AMEA POWER AYSHA 1 WIND PROJECT

LOCAL COMMUNITY GRIEVANCE MECHANISM

AMEA POWER AYSHA WIND ONE PLC

AYSHA-E&S-LGM

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1 OBJECTIVE

The aim of this grievance mechanism is to establish a system to receive and facilitate resolution of concerns, complaints, or grievances from local communities and other external stakeholders regarding the AMEA Power Aysha 1 Wind Project.

Thus, the overall objective of this mechanism is to ensure that all concerns, complaints / grievances / claims, and suggestions from Project Affected Persons (PAPs), local communities, or other stakeholders are promptly received, recorded, assessed, and resolved in a fair, transparent, and time-bound manner. This will allow the Project to identify root causes, take corrective and/or preventive measures, and avoid escalation of issues that could adversely affect community relations or project performance.

This mechanism supports the Project's commitments under IFC Performance Standard 1 (Stakeholder Engagement) and AfDB Operational Safeguard 2 (Labour and Working Conditions) to establish a predictable, accessible, and rights-based process for addressing external grievances.

Principles of an effective Grievance Mechanism:

a) Accessibility: Establishing clear and culturally appropriate channels of communication between stakeholders and the Project, available free of cost.
b) Impartiality: Ensuring all complaints are treated seriously, handled objectively, and free from bias or discrimination.
c) Confidentiality: Protecting the identity of complainants and the personal data associated with grievances.
d) Transparency: Ensuring that the process and outcomes are clearly communicated to complainants and stakeholders, allowing them to follow the progress of their case.
e) Non-retaliation: Guaranteeing that no complainant will face retribution or disadvantage for raising a concern in good faith.

Specifically, this Grievance Mechanism aims to:

- establish a permanent two-way dialogue between the project and the local communities;
- recognize, promote and protect the rights of PAPs to voice their concerns or lodge complaints;
- provide clear and practical instructions on how complaints will be handled through a simple, tiered, and effective procedure, widely disseminated within local communities;
- enable early identification and resolution of issues before they escalate into conflicts or formal disputes.

Clearly, the grievance mechanism defines procedures to receive, record, process, escalate (where necessary), and report any concerns from affected people and other stakeholders in a manner that is accessible, transparent, impartial, and timely.

It is important to highlight that this mechanism does not replace or restrict access to existing administrative, judicial, or other external redress mechanisms, and complainants may choose to use such avenues at any time.

This Project-specific grievance mechanism will be periodically reviewed and updated throughout all phases of the Project to reflect any contextual, operational, or regulatory changes.

2 SCOPE

The Local Community Grievance Mechanism (LGM) applies to all phases of the AMEA Power Aysha 1 Wind Project life cycle, including construction, operation, and decommissioning.

Its purpose is to provide a structured, transparent, and culturally appropriate process through which affected communities and other external stakeholders can raise concerns or complaints regarding the Project's environmental, social, health, or safety performance, and have them addressed in a fair, timely, and non-retaliatory manner.

The mechanism is designed primarily for the benefit of Project-Affected Persons (PAPs) and local communities. It complements, but does not replace, other administrative or judicial remedies available under Ethiopian law.

A separate grievance mechanism for workers, contractors, and suppliers is established under the Labour and Working Conditions Management Plan, in line with IFC Performance Standard 2 and AfDB OS2 and is therefore outside the scope of this document.

This community grievance mechanism covers all concerns and complaints raised by any person or group considering themselves affected by the Project, including but not limited to:

- damage to public or private assets;
- degradation or deterioration of local infrastructures (e.g. roads, access tracks);
- waste mismanagement, improper disposal, or concrete washout;
- disturbance from noise, dust, vibration, or excessive traffic speed;
- negative behaviour or misconduct by Project personnel or suppliers towards local residents;
- incidents of gender-based violence, harassment, or discrimination;
- improper or excessive use of force by security personnel; and
- any other community health, safety, or environmental concerns linked to Project activities.

All grievances, regardless of their perceived severity, will be accepted and recorded. No judgment will be made prior to investigation, and every complainant will be treated respectfully and without discrimination

However, in line with international best practice, the following types of issues fall outside the Project-level mechanism and will be referred to appropriate authorities or other systems:

- Complaints unrelated to Project activities (though if uncertainty exists, they will still be logged and assessed);
- Government policy matters or actions of public authorities;
- Allegations involving criminal activity or violence, which shall be referred to law enforcement agencies while ensuring that Project-related responsibilities are still fulfilled (e.g., cooperation with investigations, duty of care);
- Labour-related grievances, which are handled through the Worker Grievance Mechanism established under the Labour and Working Conditions Management Plan; and
- Commercial or contractual disputes, which should be managed under the relevant contractual provisions or through civil courts.

Suppliers and subcontractors will also have access to the appropriate internal grievance channels within the Labour and Working Conditions framework to ensure all project-related complaints are addressed consistently and in accordance with the Project's Environmental and Social Management System (ESMS).

