



## Initial Grievance Redress Mechanism for Public Disclosure

Project of Road Modernization in the Russian Federation

11 November 2019

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# Initial Grievance Redress Mechanism for Public Disclosure

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#### INITIAL GRIEVANCE REDRESS MECHANISM FOR PUBLIC DISCLOSURE Project of Road Modernization in the Russian Federation

## **Acronyms and Abbreviations**

Name	Description
AIIB	Asian Infrastructure Investment Bank
ESMPF	Environmental and Social Management Planning Framework
ESP	Environmental and Social Policy
FKU	Federal Budgetary Organization
GRM	Grievance Redress Mechanism
km	kilometer
m	meter
PIU	Project Implementation Unit
RF	Russian Federation
SEP	Stakeholder Engagement Plan

## 1. INTRODUCTION

This document was prepared to support the implementation of roads upgrading ("the Project") by the Federal Road Agency Rosavtodor (further refers as Rosavtodor) and local Rosavtodor units.

This document is an integral part of the Programme and outlines the Grievance Redress Mechanism (GRM) to be applied for all Subprojects and activities of the Project.

The purpose of the GRM is to facilitate handling and resolution of potential concerns and grievances from stakeholders, including those related to environmental and social performance of Rosavtodor's local departments, all in line with the Bank's Environmental and Social Policy.

## 2. SUMMARY OF THE PROJECT

## 2.1 The Road Modernisation Project

The physical activities will be performed by local departments of the Russian Federal Road Agency (Rosavtodor) in Russia (Subprojects).

## 2.2 The R-21 Kola Subproject

This Subproject envisages construction of the 406<sup>th</sup>-422<sup>nd</sup> km section of the R-21 Kola motorway (St. Petersburg – Petrozavodsk – Murmansk – Pechenga – Norwegian border). The section will have a length of around 14.82 km and will run at around 12 km to the west of the city of Petrozavodsk, crossing the Prionezhsky and Pryazhinsky districts of Russia's Republic of Karelia. The Subproject will be implemented by the state-owned Department of the St. Petersburg – Murmansk Motorway of the Federal Road Agency (FKU Uprdor Kola).

In the target area, the existing R-21 road crosses the villages of Vilga and Polovina and runs near dacha communities (Figure 1). The road has two traffic lanes; traffic intensity is over 8,000 vehicles per day.

The Project provides for the following activities:

- Reconstruction and expansion of the existing section to 4 lanes (two in each direction);
- Construction of a new 4-lane section bypassing the villages of Vilga and Polovina;
- Construction of 12 bus stops with pavilions and pathways;
- Construction of 8 slip roads and 18 exits to local roads leading to residential areas and gardening plots;
- Installation of road signs, metal barriers and reflective posts;
- Construction of a 37.75 m bridge across the Vilga river.

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District	Rural community	<b>Settlement (population)</b> The number of the settlement corresponds to the number on the map	
Pryazhinsky district	Matrosskoye rural community	1. Voskhod dacha community (no data).	
Prionezhsky district	Novovilgovskoye rural community	<ol> <li>Polovina village (66 residents<sup>1</sup>);</li> <li>Landysh dacha community (no data);</li> <li>Eco dacha community (no data);</li> <li>Beloye dacha community (no data);</li> <li>Proposed village (no permanent residents);</li> <li>Veteran-3 dacha community (no data);</li> <li>Vilga village (1063);</li> <li>Sovet dacha community (no data);</li> <li>Unnamed dacha community (no data).</li> <li>Novaya Vilga settlement (1765).</li> </ol>	

## Figure 1: Residential areas located within the Project Area

## 2.3 Subprojects

As of the time of this document, one Subproject has been defined (as part of the overall Project), while other activities and implementation areas are currently unknown.

<sup>&</sup>lt;sup>1</sup> As of 2013.

## 3. EXISTING GRIEVANCE MECHANISM

#### 3.1 Rosavtodor

Rosavtodor handles grievances in line with national legislation<sup>2</sup>, which allows individuals and legal entities to submit their grievances in the following ways:

- In writing; the claimant has to indicate the addressee (institution or the / position of a specific official), their own name and mailing address for a response, and a description of the grievance;
- By e-mail; the claimant has to indicate their name, e-mail address for a response, and a description of the grievance;
- Verbally during a personal appointment with authorised officials.

Anonymous grievances are not admitted unless they serve to notify of an offense. In this case, the grievance shall be forwarded to a competent state authority.

The appeals concerning the territory subordinated to division of Rosavtodor can be transferred for consideration to these divisions directly. The exception is when the appeal contains grievance against the activities of such divisions – in this case, the investigation is carried out directly by Rosavtodor

Below are Rosavtodor's contact details for submission of grievances<sup>3</sup>:

- Mailing address: 4, Bochkova Street, Moscow 129085, Russia;
- Telephone for inquiries: +7 (495) 870-97-22, +7 (495) 870-99-40;
- Fax: +7 (495) 870-97-13;
- E-mail: rad@fad.ru.

## 3.2 FKU Uprdor Kola

The general grievance procedure specified by national legislation<sup>4</sup> provides for a right to submit a grievance (an individual or collective grievance), which should be free and voluntary but may not infringe rights and freedoms of other persons, to state and local authorities and to their officials or to state and municipal institutions and other organisations charged with performing publically important functions and to their officials.

FKU Uprdor Kola adheres to the following principles when handling grievances:

- Grievances may be submitted free of charge;
- Claimants are statutorily guaranteed personal safety;
- Grievances may be submitted in writing (including as an electronic document);
- A time period to review a grievance is specified by law; every grievance will be reviewed; and every review will be unbiased;
- Anonymous grievances are not admitted unless they serve to notify of an offense. In this case, the grievance shall be forwarded to a competent state authority.

<sup>2</sup> Federal Law No 59-FZ dated 2 May 2006 (as amended on 27 December 2018) "On the procedure for handling grievances from Russian nationals".

<sup>3</sup> Source: http://rosavtodor.ru/about/kontakty. Reference date: 8 October 2019.

<sup>4</sup> Federal Law No 59-FZ dated 2 May 2006 (as amended on 27 December 2018) "On the procedure for handling grievances from Russian nationals".

At work areas, the relevant contractor has to install an information board indicating the name of the future facility, the name of the customer, the performing contractor with names and contact details of its officials, and the schedule of works.

Below are contact details of FKU Uprdor Kola for submission of grievances<sup>5</sup>:

- Mailing address: 1A, Antikainena Street, Petrozavodsk 185035, Karelia, Russia;
- Telephone for inquiries: +7 (8142) 444-488,
- Fax: +7 (8142) 444-489,
- Online reception: <u>https://fad.karelia.ru/?page\_id=67</u>
- E-mail: info@fad.karelia.ru.

<sup>&</sup>lt;sup>5</sup> Source: <u>https://fad.karelia.ru/?page\_id=73</u>. Date of reference: 8 October 2019.

## 4. **RECOMMENDED ADJUSTMENTS**

## 4.1 AIIB Requirements

In accordance with the AIIB ESP<sup>6</sup> Projects implemented, with the participation of the Bank, are required to establish a suitable grievance mechanism to receive and facilitate resolution of the concerns or complaints of people who believe they have been adversely affected by the Project's environmental or social impacts, and to inform Project-affected people of its availability.

