

MALICOUNDA POWER STAKEHOLDER ENGAGEMENT FRAMEWORK (8/21/20)

1 OBJECTIVES OF THIS FRAMEWORK

This framework has five main objectives:

- I. Put in place a communication framework that will allow Malicounda Power to:
 - A. interact with its stakeholders, such as the communities in its area of influence, and identify new stakeholders in the process;
 - B. bring forward any issues that might exist;
 - C. deliver on previous commitments and manage expectations; and
 - D. develop a plan to formalize a dialogue with various stakeholders.
- II. Take a preliminary step towards meeting the requirements of the International Finance Corporation's (IFC) Performance Standard (PS) 1 for a stakeholder engagement framework (SEF): "The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities."
- III. Detail a grievance mechanism. A grievance mechanism has already been developed in the ESIA and the resettlement action plan for the project, but it should be included in a SEF as an integral part of the Project's community engagement plan.
- IV. Identify the potential impacts to communities around the Project. Some impacts have been identified previously in the Project's environmental and social impact assessment (ESIA), but the consultation and participation process outlined in this framework may identify other potential social impacts.
- V. As a framework, this document will serve as a preliminary stakeholder engagement plan (SEP) during the beginning of the construction phase while a full SEP is developed.

Malicounda Power is committed to having strong ties with and positive social impacts on the communities in which it operates. This commitment will be demonstrated in all the projects in which Malicounda Power gets involved. Even at a very early stage, it is cognizant of the importance of obtaining its social license to operate and that community development is part of its strategic priority.

2 SUPPORTING DOCUMENTS

Cabinet EES, Malicounda Environmental and Social Impact Assessment, Final Report, October 2018 (in English and French)
Emile Diop, Malicounda Resettlement Action Plan, Final Report, 24 July 2020, with annexes (in English and French)
Malicounda Livelihood Enhancement Plan (once developed)

3 PROJECT DESCRIPTION

The Malicounda Project (“the Project”) consists of the construction and operation of a 120 MW (131.8 MW installed) thermal fuel power plant running on heavy fuel HFO, in continuous operation on the site of Malicounda. The power plant will include seven reciprocating engines running, each with an 18 MW capacity and a steam turbine with a 9 MW capacity. A combined-cycle is also planned, which will allow to have a higher efficiency. The Malicounda Power Plant will switch gas once it becomes available in Senegal (around the year 2023-24). The Project will be developed by Malicounda Power (the “Project Owner”), a joint venture between Melec PowerGen (BVI – 55%), Africa50 (30%) and SENELEC (15%).

The Project is being built on a land parcel of approximately 06 ha to be carved out from the 18 ha that were already conceded by the municipal council of Malicounda on the 13th of June 2018. It is located in the Malicounda municipality, in the Mbour County, Region of Thiès, more specifically just west of the village of Keur Maissa Faye (Malicounda Wolof), about 55 m to the north of the road between National Road No.1 and Malicounda. Access to the site by the engineering, procurement, construction (EPC) contractor was on October 14, 2019. The Project is expected to be completed by August 2021.

4 PROJECT AREA OF INFLUENCE

IFC’s PS 1 defines a project’s area of influence (AoI) as composed of five different elements:

- The area likely to be affected by: (i) the project and the client’s activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project; (ii) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities’ livelihoods are dependent.
- Associated facilities, which are facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable.
- Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.

At present, the Project’s AoI includes the following elements:

- (i) The Project’s site (6 ha) along with the EPC contractor’s facilities and activities (during construction) and the operating power plant and related facilities (during operation).

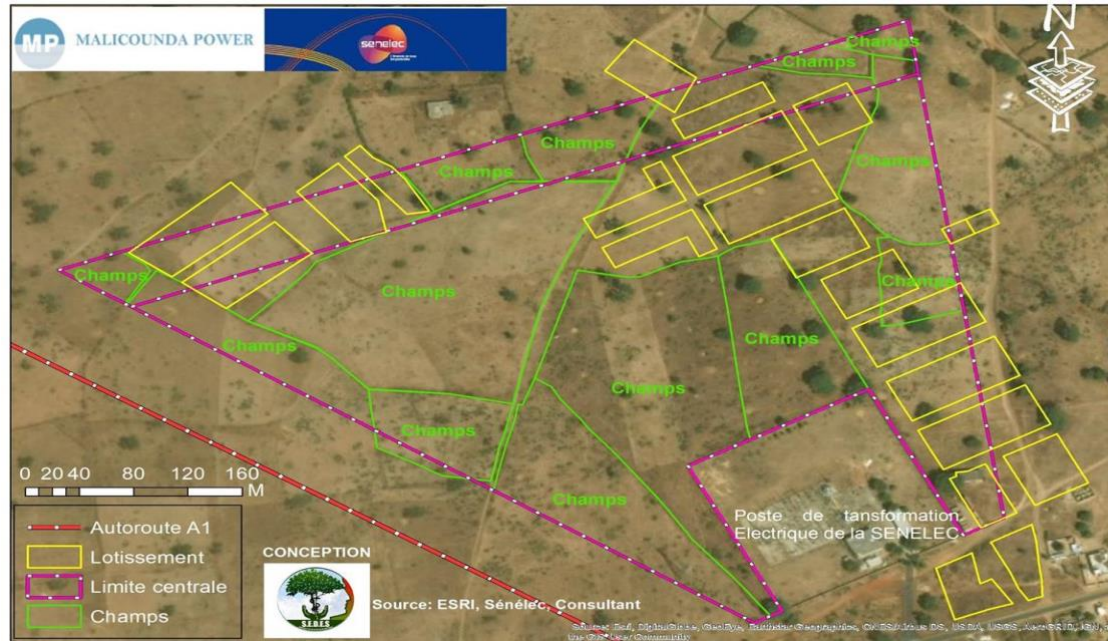
- (ii) The remaining twelve ha that serves as a buffer to the project and incorporates the access road to the nearest site and, during operation, the buried electric line evacuating power to the neighboring SENELEC substation.
- (iii) Transportation corridors leading to the site both from construction related traffic, but also fuel oil deliveries during operation. These transportation corridors are not considered associated facilities because they were not constructed for the Project and are not exclusively used by the Project's operations, but the cumulative impacts from increased Project traffic may be considered.
- (iv) The immediate airshed around the Project, based particularly on the potential for exceedances of WBG guidelines for SO₂, NO₂, and PM_{2.5}.

