahalla>sector>public reception >mahalla, for receiving, publicizing, and addressing citizens' queries, problems, and grievances.
- **About Additional Measures to Ensure the Rule of the Constitution and Law, Strengthening Public Control and Increasing Legal Culture in Society** (No. 4551, from December 13, 2019), requires that after March 1, 2020, any landscaping, construction, or reconstruction work first be discussed with the public in a citizen-engagement process and be reviewed by public expertise. NGOs will provide another layer of public control through the Council for the Development of Civil Society, under the president, in collaboration with the Center of Civil Society Development and the National Association of Nongovernment and Noncommercial Organizations, which will, by March 1, 2020, develop an integrated program to establish a modern system of public control in each field and sector. In 2019, the GoU strengthened the role of the National Commission on Combatting Human Trafficking and Forced Labor and adopted resolutions criminalizing child and forced labor.²
- **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 listed as follows:

² Ministry of Economic Development and Poverty Reduction (MoED), 2020, Grievance Redress Mechanism Manual

- Voltalia Ethics Guide, Code of Conduct, EPC Contractor and Subcontractors' Management Procedures, Environmental, Social, Health, and Safety (ESHS) Policy and specific workplace safety policies and sustainability policies; and,
- Addressing Grievances from Project Affected Communities (IFC, September 2009).

2 DEFINITIONS, ACRONYMS AND RESPONSIBILITIES

2.1 Definitions

Term	Definition
Project Representative(s)	Any person(s) working for or on behalf of Voltalia or the Project (including EPC Contractor/Subcontractors) who may be subject to grievance or complaint against them from any local stakeholder.
Complainant(s)	Person making a formal complaint or grievance against the Sarimay Solar Project. As noted earlier, this mechanism is applicable to any Affected Person(s), Affected Community(ies) and external stakeholder group(s) that have raised/filed grievance(s) during the entire lifecycle of the Project. This includes but is not limited to national / regional governmental entities, local communities, Project Affected Persons (PAPs), Non-Governmental Organizations (NGOs), media, research and academic institutions, and other.
Grievance	A grievance is a concern or complaint raised by an individual or a group within communities affected by company activities or operations. Both concerns and complaints can result from 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, etc.) will be recorded on a grievance log sheet by the SOCIAL ADVISOR as provided [REG 1: Grievance Register].
Stakeholder(s)	Stakeholders are persons or groups who are directly or indirectly affected by this project, as well as those who may have interests in this project and/or the ability to influence its outcome, either positively or negatively. Stakeholders are all interested individuals/groups including but are not limited to locally affected communities or individuals, national or local government authorities, project workers including those employed by the subcontractors.

2.2 Acronyms

Acronym	Description
AC	Affected Community
AoI	Area of Influence
AP	Affected People
CHSS MP	Community Health, Safety and Security Management Plan
EBRD	European Bank for Reconstruction and Development
EGM	External Grievance Mechanism
EPC	Engineering, Procurement and Construction
E&S	Environmental & Social
ESHS	Environmental, Social, Health, and Safety
FGD	Focus Group Discussion
GIIP	Good International Industry Practice
GM	Grievance Mechanism
GoU	Government of Uzbekistan
HQ	Headquarters
HSES MP	Health, Safety, Environment and Social Management Plan
IFC	International Finance Corporation
KII	Key Informant Interview
KPI	Key Performance Indicator
NGO	Non-governmental Organisation
RfC	Request for Clarification
RfI	Request for Information
SEP	Stakeholders Engagement Plan