The grievance mechanism is scaled to the risks and impacts of the Project. The grievance mechanism may utilize existing formal or informal grievance mechanisms, provided that they are properly designed and implemented, and deemed by the Bank to be suitable for the Project; these may be supplemented, as needed, with Project specific arrangements.

The mechanism is designed to address affected people's concerns and complaints promptly, using an understandable and transparent process that is gender sensitive, culturally appropriate and readily accessible to all affected people. The grievance mechanism includes provisions to protect complainants from retaliation and to remain anonymous, if requested.

The mechanism provides for maintenance of a publicly accessible case register, and reports on grievance redress and outcomes, which are disclosed in accordance with the applicable Environmental and Social Standards.

In accordance with the Bank requirements, a grievance mechanism for workers to address workplace concerns needs to be established.

## 4.2 Activities to implement an updated Grievance Mechanism

The existing grievance procedure will be improved to meet AllB's Environmental and Social Policy (Table 1, Table 2). The updated Grievance Redress Mechanism will be in place throughout the lifecycle of each of the Subprojects and will provide for a two-level approach (see Figure 2).

<sup>&</sup>lt;sup>6</sup> Source: <u>https://www.alib.org/en/policies-strategies/\_download/environment-framework/Final-ESF-Mar-14-2019-Final-P.pdf</u>. Date of reference: 14 October 2019

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The initial handling of grievances is a responsibility of the Project Implementation Unit (PIU), and this includes situations where PIU's contractors are involved. Grievances submitted at Project's facilities will be collected by a specially designated grievance officer and will be resolved at the PIU level. Information about how the grievance was resolved will be forwarded to Rosavtodor. Any grievance outside the PIU's level of authority will be escalated by the grievance officer to Rosavtodor.

In certain cases, a grievance may be cascaded down to contractors. However, the ultimate responsibility to resolve the grievance will lie with the PIU even if the grievance is within the relevant contractor's responsibility and even if the contractor failed to resolve the grievance. For situations when contractors have to be involved, their contracts with the PIU will include special provisions specifying the contractors' obligation to handle grievances and appoint their own grievance officers.

Grievances against the contractor's activities will be investigated by PIU, decisions on such complaints and the measures necessary for resolving the issue (if necessary) will be reported to the contractor. PIU will set deadlines for measures and monitor their implementation on a regular basis (the frequency will be determined based on the nature of the event).

If a grievance was not resolved through project-designed grievance mechanisms, claimants may approach the AIIB directly under the Bank's Project-affected People's Mechanism<sup>7</sup> or seek judicial measures.

Activities to introduce a mechanism to handle grievances from external stakeholders and employees of the Project and Subprojects into the management systems of the PIU and Rosavtodor are presented in subsequent sections of this document.

<sup>&</sup>lt;sup>7</sup> https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html

## 4.2.1 Implementation of the updated Grievance Mechanism: PIU

## Table 1: Actions to implement the Grievance Mechanism in the PIU

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency		
1.	Introduction of the updated Grievance Redress Mechanism for external stakeholders					
1.1.	Approval of the Grievance Redress Mechanism (Appendix 2)	<ul> <li>The Grievance Redress Mechanism approved by the PIU and Rosavtodor</li> </ul>	PIU Rosavtodor	Prior to commencement of construction activities		
1.2.	Publication of the Grievance Redress Mechanism brochure for external stakeholders on PIU's website (Appendix 4)	<ul> <li>Grievance Redress Mechanism brochure for external stakeholders published on PIU's website</li> </ul>	PIU	Prior to commencement of construction activities		
1.3.	<ul> <li>Appointment of persons responsible for the implementation of the GRM. Their duties will include:</li> <li>Receive grievances in line with the GRM;</li> <li>Collect concerns and questions from the public in relation to the Subproject and provide responses within their competence during the conversation (if it is impossible to give an answ er / comment on the question, accept the grievance in accordance with the GRM);</li> <li>Coordinate communications with local communities; track responses and external communications related to the Subproject;</li> <li>Manage the grievance handling process.</li> </ul>	PIU's internal order on the appointment of persons responsible for the implementation of the External GRM	PIU	Prior to commencement of construction activities		
1.4.	<ul> <li>Introduction of an External Grievance Log – a simplified data base to manage grievances received and track their status. The Grievance Log will register all grievances received and will include the following information:</li> <li>Claimant's name and contact details;</li> <li>Date of the grievance;</li> <li>Description of the grievance;</li> <li>Name of the handling employee;</li> <li>Resolution on the grievance;</li> <li>Additional measures undertaken in relation to the grievance;</li> <li>Date and description of the response;</li> </ul>	PIU's Grievance Log	PIU	Prior to commencement of construction activities		

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accordance with the GRM);

Forw ard grievances to the PIU;

Manage the grievance handling process.

Introduction of an External Grievance Log (see Item 1.4).

competence during the conversation (if it is impossible to give an answer/comment on the question, accept the grievance in

Coordinate communications with indigenous communities; track

responses and external communications related to the Project;

Introduction of requirements to implement the GRM into agreements

Receive and register grievances from stakeholders (see Item

**Timeline / Frequency** 

Prior to commencement of construction activities

Prior to commencement of

construction activities

#	Action	Quantitative / Qualitative indicators	Responsible	Γ
'n			party	
	<ul> <li>Measures taken to avoid further similar grievances (if necessary).</li> </ul>			
1.5.	<ul> <li>Introduction of requirements to implement the GRM into agreements with contractors:</li> <li>Receive and register grievances from stakeholders (see Item 1.4);</li> <li>Forw ard grievances to the PIU;</li> <li>Provide responses within their competence.</li> </ul>	<ul> <li>Agreements with contractors that include provisions on the external GRM</li> </ul>	PIU	
2.	Introduction of a GRM for indigenous communities <sup>8</sup>			
2.1.	Publication of the GRM brochure for Indigenous People on PIU's website	<ul> <li>GRM brochure for Indigenous People published on PIU's website</li> </ul>	PIU	
2.2.	<ul> <li>Appointment of persons responsible for the implementation of the GRM for Indigenous People. Their duties will include:</li> <li>Receive grievances from indigenous communities in line with the GRM;</li> <li>Collect concerns and questions from indigenous communities in relation to the Project and provide responses within their</li> </ul>	<ul> <li>PlU's internal order on the appointment of persons responsible for the implementation of GRM for Indigenous People</li> </ul>	PIU	

<sup>8</sup> Measures are applied if Subproject implementation affects the territories of traditional nature use of the Indigenous People (in accordance with the definition given in the Federal law of May 7, 2001 N 49-FZ), as well as if such territories will be identified during the screening of the Subproject

PlU's Grievance Log (see Item 1.4)

Agreements with contractors that

Indigenous People

include provisions on the GRM for

PIU

PIU

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with contractors:

1.4);

2.3.

2.4.

