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1. INTRODUCTION

1.1 Project overview

ONEX Technology Systems & Business Solutions S.A (hereinafter **ONEX**) is currently considering the acquisition, restoration and operation of **Elefsis Shipyards** through rehabilitation process. Shipyards is currently managed under the **SHIPBUILDING AND INDUSTRIAL ENTERPRISES OF ELEFSINA SA**. The Shipyards were founded in 1962 and represent a valuable part of the Greek Industry and country's industrial and shipbuilding tradition. The company has been hit hard by the crisis in the European shipbuilding sector and the intense competition from Southeast Asian companies. For the last 2 years, Elefsis Shipyards are almost inactive.

The new company, through a bankruptcy consolidation plan and through a court decision, will acquire the fixed assets of Elefsis Shipyards. The plan provides for 12-24 months of repairs and rehabilitation works so that the Shipyards will be, not only operational, but also environmentally and socially viable. All repairs and rehabilitation works will be based on the current ESIA, and the required actions included in the standards set by the DFC.

The Shipyards are sited and operate near the 27th km of Old National Road Athens - Corinth, at Makria Ammos location, in the Municipality of Elefsis, in the Subregion of West Attica, in the Prefecture of Attica, Greece. Shipyards current basic operative features include:

- Construction of new ships
- Modifications of floating means (e.g., platforms) of oil extraction
- Ship repairs
- Industrial constructions



Except shipbuilding and ship repairing, the new operator is about to install new activities including:

- Conversions and improvements of merchant ships to reduce environmental footprint (carbon emissions) according to the regulations of the International Maritime Organization (IMO), through installing scrubbers and ballast water treatment units.
- Implementing new technologies (nanotechnology) in materials production
- Producing information technology (IoT) systems for ships

1.2 Scope of the Stakeholder Engagement Plan (SEP)

This SEP applies only to the Elefsis Shipyards operations, under ONEX administration. Similar SEP in line with company policies have been developed for the other operations and/or will be developed for future activities.

The SEP provides the framework, policies and procedures based on which ONEX will plan and implement its stakeholder engagement regarding rehabilitation and future operation of Elefsis Shipyards. This SEP includes guidelines for establishing and maintaining good relationships with relevant stakeholders throughout the course of Project's activities.

Stakeholders are those 'external' to Elefsis Shipyards operation who have an interest or can influence project operations, such as affected individuals and communities, local government authorities, non-governmental and other civil society organizations, academia, media and other interested or affected parties. Stakeholders, such as contractors and suppliers are also addressed on this SEP.

The framework helps to ensure that adequate information is provided to the project-affected people and other stakeholders in a culturally appropriate and timely manner



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and that these groups are provided sufficient equal opportunity to voice their opinions and concerns with regards to Elefsis Shipyards operations.

The SEP is a “living” document which is regularly updated to include and enable:

- (1) Documentation of all consultation activities proposed and undertaken (Monitoring)
- (2) Review of appropriateness and effectiveness of methods used in engaging with stakeholders (Evaluation).



2. PROJECT CONTEXT

2.1 Project description

2.1.1 Construction/Rehabilitation (C/R) Phase

According to ONEX BPL, the implementation schedule of the described works is estimated at 12-24 months in order to achieve full functionality of the Shipyards.

Regarding buildings and other structures, the new owner must acquire a new building permit. Asbestos must also be removed from several buildings and managed by properly licensed company.

Port facilities (tanks, shipbuilding bed, piers) need the appropriate maintenance before operation. Especially pier no 2, requires immediate repairing works and that task has been appointed by ONEX to an independent engineer.

Existing Petrol Station also requires maintenance and renewal of its license. Sufficient firefighting equipment exists, but many of the relevant certificates (especially for portable extinguishers) must be renewed. The rest of electrical-mechanical equipment, although in satisfactory condition, also needs maintenance and certifications renewal.

Waste removal works are described in detail in the ESIA. Some critical points include:

- All HW (including asbestos) and NHW must be removed from temporary storage areas according to the current Greek Law, by properly licensed companies that will undertake both collection and transport of waste
- All waste falling under the scope of alternative waste management (e.g., batteries, EEEW etc.) should be managed accordingly

- If, after waste removal, any inconsistency or disruption of the floor is observed, immediate action should be taken to remove concrete and the underlying soil to avoid any contamination. A sampling borehole should be established in order to assess the contaminant migration to the underlying soil.

Other necessary works include the thorough clean-up of the drainage network and ATEX certification for any infrastructure/equipment that is about to operate in specific environments with explosive atmospheres.