2.3 Roles and Responsibilities

ROLE	ACCOUNTABILITY	Contact details
Voltalia – Corporate Level		
Business Line Manager	<ul style="list-style-type: none"> ■ Ensure the Project EGM requirements are communicated and implemented effectively and consistently to the Project’s relevant stakeholders; ■ Allow sufficient time and adequate resources for the implementation of this procedure requirements; ■ Foster leadership culture within the Project to provide full support for and promote the EGM procedure. 	TBD
HSES Regional Managers	<ul style="list-style-type: none"> ■ Development and assurance of the implementation of the HSE Policies, Sustainability principles, procedures and best practices within the context of EGM, transversely to Voltalia region; ■ Keeping up-to-date with any changes in EGM regulations and standards; ■ Overseeing, managing, and allocating adequate resources for the implementation of the EGM; ■ Monitor and ensure that the Projects’ EGM objectives are achieved; ■ Ensure the Projects’ EGM requirements and this procedure are communicated to, and implemented by the Projects’ personnel, including the Site Management Team and EPC Contractor/Subcontractors; ■ Liaise with the Lenders on Project EGM performance, to seek alignment between their expectations; ■ Final approval of this procedure and EPC Contractor/subcontractors plans/procedures prior to their implementation. 	TBD

Project Level – Votalia 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 are included in periodic reports to be prepared by the Contractor/Subcontractors 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 to the Project Owner.</p> <p>Cooperate with Project Owner to obtain necessary permits and/or legal documents for the Project, if necessary.</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 to Votalia’s Corporate Level and to the Lender;</p> <p>Liaise with the Project Owner, corporate level HSES team, and Contractor/Subcontractors’ 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:</p> <ul style="list-style-type: none"> - Provide the resources necessary for the effective implementation of this procedure; 	TBD

	<ul style="list-style-type: none"> - Is available for any consultation by the E&S Manager/Social Advisor whenever necessary; and, - Ensures contents of this procedure are made available to the community and all affected groups. 	
<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 Social Advisor;</p> <p>Support the Social Advisor and HR Coordinator by giving time off to workers subjected to external 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 EGM 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 EGM;</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 EGM'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>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>TBD</p>

<p>HSES Manager</p>	<p>Oversee performance and ensure compliance of the Project with requirements of this procedure 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 HSES 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 Social Advisor/Social Site Supervisor's tasks;</p> <p>Monitor the compliance of the activities by Site Team, EPC Contractor 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>TBD</p>
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	<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 Social Advisor/Site Manager/ Project Manager in case of need to clarify/verify grievances relevant to EGM aspects (e.g., safety regulations and standards, unsafe acts, or behaviours that are subject to grievances);</p> <p>Ensure the EGM dissemination to the EPC Contractor and 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 EGM KPIs and EGM processes.</p> <p>Support the 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> <p>Informally or through mediation. Liaise with the Volitalia 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>	
<p>HSES (SPECIALISTS)</p> <p>TEAM</p>	<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>TBD</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 HSES 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 HSES related grievance requirements are included in the ESMS;</p>	
HR COORDINATOR	<p>Ensure that EPC Contractor/Subcontractors comply with the Project EGM through audits, and assessment of Contractor reports;</p> <p>Manage and implement the EGM;</p> <p>Collaborate with the Social Advisor to manage and implement the EGM.</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
SOCIAL SUPERVISOR	<p>SITE</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 EGM;</p>	TBD

	<p>Work with the Social Advisor to address grievances through the EGM 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 procedure 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, and,</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 ADVISOR³ (Receptor)</p>	<p>The Social Advisor shall:</p> <p>Receive, log and process the complaints/grievances;</p> <p>Contact the Complainant in case further clarification is required;</p>	<p>TBD</p>

³ It is encouraged to have a mix of staff genders and backgrounds to facilitate response to communities in a safe, timely and confidential manner.