Three communities border on the project and are directly affected: Malicounda Ngeurigne (a part of Malicounda Sereer), Malicounda Bambara, and Keur Maissa Faye (a part of Milicounda Wolof). Each of these communities is made up primarily of a single ethnic group, as their names imply. Each community has a least one land owner whose land was taken up by the project. Because of the prevailing wind, Keur Maissa Faye is most likely to be affected by air emissions. Malicounda Bambara is on the public road to the site that will be used during construction. Additional communities that the project traffic may affect during construction include Malicounda Sas and Malicounda itself.

No indirect or induced impacts have been noted so far, e.g., population influx or cumulative impacts from other projects in the area. Consultations, however may identify such impacts from, for instance, increased demand and rising prices for agricultural land at least partially attributable to this Project. These indirect impacts, if they appear, will create an indirect area of influence.

The Aol will change when the infrastructure to bring gas to the Project is developed. This infrastructure will likely be an associated facility, the extent of which will depend on the design and access to other off-takers. The potential stakeholders would be determined at the time of planning for pipeline or gas storage facilities.

Prior Land Use at the Project Site



5 PROJECT IMPACTS

Positive Project Impacts

The most significant positive impacts during all phases of this project are:

- job creation;
- improving income and living conditions; and
- development of commercial activities for the benefit of the local population.

The electrical network operation phase (after works) will generate several positive impacts such as:

- the improvement of the supply of electrical energy to neighboring districts;
- the improvement of the living conditions at the level of households in all villages and neighborhoods which do not have access to electricity and which will be served with the increase in the distribution capacity of SENELEC;
- the development of income-generating activities since SMEs will be able to access energy at affordable costs; and
- better functioning of certain basic social infrastructures such as: schools, health centers and hospitals, etc., thereby improving their attendance rate, the quality of life of pregnant women, children, the elderly and the disabled.

Negative Project Impacts

The Malicounda thermal power plant project has undergone a successful environmental and social assessment process. Briefly, these impacts can be summarized as follows:

Construction phase	Operation phase
<ul style="list-style-type: none">• Emissions of dust and exhaust gases from vehicle traffic, transport and storage of construction materials• Increased road traffic along main roads to project site• The risks of contamination of the soil, subsoil and water resources by discharging accidental oil spills or by poor waste management• Degradation (erosion, compaction) of soils by civil engineering works• Vegetation degradation on at least 6 ha	<ul style="list-style-type: none">• Emissions of dust (PM10 and PM 2.5) and Greenhouse gases (SO_x, NO_x, and CO)• Soil and groundwater pollution likely to be caused by various activities of the plant (handling of fuel oil, storage of hydrocarbons, maintenance and washing activities of the plant)• Impacts on the water resources used by the populations (competition, overexploitation)

Construction phase	Operation phase
<ul style="list-style-type: none"> • Loss of ecosystem services • Modification of the natural flow of water due to earthworks (leveling, compaction, cut and fill) • Risks of accidents at work and with the population • Loss of land and sources of income • Risk of conflicts with local populations • Disruption of the living environment (noise, vibration, waste, traffic). 	<ul style="list-style-type: none"> • Risk of professional accidents • Risk of conflicts with local populations • Impact on the landscape with the presence of the power plant • Disruption of the living environment (noise, waste) • Hygiene, health and safety impacts

6 LEGAL REQUIREMENTS AND INTERNATIONAL NORMS

Public consultation is a component of the environmental and social impact assessment. It is governed by the law on the Environment Code by ministerial decree No. 9468 MJEHP-DEEC dated November 28, 2001 regulating the participation of the public in the environmental impact study.

It must constitute a platform for exchanges in which all environmental issues are addressed. Thus, public consultation has the following specific objectives:

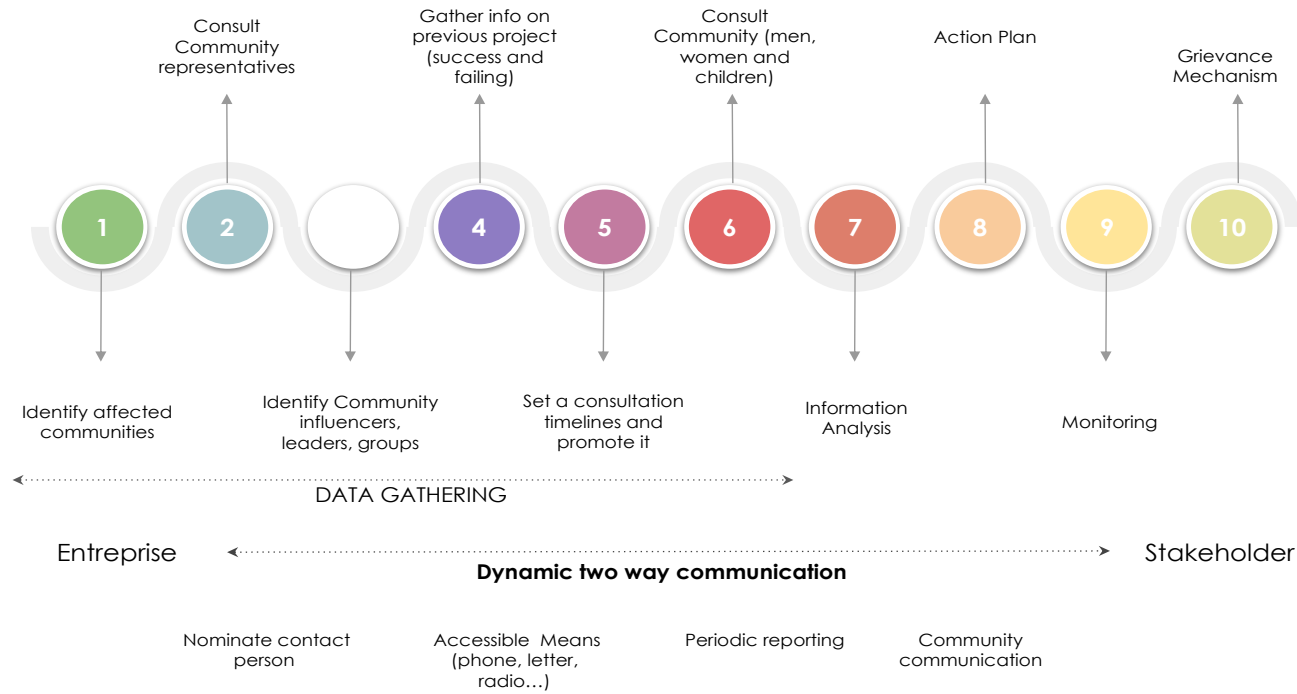
- To inform stakeholders about the plant construction and operation project 120 MW Malicounda thermal power plant;
- To collect their opinions and concerns in relation to the project components, objectives, challenges and priorities;
- To collect the recommendations of the stakeholders whose application will allow better sustainability of the project in its host site; and
- To collect up-to-date data on the locality, the department and the region from the technical services of the State and local authorities, which will enable understanding of the initial situation in the Project area.

The AfDB's requirements for consultation are found in Operational Safeguard (OS) 1 – Environmental and Social Assessment: “The borrower or client is responsible for conducting and providing evidence of meaningful consultation (i.e., consultation that is free, prior and informed) with communities likely to be affected by environmental and social impacts, and with local stakeholders, and also for ensuring broad community support....”

The general requirements for consultation in the IFC's Performance Standard 1 – Environmental and Social Assessment and follows the same general principle of free, prior, and informed consultation of those who are directly affected. Given the impacts of the project, the requirement would be for informed consultation and participation (ICP): “For projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation (ICP) process that will build upon the steps outlined above in Consultation and will result in the Affected Communities' informed participation.” ICP is a more iterative process that seeks to incorporate the views of the affected community in the environmental and social decision making of the project.

7 PROCESS

STAKEHOLDER ENGAGEMENT PLAN



8 PREVIOUS STAKEHOLDER ENGAGEMENTS

Date (DD/MM/YYYY)	Village	Number of present individuals	Notes
10/07/2017	Malicounda Wolof	28	For detailed information see, Tables 50-52, pp. 166 - 169 of the ESIA.
	Malicounda Serere	51	
	Malicounda Bambara	19	
23/07/2018	Public meeting	100	<p>This public meeting was put together after opposition to the project reportedly appeared in 2018, allegedly caused by false information coming from opponents of the Mayor of Malicounda. “This meeting brought together more than a hundred people, made up of representatives of the three villages [Malicounda Wolof, Malicounda Serere, and Malicounda Bambara] that met during the 2017 consultations and the following structures and authorities:</p> <ul style="list-style-type: none"> • Sindia sub-prefecture; • The Municipality of Malicounda (the mayor and his assistants); • Malicounda municipal council; • SENELEC; • The EES Cabinet; • The Commander of the Mbour

			<p>police.” (ESIA, p. 170)</p> <p>The ESIA consultants, EES Cabinet, explained the mitigation measures being put in place for the project, including the buffer zone, use of good quality fuel, and the development of a resettlement action plan. Following this explanation, the participants were reported to ‘acclaim their approval for the project,’ subject to the finalization of the ESIA.</p>
27/08/2019	Public meeting - PAPs/village chiefs/ Malicounda municipal councilor	9	For detailed information see, Annexes for the Resettlement Action Plan, pp. 44-46

9 STAKEHOLDER IDENTIFICATION AND ANALYSIS



9.1 Affected Parties and their Needs

The following is a detailed identification of directly, or potentially directly, affected stakeholders within the Project's area of influence, along with indirectly affected stakeholders in the host communities.