3 STANDARDS

The implementation of this Local Community Grievance Mechanism (LGM) shall be carried out in accordance with the following national and international standards, as well as AMEA Power's corporate Environmental and Social Management System (ESMS):

National Legislations

- Ethiopian Environmental Impact Assessment Proclamation No. 299/2002 and Environmental Pollution Control Proclamation No. 300/2002, which require effective consultation and management of environmental and social impacts during project development.
- Ethiopian Labour Proclamation No. 377/2003 (as amended by Proclamation No. 1156/2019), which provides general provisions on grievance handling and dispute resolution between employers and employees.
- Ethiopian Civil Code and related administrative frameworks, which establish the right of individuals to seek redress through judicial and administrative mechanisms.

International Standards and Requirements

- International Finance Corporation (IFC) Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts – paragraphs 34–35 on establishing and maintaining a grievance mechanism for affected communities;
- IFC Performance Standard 4: Community Health, Safety and Security, which requires procedures for receiving and addressing concerns related to security personnel and community safety;
- African Development Bank (AfDB) Operational Safeguard 1: Environmental and Social Assessment, requiring effective stakeholder engagement, disclosure, and a grievance redress mechanism for affected communities;
- AfDB Operational Safeguard 2: Labour and Working Conditions, which complements PS2 in ensuring accessible grievance channels for both workers and affected people;
- ISO 26000:2010 on Social Responsibility, which promotes transparent and ethical organizational behaviour toward stakeholders; and
- United Nations Guiding Principles on Business and Human Rights, particularly Principle 31, which sets out the effectiveness criteria for non-judicial grievance mechanisms (legitimacy, accessibility, predictability, equitability, transparency, rights-compatibility, and continuous learning).

Project specific documents

- Environmental and Social Impact Assessment (ESIA) for the Aysha 1 Wind Project;
- Environmental and Social Management System (ESMS) Manual; and
- Stakeholder Engagement Plan (SEP), which outlines the broader framework for engagement and information disclosure with affected communities.

AMEA Power's Policies and Procedures

- AMEA Power's Procedure on Local Procurement and Employment (AP-QHSE-PRO-011);
- AMEA Power's Procedure on Labour and Working Conditions Management (AP-QHSE-PRO-006);

- AMEA Power's Procedure on Grievance Mechanism (AP-QHSE-PRO-007);
- AMEA Power's Human Rights Policy; and
- AMEA Power's Gender Equality Policy.

4 INTRODUCTION

The Project is located within Ethiopia's Somali Regional State in Aysha Woreda. The Woreda is situated in the northern part of Sitti Zone and is bordered by Dembel in the south and Shinile Woreda on the southwest. It also borders on Djibouti in the north and Somaliland to the east. The main road that connects Ethiopia with Djibouti crosses this Woreda, as does the Ethio-Djibouti railway line.

Aysha town is the administrative town of the Woreda and is located around 5 km to the northeast of the boundary of the lease area and 630 km by roads from the capital of Addis Ababa. The Lasarat town is located approximately 3 km to the west of the boundary of the Project. Figure 1 illustrates the locality of the Project and Figure 2 illustrates the administrative context of the Project.