	<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 Manager/E&S Regional Manager); - Increased prioritization of the grievance case; - 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 EPC Contractor/Subcontractors, are trained on the contents of this procedure;</p>	
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	<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>		
E&S MANAGER	REGIONAL	<p>Provide support to the E&S Manager/Social Advisor for the implementation of this procedure;</p> <p>Whenever a grievance is raised, be part of the resolution team;</p> <p>During induction of new workers ensure the contents of this procedure are made clear to all.</p>	TBD
EPC Contractor/Subcontractors			
CONTRACTORS/ 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.</p> <p>Ensures that employees are well informed about the EGM and know their rights in case of grievances (external grievances against them) and during the grievance process.</p>	TBD
All Workers			
Workers		<p>All workers are expected to attend EGM trainings.</p> <p>They must be aware of the EGM process and their rights (time off and other considerations) in case of grievances/complaints filed against them; and,</p> <p>Have the freedom to choose a representative or a trade union group speak on their behalf if they prefer to remain anonymous and get the support from their supervisors and management during the grievance process (which could affect work performance).</p>	

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 APs/Acs and other interested stakeholders, and ensuring the EGM is operational and effective throughout the Project lifecycle. Figure 3-3 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.

Figure 3-1 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 Voltalia'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. **Voltalia's Social Advisor** will perform this process within the timeframe presented in Table 1, below.

The company is obliged to:

- Have a formal grievance procedure in place;
- Ensure that the EGM is operational to effectively handles environmental and social, and community health and safety aspects or concerns of the workers and any other applicable stakeholders.
- Communicate the mechanism to all relevant external stakeholder including the procedure to redress, and/or resort to administrative or judicial procedures.
- Investigate all grievances promptly;
- Preserve confidentiality at all stages of the process;
- Resolve all grievances in a timely manner;
- Respect its no-retaliation policy;
- Make sure the APs/ACs understand and support its purpose and the benefits to them; and
- Make sure other stakeholder groups, such as the workers 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 *mahallas* grievance or through Lenders' grievance mechanism.

The APs/ACs and all stakeholder groups will have the opportunity to file complaints/grievances on any of all aspects related to the Project that could have a negative/positive impact on their personal lives or the livelihood of their communities.