After the conduction of the abovementioned C/R works, the new operator is about to install some new activities (additionally to the existing ones) including:

- Conversions and improvements of merchant ships to reduce environmental footprint (carbon emissions) according to IMO regulations, through installing of scrubbers and ballast water treatment units.
- Implementing new technologies (nanotechnology) in materials production
- Producing information technology (IoT) systems for ships

During C/R phase it is estimated that some 7,200 tn of NHW, 7 tn of asbestos and 1 tn of other HW will be produced. With respect to liquid waste production, no significant streams are expected, with the exception of an accident. Air pollutants maybe generated during waste removal operations, works involving handling of inert materials (e.g., during pier repairing) and due to motorized equipment operation. Finally, noise and vibrations are expected in levels typical for a construction site.

Prior to the commencement of the Shipyards operation, the following permits and certificates should be obtained:

- AET, after conduction and approval of an ESIA from YPEN
- Renewal of the existing Occupational Safety Assessment and certification under OHSAS 18001



- Port Authority Permit for the conduction of port-related works (pier, tanks) after conduction and approval of the appropriate port, static and E/M studies
- New building permit
- Renewal of ISO 9001:2015 Quality Management System Certificate
- Renewal of ISO 14001:2015 Environmental Management Systems Certificate

Finally, the cost of C/R works was estimated approximately **40,000,000 €**, while the respective timeline is maximum **24 months**.

2.1.2 Operational Phase

ONEX plan for the operation of Elefsis Shipyards, after completion of the C/R phase, is based on the following pillars:

- Full utilization of the existing capacity of the facilities of the Elefsis Shipyard
- Reorganization of current activities (shipbuilding and ship repairing)
- Provision of additional services regarding modifications and improvements of merchant ships to reduce the environmental footprint (carbon emissions) (scrubbers, ballast water treatment etc.) and combining new technologies (nanotechnology) in production materials and IT (IoT) in ship systems.

Under the new ownership, the Shipyards are expected to occupy 1200-1500 employees. The labor force during specific periods may exceed 2000, not including subcontractors. As far as resources consumption, the following amounts are expected:

- Water: 240 m³/day
- Electricity: 20,000 MWh/year
- Fuels: 50.000 l/year

Some of the most important liquid waste streams expected during operation phase include water with petroleum products (EWC codes: 13 04 01 *, 13 04 03 *, 16 07 08*), used mineral oils (EWC code: 13 02 06 *), water with chemicals, reef colors and



sanitary waste. Other streams may be derived from ships and include dirty ballast, slop, bilge water etc.

Solid waste can be divided to those coming from the production process (e.g., metal scrap and similar waste, packaging materials, sandblasting waste) and those received from ships (e.g., municipal, operational, special waste etc.). All waste expected are categorized according to EWC codes.

Air pollutants are categorized in terms of their nature (e.g., PM, VOCs etc.) but also based on their origin (thermal cutting, sandblasting etc.). Finally, noise and vibrations levels expected are also distinguished according to their source (e.g., sandblasting activities).

2.2 Baseline conditions

The current conditions of Elefsis Shipyards are thoroughly described in Chapter 3 of the ESIA, revealing the main problems and discrepancies of the current status of the Shipyards, and it comprises the guide for ONEX's future decision making in terms of rendering the facility operational. More specifically, extensive information is provided in terms of current permits and certifications status, buildings, infrastructure, networks, waste present on site, wastewater management facilities and materials handling & storage. Furthermore, the current personnel and the OHS status are also described.

The crucial findings of the baseline report include the main actions need to be taken from ONEX prior to the commencement of the new operational phase. Key sectors include waste management (including asbestos), clean-up processes, infrastructure and network maintenance, material handling and storage and certifications renewal.



3. APPLICABLE REQUIREMENTS

3.1 Lenders requirements

According to IFC Standard 1, section 25: “Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts”. Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements:

- Stakeholder analysis and planning
- Disclosure and dissemination of information
- Consultation and participation
- Grievance mechanism
- Ongoing reporting to Affected Communities

The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project’s risks and adverse impacts, and the project’s phase of development.

3.2 National legislation

Regarding National Legislation, the JMD 1649/45/2014 (OG 45/B/2014): "Specialization of the procedures for expressing opinions, the way of information and the participation of Public and relevant Stakeholders in the public consultation during the environmental licensing of Category A projects and activities”, sets the framework for the participation of Public and Stakeholders to the environmental licensing of Category A projects.



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Within the time limit set for the public consultation, the public concerned has the right to express substantiated views in writing and comments on the impact on the environment that the project may cause. These views are submitted or mailed electronically, preferably to the competent authority of the relevant Region. The above views may be submitted also through the Digital Environmental Registry (DWR) platform.