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency		
	Provide responses within their competence.					
3.	Introduction of an updated mechanism to handle grievances from employees of Subprojects					
3.1.	Publication of the GRM brochure for Subprojects personnel on PIU's website	<ul> <li>GRM brochure for Subprojects personnel published on PIU's w ebsite</li> </ul>	PIU	Prior to commencement of construction activities		
3.2.	Display of the GRM brochure for Subprojects personnel on information boards at the PIU's office, at the general contractor's construction camp etc.	<ul> <li>GRM brochure for Subprojects personnel displayed on information boards</li> </ul>	PIU Contractors	Prior to commencement of construction activities		
3.3.	<ul> <li>Appointment of persons responsible for the implementation of the GRM. Their duties will include:</li> <li>Receive grievances from employees of Subprojects in line with the GRM;</li> <li>Manage the grievance handling process.</li> </ul>	<ul> <li>PIU's internal order on the appointment of persons responsible for the implementation of GRM for Subprojects personnel</li> </ul>	PIU Contractors	Prior to commencement of construction activities		
3.4.	<ul> <li>Introduction of a separate Grievance Log for Subprojects personnel <ul> <li>a simplified data base necessary to manage grievances received</li> <li>and track their status. The Grievance Log will register all grievances</li> <li>received and will include the follow ing information:</li> <li>Claimant's name and contact details;</li> <li>Date of the grievance;</li> <li>Description of the grievance;</li> <li>Name of the handling employee;</li> <li>Resolution on the grievance;</li> <li>Additional measures undertaken in relation to the grievance;</li> <li>Date and description of the response;</li> <li>Measures taken to avoid further similar grievances (if necessary).</li> </ul> </li> </ul>	<ul> <li>PIU's Grievance Log for Subprojects personnel</li> </ul>	PIU	Prior to commencement of construction activities		
3.5.	Introduction of requirements to implement the GRM for Subprojects personnel into agreements with contractors, including the development of the GRM procedure, informing the contractor's employees about the functioning of the GRM and appointing persons responsible for the implementation of the GRM (see items $3.2 - 3.3$ ).	<ul> <li>Contracts with contractors, including the relevant provisions of the GRM from employees of the Subproject</li> </ul>	PIU	Prior to commencement of construction activities		

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
4.	Disclosure of the Grievance Mechanism to the general public			
4.1.	Publication of announcements on the establishment of the GRM and contact details of GRM officers in local media	<ul> <li>Media publications in areas affected by Subprojects</li> </ul>	PIU in conjunction with Rosavtodor	Prior to commencement of construction activities
4.2.	<ul> <li>Publication of notices about the availability of the GRM and contact details of GRM officers on information boards:</li> <li>At construction sites of Subprojects;</li> <li>At offices of local authorities (subject to their approval);</li> <li>In residential areas within the implementation area of Subprojects;</li> <li>At special locations to be determined during public consultations.</li> </ul>	Notices on information boards	PIU in conjunction with Rosavtodor	Prior to commencement of construction activities
4.3.	Publication of announcements on the establishment of the GRM and contact details of GRM officers (both PIU and Rosavtodor) on PIU's website	Announcements on PIU's websites	PIU in conjunction with Rosavtodor	Prior to commencement of construction activities
4.4.	Notification of stakeholders about the availability of the GRM and contact details of GRM officers (both PIU and Rosavtodor) during public consultations to be held as of SEP (Stakeholder Engagement Plan).	<ul> <li>Minutes of public consultation meetings containing information about the GRM</li> </ul>	PIU in conjunction with Rosavtodor	Prior to commencement of construction activities and throughout the Subproject life cycle
5.	Disclosure of the Grievance Redress Mechanism to indigenous c	communities		
5.1.	Publication of announcements in local media on the establishment of the GRM and contact details of GRM officers (both PIU and Rosavtodor) and Indigenous Community liaison officer.	<ul> <li>Media publications in areas affected by Subprojects</li> </ul>	PIU in conjunction with Rosavtodor	Prior to commencement of construction activities
5.2.	Informing the indigenous communities during consultations, individual meetings and meetings in mini-groups (see the Indigenous People Planning Framework for details) about the GRM and the contact details of the PIU's and Rosavtodor's GRM officers responsible for the implementation of the GRM.	<ul> <li>Minutes of consultation with indigenous people containing information about the GRM</li> </ul>	PIU in conjunction with Rosavtodor	Prior to commencement of construction activities and throughout the Subproject life cycle

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
5.3.	<ul> <li>Consultations with representatives of local administrations of districts, rural and urban settlements responsible for the management of IP issues. Within the framew ork of consultations:</li> <li>clarify the most appropriate methods of interaction and ways of involving indigenous peoples in the dialogue,</li> <li>clarify contact details of authorized representatives of indigenous peoples, elders, community leaders, etc.</li> </ul>	<ul> <li>Minutes of consultation in local administrations</li> </ul>	PIU	Prior to commencement of construction activities
5.4.	<ul> <li>Publication of notices about the availability of the GRM and contact details of PlU's and Rosavtodor's GRM officers on information boards:</li> <li>At construction sites of Subprojects;</li> <li>At offices of local authorities (subject to their approval);</li> <li>In residential areas within the implementation area of Subprojects;</li> <li>At special locations to be determined during public consultations.</li> </ul>	<ul> <li>Notices on information boards</li> </ul>	PIU in conjunction with Rosavtodor	Prior to commencement of construction activities
5.5.	Publication of announcements on PIU's website on the establishment of the Grievance Mechanism and contact details of PIU's and Rosavtodor's GRM officers	Announcements on PlU's web	PIU in conjunction with Rosavtodor	Prior to commencement of construction activities
6.	Disclosure of the Grievance Redress Mechanism to employees			·
6.1.	Communication of the GRM availability to all new employees	<ul> <li>Labour agreements containing information about the GRM</li> </ul>	PIU	During the hiring process
6.2.	Display of information about the GRM on information boards at the PIU's office and at the general contractor's construction camp.	<ul> <li>Notices on information boards</li> </ul>	PIU Contractors	Prior to commencement of construction activities and throughout the Subproject life cycle
7.	Monitoring and reporting			
7.1.	<ul> <li>Review of grievances from Subproject:</li> <li>Number of open / resolved / closed grievances received from stakeholders during the reporting period;</li> <li>Number of open / resolved / closed grievances received from employees of Subprojects during the reporting period;</li> </ul>	<ul> <li>PIU's monthly external stakeholders GRM implementation report sent to the Rosavtodor</li> </ul>	PIU	Once per quarter throughout the Project's lifecycle

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#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
	<ul> <li>Breakdow n by topics (construction / noise / road safety etc.);</li> <li>Performance dynamics (total number of grievances / number of grievances from specific settlements etc.).</li> </ul>	<ul> <li>PIU's monthly Subproject personnel GRM implementation report sent to the Rosavtodor</li> </ul>		
7.2.	The results of the analysis of complaints from external stakeholders are published on the PIU website (PIU's monthly external stakeholders GRM implementation report)	<ul> <li>PIU's monthly external stakeholders GRM implementation report is published on the PIU website</li> </ul>	PIU	Once per quarter throughout the Project's lifecycle

## 4.2.2 Implementation of the updated Grievance Mechanism: Rosavtodor

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
8.	Introduction of the updated Grievance Redress Mechanism	for external stakeholders		
8.1.	Approval of the Grievance Redress Mechanism (Appendix 3)	<ul> <li>The Grievance Redress Mechanism approved by the Rosavtodor</li> </ul>	Rosavtodor	Prior to commencement of construction activities
8.2.	Publication of the Grievance Redress Mechanism brochure for external stakeholders on Rosavtodor's website (Appendix 5)	<ul> <li>Grievance Redress Mechanism brochure for external stakeholders published on Rosavtodor's website</li> </ul>	Rosavtodor	Prior to commencement of construction activities
8.3.	<ul> <li>Appointment of persons responsible for the implementation of the GRM. Their duties will include:</li> <li>Receive grievances in line with the GRM;</li> <li>Collect concerns and questions from the public in relation to the Project and provide responses within their competence during the conversation (if it is impossible to give an answ er / comment on the question, accept the grievance in accordance with the GRM);</li> <li>Coordinate communications with local communities; track responses and external communications related to the Project;</li> </ul>	Rosavtodor's internal order on the appointment of persons responsible for the implementation of the External GRM	Rosavtodor	Prior to commencement of construction activities