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

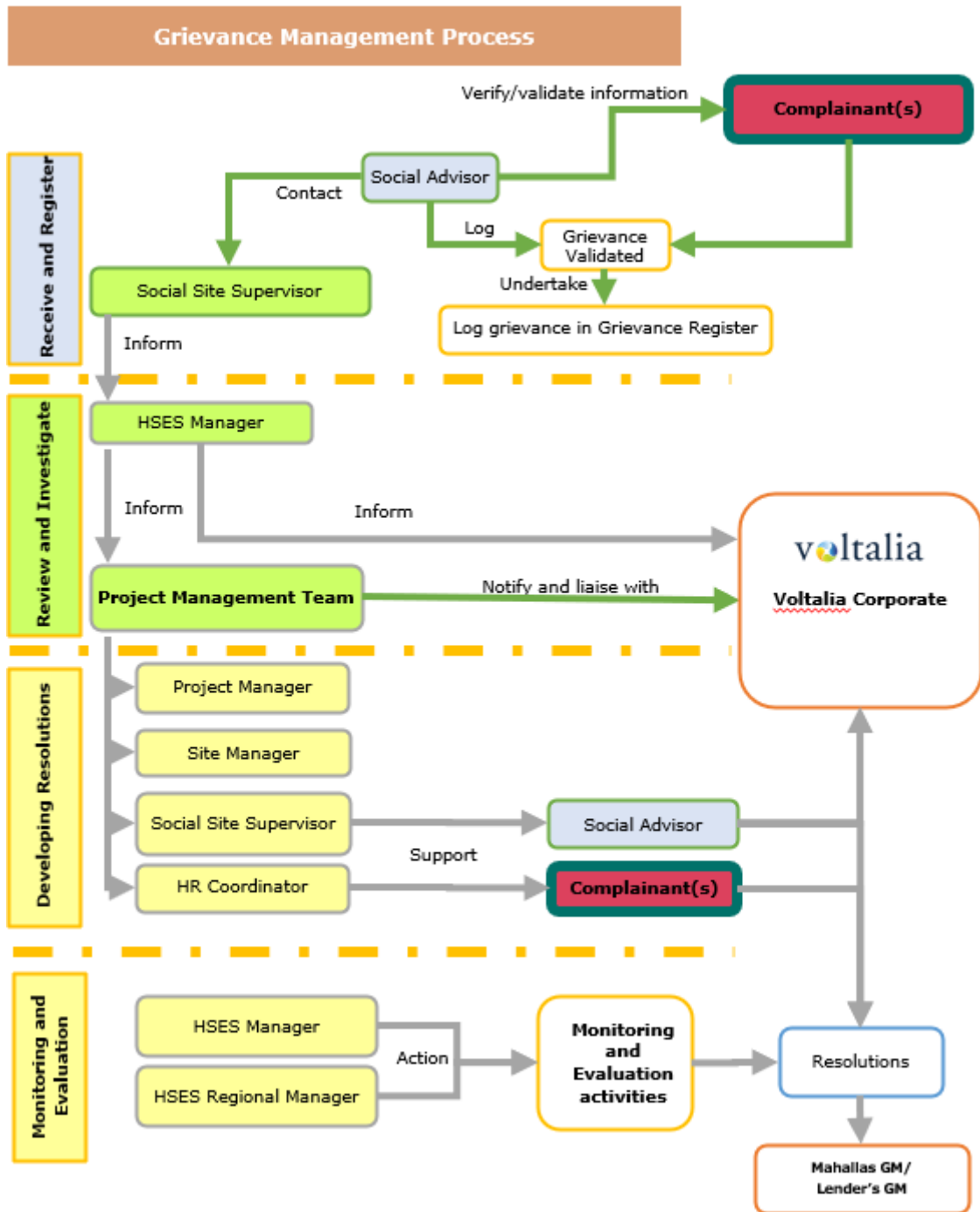
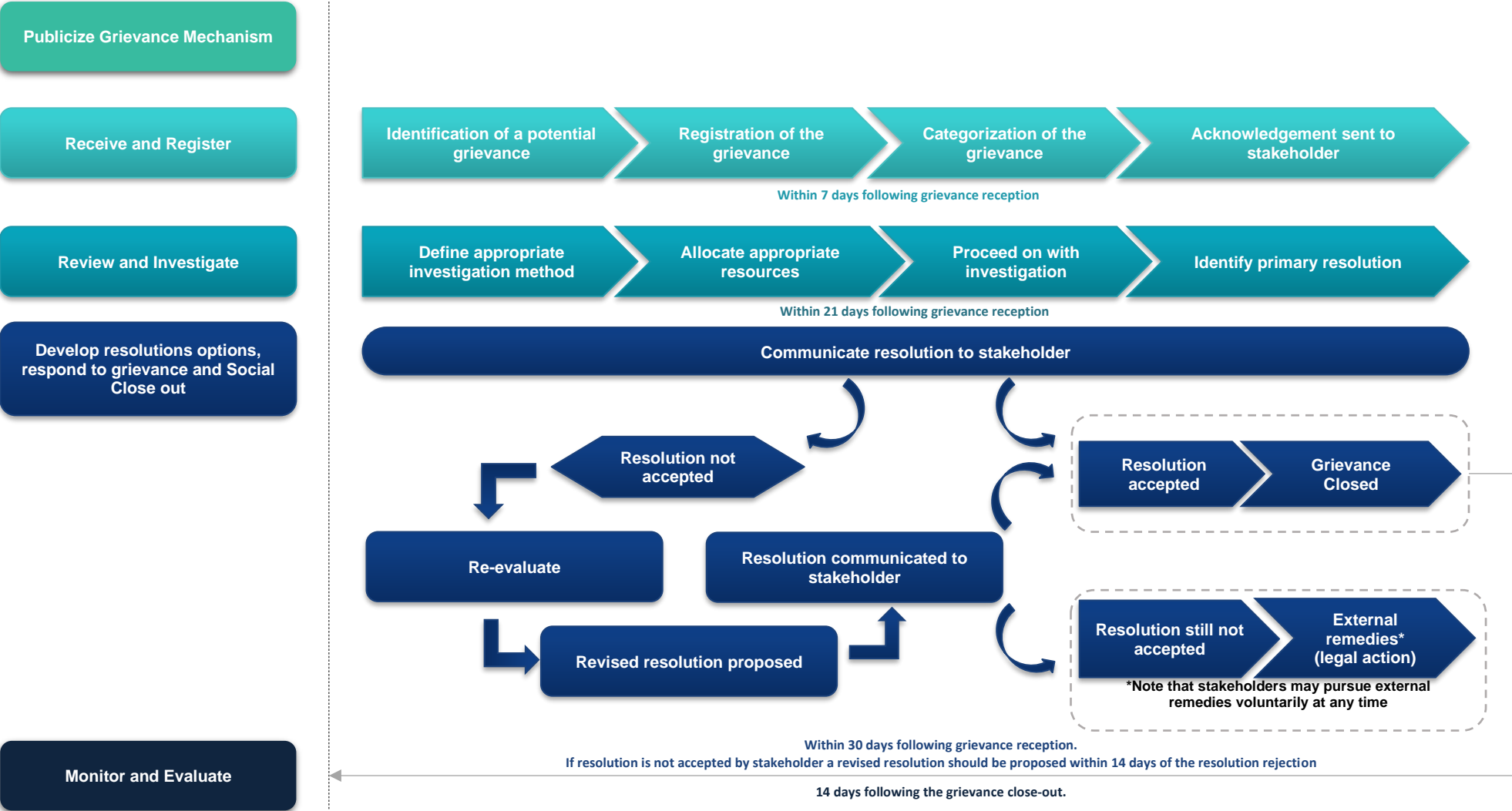