The informed public and the interested Stakeholders participating in the public consultation, have the right within the deadlines set for public consultation, to be informed of the environmental data relevant to a project or an activity, addressed to the relevant Region, or the relevant Municipality or, finally, the competent environmental authority (YPEN).



4. STAKEHOLDER IDENTIFICATION

4.1 Stakeholder Categorization

This section is used to identify all of the project's stakeholders by name. At a minimum, the section also defines their roles and responsibilities as they relate to the project.

In general, Stakeholders are defined as individuals or groups, external to a project's core operations, that may be affected by the project, have an interest in it or have influence over it.

Stakeholders were identified based on:

- Elefsis Shipyards staff and contractors' general knowledge of the area
- Site visits conducted by ONEX executives and ENVITERRA consultants
- The ESIA consultants' general knowledge of the area and previous experience conducting ESIA's in Greece and EU

During the recent stakeholder engagement, a list of stakeholders was developed by taking into account the following considerations:

- Potential Project's impacts during its life cycle, with focus on the operational phase,
- Type of stakeholder engagement mandated by laws and Project standards,
- Potentially people / organizations (directly and indirectly) affected by potential impacts in the Project's area of influence; and
- Vulnerable groups required special engagement efforts

Key stakeholders' groups that were preliminary identified, include the following parties (Table 4.1).

Table 4.1: Stakeholders Categories

Stakeholder Categories	Stakeholders
Government/Administration	<ul style="list-style-type: none"> • Ministry of the Environment • Ministry of Maritime Affairs and Insular Policy • Port Authority • Prefecture of Attica/Subregion of West Attica • Municipality of Elefsis
Main Project Parties	<ul style="list-style-type: none"> • Lenders • Employees Union • Contractors/Suppliers
Directly Affected Stakeholders and project affected people	<ul style="list-style-type: none"> • Local Community (municipality of Elefsis) • Vulnerable Groups (refugee camp residents) • Affected individuals • Affected installations • Local Businesses (e.g., accommodation etc.)
Economically Interested Parties and Business Partners	<ul style="list-style-type: none"> • Lenders • Individual Shareholders
Non-governmental organizations (NGOS) & Medias	<ul style="list-style-type: none"> • National Media • Local Media • NGOs

4.2 Stakeholder Mapping

The stakeholder mapping matrix is a tool which assists in identifying where stakeholders stand depending on their power/influence and interest. The influence and interest of stakeholders can be classified as low or high.

A definition of each group based on the stakeholder mapping can be summarised as follows:

1. Monitor: low influence and low interest. Typically, this group includes those who have limited interest and influence on the Project including the media and non-governmental organisations (NGOs).