Stakeholder Groups	Stakeholder Sub-Groups	Potential Interests	Frequency of Engagement	Notes
Landowners on project site (PAP) [Reported to be from Malicounda Ngeurigne and Keur Maissa Faye, with one plot owned by someone from Malicounda Bambara]	Men	<ul style="list-style-type: none"> • Fair compensation for land and assets • Livelihood restoration • New agricultural or housing land 	<ul style="list-style-type: none"> • At least twice during development of livelihood enhancement plan (LEP). • At least monthly during implementation of LEP for those whose livelihood was affected and who are therefore participants in the livelihood enhancement programs. • Completion report, with consultation, after 4 years 	<ul style="list-style-type: none"> • Development of LEP will include consultations with PAPs, both men and women. • Will be ongoing efforts to provide information about land acquisition opportunities, e.g., if the Malicounda administration develops new housing subdivisions.
	Women	<ul style="list-style-type: none"> • Fair compensation for land and assets • Livelihood restoration • Loss of market opportunities • New agriculture or housing land 	Same as above	Same as above
Other members of PAP households	Men	<ul style="list-style-type: none"> • Loss of access to land • Livelihood restoration 	<ul style="list-style-type: none"> • At least once during LEP development to determine whether impacted by land acquisition 	<ul style="list-style-type: none"> • Development of LEP will incorporate household members who have been affected by land acquisition even when non-owners. They will be consulted further if they have been affected.
	Women	<ul style="list-style-type: none"> • Loss of access to land • Livelihood restoration • Loss of market opportunities • Project employment 	Same as above	Same as above
	Youth	<ul style="list-style-type: none"> • Loss of access to land 	Same as above	Same as above

		<ul style="list-style-type: none"> • Project employment 		
	Vulnerable people	<ul style="list-style-type: none"> • Identification of vulnerability • Income earning opportunities • Healthcare • Education (particularly for girls) 	<ul style="list-style-type: none"> • At least two consultations, first to identify vulnerability and participation in LEP, second to review possible measures as vulnerable person 	Same as above
People within immediate airshed	Residents in the area shown by monitoring and modeling to have possible air emission exceedances. ¹	<ul style="list-style-type: none"> • Information about pollutant levels 	Annually during operation	<ul style="list-style-type: none"> • Meet IFC requirement for ongoing reporting to community
	People vulnerable to breathing issues resident in the area having possible air emission exceedances.	<ul style="list-style-type: none"> • Warning of possible pollutant exceedances 	As needed to protect health	<ul style="list-style-type: none"> • Consider improved access to healthcare
Herders	All households in Keur Maissa Faye and Malicounda Ngeurigne.	<ul style="list-style-type: none"> • Access to grazing land • Access to water • Market access 	<ul style="list-style-type: none"> • At least once during preparation of LEP to determine inclusion 	<ul style="list-style-type: none"> • Additional consultations may take place if included in LEP because of impact from land acquisition, otherwise included in general host community consultations.
Community members in host communities	Men	<ul style="list-style-type: none"> • Job opportunities • Business opportunities • Health • Religious facilities 	Yearly	<ul style="list-style-type: none"> • Preparation of a community development/CSR plan
	Women	<ul style="list-style-type: none"> • Job opportunities • Business opportunities • Women's health. Prenatal, infant and child health • Education 	Yearly	Same as above

¹ ESIA, p. 195, states that the results of the ADMS atmospheric dispersion model, even with a 42 m stack, shows the possibility of average daily SO₂ levels at a monitoring site near the solar project could exceed WHO intermediate targets, with possible similar levels at some intermediate points. The exceedances would occur approximately 6 days out of the year. The area of these predicted exceedances would be considered the 'at risk' area.

		<ul style="list-style-type: none"> • Access to water 		
	Youth	<ul style="list-style-type: none"> • Job opportunities • Business opportunities • Education • Sports facilities 	Yearly	Same as above
	Vulnerable people	<ul style="list-style-type: none"> • Identification of vulnerability • Income earning opportunities • Healthcare • Education (particularly for girls) 	Yearly	Same as above
Communities along tarmac road used for truck access to Project site during construction (Malicounda, Malicounda Sas, Malicounda Bambara)²	Community leaders	<ul style="list-style-type: none"> • Road safety measures • Traffic control 	Monthly during construction; yearly after construction	<ul style="list-style-type: none"> • Review and revision of traffic safety policies and provisions. Consideration of alternative routes.

² During operation, site access will be via the toll road adjacent to the site.

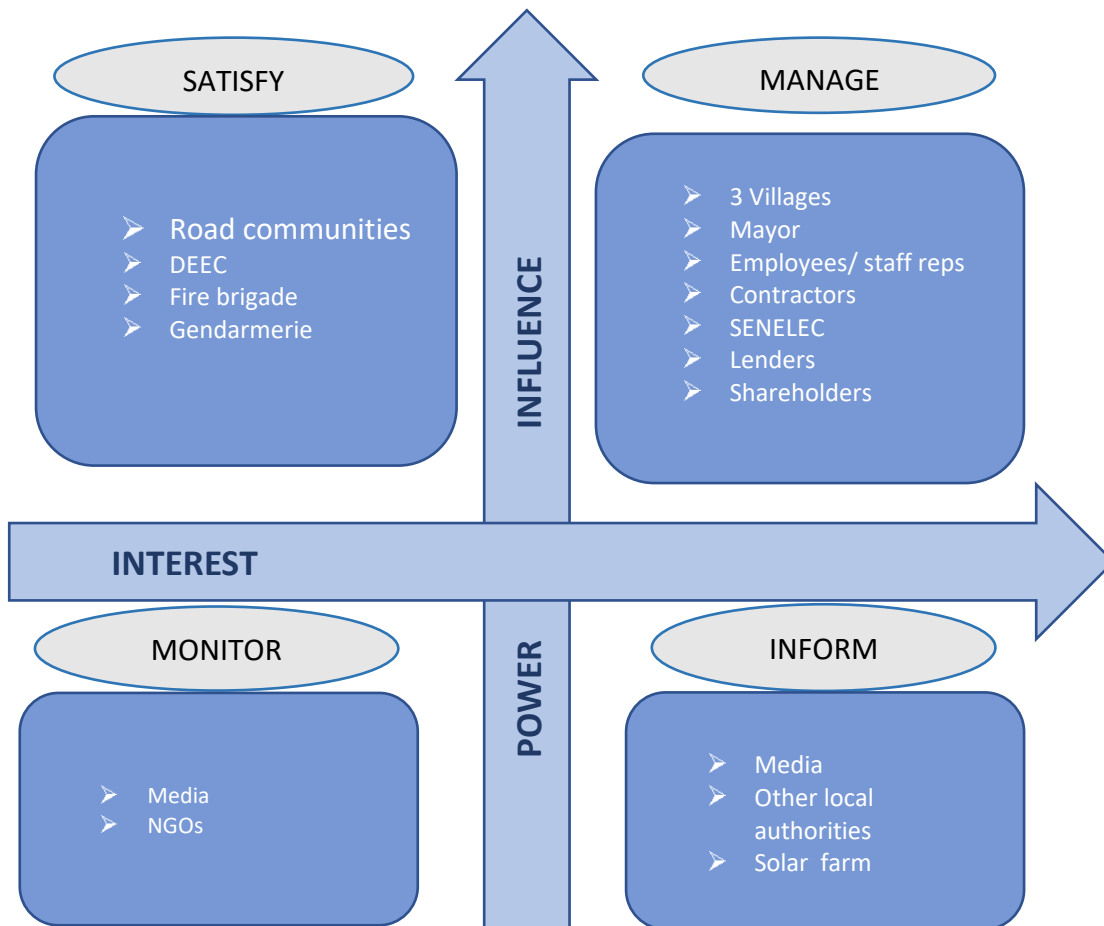
A list of institutional stakeholders is as follows:

Stakeholders	What do they want from us?	What do we need from them?	Strategic Objectives	KPI
Government	<p>SENELEC</p> <ul style="list-style-type: none"> ➤ Availability anytime <p>MINISTRY OF ENVIRONMENT- DEEC</p> <ul style="list-style-type: none"> ➤ Regulatory compliance, annual reporting on effluent, air quality and noise based on the ESMP. Any exceedance must be highlighted. <p>Mayor's office</p> <ul style="list-style-type: none"> ➤ Financial support to meet his obligation with the population example (water for the communities when there is shortage, events etc.) <p>District Administrator</p> <ul style="list-style-type: none"> ➤ Compliance and some support. ➤ Information on social actions we are doing as it gets reported to the President <p>Fire Brigade</p> <ul style="list-style-type: none"> ➤ Malicounda to involve them in drills and emergency situation ➤ Hire them for first aid training ➤ Support them for events ➤ Fuel (215 liters) 	<ul style="list-style-type: none"> ➤ Respect contract ➤ Engagement, communication ➤ Facility inspection to confirm compliance ➤ Good collaboration, communication and support our community development initiative and involvement of his bureau in grievance resolution ➤ Good collaboration and communication ➤ Commitment to duty ➤ Quick and effective response 	<ol style="list-style-type: none"> 1) Develop strong relationship with SENELEC 2) Compliance with all legal requirement pertaining to environment, health, safety and security 3) Timely Reporting 4) Proactive in our engagement to anticipate potential issues as well as share our social impact achievements 	<ul style="list-style-type: none"> ➤ Number of permits not renewed on time ➤ Number of reports not submitted on time ➤ Number of fire drills ➤ Number of non-compliance issued by authorities ➤ Number of fines

	Gendarmerie ➤ Fuel (215 liters)	➤ Security coordination ➤ Cooperation and support ➤ Rigor ➤ Information sharing ➤ Timely response		
Organized Development Groups (NGOs, development partners, community groups)	➤ Job and internship opportunities ➤ Support in community development projects ➤ Access to water for farming	➤ Communication in good faith, and transparency ➤ Dialogue ➤ Support in implementing some social impact projects	Inclusiveness	➤ Number of engagements / info sessions with NGO ➤ Number of NGOs used in CIS
Other Companies in the Project Surrounding	➤ Collaboration on community development	➤ Collaboration on community development ➤ Collaboration on Security and Safety issues as well as emergency response	Partnership for Social Impact	➤ Number of joint projects
Lenders	1) Compliance with their environment, health, safety and social (EHSSS) Performance Standards 2) Compliance with ESMS 3) Timely annual report 4) Report on specific incidents within 3 business days 5) Available and prepared for site visits 6) Responsiveness	1) Responsiveness 2) Constructive support	Compliance with CTA and Malicounda ESMS	➤ Number of incidents of non-compliance (target zero)

Equity Partners	1) Avoid any reputational risks arising from EHSSS 2) EHSSS compliance with CTA Agreement 3) Create value through ESG/ increasing brand equity	1. Support Malicounda Power strategic plan	Protecting the Reputational Risk of the Company in relation to EHSSS	➤ #Negative credible media attention ➤ Improve E&S Performance Energy, water efficiency and waste generated and recycled
Contractors	Quality Control ➤ Good business relationship and renewed contract Security Guards ➤ Good business relationship and renewed contract Fuel delivery services ➤ Good business relationship and renewed contract Employees transport system ➤ Good business relationship and renewed contract	➤ Consistency of delivery on standard of service agreed. ➤ Good work ethic ➤ Security Plan ➤ Consistency of delivery on standard of service agreed. ➤ Good work ethic ➤ Respect of staff and communities ➤ Well trained ➤ Consistency of delivery on standard of service agreed ➤ Community Safety ➤ Good work ethic ➤ Good driver management ➤ Consistency of delivery on standard of service agreed ➤ Clean cars ➤ Safe drivers ➤ Community Safety	Effective support in our business operations	➤ Number of non-compliances with service contract ➤ EHSS incident resulting from contracting services