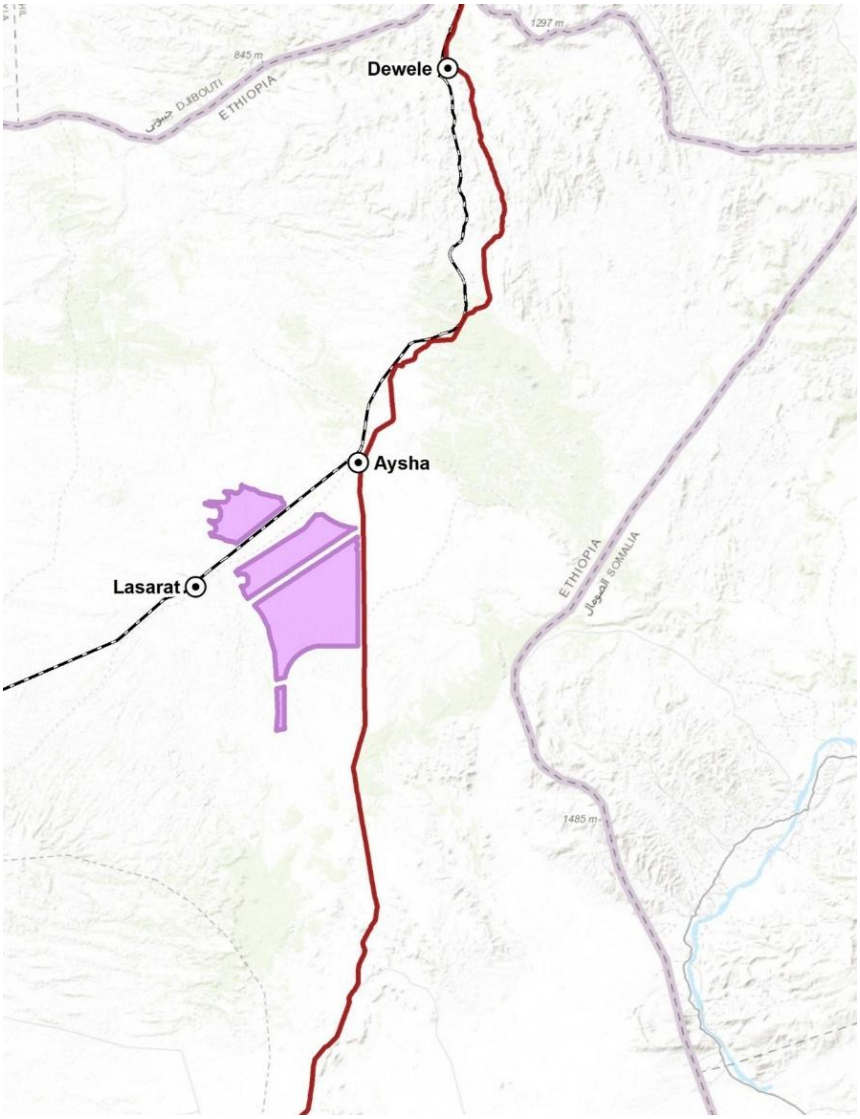

FIGURE 1 - PROJECT LOCATION

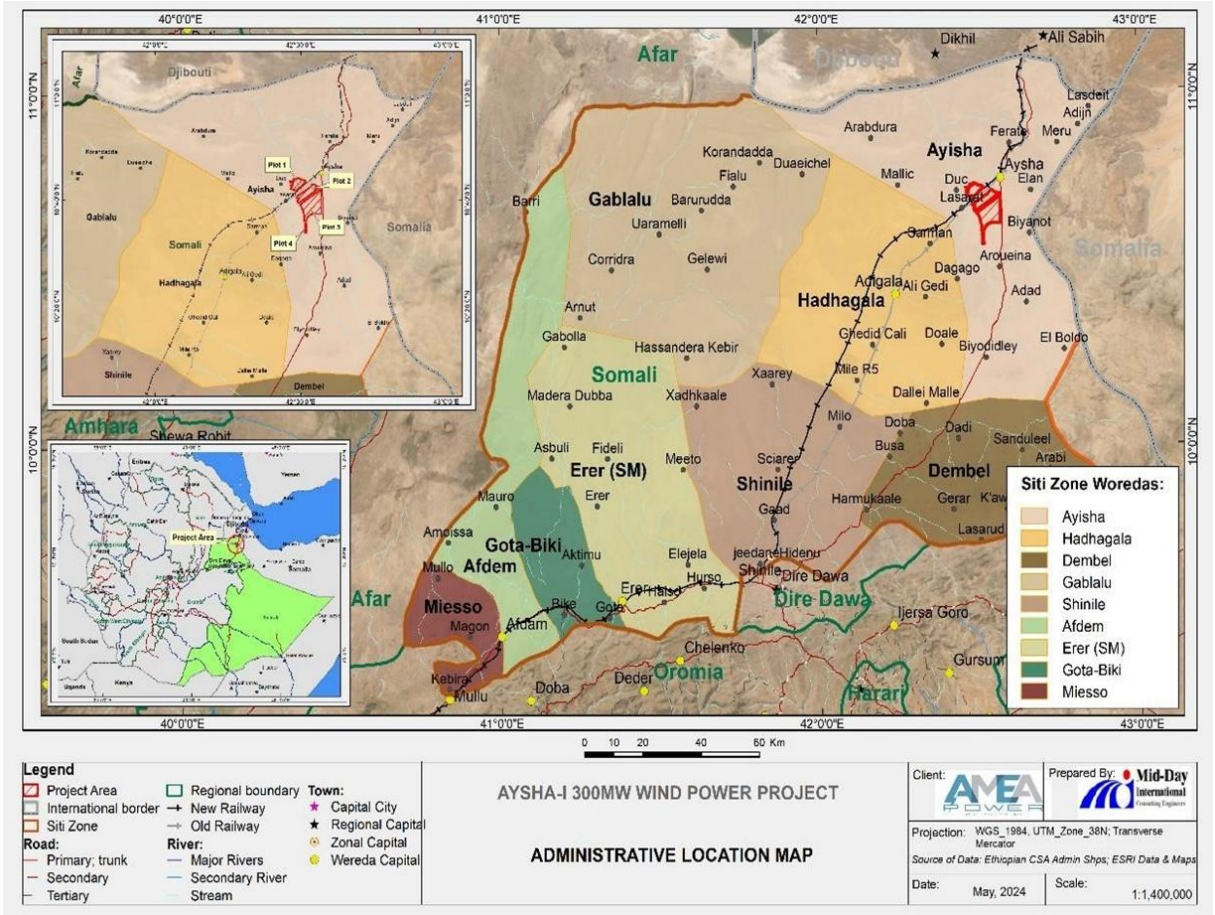

FIGURE 2 - ADMINISTRATIVE LOCATION MAP

5 GENERAL PRINCIPLES

The Local Community Grievance Mechanism (LGM) for the AMEA Power Aysha 1 Wind Project will comply with the following principles, consistent with IFC Performance Standard 1 and AfDB Operational Safeguard 1:

- **Clarity**: Clearly define the purpose, scope, and process of the mechanism, including how grievances are received, reviewed, resolved, and, if needed, escalated.
- **Accessibility**: Ensure that the mechanism is culturally appropriate, free of cost, and available to all stakeholders, including vulnerable or marginalized groups.
- **Non-Retaliation**: Assure community members that they can raise concerns without fear of retaliation, discrimination, or loss of benefits.
- **Transparency**: Ensure the entire process—from receipt to resolution and appeal—is clearly documented, publicized, and explained to stakeholders in understandable formats and local languages.
- **Impartiality and Fairness**: Grievances shall be handled objectively and fairly, with opportunities for appeal through a tiered escalation structure to guarantee impartial review.
- **Confidentiality**: Protect complainants' identities and personal information, ensuring that data related to grievances is handled responsibly and in accordance with privacy standards.
- **Timeliness:** All grievances will be handled promptly and within defined timeframes to maintain trust and predictability.