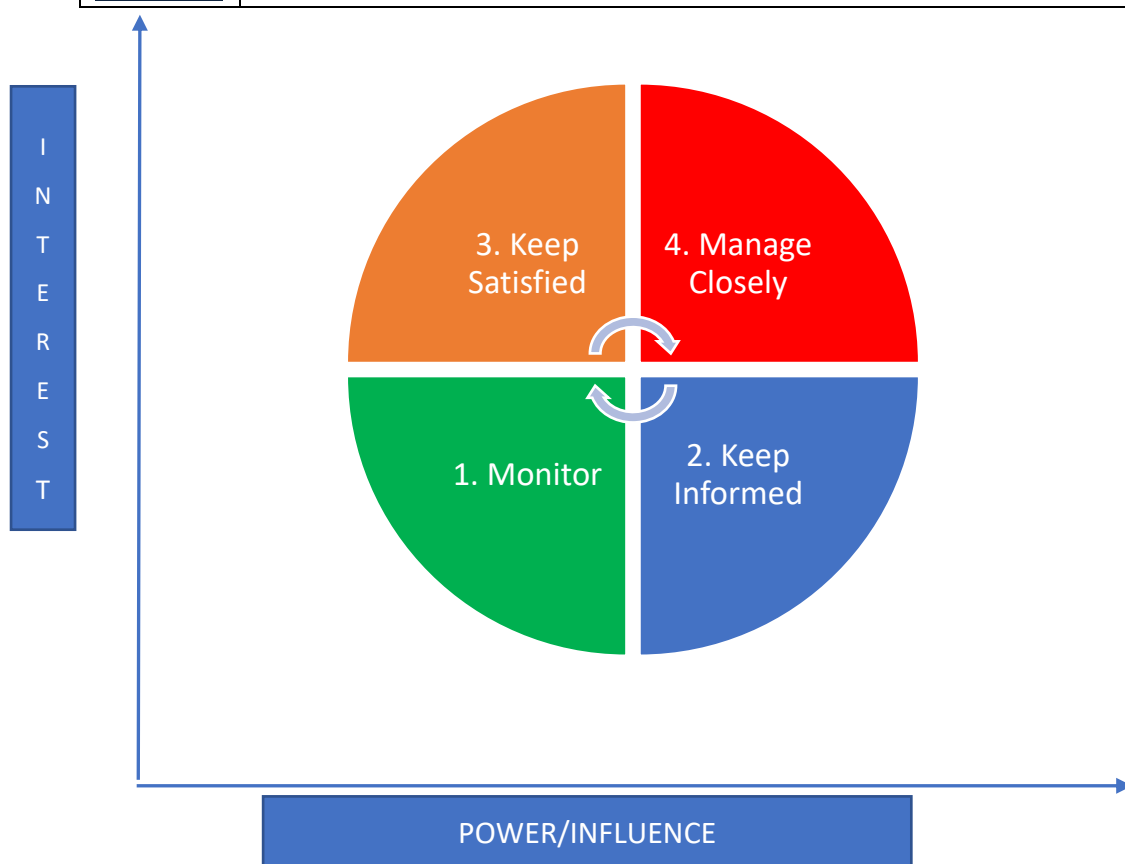


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2. Keep Informed: high influence and low interest. From an impact assessment perspective, these are stakeholders that have the potential to influence Project outcomes but may not have a specific interest in impact assessment related issues. Stakeholders in this group should be kept informed on the progress of the Project development and usually include statutory consultees.

3. Keep Satisfied: low influence and high interest. This group is also an important group and includes those groups or organisations that are not adversely affected, but whose interests determine them as stakeholders. As such, this group should be kept engaged and the Project should maintain an open channel of communications with this group throughout Project phases. Typically this group would include local communities not directly affected by the Project and authorities who have limited influence on the Project.

4. Manage Closely: high influence and high interest. This group of stakeholders is often the most important to the Project as they have the ability to influence Project outcomes and also have a high level of interest in aspects of impact assessment. Stakeholders in this group should be engaged throughout the ESIA, and for many of these stakeholders beyond the ESIA and during Project life cycle. This group of stakeholders would typically include statutory approval bodies and affected communities.



4.3 Ranking of Stakeholder’s Interest and Influence

Following the abovementioned mapping methodology (par. 4.2), the relevant Stakeholders identified in par. 4.1 are ranked as illustrated in Table 4.2.

Table 4.2: Stakeholders Ranking

Category	Stakeholder	Influence	Interest	Influence & Interest
Government/Administration	Ministry of the Environment	High	High	4
Government/Administration	Ministry of Maritime Affairs and Insular Policy	High	High	4
Government/Administration	Port Authority	Medium	Medium	3
Government/Administration	Prefecture of Attica/Subregion of West Attica	Medium	Medium	3
Government/Administration	Municipality of Elefsis	Low	High	3
Main Project Parties	ONEX	High	High	4

Category	Stakeholder	Influence	Interest	Influence & Interest
Main Project Parties	Employees Union	Medium	High	4
Main Project Parties	Contractors/Suppliers	Medium	Medium	3
Directly Affected Stakeholders and project affected people	Local Community (municipality of Elefsis)	Medium	High	4
Directly Affected Stakeholders and project affected people	Vulnerable Groups (Refugee Camp)	Low	Medium	2
Directly Affected Stakeholders and project affected people	Affected individuals	Medium	Low	2
Directly Affected Stakeholders and project affected people	Affected installations	Low	High	3
Directly Affected Stakeholders and project affected people	Local Businesses (e.g., accommodation etc.)	Low	Medium	2
Non-governmental organizations (NGOS) & Medias	Social Civic Unions (i.e., Women’s Union, Youth Union etc.) at the Municipality of Elefsis	Low	Medium	2
Non-governmental organizations (NGOS) & Medias	Center of Environmental Education (CEE) of Elefsis	Low	Low	1
Non-governmental organizations (NGOS) & Medias	Other NGOs that might be interested in the project development and its potential impacts	Low	Low	1
Non-governmental organizations (NGOS) & Medias	National Media	Low	Low	1
Non-governmental organizations (NGOS) & Medias	Local Media	Low	Low	1

4.4 Previous Consultation Activities

All previous activities are summarized in Table 4.3.

Table 4.3: Previous Consultation Activities

Description/Content	Issued	Date
Letter of Commitment to ONEX Rehabilitation Plan for Elefsis Shipyards	Elefsis Shipyards/Employees Union	23/02/2022
Letter of support	Mayor of Elefsis Municipality	30/07/2020
Letter of support	Mayor of Elefsis Municipality	29/07/2020
Letter of support	Prefecture of Attica	29/07/2020

The local community of Elefsis is eager for the acquisition of the shipyard by ONEX. The locals wait for this administrative change, that is seen as an opportunity for growth and creation of new jobs in the area.