FIGURE 3-1 COMMUNICATION FLOW DURING PUBLICATION OF THE GRIEVANCE PROCESS

FIGURE 3-2 GRIEVANCE MANAGEMENT PROCESS



3.1 Grievance Mechanism Publication

The EGM⁴ procedures, grievance forms and grievance boxes shall be presented to the communities living within the Social AoI and the relevant stakeholders during the public consultations, Focused Group Discussions (FGDs), and Key Informant Interview (KIIs) as well as to every directly impacted APs/Acs or households during the socio-economic and asset surveys in order to raise awareness and promote the Project's grievance procedures. The Company's representative(s) including the Social Advisor shall assure participants in the public consultation that grievances/complaints on any aspect or issues are encouraged, and any issues raised will be addressed with a high degree of care and confidentiality in a timely and satisfactory manner. Participants and the general public should be informed about other external grievance mechanisms available to them such as Lenders' grievance mechanisms, the *Mahallas'* grievance mechanisms including other available public administrative and judicial procedures.

The Company shall communicate this procedure to its external stakeholders during consultations and key activities (e.g., baseline surveys) and informs them on how they can express their grievances, including indications of the channels to be used.

The following EGM materials shall be present and promoted in public and private establishments (where permitted) within the Project area and made accessible to APs/ACs and the relevant/interested stakeholders:

- External 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 shared with the stakeholders includes the following:

- General principles of the EGM;
- What benefits complainants can receive from the EGM;
- When, where, and how Project stakeholders can file complaints/grievances;
- Who is responsible for receiving and responding to complaints/grievances; and,
- The nature of the response the stakeholders can expect, including timing.

The outcomes of the public consultations shall be published online and through the local communication streams and the website according to the SEP (doc. No. Xx xx xx).

For ease of access and to raise awareness, grievance forms and grievance boxes shall be well placed/distributed within the Social AoI, particularly at the entrance points or inside of local shops, petrol stations, public places (if permitted by the owner of the selected establishments).