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
	Manage the grievance handling process.			
8.4.	<ul> <li>Introduction of an External Grievance Log – a simplified data base to manage grievances received and track their status.</li> <li>The Grievance Log will register all grievances received and will include the follow ing information: <ul> <li>Claimant's name and contact details;</li> <li>Date of the grievance;</li> <li>Name of the handling employee;</li> <li>Resolution on the grievance;</li> <li>Additional measures undertaken in relation to the grievance;</li> <li>Date and description of the response;</li> <li>Measures taken to avoid further similar grievances (if necessary).</li> </ul> </li> </ul>	Rosavtodor's Grievance Log	Rosavtodor	Prior to commencement of construction activities
9.	Introduction of an updated mechanism to handle grievances from employees of Projects			
9.1.	Publication of the GRM brochure for Project's personnel on Rosavtodor's website	<ul> <li>GRM brochure for Projects personnel published on Rosavtodor's website</li> </ul>	Rosavtodor	Prior to commencement of construction activities
9.2.	Display of the GRM brochure for Project's personnel on information boards at the Rosavtodor's office, at the general contractor's construction camp etc.	<ul> <li>GRM brochure for Projects personnel displayed on information boards</li> </ul>	Rosavtodor	Prior to commencement of construction activities
9.3.	<ul> <li>Appointment of persons responsible for the implementation of the GRM. Their duties will include:</li> <li>Receive grievances from Project's employees in line with the GRM;</li> <li>Manage the grievance handling process.</li> </ul>	Rosavtodor's internal order on the appointment of persons responsible for the implementation of GRM for Project's personnel	Rosavtodor	Prior to commencement of construction activities
9.4.	Introduction of a separate Grievance Log for Project's personnel – a simplified data base necessary to manage grievances received and track their status. The Grievance Log	<ul> <li>Rosavtodor's Grievance Log for Project's personnel</li> </ul>	Rosavtodor	Prior to commencement of construction activities

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#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
	<ul> <li>w ill register all grievances received and w ill include the follow ing information:</li> <li>Claimant's name and contact details;</li> <li>Date of the grievance;</li> <li>Description of the grievance;</li> <li>Name of the handling employee;</li> <li>Resolution on the grievance;</li> <li>Additional measures undertaken in relation to the grievance;</li> <li>Date and description of the response;</li> <li>Measures taken to avoid further similar grievances (if necessary).</li> </ul>			
10.	Disclosure of the Grievance Mechanism to the general publi	c		
10.1.	Publication of announcements on the establishment of the GRM and contact details of GRM officers on Rosavtodor's website	Announcements on Rosavtodor's websites	Rosavtodor	Prior to commencement of construction activities
11.	Disclosure of the Grievance Redress Mechanism to employe	ees		
11.1.	Communication of the GRM availability to all new employees	<ul> <li>Labor agreements containing information about the GRM</li> </ul>	Rosavtodor	During the hiring process
11.2.	Display of information about the GRM on information boards at the Rosavtodor's office.	<ul> <li>Notices on information boards</li> </ul>	Rosavtodor	Prior to commencement of construction activities
12.	Monitoring and reporting			
12.1.	<ul> <li>Monitoring the PIU activities within GRM:</li> <li>The duration of the complaint handling,</li> <li>Effectiveness of complaints handling and measures taken to resolve them,</li> <li>Analysis of feedback from applicants, etc.</li> </ul>	<ul> <li>Monthly reports received from each PIU,</li> <li>Corrective measures based on monitoring results is developed and implemented</li> </ul>	Rosavtodor	Monthly throughout the Project's lifecycle
12.2.	<ul> <li>Review of grievances from entire Project:</li> <li>Number of open / resolved / closed grievances received from stakeholders during the reporting period;</li> </ul>	<ul> <li>Rosavtodor's annual external stakeholders GRM implementation report sent to the Bank</li> <li>Rosavtodor's annual Subproject personnel GRM implementation report sent to the Bank</li> </ul>	Rosavtodor	Annually throughout the Project's lifecycle

#	Action	Quantitative / Qualitative indicators	Responsible party	Timeline / Frequency
	<ul> <li>Number of open / resolved / closed grievances received from employees of Subprojects during the reporting period;</li> <li>Breakdow n by topics (construction / noise / road safety etc.);</li> <li>Performance dynamics (total number of grievances / number of grievances from specific settlements etc.).</li> </ul>			
12.3.	The results of the analysis of complaints from external stakeholders are published on the Rosavtodor's website (Rosavtodor's annual external stakeholders GRM implementation report)	<ul> <li>Rosavtodor's annual external stakeholders GRM implementation report is published on Rosavtodor's website</li> </ul>	Rosavtodor	Annually throughout the Project's lifecycle

## **APPENDIXES**

### APPENDIX 1: CITIZENS AND ORGANIZATION APPEALS PROCEDURE OF ROSAVTODOR

Source: <u>http://rosavtodor.ru/about/normativno-pravovaya-osnova/reglament-federalnogo-dorozhnogo-agentstva</u>

Reference date: 8 October 2019

Citizens and Organization Appeals Procedure of Rosavtodor



## APPENDIX 2: PIU'S GRM PROCEDURE

1.	Receiving a grievance			
	Method of receiving a grievance	Timeline for registration of the grievance	Timeline for sending a notice of grievance registration to the applicant	
	Personal reception	During personal reception		
	By phone	During phone call		
	By e-mail	On the date of receiving the email	Within one day of receiving the grievance receipt, if the complaint	
	By mail	On the date of receiving the letter	relates to security issues;	
	By website	On the date of receiving the application	Within 5 w orking days of receiving the grievance – for all other	
	Forwarding complaints from General Contractor and subcontractors	On the date of receiving the grievance by the General Contractor or subcontractors	complaints	
	Forwarding complaints from Rosavtodor	On the date of receiving the grievance by the Rosavtodor	The notification is sent by Rosavtodor	
2.	Definition of the responsible	person for grievance handling:		
	<ul> <li>The complaint is investigated within the PIU (see paragraph 2.1 below),</li> <li>The complaint is addressed to the General Contractor (see paragraph 2.2 below), or</li> <li>The complaint is resubmitted to the Rosavtodor (see paragraph 2.3 below).</li> </ul>			
	Type of grievance         Safety issues related to the behavior of w orkers and activities on construction sites, operation of the reconstructed road, etc.         Other issues		Timeline for definition of the responsible party: PIU, the General Contractor or Rosavtodor	
			On the date of receiving the grievance	
			Within 5 w orking days of receiving the grievance	
2.1.	1. Investigation of the grievance within the PIU:			
	<ul> <li>Investigation of the facts and causes of the issue,</li> <li>Development of measures to address the issue / mitigate the impact,</li> <li>Consultation with the applicant on the measures developed,</li> <li>Implementation of corrective measures,</li> <li>Sending notifications to the Rosavtodor's GRM officer at each stage (for grievances forw Rosavtodor to the PIU).</li> </ul>			
	Type of grievance	Timeline for definition of the responsible person by PIU	Timeline for investigation by PIU	
	Safety issues	On the date of receiving the grievance	Within 1 to 2 days of receiving the grievance	
	Other issues	Within 3 w orking days of receiving the grievance	Within 30 calendar days of receiving the grievance	