The Shipyard has a long tradition on social offers to general public and local institutions without advertising them, including:

- Providing accommodation to refugees through granting (for free) a building to the Greek Ministry of Migration and Asylum, since 2017 (see also par. 4.5).
- Tactical blood donations by the personnel.
- Free of charge small repairs at the building housing the Elefsis Department of Hellenic Labour Inspectorate.
- Assistance to the Elefsis Hellenic Coast Guard Department (providing permanent docking space for some of its vessels)
- Free of charge construction of the “Olympias” trireme for the Hellenic Navy. (Full scale replica of an ancient Athenian war ship).

4.5 Vulnerable Groups

After implementing the previously mentioned identification method, the only vulnerable group of people identified was the refugees hosted in the Accommodation Facility (AF) of Elefsis. The latter offers temporary accommodation to third-country

nationals or stateless individuals who have applied for international protection within the territory of Greece. AF also hosts the family members of applicants, minors-whether unaccompanied or not, as well as vulnerable individuals.

The AF of Elefsis operates since 2017. Nowadays, the AF accommodates refugees from Ukraine and specifically women and children. Almost 300 individuals are present on site today.

The AF of Elefsis is a property of the Elefsis Shipyard (former Navy School Building – see Chapter 3) and has been granted for free to the Greek Ministry of Migration and Asylum which is responsible for its operation. The water needs of the AF (public network) are covered from Elefsis Shipyards budget.

AF of Elefsis offer a stable living environment that meets residents' essential material, social and educational needs. Residents live freely without restrictions in Facilities but are obliged to follow the regulations of operation that ensure peaceful and efficient living conditions.

Apart from accommodation, the AF offer a variety of services to residents, such as meal services, education on rights and obligations of applicants of international protection, psychological support, medical services, personal hygiene items, clothing, Greek language classes, and training sessions for the development of skills and competencies.

Residents of AF must leave the premises when they become recognized refugees or are granted subsidiary protection, within a period of thirty (30) days from the issue of these decisions. However, unaccompanied minors remain residents of the facilities until they become adults.



During AF operation, no complaints or demands have been declared in conjunction with the Shipyards' activities.

Considering the future operation of the Camp, according to the new strategy of the Ministry of Migration and Asylum (migration.gov.gr), the number of refugee camps, throughout the country, is about to be reduced. The plan involves the creation of larger, more properly organized refugee camps and the closure of smaller ones. In this context, under the responsibility of the Ministry, the Refugee Camp within the Shipyards area of influence, is about to be relocated. Nevertheless, no specific timeline for the relocation has been notified yet.

ONEX has not submitted any official request for camp relocation. On the contrary, ONEX will continue to support the camp until its relocation will be carried out. ONEX is committed that, even if the camp has not been relocated until the C/R Phase of the Project has begun, it will take all the necessary measures for the protection of refugees and the mitigation and/or elimination of any effects.

5. ENGAGEMENT STRATEGY AND METHOD

Based on the results of the above mapping, the Project analyzed the stakeholder groups to determine the most appropriate method of engagement for each key group, as presented below. The analysis considered the groups concerns, their level of interest in the Project and their potential to be impacted (including positive/negative and direct/indirect).

LEVEL 1: Monitor

- Inform via public communications (for example through the Project web site and press communications)
- The Project will be responsive for direct requests for further information and engagement if the stakeholders ask to be consulted
- Monitor for Stakeholders feedback

LEVEL 2: Keep Informed

- Make use of interest by informing in low-risk area
- Keep informed and consulted in interest area
- The Project will be responsive for direct requests for further information

LEVEL 3: Keep Satisfied

- Keep engaged and consulted regularly
- Seek to obtain their support and technical guidance
- The Project aim to be proactive in its communications, providing information and seeking views at regular intervals
- Fluid ongoing two-way information flow

LEVEL 4: Manage Closely



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- Inform and consult in interest areas by formal communications such as meetings or letters, writing documents
- Involve in governance and decision-making
- Keep ongoing engagement and collaborative working in areas of mutual interest



6. ENGAGEMENT PROGRAMME

6.1 Type of Information to be disclosed

The following project aspects, issues and activities are the information that is required to being disclosed to relevant stakeholders and affected communities:

- Project activities, timing, progress/milestones, and employment opportunities
- Dissemination of Grievance Redress Mechanism to project affected communities
- Project operation
- Community Health and Safety
- Environmental and social responsibility programs

6.2 Communication Methods

6.2.1 Principles of Communication

In order to provide a foundation for a cooperative relationship with the identified stakeholders, ONEX, in line with its communication policy, strives to achieve constructive communication in order to:

- Secure a relationship of trust between the company and the local community
- Foster a relationship of trust and understanding between the company management and governmental organization
- Anticipate and counteract attempts at misrepresenting the Company's activities
- Promote the contribution of the Company towards an improved living standard in the Project area

- Alleviate concerns related to the introduction of new processes and equipment through facts and evidence-based argumentation
- Improve internal Company communication and thereby increase efficiency of the work process as a whole.