To properly manage potential community impacts identified in the ESIA, the Project Company has appointed a Community Liaison Officer (CLO) responsible for managing and coordinating all community grievances, ensuring that issues are recorded, investigated, and resolved in accordance with these principles.

6 METHODS TO ACCESS

The Local Community Grievance Mechanism (LGM) has been disclosed to the affected communities during the Environmental and Social Impact Assessment (ESIA) consultations and will continue to be communicated throughout the Project lifecycle.

The grievance mechanism will be publicized at visible and accessible locations, including:

- the Project site gate and main entrance;
- the Local Community Chiefs' Offices and other public gathering points (e.g., town halls, educational centres, mosques); and
- the Project Company's official website and social media channels (as applicable).

Information on the grievance process will be available in English, Amharic, and Somali, and explained verbally to community members during stakeholder engagement activities. While records and registers will be maintained in English, grievance forms and submissions will be accepted in any local language understood by the complainant.

Given that many project-affected community members have limited internet access but wide mobile phone ownership, multiple channels for grievance submission will be made available to ensure inclusivity. Grievances may be submitted:

- Verbally to the Community Liaison Officer (CLO) or Assistant CLO during field visits or community meetings;
- By telephone or SMS using the dedicated Project Grievance Hotline, which will be publicly posted in local languages;
- In writing through grievance boxes located at the site entrance, local administration offices, and other agreed community access points;
- By email or online form, where possible, via the Project's official contact channels; and
- Through local leaders or representatives, who may assist individuals in submitting grievances if they have limited literacy or mobility.

A female CLO or focal point will be available to receive and handle gender-sensitive or confidential grievances, including those related to Gender-Based Violence or Harassment (GBVH), ensuring privacy and survivor-centred handling.

Access to the mechanism will be free of cost, and no individual will face any form of retaliation, intimidation, or discrimination for lodging a grievance.

7 TRANSPARENCY & ACCOUNTABILITY

Raising a complaint can sometimes expose individuals to social or personal risks, particularly in cases involving corruption, misconduct, compensation, or sensitive cultural and gender issues. To protect complainants and encourage open communication, the grievance mechanism integrates several safeguards in line with IFC Performance Standard 1 and AfDB Operational Safeguard 1:

- **Non-Retaliation**: The Project upholds a zero-tolerance policy for retaliation or discrimination against any person or group who submits a grievance in good faith. All complainants are protected from intimidation, harassment, or adverse treatment.
- **Confidentiality**: All grievances and personal data will be treated as confidential, and information will be shared only on a need-to-know basis. Personal identifiers will be removed from public reports or summaries.
- **Anonymous Submissions**: Community members may submit grievances anonymously through grievance boxes, the hotline, or trusted intermediaries. Anonymous grievances will receive the same level of review and consideration as other complaints.
- **Data Protection**: All records related to grievances will be securely stored in accordance with AMEA Power's ESMS data management protocols, ensuring privacy and controlled access.

The mechanism includes a transparent feedback system to keep complainants informed about the status of their grievance. The Community Liaison Officer (CLO) will provide regular updates on progress, actions taken, and outcomes, using the complainant's preferred method of communication (e.g., phone, in person, written note).

For anonymous grievances, feedback on general outcomes and corrective actions will be provided through public channels, such as the Project's website, community notice boards, and informational handouts available at the CLO office, ensuring that results are visible without compromising confidentiality.

8 TIMELINE

To ensure a predictable and transparent process, the local community grievance mechanism establishes clear timeframes for acknowledging, assessing, and resolving grievances. These timelines are consistent with international best practice and aligned with the Worker Grievance Mechanism.

The mechanism aims to:

- Acknowledge receipt of any grievance or complaint within **3 working days** of submission;
- Inform the complainant of the initial assessment or proposed action within **10 working days** of receipt; and
- Close grievances within **4 weeks (28 calendar days)** of receipt, unless additional investigation time is justified and clearly communicated to the complainant.

If a grievance cannot be resolved within the initial timeframe, the Community Liaison Officer (CLO) will inform the complainant of the reasons for the delay, provide an updated timeline, and continue to issue progress updates until closure.

For grievances that are escalated through higher tiers (see Section 10.5), each tier will follow similar time-bound principles to ensure that all cases are resolved promptly, fairly, and within a maximum period of four (4) weeks per tier.

All grievances, including those resolved verbally, will be recorded in the Grievance Register and tracked through to closure to ensure accountability and continuous improvement.