Staff Representatives	<ul style="list-style-type: none"> ➤ Job security and good remuneration ➤ Respect ➤ Safety ➤ Career development and Training ➤ Empathy 	<ul style="list-style-type: none"> ➤ Competence ➤ Good Work Ethics ➤ Loyalty ➤ Job satisfaction ➤ Good Ambassadors of Malicounda 	<ul style="list-style-type: none"> ➤ Performance Evaluation System ➤ Career development Plan including training 	<p>To be developed with HR</p> <p>Attrition rate</p> <p>Employee satisfaction survey rate</p> <p>Training etc.</p>
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9.2 Disadvantaged/vulnerable individuals or groups

Main Criteria	Value
Being a PAP woman head of a household with more than 5 children in charge	10
Being a divorced woman PAP head of a household	10
Being a single woman PAP head of a household	10
Being a minor PAP head of a household (less than 18 years of age)	10
Being a 60-year old or more woman PAP head of a household	10
Being a 70-year old or more man PAP head of a household	10
Being a PAP head of a household living with a disabled or a disabling chronic illness	10
Being a PAP head of a household with no secondary activity	10
Secondary Criteria	Value
Being a PAP with a monthly income less than 263,541 CFA Francs	5
Being a PAP with more than 5 children in charge with an income of less than 200,000 CFA Francs	5
Being a PAP head of a household not having another member who helps them to take care of the household	5
Being a PAP head of a household with a monthly expenditure of less than 240,000 CFA Francs	5

Any PAP having obtained a score greater than or equal to 20 points is identified as potentially vulnerable.

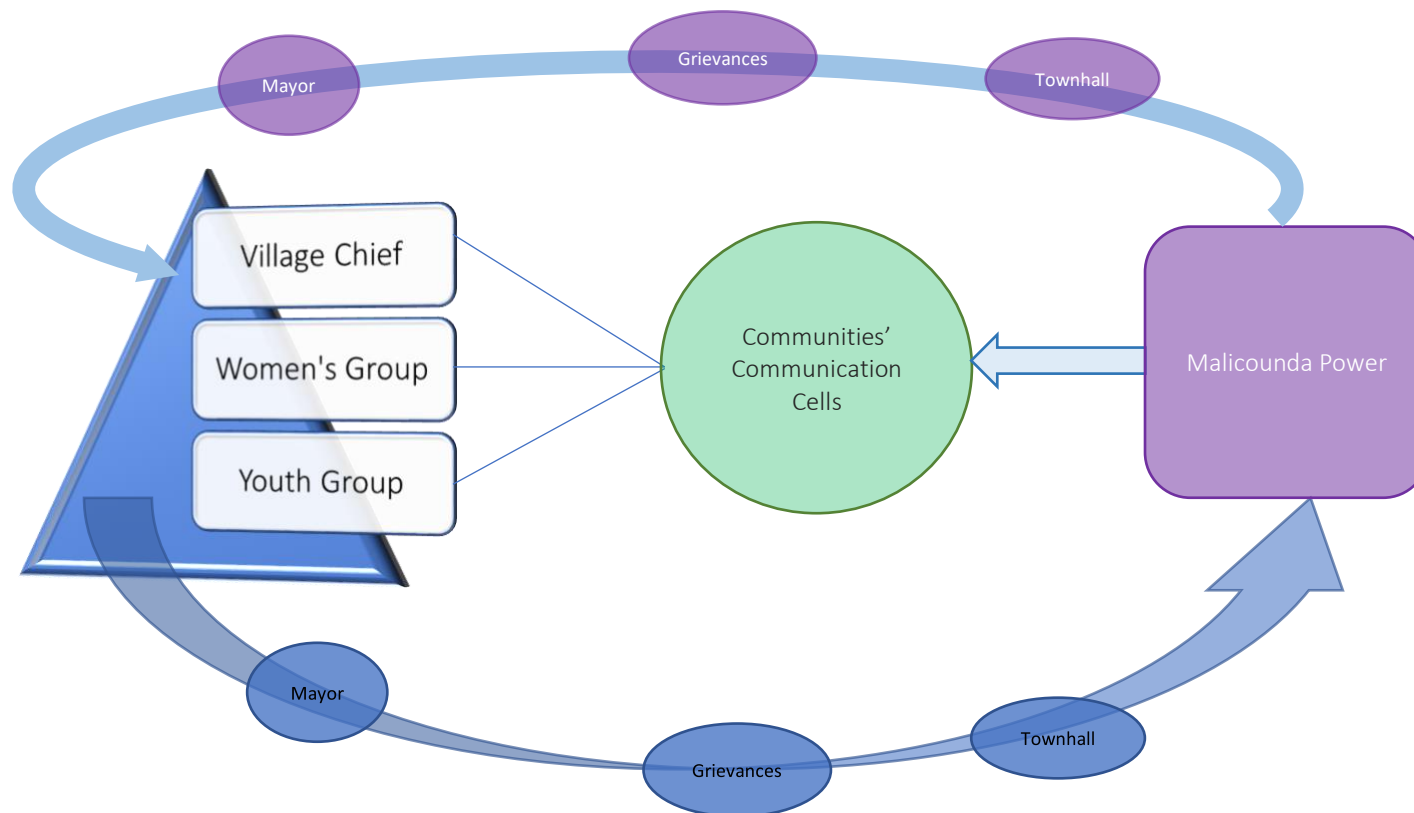
There are no identified groups or communities of indigenous people in Senegal, and, therefore, none in the Project Aol. None of the ethnically differentiated communities in the Aol are considered disadvantaged.