6.2.2 Tools of Communication

A number of methods/tools will be employed for stakeholder engagement to consult with each of the identified key stakeholder groups, such as listed below.

- Face to face discussions
- Public meetings/open house community forums
- Formal closed-door meetings
- Flyers and public notices
- Formal correspondence
- Website
- Media reports/announcements

6.3 Degree/Level of Engagement/Dialogue

Engaging in an appropriate way and communicating adequately is fundamental for a good relationship. In order to sufficiently meet the needs of the varied stakeholders, ONEX has developed engagement methods tailored according to the needs of the targeted groups. Following is a summary of some of the applied and existing methods of engagement with external groups of stakeholders.

The Stakeholder level of dialogue is measured by two factors, namely, (1) the intensity of the dialogue between the stakeholders and the Company, which ranges from privileged relationship/ active partnership on the one hand to limited contact at the other; and (2) the level of attitude starting from the common interest, at a varying



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degree: rather cooperative, neutral/ versatile, rather in disagreement, and conflicting interest.

For project’s Stakeholders, a detailed engagement program is illustrated in Table 6.1.

Table 6.1: Stakeholder Level of Dialogue & Form of Engagement

Category of Stakeholder	Stakeholder	Dialogue Level	Engagement Period	Form of Engagement
Government/Administration	Ministry of the Environment	Proactive Information	2/year	ESIA Environmental Monitoring Report
Government/Administration	Ministry of Maritime Affairs and Insular Policy	Proactive Information	2/year	ESIA Environmental Monitoring Report
Government/Administration	Port Authority	Proactive Information	1/year	ESIA Environmental Monitoring Report
Government/Administration	Prefecture of Attica/Subregion of West Attica	Proactive Information	1/year	ESIA Environmental Monitoring Report
Government/Administration	Municipality of Elefsis	Proactive Information	1/year	ESIA Environmental Monitoring Report Occupational Report
Main Project Parties	Lenders	Regular Direct Contact	2/year	Six-monthly report
Main Project Parties	Employees Union	Occasional Direct Contact	Depending on the events	Information Dissemination Meetings
Main Project Parties	Contractors/Suppliers	Regular Direct Contact	2/year	Six-monthly report
Directly Affected Stakeholders and project affected people	Local Community (municipality of Elefsis)	Regular Direct Contact	6/year	Open Dialogue Dissemination material Two-monthly meetings
Directly Affected Stakeholders and project affected people	Refugees & Ministry of Migration and Asylum	Occasional Direct Contact	2/year	Open Dialogue/ Dissemination material Six-monthly meetings Providing Educational programs Providing transport to the residents of the camp to the city of Elefsis for attending cultural and other events



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Category of Stakeholder	Stakeholder	Dialogue Level	Engagement Period	Form of Engagement
Directly Affected Stakeholders and project affected people	Affected individuals	Regular Direct Contact	6/year	Open Dialogue/ Dissemination material Two-monthly meetings
Directly Affected Stakeholders and project affected people	Affected installations	Occasional Direct Contact	1/year	Environmental Monitoring Report
Directly Affected Stakeholders and project affected people	Local Businesses (e.g., accommodation etc.)	Occasional Direct Contact	1/year	Environmental Monitoring Report Occupational Report
Non-governmental organizations (NGOS) & Medias	Social Civic Unions (i.e., Women's Union, Youth Union etc.) at the Municipality of Elefsis	Regular Direct Contact	6/year	Open Dialogue/ Dissemination material Two-monthly meetings
Non-governmental organizations (NGOS) & Medias	Center of Environmental Education (CEE) of Elefsis	Occasional Direct Contact	2/year	Educational Events Open Dialogue/ Dissemination material
Non-governmental organizations (NGOS) & Medias	Other NGOs that might be interested in the project development and its potential impacts	Occasional Direct Contact	1/year	Open Dialogue/ Dissemination material
Non-governmental organizations (NGOS) & Medias	National Media	Occasional Direct Contact	1/year	Open Dialogue/ Dissemination material
Non-governmental organizations (NGOS) & Medias	Local Media	Occasional Direct Contact	1/year	Open Dialogue/ Dissemination material

7. GRIEVANCE MECHANISM

7.1 General

Grievance Mechanism (GM) is an important criterion for development projects wherein ongoing risks and impacts of projects are probable. The GRM is an important tool through which the affected communities' concerns and complaints are registered and addressed. ONEX will establish a grievance mechanism in order to receive and facilitate resolution of affected people's concerns, complaints and grievances about the project's environmental performance. The mechanism shall use an understandable and transparent process that addresses the affected people's concerns and complaints promptly.