2.2. Monitoring of grievance handling by the General Contractor:

<ul> <li>(in parallel with the gri</li> <li>Control over the appoi</li> <li>Control over the inves</li> <li>Control over the devel</li> <li>Control over the constr</li> </ul>	Notification of the applicant about the forwarding of the grievance redress to the General Contractor (in parallel with the grievance forwarding to the General Contractor), Control over the appointment of the responsible person, Control over the investigation of the facts and causes of the issue, Control over the development of measures to address the issue / mitigate the impact, Control over the consultation with the applicant on the measures developed, Control over the implementation of corrective measures		
Type of grievance	Timeline for definition of the responsible person by General Contractor	Timeline for investigation by General Contractor	
Safety issues	On the date of receiving the grievance	Within 1 to 2 days of receiving th grievance	
Other issues	Within 3 w orking days of receiving the grievance	Within 30 calendar days of receiving the grievance	

## 2.3. Notification of the applicant about the forwarding of the grievance redress to the Rosavtodor (in parallel with the grievance for warding to the Rosavtodor)

#### 3. Settlement of the grievance

Result of investigation	Further actions
The grievance is settled	The applicant is invited to sign a statement of satisfaction with the decision
The grievance is not settled (additional time is required to investigate the issue)	Letter to extend the period of consideration of the complaint is sent to the applicant. The additional period of grievance investigation may not exceed 15 calendar days
The grievance is not settled	The grievance is re-investigated, the applicant is consulted on possible solutions. The complaint may be forw arded to the Rosavtodor for further consideration. If the grievance cannot be resolved, the applicant may be proposed to appeal to the court.

## APPENDIX 3: ROSAVTODOR'S GRM PROCEDURE

1.	Receiving a grievance		
	Method of receiving a grievance	Timeline for registration of the grievance	Timeline for sending a notice of grievance registration to the applicant
	Personal reception	During personal reception	
	By phone	During phone call	Within one day of receiving the
	By e-mail	On the date of receiving the email	grievance receipt, if the complaint relates to security issues;
	By mail	On the date of receiving the letter	Within <u>5 w orking days</u> of receiving the grievance – for all other complaints
	By website	On the date of receiving the application	Complaints
	Forwarding complaints from PIU	On the date of receiving the grievance by the PIU	The notification is sent by PIU
2.	Definition of the responsible per	son for grievance handling:	
		within the Rosavtodor (see paragra o the PIU (see paragraph 2.2 below	
	Type of grievance		Timeline for definition of the responsible party: PIU or Rosavtodor
	Safety issues related to the behavio	or of workers and activities on	On the date of receiving the
	construction sites, operation of the	reconstructed road, etc.	grievance
	Other issues		Within 5 w orking days of receiving the grievance
2.1.	Investigation of the grievance wi	ithin the Rosavtodor:	
	<ul> <li>Investigation of the facts and causes of the issue,</li> <li>Development of measures to address the issue / mitigate the impact,</li> <li>Consultation with the applicant on the measures developed,</li> <li>Implementation of corrective measures,</li> <li>Sending notifications to the PIU's GRM officer at each stage (for grievances forw arded from PIU to Rosavtodor).</li> </ul>		
	Type of grievance	Timeline for definition of the responsible person by Rosavtodor	Timeline for investigation by Rosavtodor
	Safety issues	On the date of receiving the grievance	Within 1 to 2 days of receiving the grievance
	Other issues	Within 3 working days of receiving the grievance	Within 30 calendar days of receiving the grievance
2.2.	Monitoring of grievance handling by the PIU:		
	<ul> <li>Notification of the applicant about the forw arding of the grievance redress to the PIU (in parallel with the grievance forw arding to the PIU),</li> <li>Control over the appointment of the responsible person,</li> <li>Control over the investigation of the facts and causes of the issue,</li> <li>Control over the development of measures to address the issue / mitigate the impact,</li> </ul>		

	<ul> <li>Control over the consultation with the applicant on the measures developed,</li> <li>Control over the implementation of corrective measures</li> </ul>			
	Type of grievance	Timeline for definition of the responsible person by PIU	Timeline for investigation by PIU	
	Safety issues	On the date of receiving the grievance	Within 1 to 2 days of receiving the grievance	
	Other issues	Within 3 working days of receiving the grievance	Within 30 calendar days of receiving the grievance	
3.	Settlement of the grievance	ement of the grievance		
	Result of investigation Further actions			
The grievance is settled The applicant is invited to sign a statement of satisfa decision				
	The grievance is settled		statement of satisfaction with the	
	The grievance is settled The grievance is not settled (additional time is required to investigate the issue)	decision Letter to extend the period of cor	statement of satisfaction with the sideration of the complaint is sent to od of grievance investigation may not	

## APPENDIX 4: EXTERNAL GRIEVANCE BROCHURE PIU

#### PIU (Insert name)

#### **EXTERNAL GRIEVANCE BROCHURE**

Infrastructure projects such as construction and reconstruction of federal motorways may have an adverse impact on people living within the area of implementation of such projects.

As part of a project for modernization of motor roads in Russia, which will be implemented jointly with the Asian Infrastructure Investment Bank, the PIU (*insert name*) hereby commits to handle fairly and transparently any potential issues and concerns during pre-construction, construction and operation of facilities of the project.

This brochure describes the kinds of concerns it covers, how a grievance may be submitted, and how it will be handled. Please note that this mechanism does not prevent any claimant to bring a concern before a court or a non-judicial agency.

#### Please note that the Grievance Redress Mechanism does not prevent any claimant to bring a concern before a court or a non-judicial agency.

#### What kinds of grievances may be submitted?

You can submit a grievance if you believe that the project has an adverse impact on you or your place of residence, e.g.:

- Noise and dust from construction activities;
- Road safety risks;
- Unethical behavior by project employees;
- Infringement of rights of local residents;
- Offences committed by project employees or by project-related activities, etc.

The PIU (*insert name*) will handle all grievances received in relation to the project. If a grievance is not related to the project, you will be provided with a written explanation. In all other cases, the PIU (*insert name*) will investigate any alleged facts and causes of adverse impacts and implement corrective and preventive measures.

#### How can a grievance be submitted?

There are several ways to submit a grievance:

- Mail a completed grievance form (see the end of this document) to the following address: ......;
- Send an e-mail to: .....;
- Complete an electronic grievance form on PIU's website at ......;
- Call: .....;
- Request a personal appointment.

#### Confidentiality and anonymity

You may file an anonymous grievance if you wish. In this case, please note that giving an anonymous grievance may make it more difficult to resolve the issue or provide you with a response. If you insist on filing anonymously, please provide sufficient data and facts to enable an investigation and resolution without your involvement. Responses to anonymous grievances will be posted on the PIU's website, unless otherwise indicated in the complaint.

You can also file grievances on a confidential basis. If you selected not to disclose your personal data, your details will not be disclosed. Confidentiality of your grievance will be ensured by grievance officers. However, there may be situations when your personal would have to be disclosed, e.g. if you have to testify before a court. In this case, grievance officers will discuss the situation and possible options.

#### Grievance handling stages

Priority will be given to messages notifying of accidents, unsafe conditions, unsafe behavior and other safety-related matters at construction sites of Subprojects that require an urgent response. Such grievances will be considered within 1-2 days, other issues will be considered within 30 days.