The Company shall ensure that the general information about the EGM procedures and forms, including instructions on how to file grievances and the timeframe for processing grievances are available in all the local languages, easily accessible and legible by all interested stakeholders. The EGM posters shall be advertised on public billboards, local notice boards or communication streams, available at site entry points, published on the Company's website (www.sarimaysolar.com) and local Telegram Messenger channels.

The grievance management process is illustrated Figure 3-2 Grievance Management Process above.

⁴ The EGM (Community Grievance Mechanism) was presented to the Project's stakeholders during public consultations performed during the ESIA process, in June 2023 and November 2023.

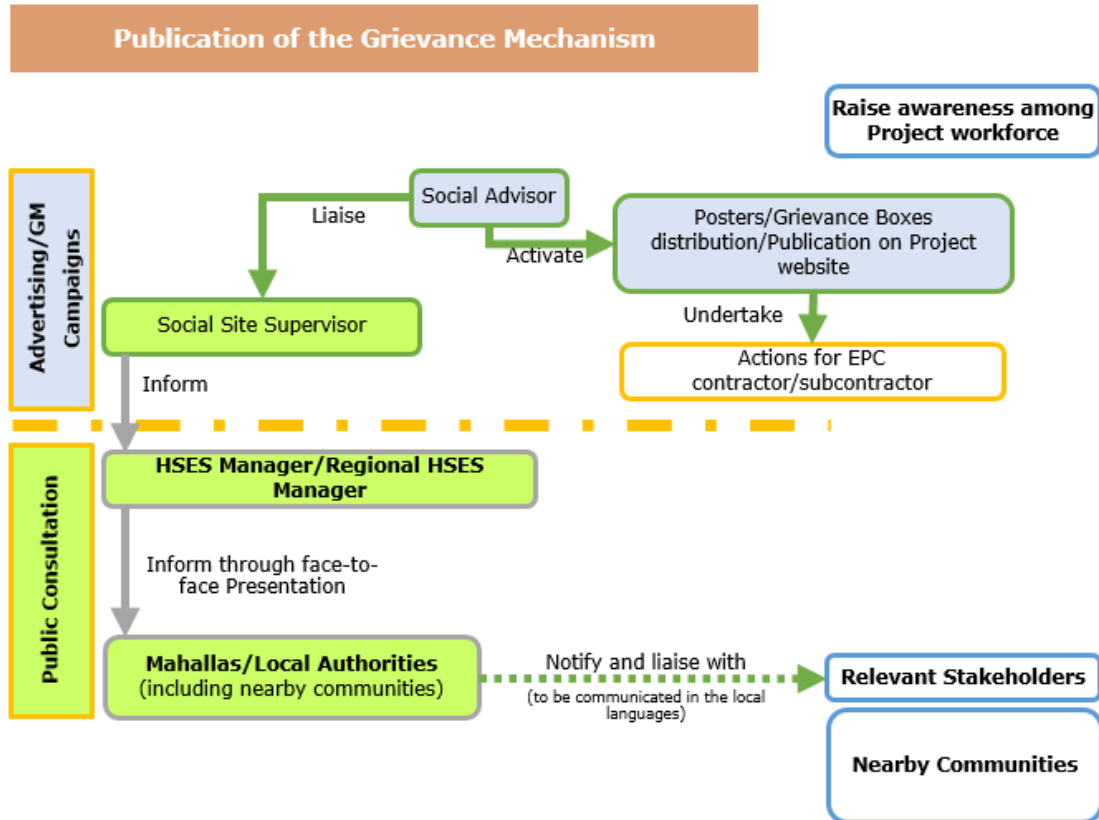


FIGURE 3-3 COMMUNICATION FLOW DURING PUBLICATION OF THE GRIEVANCE MECHANISM

3.2 Grievance Submission and Reception

Any person or stakeholder group may send comments, complaints and/or requests for information/clarification using the channels described below.