7.2 Internal Grievance Mechanism for Workers

ONEX will put in place a two-step grievance mechanism to address the concerns of workers.

Step 1

- The grievance body shall comprise of the Site Manager, Safety Officer, Head of Environment, and a representative from the Workers Union
- The project office shall receive written complaints directly from the aggrieved party or document verbal
- Complaints in register maintained at the reception of the facility.
- All complaints shall be reviewed and responded to within five working days.
- In case, the complainant is not satisfied then they can approach the next level of escalation.
- All response shall be documented, and complaint closed on regular basis.

Step 2

- The committee shall further review the complaint, hold discussions if required and respond within 7 -10 days of receipt of complaint
- The complaint will be closed if the complainant is satisfied.
- In case the complainant is not satisfied he can then take recourse to legal action.

Development of Grievance Redressal Mechanism

Receive and Register a Complaint

- Any worker with concerns regarding onsite work such as occupational health and safety, salaries, environmental conditions etc., may register his/her complaint in writing to the nominated person/grievance officer at site (Step 1).
- Secured grievance boxes shall be placed at various identified location within the site area.
- If any worker wishes to remain anonymous, he/she can write down the grievances and drop in the available complaint boxes.
- Once a complaint has been received it shall be recorded in the grievance log register or data system.

Assessment and Addressal of Complaint

- The complaint boxes will be opened every week by Safety Officer and grievances will be forwarded to the Site Manager for further action.
- The grievance will be assessed to determine if the issues raised by the complaint fall within the mandate of the grievance mechanism or not.



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- During the assessment of complaints, the site grievance redressal team will gather information about the key issues and concerns and helps determine whether and how the complaint might be resolved.
- The issues will be registered by Safety Officer who will take 2 days to screen and assess the grievance.
- The grievances will be redressed at the Step 1 within 5 working days. If the grievance fails to be addressed at Step 1 within stipulated time or to the satisfaction of complainant, the grievance will be escalated to the Step 2 to take the final decision pertaining to the complaint.
- The HR Head will put the case of the grievance along with the Social Specialist in front of the Committee. Deliberations will be accordingly conducted over the matter and a consensus is to be reached between the members of the Committee. If necessary, meetings will be conducted with the complainant and evidence will be examined. The grievance will be closed within 5 working days of referral
- The complainant will have the opportunity to be present at the committee meetings and discuss the grievance at both the levels. If the grievance remains unresolved even after going through both the levels of GRC, the complainant will have the option to approach the appropriate court of laws for redress.

Grievance Box/register should be maintained on site for both direct and indirect workers with Grievance Officer's contact details visible to all at site. It should be ensured that the Grievance Officer's contact details shall be communicated to all workers during the induction period. In addition, the details of the Grievance Officer should also be disseminated to the local communities around the area.

7.3 External Grievance Mechanism for Communities

As for workers (see par. 7.2) ONEX will put in place a two-step grievance mechanism to address the concerns of local community.

Step 1

- The grievance body shall comprise of the Site Manager, Safety Officer, Head of Environment, and a representative from the Local community (Municipality of Elefsis).
- The project office shall receive written complaints directly from the aggrieved party or document verbal
- Complaints in register maintained at the reception of the facility.
- All complaints shall be reviewed and responded to within five working days.
- In case, the complainant is not satisfied then they can approach the next level of escalation.
- All response shall be documented, and complaint closed on regular basis.

Step 2

- The committee shall further review the complaint, hold discussions if required and respond within 7 -10 days of receipt of complaint
- The complaint will be closed if the complainant is satisfied.
- In case the complainant is not satisfied he can then take recourse to legal action.

Development of Grievance Redressal Mechanism

Receive and Register a Complaint

- Any stakeholder/member of the local community with concerns referring to community health and safety, local employment, community risk, migrant labor etc. may register their complaint in writing to the nominated person/grievance officer at site (Step 1).
- Secured grievance boxes shall be placed at various identified location around the site area and community level (e.g. local community's administration buildings).
- If any stakeholder or community member wishes to remain anonymous, he/she can write down the grievances and drop in the available complaint boxes.
- Once a complaint has been received it shall be recorded in the grievance log register or data system.