If your grievance cannot be resolved using the PIU's mechanism, you can escalate it to Rosavtodor.

Stage 1

## Receipt of a grievance

•You can file your grievance to the PIU (*insert name*) using one of the ways described above

Registration of the grievance

•Once the grievance is received, it will be registered, and a handler will be appointed.

Stage 3

Acknowledgement of receipt

•Within 5 working days after receiving your grievance, the PIU (*insert name*) will mail you a letter to confirm that they have received and registered the grievance, and to give you registration number of the grievance and the handler's name and contact details.

## Stage 4

## Investigation and resolution

• The PIU (*insert name*) will investigate the facts and causes of the issue. During the investigation, you may be contacted by authorised persons who may request additional information. Once the investigation has been completed, you will receive a letter outlining its results and proposed response measures if necessary.

## Stage 5

## Closure of the grievance

• The PIU (*insert name*) will use its best endeavours to settle the grievance within 30 calendar days from its receipt. If, based on the results of the investigation and the measures taken, you agree that the complaint has been resolved, the PIU (*insert name*) will offer to sign a statement of satisfaction with the results and the interaction process. If the grievance remains unresolved, it will be reviewed again and the possibility of further measures to resolve it will be discussed with you. If a grievance is outside PIU's (*insert name*) area of competence, it will be forwarded to Rosavtodor.

## Stage 6

Monitoring

•The PIU (*insert name*) may contact you additionally to make sure that you no longer have any concerns in relation to the grievance subject.

	Document # (To be completed by the authorized employee of the Project):			
1.	Full name of the sender			
2.	Sender's contacts	Address:		
	(please indicate how you wish to be reached)	Telephone:		
	be reached)	E-mail:		
3.	Preferred language of communication	□ Russian □ Other (please specify)		
4.	<ul> <li>Please tick one of the options below:</li> <li>I agree to transfer my personal data to third parties</li> <li>Please do not disclose my personal data without my consent / I would like to file the grievance anonymously</li> </ul>			
5.		Describe your grievance or an incident. What happened? Where and when did it happen? Who was involved in the incident? What were the consequences of the incident?		
6.	What do you think should be done to resolve the issue?			
<u> </u>				
7.	Signed:			
	. Date:			
PI	Please mail this form to the following address: (PIU's address)			

#### APPENDIX 5: EXTERNAL GRIEVANCE BROCHURE ROSAVTODOR

#### ROSAVTODOR

#### **EXTERNAL GRIEVANCE BROCHURE**

Infrastructure projects such as construction and reconstruction of federal motorways may have an adverse impact on people living within the area of implementation of such projects.

As part of a project for modernization of motor roads in Russia, which will be implemented jointly with the Asian Infrastructure Investment Bank, Rosavtodor hereby commits to handle fairly and transparently any potential issues and concerns during pre-construction, construction and operation of facilities of the project.

Most of the issues can be resolved by submitting your grievance to the Project Implementation Unit:

- Construction of the 406th-422nd km section of the R-21 Kola motorway (St. Petersburg-Petrozavodsk-Murmansk-Pechenga-Norwegian border), Republic of Karelia. PIU — FKU Uprdor Kola (*insert website*);
- ....

You can file a grievance directly with Rosavtodor, including if the grievance cannot be resolved through the grievance department of the PIU.

This brochure describes the kinds of concerns it covers, how a grievance may be submitted, and how it will be handled.

## Please note that the Grievance Redress Mechanism does not prevent any claimant to bring a concern before a court or a non-judicial agency.

#### What kinds of grievances may be submitted?

You can submit a grievance if you believe that the project has an adverse impact on you or your place of residence, including if your grievance has not been resolved during the appeal to the territorial PIU, for example e.g.:

- Noise and dust from construction activities;
- Road safety risks;
- Unethical behavior by project employees;
- Infringement of rights of local residents;
- Offences committed by project employees or by project-related activities etc.

Rosavtodor will handle all grievances received in relation to the project. If a grievance is not related to the project, you will be provided with a written explanation. In all other cases, Rosavtodor will investigate any alleged facts and causes of adverse impacts and implement corrective and preventive measures.

#### How can a grievance be submitted?

There are several ways to submit a grievance:

- Mail a completed grievance form (see the end of this document) to the following address: 129085, Bochkova str., 4, Moscow;
- Send an e-mail to: rad@fad.ru;
- Complete an electronic grievance form on Rosavtodor' s website at ...;
- Call: +7 (495) 870-97-22, +7 (495) 870-99-40;
- Request a personal appointment at http://rosavtodor.ru/obshestvennaya-priemnaya/zapis-na-priem.

#### Confidentiality and anonymity

You may file an anonymous grievance if you wish. In this case, please note that giving an anonymous grievance may make it more difficult to resolve the issue or provide you with a response. If you insist on filing anonymously, please provide sufficient data and facts to enable an investigation and resolution without your involvement. Responses to anonymous grievances will be posted on the PIU's website, unless otherwise indicated in the grievance.

You can also file grievances on a confidential basis. If you selected not to disclose your personal data, your details will not be disclosed. Confidentiality of your grievance will be ensured by grievance officers. However, there may be situations when your personal would have to be disclosed, e.g. if you have to testify before a court. In this case, grievance officers will discuss the situation and possible options.

#### Grievance handling stages

Priority will be given to messages notifying of accidents, unsafe conditions, unsafe behavior and other safety-related matters at construction sites of Subprojects that require an urgent response. Such grievances will be considered within 1-2 days, other issues will be considered within 30 days.

If your grievance cannot be resolved using the PIU's mechanism, you can escalate it to Rosavtodor.

Stage 1

Receipt of a grievance

•You can file your grievance to Rosavtodor using one of the ways described above

## Stage 2

## Registration of the grievance

•Once the grievance is received, it will be registered, and a handler will be appointed.

## Stage 3

## Acknowledgement of receipt

•Within 5 working days after receiving your grievance, Rosavtodor will mail you a letter to confirm that they have received and registered the grievance, and to give you registration number of the grievance and the handler's name and contact details.

## Stage 4

## Investigation and resolution

Rosavtodor will investigate the facts and causes of the issue. During the investigation, you
may be contacted by authorised persons who may request additional information. Once the
investigation has been completed, you will receive a letter outlining its results and
proposed response measures if necessary.

## Stage 5

## Closure of the grievance

• Rosavtodor will use its best endeavours to settle the grievance within 30 calendar days from its receipt. If, based on the results of the investigation and the measures taken, you agree that the complaint has been resolved, Rosavtodor will offer to sign a statement of satisfaction with the results and the interaction process. If the grievance remains unresolved, it will be reviewed again and the possibility of further measures to resolve it will be discussed with you. If you are not satisfied with the decision on the grievance, you can go to court.