Grievance forms shall be available for review and located at all the Votalia site offices, including those of the contractor and subcontractors, and at all the entry points of the site. Location of Grievance Forms will be communicated to all communities as part of the induction talk and displayed at the information boards located at the entry points of the site, during public consultations. In addition, anyone can use the email address to send their complaint or issue.

The EGM is designed to allow and encourage every external stakeholder to raise grievances irrespective of their literacy level or access to technology. Stakeholders 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 via the next:

- 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 EGM of Sarimay solar park: +998933161631;
- Company's website: The EGM will be published on the Sarimay Solar website (www.Sarimaysolar.com)
- Verbally: This shall be done to the Social Advisor or corresponding contractor/subcontractors.

3.3 Grievance Registration

Upon reception of the complaint/grievance as indicated in section 3.2 above, the SOCIAL ADVISOR shall immediately register the grievance in the Grievance Register [**Annex 5 – Grievance register**] according to timeframe presented in Table 2 below.

The Grievance register shall be Microsoft Excel file or equivalent which to be used for logging, tracking and managing the complaints. This will assist in tracking overall trends and patterns in grievances, allowing emerging issues to be flagged and understood at an early stage. The information or data collected shall comply with the Law of the Republic of Uzbekistan “On Personal Data” of July 2, 2019, No. ZRU-547 (entered into force on October 1, 2019) and be regularly updated online via the Votalia corporate Grievance Management Tool (add URL link), 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 Complainant should call the person (Social Advisor) in charge of processing the grievances.

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

After reception and registration, the grievance will be assessed and classified by Votalia as follows:

- **EG0**: Request for information or clarification on the following but not limited to infrastructure, construction site, land use including issues not directly related to the Project
- **EG1**: Questions / concerns (any concern, unhappiness, or discontent that the individual, AP/AC or other stakeholder group might experience as a result of the Project)
- **EG2**: Requests / Petitions; and,
- **EG3**: Complaints / Grievances (about the Project's impacts negative and/or positive)

All grievances will then be given a priority level 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 stakeholders (individual or as a group) that could impact the project reputation or compromise its development at medium term.
High	Concern, claim or grievance involving stakeholders of high priority, and: <ul style="list-style-type: none"> • Reports a breach to human rights. • Reports of complaints of nuisance or suspected exceedances of air/noise emissions as a result of the project. • 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 Social Advisor identifying and categorizing the grievances according to their severity levels as defined in the 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.

Priority Level \ Grievance Category	Low	Medium	High
EGM0	Level 1	Level 1	Level 1
EGM1	Level 1	Level 1	Level 1
EGM2	Level 1	Level 2	Level 2
EGM3	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 Site Manager and HR Manager 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/External Investigator) might need to be mobilized.

3.5 Grievance Acknowledgement

All incoming grievances will be acknowledged according to the timeframe presented in Table 1 below of grievance reception. The Complainant shall be shared an acknowledgement form via SMS or email as soon as the Receptor 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 by 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.

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

- Grievance category; and,
- Priority level.

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.

3.6.3 Investigation Procedures

The 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.

Level 2:

- Seek advice internally before proceeding to response and/or resolution.

Level 3:

- Seek advice internally (e.g., Site Manager/HR Manager/Project Manager) 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 the Complainant(s) and visit the site before proceeding to response and/or resolution.

In coordination with the relevant personnel, the Social Advisor will analyze 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). This will include any personnel from the Company, EPC Contractor, subcontractors, or supplier staff as applicable and depending on the nature of the complaint. The relevant personnel will be promptly contacted to seek their cooperation in investigating and resolving 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 a permit / clearance has already been obtained from a governmental entity. For example, a grievance could be submitted claiming that project has destructed an archaeological or cultural site within the project area although a site assessment has been already conducted and clearance has been obtained from the relevant governmental entity. In this case, this governmental entity should be involved in the investigation and management of grievance; and,
- Grievances that entail damage to property, which have been verified might require an assessment of the damaged asset with the support of an external specialist in agreement with the complainant.
- 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 AP(s) and the senior figure within the Organization.
- Reach an agreement with the Complainant(s) through formal channels (through EGM procedures).