9 PUBLICIZING GRIEVANCE MECHANISM

To ensure that all stakeholders are aware of their right and means to raise concerns, the Local Community Grievance Mechanism (LGM) will be publicized widely and continuously throughout all phases of the Project.

The Community Liaison Officer (CLO) will play a central role in disseminating information about the mechanism and in ensuring that all Project-Affected Persons (PAPs) understand how to access it.

Publicity and disclosure measures will include:

- Displaying information at visible and accessible locations such as the Project site gate, local administration offices, community centres, markets, mosques, and schools;
- Explaining the process verbally during community consultations, stakeholder meetings, and household visits, ensuring that information reaches vulnerable or illiterate groups;
- Distributing leaflets, posters, or visual materials in Amharic, Somali, and English, describing how to lodge a complaint, available contact points, and the assurance of confidentiality and non-retaliation;
- Publicizing the dedicated grievance hotline and email address, along with the names and contact details of the CLO;
- Including GM information in the Project's website, social media platforms, and public disclosure materials (where feasible); and
- Collaborating with local leaders, women's groups, and community-based organizations to facilitate outreach and awareness, especially among vulnerable or marginalized populations.

The information provided online and on printed material will be available in English and Amharic, and will include at least the following:

- Purpose and scope of the mechanism;
- Available channels for submitting grievances;
- Expected timelines for acknowledgment, response, and closure;
- Assurance of non-retaliation and confidentiality; and
- Escalation options and external remedies available to complainants.

Regular refresher sessions and periodic community awareness campaigns will be conducted by the CLO to ensure continued understanding of the process, especially as project phases evolve or new community members are engaged.

All public materials will be clear, concise, and culturally appropriate, ensuring equal access for men, women, youth, and vulnerable groups in the Project's area of influence.

10 GRIEVANCE MECHANISM PROCEDURE

Handling grievances encompasses a step-by-step process as well as assigned responsibilities to ensure fair, consistent, and transparent resolution of all complaints received from local communities and external stakeholders.

10.1 Submitting a complaint

The grievance mechanism allows stakeholders to submit complaints through multiple accessible and culturally appropriate channels, including:

- By post;
- By phone or SMS (via the dedicated Grievance Hotline);
- Online: By email and/or through an online form on the Project's website (where feasible);
- At the project gate;
- Via the Mailboxes (project gate and other locations as aforementioned) and
- During meetings with the Community Liaison Officer (CLO).

Written complaints will be received by post, email, or grievance boxes. Verbal complaints will be received at the Project gate or during meetings with the CLO. Security personnel will receive dedicated training to properly handle community interactions and direct any complainant to the CLO, as required under the Project-specific Security Management Plan, developed in compliance with IFC PS4: Community Health, Safety, and Security.

For stakeholders who prefer to submit grievances verbally, the CLO will meet them at the company gate (or, if comfortable, within the company offices), record the details, and read back the information to confirm accuracy before registration.

The CLO will maintain regular contact with stakeholders throughout construction, operation, and decommissioning to facilitate two-way communication.

A female CLO or focal point will be available to receive and handle any gender-sensitive grievances, including Gender-Based Violence and Harassment (GBVH) cases, ensuring confidentiality and survivor-centred handling.

10.2 Receiving complaints

The Project Company publicly commits to a predictable timeframe for acknowledging and responding to all recorded grievances to reduce uncertainty and enhance stakeholder trust.

The following procedure will be followed:

- All incoming grievances will be acknowledged as soon as possible, and no later than three (3) working days from submission.
  - Acknowledgment will include a reference number and indicative timeline for next steps.
  - Complaints received in person will be acknowledged immediately.
- Once received, all grievances must be logged in the Stakeholder Grievance Register, which forms part of the monthly QHSE Statistics Report shared with lenders and available on-site for consultation.

- If the grievance is complex or requires detailed investigation, the complainant will receive an update within two (2) weeks, explaining actions taken and expected timelines for resolution.
- The acknowledgment letter will also clarify if a complaint is outside the Project's scope, along with guidance on appropriate external channels (e.g., administrative or judicial systems).

10.3 Reviewing and Investigating grievances

All grievances will be reviewed and investigated promptly to ensure an informed and fair resolution.

The CLO will maintain a grievance log documenting every action taken to address each complaint.

Investigations will be undertaken for all cases that cannot be resolved immediately, ensuring the principle of "no cost to communities."

For complex grievances involving multiple stakeholders or sensitive issues, an investigation team may be formed internally or in collaboration with local authorities or external experts, provided complainants consent to this approach.

If an internal team is formed, consideration will be given to conflict of interest, gender balance, and technical competence.

The CLO will meet with complainants, conduct site visits where necessary, and coordinate with relevant departments or management to verify facts and assess possible remedies.

The CLO will update complainants weekly on the status of their grievance until closure.

10.4 Grievance Resolution options and responses

The grievance mechanism is designed to be flexible and responsive, recognizing that different grievances require different types of resolution.