## Stage 6 Monitoring

•Rosavtodor may contact you additionally to make sure that you no longer have any concerns in relation to the grievance subject.
	Document # (To be completed by the authorized employee of the Project):				
1.	Full name of the sender				
2.	Sender's contacts (please indicate how you wish to be reached)	Address:			
		Telephone:			
		E-mail:			
3.	Preferred language of communication	□ Russian □ Other (please specify)			
4.	<ul> <li>Please tick one of the options below:</li> <li>I agree to transfer my personal data to third parties</li> <li>Please do not disclose my personal data without my consent / I would like to file the grievance anonymously</li> </ul>				
5.	Describe your grievance or an incident. What happened? Where and when did it happen? Who was involved in the incident? What were the consequences of the incident?				
6.	What do you think should be done to resolve the issue?				
7.	Signed:				
	Date:				
	Please mail this form to the following address: 129085, Bochkova str., 4, Moscow				

### APPENDIX 6: INTERNAL GRIEVANCE BROCHURE PIU

Version: 1.0

#### PIU (insert name)

#### **INTERNAL GRIEVANCE BROCHURE**

Project staff may complain about the actions of other employees or the actions of the PIU and its contractors regarding their work activities by filing grievances. Most grievances can be resolved on a routine basis through discussion with immediate supervisor. In this regard, the PIU recommends, before using this procedure, trying to resolve the issue through such a discussion.

Nevertheless, situations may arise where discussion with the immediate supervisor is impossible, for example, if the grievance concerns him/her personally or is not within the competence of the supervisor. In such cases, the employee is entitled to use the grievance mechanism presented below.

This brochure describes the kinds of concerns it covers, how a grievance may be submitted, and how it will be handled.

# Please note that the Grievance Redress Mechanism does not prevent any claimant to bring a concern before a court or a non-judicial agency.

#### What kinds of grievances may be submitted?

You can submit a grievance if you believe that the project activities are unsafe and has an adverse impact on you or your colleagues, e.g.:

- Non-observance of safety measures during work, transportation of goods and personnel, etc.;
- Unethical behavior by subproject employees;
- Infringement of rights workers;
- Offences committed by Subproject employees or by Subproject-related activities etc.

The PIU (*insert name*) will handle all grievances received in relation to the Subproject, investigate any alleged facts and causes of adverse impacts and implement corrective and preventive measures.

#### How can a grievance be submitted?

There are several ways to submit a grievance:

- Mail a completed grievance form (see the end of this document) to the following address: ......;
- Send an e-mail to: .....;
- Complete an electronic grievance form on PIU's website at ......;
- Call: .....;
- Request a personal appointment.

#### Confidentiality and anonymity

You may file an anonymous grievance if you wish. In this case, please note that giving an anonymous grievance may make it more difficult to resolve the issue or provide you with a response. If you insist on filing anonymously, please provide sufficient data and facts to enable an investigation and resolution without your involvement. Responses to anonymous grievances will be posted on information boards in the PIU office or construction camp (depending on the nature of the issue), unless otherwise indicated in the complaint.

You can also file grievances on a confidential basis. If you selected not to disclose your personal data, your details will not be disclosed. Confidentiality of your grievance will be ensured by grievance officers. However, there may be situations when your personal would have to be disclosed, e.g. if you have to testify before a court. In this case, grievance officers will discuss the situation and possible options.

### Grievance handling stages

Priority will be given to messages notifying of accidents, unsafe conditions, unsafe behavior and other safety-related matters at construction sites of Subprojects that require an urgent response. Such grievances will be considered within 1-2 days, other issues will be considered within 30 days.

## Stage 1

### Receipt of a grievance

•You can file your grievance to the PIU (*insert name*) using one of the ways described above

## Stage 2

### Registration of the grievance

•Once the grievance is received, it will be registered, and a handler will be appointed.

### Stage 3

### Acknowledgement of receipt

•Within 5 working days after receiving your grievance, the PIU (*insert name*) will mail you a letter to confirm that they have received and registered the grievance, and to give you registration number of the grievance and the handler's name and contact details.

## Stage 4

## Investigation and resolution

•The PIU (*insert name*) will investigate the facts and causes of the issue. During the investigation, you may be contacted by authorised persons who may request additional information. Once the investigation has been completed, you will receive a letter outlining its results and proposed response measures if necessary.

## Stage 5

### Closure of the grievance

•The PIU (*insert name*) will use its best endeavours to settle the grievance within 30 calendar days from its receipt. If, based on the results of the investigation and the measures taken, you agree that the complaint has been resolved, the PIU (*insert name*) will offer to sign a statement of satisfaction with the results and the interaction process. If the grievance remains unresolved, it will be reviewed again and the possibility of further measures to resolve it will be discussed with you. If a grievance is outside PIU's (*insert name*) area of competence, it will be forwarded to Rosavtodor.

## Stage 6

### Monitoring

•The PIU (*insert name*) may contact you additionally to make sure that you no longer have any concerns in relation to the grievance subject.

	Document # (To be completed by the authorized employee of the Project):		
1.	Full name of the sender		
2.	Sender's contacts (please indicate how you wish to be reached)	Address:	
		Telephone:	
		E-mail:	
3.	Preferred language of communication	□ Russian □ Other (please specify)	
4.	<ul> <li>Please tick one of the options below:</li> <li>I agree to transfer my personal data to third parties</li> <li>Please do not disclose my personal data without my consent / I would like to file the grievance anonymously</li> </ul>		
5.	Describe your grievance or an incident. What happened? Where and when did it happen? Who was involved in the incident? What were the consequences of the incident?		
6.	What do you think should be done to resolve the issue?		
7.	Signed:		
8.			
_	Please mail this form to the following address:		

Version: 1.0

#### APPENDIX 7: INTERNAL GRIEVANCE BROCHURE ROSAVTODOR

#### ROSAVTODOR

#### INTERNAL GRIEVANCE PROCEDURE

Project staff may complain about the actions of other employees or the actions of the PIU and its contractors regarding their work activities by filing grievances. Most grievances can be resolved on a routine basis through discussion with immediate supervisor. In addition, a separate grievance procedure has been developed for each unit of Rosavtodor involved into the Project.

If both mechanisms do not allow to resolve the 9ssue, or the grievance concerns the activities of the PIU management, the employee has the right to use the complaint mechanism presented below.

If both mechanisms fail to resolve the issue, or the grievance relates to PIU management, an employee has the right to use the grievance mechanism presented below.

This brochure describes the kinds of concerns it covers, how a grievance may be submitted, and how it will be handled.

Please note that the Grievance Redress Mechanism does not prevent any claimant to bring a concern before a court or a non-judicial agency.

#### What kinds of grievances may be submitted?

You can submit a grievance if you believe that the project activities are unsafe and has an adverse impact on you or your colleagues, and your grievance has not been settled during the appeal to the PIU, e.g.:

- Non-observance of safety measures during work, transportation of goods and personnel, etc.;
- Unethical behavior by subproject managers;
- Infringement of rights workers;
- Offences committed by Subproject employees or by Subproject-related activities etc.

Rosavtodor will handle all grievances received in relation to the Subproject, investigate any alleged facts and causes of adverse impacts and implement corrective and preventive measures.

#### How can a grievance be submitted?

There are several ways to submit a grievance:

- Mail a completed grievance form (see the end of this document) to the following address: 129085, Bochkova str., 4, Moscow;
- Send an e-mail to: rad@fad.ru;
- Complete an electronic grievance form on Rosavtodor's website at ...;
- Call: +7 (495) 870-97-22, +7 (495) 870-99-40;
- Request a personal appointment at http://rosavtodor.ru/obshestvennaya-priemnaya/zapis-na-priem.

#### Confidentiality and anonymity

You may file an anonymous grievance if you wish. In this case, please note that giving an anonymous grievance may make it more difficult to resolve the issue or provide you with a response. If you insist on filing anonymously, please provide sufficient data and facts to enable an investigation and resolution without your involvement. Responses to anonymous grievances will be posted on information boards in the Rosdavtodor's and PIU office or construction camp (depending on the nature of the issue), unless otherwise indicated in the grievance.