3.7 Grievance Response

Resolution process will adapt to the type of complaint and to the complainant 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	The Social Advisor in cooperation with Votalia E&S Manager refers to Votalia E&S Corporate Manager and the Complainant, reaching a resolution through discussion or negotiation. As during the evaluation process, Votalia 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 complainants every opportunity to present their views.
Through a third party	Informally or through mediation. The Social Advisor in collaboration with Votalia E&S Manager refers to the Votalia 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, Votalia E&S manager should identify a list of potential mediators (e.g., member of the church, imam, leaders of the community, etc.).

The Social Advisor will perform this resolution process and inform the Complainant(s) 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 Complainants are not likely to be satisfied with the outcome of the preliminary resolutions, the Votalia Environmental and Social Manager shall invite the complainant to collect additional evidence, obtain additional arguments, conduct further investigations and clarify the company’s position. Votalia E&S Manager could get direct support from Votalia Country Manager, Votalia E&S Corporate Officer, Votalia Head of Projects and/or the Director.
 - 3.2. If Complainants are not satisfied with the outcome of a conclusive resolution, Votalia 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 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. 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 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 to the Complainant within twenty-one (21) days for high and medium severity grievances and fourteen (14) days for low level grievances from the reception of the grievance.

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 once such actions are completed in accordance with the preferred method of communication specified.

Upon resolving the grievance, a grievance Close-out 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 that will detail the solution that was implemented to resolve the grievance.

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

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

1. Grievance shall be escalated to Volitalia HQ;
2. If no resolution is reached after 1., grievance shall be brought up in a dedicated discussion between Volitalia HQ, EPC Contractor and the relevant Contractor/Subcontractor 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 Volitalia 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 implemented corrective actions. If no further attention is required, then the E&S manager can close the grievance and record this in the Grievance Register log.

3.8 Grievances Process Timing

TABLE 2: GRIEVANCE RESOLUTION PROCESS TIMEFRAME

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. 	E&S Manager /Project Manager	14 days from reception	1 working day	7 days from reception	21 days from reception	30 days from reception
Medium	<ul style="list-style-type: none"> Seek advice internally before proceeding to response and/or resolution. 	Social Advisor Voltalia E&S Manager	14 days from reception	1 working day	7 days from reception	21 days from reception	30 days from reception
Low	<ul style="list-style-type: none"> Review information to be provided before proceeding to response and/or resolution. 	Social Advisor	7 days from reception	1 working day	7 days from reception	14 days from reception	21 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 grievance mechanism will be regularly monitored and evaluated by the E&S Manager and E&S Corporate 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.

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 GRIEVANCE MECHANISM EFFICACY.

Performance Indicator	Limits / Objective to achieve
Number of grievances communicated	Achieve over 50% of total population within the Social Aol (percentage of participation in grievance campaign or submission)
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 GM going to administrative, judicial or third-party remedy systems.
Grievances are properly recorded and followed through	All grievances are registered and addressed
The grievance mechanism for submitting comments and complaints, on the website and on information boards are properly published and advertised	Grievance publication covers the project area, district and countrywide.

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	
Volitalia representative signature		Date	
EPC Contractor signature		Date	
Subcontractor signature		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		Voltalia representative name	
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This receipt is to certify that your complaint has been registered and will now be examined by Voltalia.

The project team commits to contacting you within 21 days of this acknowledgement. Questions can be shared with Voltalia using the following contacts:

- Environmental and Social Advisor contact details: Zukhra Sharipova, [Sarimay@voltage.com](mailto: Sarimay@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			
Environmental and Social manager signature		Date	
Project director signature		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			
Actions resolution for	Action(s)	Deadline for implementation	
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 POSTER



ANNEX 5 - Grievance Register

Ref No.	How was Grievance received (website or others)	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)