10 STAKEHOLDER ENGAGEMENT PROGRAM

10.1 Proposed Strategy for Consultation

Malicounda Power will establish effective communication channels with the communities both to communicate information but also to obtain insight from the community on any issues of concern and what is working well. The Project will create Community Communication Cells (that will encapsulate particular groups identified in 8.1 above, e.g., women living in PAP households, to discuss issues that may be of particular importance to those groups. General community meetings – town hall style – will be held when providing the communities as a whole with information, e.g., community development initiatives updates, monitoring information, plan to build a new gas pipeline to the plant etc.

Strategy:



The Community Communication Cells must reflect representation from relevant community members.

10.2 Communication means and frequency:

Means of Communication	Frequency of Communication
Youth and Women' Groups	On a need basis but no less than every three months
Community Communication Cell	Every three month unless there is a grievance resolution meeting scheduled
Mayor's office	Weekly
Townhall	Every three month unless there is a special event that requires such gathering

10.3 Information Disclosure

All Project environmental and social documents, i.e., environmental and social impact assessment, resettlement action plan, stakeholder engagement framework (and plan once developed), and livelihood enhancement plan (when prepared), will be given to each of the three village chiefs to ensure that they are available to the communities. These documents will be available for the life of the Project. Additional disclosure of such things as monitoring data relevant to the community will also be made publicly available.

A further innovation will be the creation of graphic banners that will provide a series of key images on a large vinyl banner that can be left hung-up in a community or communities. The banner will be developed with the help of people knowledgeable in the local culture. People within the community, with different backgrounds, will be trained in explaining the meaning of the images. These banners would be used particularly to inform people who do not use a written language, are illiterate, or are in locations without electricity that would allow the use of computer-based presentations. The full SEP will incorporate graphics that can be used to explain the impacts of the project, the stakeholder engagement process, and the grievance mechanism. The banners will be periodically updated based on any changes in the Project, or commitments to the community.

11 RESOURCE AND RESPONSIBILITIES FOR IMPLEMENTING THE STAKEHOLDER ENGAGEMENT ACTIVITIES

Responsibility for stakeholder engagement will rest with the plant manager, who will be supported by the Project's EHSS Manager. A budget will be allocated to implement the stakeholder engagement plan for 2020.

12 GRIEVANCE MECHANISM

The grievance mechanism for the communities as a whole will follow the same steps as the grievance mechanisms for the PAPs detailed in the RAP but with a broader representation of the Local Mediation Committee (LMC) to recognize the broader set of interests in the communities. The LMC will be comprised of:

- a. The 3 village chiefs
- b. The Iman
- c. The Badienou Gokh (respected women leaders)
- d. Representatives of youth groups (to include young women)
- e. Representatives from the mayor's office
- f. Representative of Malicounda

Receipt of Grievances

Grievances may be received through several channels. Verbal complaints expressed to any employee by a community member will be recorded on a complaint reporting form. This procedure will allow non-literate community members to express their grievances. Additional channels will include a publicly located complaints box, a published email address, and an agreement with the village chiefs and mayor to accept complaints on behalf of community members. Once Malicounda has received a grievance or complaint, it will initiate a possibly four step process. Not every step may be needed to resolve the grievance.

Step 1

A team for receiving and monitoring complaints will be made available by the Project Company and will play the role of facilitating structure. This internal unit, made up of part of the Project staff, will be chaired by a manager who centralizes all information relating to complaint management. The composition of this unit will be determined by the General Manager of Malicounda Power. The actors will have the task of assisting the complainants on a daily basis and will be called upon to assist the complainants and inform them of their rights.

This unit will be the place to where any complainant, wishing to lodge a complaint, will be referred. Within ten (10) business days Malicounda Power will investigate and respond in writing to the complaint, if the complainant is satisfied with the response then process is completed and should the response be unacceptable then the grievance will be escalated to a resolution meeting. The meeting will examine the claims of the complainant and will try to find an appropriate answer for the complainant before the complainant addresses his/her request to the LMC.

This unit will act as an interface between the complainant and the Project promoters and will be responsible for:

- ✓ Receipt of the complaint ;
- ✓ Assisting complainant in formulating her or his complaint (illiterate people, people with physical disabilities, etc.). For example, if the complainant is illiterate, they should be accompanied by a witness who can read and write;
- ✓ Entering the complaint on a complaint form;
- ✓ Verifying the complaint in the field with the complainant. This verification will assess the admissibility of the complaint. The results of the verification will be registered on the claim form signed by the PAP;
- ✓ Recording of admissible complaints from the complainants in a grievance tracking system; and
- ✓ Forwarding unresolved complaints to the LMC for amicable resolution.

Step 2

Complaints that could not be resolved in step 1 will be transmitted to the LMC for amicable resolution within 48 hours of its receipt by the committee.

If the LMC, being a mediation entity, determines that the request is well-founded, the Company must address the grievance appropriately.

If the LMC believes that grievances require dispute resolution, a meeting should be scheduled as soon as possible, but no later than ten (10) business -days. This meeting will include members of the Malicounda communication unit and the complainant, who is free to bring a trusted person to accompany him/her. If the complainant agrees to the suggestion of a resolution recommended by the LMC, the minutes of mediation can be signed and the resolution of the complaint will be entered in the complaint tracking system, thereby ending the claim resolution process.

If the attempt to reach an amicable resolution is unsuccessful, or if a party is not satisfied with the resolution rendered by this second step, the parties may take the dispute to Court.