Assessment and Addressal of Complaint

- The complaint boxes will be opened every fifteen (15) days by Safety Officer and grievances will be forwarded to the Site Manager for further action.
- The grievance will be assessed to determine if the issues raised by the complaint fall within the mandate of the grievance mechanism or not.
- During the assessment of complaints, the site grievance redressal team will gather information about the key issues and concerns and helps determine whether and how the complaint might be resolved.
- The issues will be registered by Safety Officer who will take 2 days to screen and assess the grievance.
- The grievances will be redressed at the Step 1 within 15 working days. If the grievance fails to be addressed at Step 1 within stipulated time or to the satisfaction of complainant, the grievance will be escalated to the Step 2 to take the final decision pertaining to the complaint.



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- The HR Head will put the case of the grievance along with the Social Specialist in front of the Committee. Deliberations will be accordingly conducted over the matter and a consensus is to be reached between the members of the Committee. If necessary, meetings will be conducted with the complainant and evidence will be examined. The grievance will be closed within 5 working days of referral
- The complainant will have the opportunity to be present at the committee meetings and discuss the grievance at both the levels. If the grievance remains unresolved even after going through both the levels of GRC, the complainant will have the option to approach the appropriate court of laws for redress.

Grievance Redressal Mechanism/Procedure will be adequately and elaborately developed for the community relating to the steps to follow in terms of redressal of grievances, time taken, anonymous grievance handling etc.

Grievance Box/register should be placed at the entrance of the project site for the community. Additionally, formal records of communication with the community should be maintained at site.



8. MONITORING AND REPORTING

Stakeholder engagement should be monitored and reported by ONEX throughout the entire life cycle of the project. Monitoring and reporting activities will involve:

- Updates of the stakeholder list
- Records of all consultations held
- Records of all grievances received and dealt with (entered into a Grievance Log on the system or a computer).

Every meeting and interaction related to the project engagement should be recorded by ONEX through the following:

- Stakeholder list
- Grievance Mechanism Log
- Minutes of all meetings
- Meeting attendance register



9. RESOURCES, RESPONSIBILITIES & BUDGET

9.1 Staff

Stakeholder engagement process is managed by the Human Resources (HR) department. ONEX will appoint a Public Relation Officer (**Head of Community Relations and Affair**) to maintain interaction with the external stakeholders (including governmental ones) and implement the SEP. His/hers contact details should be disseminated to the local communities and other external stakeholders residing within the vicinity of the project area. All communications disseminated and exchanged between the personnel and the communities should be documented and maintained on site.

The Head of Community Relations and Affair will be supported by a **Field Relations Officer** and a **Relations Staff Officer**. Other sections or departments such as Legal, Project, Supply Chain Management, Contract, Accounting etc. will also provide all necessary feedback. The team will be monitored by HR & Administration Manager.

The Roles and Responsibilities for SEP Implementation are summarized below:

Head of Community Relations and Affair

- Developing and maintaining relationships with key community groups, government officials, media and public in general.
- Develop and proposes strategic stakeholders' engagement.
- Manage grievance redress mechanism
- Plan, propose and implement community development and social programs in accordance with Work Plan & Budget and the objectives and policy of the company.



- Monitor the implementation and progress of Corporate Social Responsibility (CSR) programs at site and provides consultation where necessary.
- Develop and supervise the update of stakeholder database and stakeholder's commitment register.
- Report SEP implementation to Senior Manager of HR & Administration

Field Relations Officer

- Assist the development of stakeholder engagement program and activities
- Implement stakeholder engagement program and activities with the direct referrals from other competent departments/officers
- Record and document stakeholder engagement activities
- Prepare regular report on stakeholder engagement activities
- Record and document stakeholder grievances in the grievance mechanism log.

Relations Staff Officer

- Assist the development of stakeholder engagement program and activities
- Implement stakeholder engagement program and activities with the direction from Head of Community Relations and Affair
- Record and document stakeholder engagement activities
- Prepare regular report on stakeholder engagement activities
- With guidance from Head of Community Relations and Affairs develop and maintain stakeholders' database and commitment register.

9.2 Budget

ONEX is expected to allocate an annual budget of **80,000€** for stakeholder engagement activities in the initial phase of the Project. Stakeholder engagement budget will increase gradually commensurate with Project development.



9.3 Documents

The SEP document is maintained by Human Resources Department. Original and amendment(s), if any, shall be kept by the same division which is responsible for their distribution.

All other documents related to SEP will be also kept by the same division. Examples of that documentation are presented below.

Stakeholder Database

No	Position	Institution	Contact Number	Email	Website	Aims/ interest	Category

Stakeholder Engagement Log

Type of Engagement	Location	Date	Stakeholders (Individual, groups/organizations)	ONEX Representative	Key issues	Company	Response	Documentation	Follow Up Action	Report back