Possible resolution options may include:

- Modifying or halting activities causing harm or nuisance (e.g., adjusting work schedules, reducing noise, or controlling dust);
- Providing repair, replacement, or compensation for damaged assets;
- Issuing an apology or corrective action;
- Revising community engagement strategies or operational practices; or
- Collaborating with local authorities to address broader community concerns.

The investigation team, supported by the Project Social Specialist and Site Manager, will prepare a resolution proposal for each case, which will be reviewed and endorsed by Senior Management prior to implementation.

The CLO will present the proposed resolution to the complainant for agreement.

- If accepted, actions will be implemented within the agreed timeframe.
- If the complainant is not satisfied, the case will be reassessed or escalated following the three-tier structure described in Section 10.5.

All implemented actions will be verified and documented. For example:

- Obtain written or verbal confirmation from the complainant if they are satisfied with the resolution; and
- Capture photographic or documentary evidence confirming completion of corrective measures.

10.5 Grievance Mechanism for Gender-Based Violence, Harassment and Sexual Exploitation & Abuse (GBVH/SEA)

In addition to the general grievance procedure, the AMEA Power Aysha 1 Wind Project maintains a confidential and survivor-centred grievance pathway to address any concerns or allegations related to Gender-Based Violence (GBV), Sexual Harassment (SH), or Sexual Exploitation and Abuse (SEA) occurring in connection with Project activities, workers, suppliers, or security personnel.

10.5.1 Key Principles

The handling of all GBVH/SEA grievances will be guided by the following core principles:

- **Safety**: The survivor's physical and psychological safety is the absolute first priority.
- **Confidentiality**: All information will be kept strictly confidential and shared only with the survivor's informed consent. Anonymity will be protected.
- **Respect**: The survivor will be treated with dignity, empathy, and respect at all times. Their account will be believed, and they will not be judged.
- **Non-discrimination**: The survivor will not face any negative consequences for reporting an incident.
- **Empowerment**: The survivor's choices and decisions about how to proceed will be respected and supported. They control the process.

10.5.2 Reporting Channels

Recognizing that survivors may be hesitant to use standard grievance channels, the Project provides safe, confidential, and survivor-centred options for reporting incidents of Gender-Based Violence, Harassment, or Sexual Exploitation and Abuse (GBVH/SEA).

The following reporting channels are available:

- **Directly to trained GBVH Focal Points**: Survivors may report incidents directly to the Social Manager, Community Liaison Officer (CLO), or female CLO/focal point, all of whom will receive specialized training from a certified GBV Service Provider on ethical and survivor-centred handling of disclosures. At least one female focal point will always be available to receive and manage sensitive grievances in a confidential and culturally appropriate manner.

- **Directly to the external GBV Service Provider**: Survivors may contact the independent GBV Service Provider directly through a confidential hotline or local contact. With the explicit consent of the survivor, the Service Provider may inform the Project's designated GBVH Focal Point to coordinate any support measures or internal actions required. The Project will ensure this pathway is clearly communicated during community awareness sessions.

- **Anonymous Reporting**: Survivors or witnesses may report concerns anonymously through grievance boxes, the hotline, or trusted intermediaries. Anonymous GBVH/SEA reports will be immediately and confidentially escalated to the trained GBVH Focal Points for assessment, while ensuring no information that could identify the survivor is disclosed.

All GBVH/SEA complaints—whether direct or anonymous—will be treated as strictly confidential, documented in a secure, restricted-access log, and managed in coordination with the external GBV Service Provider to ensure timely referral and survivor safety.

10.5.3 Procedure for Handling GBVH Grievances

- **Immediate Acknowledgement and Safety Assessment**
  Upon receiving a report, the female CLO (or Social Manager) will ensure the survivor's safety and provide or facilitate immediate access to medical, psychosocial, or legal support services through pre-identified referral partners.

- **Documentation and Confidential Registration**
  A simplified, confidential record of the incident will be maintained separately from the general Grievance Register, accessible only to authorized staff (CLO, Social Manager, E&S Coordinator).

- **Investigation and Resolution**
  The Project will not conduct a formal investigation into the survivor's personal account unless consent is explicitly given.
  If the survivor consents, the Project will investigate alleged misconduct involving project staff, workers, or security providers, and take disciplinary or contractual action consistent with AMEA Power's Code of Conduct and national law.
  Criminal offences will be referred, with consent, to relevant authorities and supported by the Project's legal or social teams as appropriate.

- **Feedback and Closure**
  The survivor will be informed of any action taken, as appropriate, while maintaining confidentiality.
  The case will be considered closed only when the survivor agrees that no further project-level action is required.

10.5.4 Referral Pathways and Support Services

The Project will establish and maintain referral agreements or contact lists with:

- Local health facilities (for emergency medical care);
- Psychosocial support providers or NGOs specializing in GBV services;
- Police or Women and Children Affairs Office for legal support; and
- National hotlines or GBV service networks, where available.

The CLO and Social Manager will be trained on GBVH awareness, survivor support, and confidential handling protocols, and refresher training will be conducted annually for all Project staff and suppliers.