Step 3

Departmental Court: Failing a resolution by mediation with the LMC, the file is transferred to the Court of Mbour to start legal procedures, and the complainant may initiate a referral to the Prefect of the department to rule on this situation. In the event of disagreement with this body, the PAP may then initiate a judicial procedure.

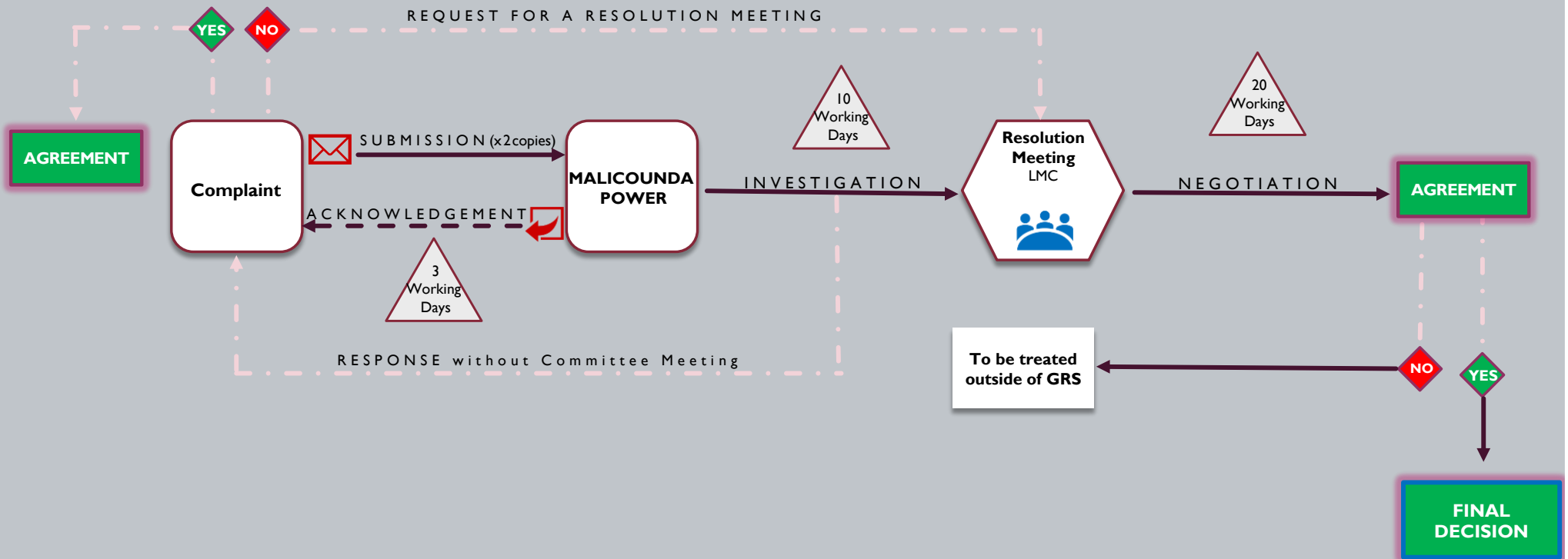
Step 4

This last stage of resolution includes the Regional Court, which is the common law judge in all matters. The Regional Court will deal with the complainants who have not found an amicable solution through the first three steps.

The litigation procedure can be burdensome, complicated, and costly for the litigant. It is sometimes unsuitable for those who have de facto rights to which the judge may not pay attention. Finally, the litigation procedure is problematic for a population that is generally illiterate. Therefore, amicable dispute resolution will be preferred in the context of this Project.

Moreover, it is important to mention that while the litigation is in the hands of the judge, any disputed amounts of compensation, for example for land acquisition, are deposited at the Deposit and Consignment Office. Construction or operation will only be halted if the grievance concerns the health and safety of the communities in the Aol.

GRIEVANCE RESOLUTION WORKFLOW



13 MONITORING AND REPORTING

Malicounda Power will monitor and evaluate the effectiveness of this SEP. The SEP outlined above is a dynamic process and as such the change in needs of the stakeholders might change over time. The level of satisfaction or dissatisfaction of the communities can go up and down and therefore, the effectiveness and fit-for-purpose of the stakeholder engagement needs to be evaluated. Malicounda Power plant manager in collaboration with the EHSS team will ensure that the stakeholder engagement plan is being executed and will update the stakeholder engagement matrix at a minimum quarterly to ensure that there are no new stakeholders or the needs have not changed. Furthermore, feedback will be regularly sought from key stakeholders on the efficacy of the stakeholder engagement plan. Suggestion boxes have been strategically placed in the Mayor' office, in the community and at the entrance of Malicounda Power Plant.

13.1 Reporting Back to Stakeholder Groups

Reporting to stakeholders will take place through the engagements with Community Communication Cells, e.g., youth and women groups, and last but not least through the quarterly townhall meeting that will take place starting December 2020.

ANNEXES

Annex 1

3 Villages in Malicounda

Villages	Village Chief	Women representative (Badienou Gokh)	Youth representative	Imam
Malicounda Sereer	Moustapha FAYE	Astou FAYE		
Malicounda Bambara	Aliou SANGHARE	Awa KEITA	Mou SYLLA	
Malicounda Wolof	El Hadji Masidy FAYE	Nogoye FALL	Modou FALL	

Annex 2

Malicounda Local Authorities

Structures	Name
Mayor of Malicounda	Maguette SÈNE
Subprefecture	Ibrahima NDIAYE
Prefecture of Mbour	Mor Talla TINE
Governor of Thies	Mouhamadou Moustapha NDAO