You can also file grievances on a confidential basis. If you selected not to disclose your personal data, your details will not be disclosed. Confidentiality of your grievance will be ensured by grievance officers. However, there may be situations when your personal would have to be disclosed, e.g. if you

have to testify before a court. In this case, grievance officers will discuss the situation and possible options.

#### Grievance handling stages

Priority will be given to messages notifying of accidents, unsafe conditions, unsafe behavior and other safety-related matters at construction sites of Subprojects that require an urgent response. Such grievances will be considered within 1-2 days, other issues will be considered within 30 days.

## Stage 1

### Receipt of a grievance

• You can file your grievance to Rosavtodor using one of the ways described above

## Stage 2

### Registration of the grievance

•Once the grievance is received, it will be registered, and a handler will be appointed.

### Acknowledgement of receipt

•Within 5 working days after receiving your grievance, Rosavtodor will mail you a letter to confirm that they have received and registered the grievance, and to give you registration number of the grievance and the handler's name and contact details.

# Stage 4

### Investigation and resolution

Rosavtodor will investigate the facts and causes of the issue. During the investigation, you
may be contacted by authorised persons who may request additional information. Once the
investigation has been completed, you will receive a letter outlining its results and
proposed response measures if necessary.

# Stage 5

### Closure of the grievance

• Rosavtodor will use its best endeavours to settle the grievance within 30 calendar days from its receipt. If, based on the results of the investigation and the measures taken, you agree that the complaint has been resolved, Rosavtodor will offer to sign a statement of satisfaction with the results and the interaction process. If the grievance remains unresolved, it will be reviewed again and the possibility of further measures to resolve it will be discussed with you. If you are not satisfied with the decision on the grievance, you can go to court.

## Stage 6

Monitoring

• Rosavtodor may contact you additionally to make sure that you no longer have any concerns in relation to the grievance subject.

	Document # (To be completed by the authorized employee of the Project):		
1.	Full name of the sender		
2.	Sender's contacts (please indicate how you wish to be reached)	Address:	
		Telephone:	
		E-mail:	
3.	Preferred language of communication	<ul> <li>Russian</li> <li>Other (please specify)</li> </ul>	
4.	<ul> <li>Please tick one of the options below:</li> <li>I agree to transfer my personal data to third parties</li> <li>Please do not disclose my personal data without my consent / I would like to file the grievance anonymously</li> </ul>		
5.	Describe your grievance or an incident. What happened? Where and when did it happen? Who was involved in the incident? What were the consequences of the incident?		
6.	What do you think should be done to resolve the issue?		
F			
7.	Signed:		
8.			
PI	Please mail this form to the following address: 129085, Bochkova str., 4, Moscow		

### APPENDIX 8: GRIEVANCE BROCHURE FOR INDIGENOUS PEOPLES PIU

#### PIU (insert name)

#### **GRIEVANCE BROCHURE FOR INDIGENOUS PEOPLE**

Construction of motorways may have an adverse impact on indigenous peoples living within the area of implementation of such projects.

PIU (*insert name*) and Rosavtodor with funding from the AllB plans to implement ... (*insert Subproject name*) in ... (*insert territory name*)

The PIU (*insert name*) commits to handle fairly and transparently any potential issues and concerns related to construction and operation of the motorway.

This brochure describes the kinds of concerns it covers, how a grievance may be submitted, and how it will be handled.

Please note that the Grievance Redress Mechanism does not prevent any claimant to bring a concern before a court or a non-judicial agency.

#### What kinds of grievances may be submitted?

You can submit a grievance if you believe that the project has an adverse impact on you, e.g.:

- Noise and dust from construction works;
- Safety risks;
- Infringement of rights of local residents;
- Offences committed by project employees etc.

The PIU (*insert name*) will handle all grievances received in relation to the project. If a grievance is not related to the project, you will be provided with a written explanation. In all other cases, the PIU (*insert name*) will investigate any alleged facts and causes of adverse impacts and implement corrective and preventive measures.

#### How can a grievance be submitted?

There are several ways to submit a grievance:

- Personally to the specialist responsible for GRM implementation;
- Call: .....;
- During meetings and consultations with Subproject's representatives;
- Mail a completed grievance form (see the end of this document) to the following address: ......;
- Send an e-mail to: .....;
- Complete an electronic grievance form on PIU's website at ......;
- Request a personal appointment.

#### Confidentiality and anonymity

You may file an anonymous grievance if you wish. In this case, please note that giving an anonymous grievance may make it more difficult to resolve the issue or provide you with a response. If you insist on filing anonymously, please provide sufficient data and facts to enable an investigation and resolution without your involvement and specify how you want the response to be sent to you (for example, publishing the response on the PIU website).

At your request, PIU will not disclose your personal data. However, there may be situations when your personal would have to be disclosed, e.g. if you have to testify before a court. In this case, the PIU will discuss the situation and possible options.

#### Grievance handling stages

Priority will be given to messages notifying of accidents, unsafe conditions, unsafe behavior and other safety-related matters at construction sites of Subprojects that require an urgent response. Such grievances will be considered within 1-2 days, other issues will be considered within 30 days.

If your grievance cannot be resolved using the PIU's mechanism, you can escalate it to Rosavtodor.

## Stage 1

### Receipt of a grievance

• You can file your grievance to the PIU (*insert name*) using one of the ways described above.

Stage 2

### Registration of the grievance

•Once the grievance is received, it will be registered, and a handler will be appointed.

## Stage 3

### Acknowledgement of receipt

•Within 5 working days after receiving your grievance, the PIU (*insert name*) will mail you a letter to confirm that they have received and registered the grievance, and to give you registration number of the grievance and the handler's name and contact details.

## Stage 4

### Investigation and resolution

•The PIU (*insert name*) will investigate the facts and causes of the issue. During the investigation, you may be contacted by authorised persons who may request additional information. Once the investigation has been completed, you will receive a letter outlining its results and proposed response measures if necessary.

## Stage 5

### Closure of the grievance

•The PIU (*insert name*) will use its best endeavours to settle the grievance within 30 calendar days from its receipt. If, based on the results of the investigation and the measures taken, you agree that the complaint has been resolved, the PIU (*insert name*) will offer to sign a statement of satisfaction with the results and the interaction process. If the grievance remains unresolved, it will be reviewed again and the possibility of further measures to resolve it will be discussed with you. If a grievance is outside PIU's (*insert name*) area of competence, it will be forwarded to Rosavtodor.

# Stage 6

### Monitoring

•The PIU (*insert name*) may contact you additionally to make sure that you no longer have any concerns in relation to the grievance subject.

#### Grievance form

	Document # (To be completed by the authorized employee of the Project):				
1.	Full name of the sender				
2.	Sender's contacts (please indicate how you wish to be reached)	Address:			
		Telephone:			
		E-mail:			
3.	Preferred language of communication	□ Russian □ Other (please specify)			
4.	<ul> <li>Please tick one of the options below:</li> <li>I agree to transfer my personal data to third parties</li> <li>Please do not disclose my personal data without my consent / I would like to file the grievance anonymously</li> </ul>				
5.	Describe your grievance or an incident. What happened? Where and when did it happen? Who was involved in the incident? What were the consequences of the incident?				
6	What do you think should be done to resolve the issue?				
0.					
7.	Signed:				
_	Date:				
_	Please mail this form to the following address:				