10.6 Escalation and Appeal Process

To ensure fair, transparent, and progressive resolution of grievances, the AMEA Power Aysha 1 Wind Project applies a 3-tier escalation system:

10.6.1 Tier 1 – Local / Immediate Resolution

- Point of contact: Community Liaison Officer (CLO).
- Objective: Seek to resolve grievances informally and promptly within ten (10) working days of receipt.
- Actions: CLO investigates and discusses the grievance directly with the complainant and concerned departments.
- Documentation: All grievances, verbal or written, are logged in the Grievance Register.

10.6.2 Tier 2 – Management Review

- Trigger: If the complainant is not satisfied with the Tier 1 resolution, or if the grievance involves multiple parties or technical complexity.
- Point of contact: Project Social Specialist and Site Manager.
- Actions: Review the case, conduct further investigation if necessary, and meet with the complainant to discuss possible corrective or preventive measures.
- Timeline: Response to be provided within fifteen (15) working days of escalation.
- Documentation: Resolution proposal communicated to the complainant and recorded as “Tier 2 outcome” in the Grievance Register.

10.6.3 Tier 3 – Executive / External Resolution

- Trigger: If the complainant rejects the Tier 2 outcome or if the grievance relates to alleged misconduct by project management.
- Point of contact: AMEA Power Head of ESG and Executive Management, in coordination with the Project Company.
- Actions: Conduct impartial review of all case documentation and, if appropriate, engage independent external bodies (e.g., local authorities, woreda administration, judicial mechanisms, or lenders’ accountability mechanisms such as the AfDB Independent Recourse Mechanism).
- Timeline: Final response within four (4) weeks of escalation.
- Outcome: Decision communicated in writing (or preferred method) and recorded as “Closed – Tier 3 Outcome”.

At any stage, complainants retain the right to access judicial, administrative, or other external remedies outside the Project’s mechanism without prejudice.

11 ROLES AND RESPONSIBILITIES

11.1 Community Liaison Officer

The CLO acts as the primary point of contact for the local community to submit grievances and feedback regarding the project. A female CLO will be appointed to facilitate accessibility for women and vulnerable community members.

Key Responsibilities:

- Acts as an accessible, confidential, and culturally sensitive point of contact for community members to raise grievances.
- Checks and maintains grievance submission channels (boxes, phone lines, email) daily, ensuring all received complaints are promptly transferred to the Social Manager.
- Assists community members in filing grievances, including translating forms and explanations into local languages as needed.
- Ensures the grievance mechanism is transparent, culturally appropriate, and communicated widely to the local community.
- Provides updates to complainants on the status of their grievance in coordination with the Social Manager.
- Supports the Social Manager during investigations, particularly with translation, liaising with community members, and ensuring survivor-centric handling of sensitive cases (including GBVH complaints).

11.2 Female Community Liaison Officer

The Female CLO ensures that women and vulnerable groups can safely and comfortably raise concerns, particularly regarding sensitive issues such as GBVH or social impacts.

Key Responsibilities:

- Provides a confidential and safe channel for women and vulnerable groups to report grievances.
- Supports the community in understanding their rights and the grievance process.
- Assists in translating and filing grievances in local languages.
- Acts as a GBVH focal point, ensuring sensitive complaints are handled confidentially and referred promptly to external GBV service providers.
- Collaborates with the CLO and Social Manager to ensure gender-responsive grievance tracking and reporting.

11.3 Social Manager

The Social Manager oversees the formal process for local community grievances (Tier 2) and reports functionally to AMEA Power's E&S Coordinator

Key Responsibilities:

- Overall implementation and management of the Local Community Grievance Mechanism.
- Logging, tracking, and formally acknowledging all grievances in the Community Grievance Register.

- Leading independent and confidential investigations of formal grievances in consultation with relevant parties.
- Determining resolutions in consultation with the Project Manager and communicating decisions to complainants.
- Managing escalation to Tier 3: Appeal or external resolution as needed.
- Ensuring compliance with GBVH protocols, survivor-centered approaches, and referral to external service providers.
- Preparing monthly reporting for management and lenders, including grievance trends and systemic issues.
- Updating LCGM procedures as needed throughout the project lifecycle.

11.4 E&S Coordinator

The E&S Coordinator ensures the mechanism complies with AMEA Power's standards, ESMS, and lender requirements.

Key Responsibilities:

- Conducts periodic audits of the LCGM to ensure compliance and confidentiality.
- Provides final sign-off on Tier 2 grievance resolutions before communication to complainants.
- Reviews trends to identify systemic community concerns and directs corrective measures.
- Oversees Tier 3 appeals and ensures full, unbiased case documentation.
- Monitors adherence to GBVH protocols by Social Manager and CLOs.
- Ensures sufficient resources are allocated for effective LCGM management.

11.5 Site Manager

The Site Manager is ultimately accountable for LCGM performance and ensures resources and oversight are in place.

Key Responsibilities:

- Ensures the mechanism is implemented rigorously across all project areas affecting local communities.
- Provides resources (staff, budget, materials) to support Social Manager and CLOs.
- Participates in final review of significant Tier 2 investigations and approves resolutions.
- Ensures all project staff adhere to non-retaliation and grievance handling principles.
- Publicizes the mechanism to the local community.
- Holds Social Manager and CLOs accountable for timely investigation and resolution.

11.6 Community Members

Community members have the right to raise grievances and the responsibility to respect the process.

Key Responsibilities:

- Filing grievances in good faith, providing complete and accurate information.
- Cooperating with the Social Manager and investigation team.

- Maintaining confidentiality of the investigation process.
- Respecting the mechanism and refraining from filing false or malicious complaints.
- Reporting any retaliation or adverse action related to grievance filing.
- Exercising the right to escalate grievances to Tier 3 if dissatisfied with the resolution.

12 TRAINING

The Project Company shall ensure that all personnel engaging with the local community (including CLO, Social Manager, supervisors, security staff, and drivers) are trained on this procedure during induction and through regular refresher sessions. Training will emphasize the principles of confidentiality, non-retaliation, gender sensitivity, and the specific protocols for handling GBVH and other sensitive complaints.

Particular attention shall be paid to personnel working off-site, such as drivers or community liaison staff. Such personnel will be provided with copies of the community grievance form, contact details of the CLO (including the female CLO), and guidance on how to assist community members in accessing the grievance mechanism safely and effectively.

13 MONITORING, AUDIT AND REPORTING

The implementation of this grievance mechanism will be monitored through periodic review of the community complaints register, which will be updated and submitted to AMEA Power's Corporate E&S team on a monthly basis.

The performance of the mechanism and the timely resolution of complaints are assessed monthly and during semi-annual and annual internal audits by evaluating:

- The extent to which the grievance mechanism is functioning effectively and is being implemented as intended;
- Any particular trend revealed by the nature of the grievances received, the root cause of the grievances and the effectiveness and level of satisfaction in resolving them; and
- Potential areas for improvement and concern, including accessibility for women and vulnerable groups.

As noted, the following documents must be properly retained for each grievance received in the Project Sponsor:

- Community Grievance Registration Form (Annex 1)
- Community Grievance Close out Form (Annex 2)
- Grievance log (Annex 3), which consolidates all recorded grievances as well as commitments, agreements and feedback from complainants until resolution and closure of the grievance.
- Grievance Resolution Form (Annex 4)

On a monthly basis, the Project Company will provide a report on the status of complaints received through the community grievance mechanism to the Sponsors, who will cascade the information to Lenders and Advisors.

13.1 KPI

The KPIs for monitoring the LCGM are summarized below:

No.	KPI	Measurement Action	Frequency	Goal
1	% of grievances acknowledged within 3 working days	Review of grievance log	Monthly	100%
2	% of grievances closed within 28 calendar days	Review of grievance log	Monthly	90%
3	Number of unresolved Tier 2/3 grievances (outstanding > 28 days)	Submission of log sheet	Monthly	as low as possible (e.g. <2)
4	Number of repeat grievances on the same issue/perpetrator	Trend analysis of log sheet	Quarterly	Reduce trend; identify root causes
5	Complainant Satisfaction Rate (measured on close-out)	Community Grievance Close-out Form	Monthly	> 75% satisfaction
6	% of grievances reported/handled via female CLO (for women workers /complainants)	Review of grievance log	Monthly	100% accessibility for female complainants

ANNEX 1 – GRIEVANCE SHEET

PUBLIC GRIEVANCE FORM

Reference No.	
Full Name:	
Contact Information Please mark how you wish to be contacted and add contact details	☐ **By Post:** ☐ **By Telephone:** ☐ **By E-mail:** ☐ **Other (please specify)**
Description of Concern, Incident or Grievance	**What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?**
Date of concern, incident, or grievance	
☐ **One-time incident/grievance (date)** ☐ **Happened more than once (how many times?)** ☐ **On-going (currently experiencing problem)**	
What would you like to see happen to resolve the problem?	
Signature: **Date:**	
Please insert this form in one of the grievance boxes	

ANNEX 2 – GRIEVANCE CLOSEOUT FORM

GRIEVANCE CLOSE-OUT FORM

Reference No:	
Full Name	
Description of Concern, Incident or Grievance:	
Description of Actions Taken to Resolve the Grievance	
Date of Submission of Grievance	
Date of Communication of Solution to Grievance	
Has the grievance been resolved (Yes/No)	

CLO	**Complainant**
Name:	Name:
Date:	Date:
Signature:	Signature

ANNEX 3 – GRIEVANCE LOG SHEET

Ref No.	How Was grievance submitted	Date of Submission of Grievance	Name and Contact Information	Description of Grievance	Actions Taken to Resolve the Grievance	Date of Communication of Solution	Has grievance been resolved (Y/N) if not explain why

ANNEX 4 – GRIEVANCE RESOLUTION FORM

How was grievance received	☐ Grievance Box (specify which box) ☐ Directly contact with CLO
Reference No:	
Description of Concern, Incident or Grievance	*What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?*
Date of Grievance	
Has the Grievance Been Resolved?	☐Yes ☐No; ***If not provide a justification below***
Fill Out Either Section 1 OR Section 2 below	
Section 1	
Summary of Actions Undertaken to Resolve Grievance	
Date of Implementation	
Section 2	
Summary of Proposed Actions to be Implemented to Resolve Grievance	
Timeline for Implementation	

CLO Signature:

Date:

Project Manager Signature:

Date: