LOCAL COMMUNITY GRIEVANCE MECHANISM

ITUKA WEST NILE PROJECT

ITUKA-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 the stakeholder's concerns and grievances about the Ituka Solar Power Project's environmental and social performance.

Thus, the overall objective of this grievance mechanism is to ensure that concerns, complaints / grievances / claims, and suggestions coming from PAPs, communities or other stakeholders involved in the implementation of the project are promptly received, recorded, analysed and processed. This will make it possible to detect the causes and take corrective and / or preventive actions in order to avoid an aggravation, which could go beyond the control of the project.

Clearly, the grievance mechanism defines procedures to receive, record, process and report any concerns of affected people and other stakeholders as part of the implementation of the Ituka Solar power project and accessible way, transparent and diligent.

It is important to highlight that the GM does not replace existing administrative or judicial redress mechanisms.

This project specific grievance mechanism will be reviewed and updated after any change in the context in which the project operates during all phases of the project.

2 SCOPE

The aim of the grievance mechanism is to establish a system to receive and facilitate resolution of the stakeholder's concerns and grievances about the Project's environmental and social performance. The grievance mechanism has the Affected Communities as its primary beneficiaries (a separate grievance mechanism for workers will be included in the Labour and Working Conditions Management Plan). It seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible at no cost and without retribution to the party that originated the issue or concern. The mechanism will not impede access to judicial or administrative remedies. The grievance mechanism was explained during the ESIA consultation meetings and will continue to be publicised during the project's life cycle

The grievance mechanism applies to all phases of the project life cycle.

The Community Grievance Mechanism Procedure applies also to requests and complaints that might arise from any person (community members or others) considering themselves affected by the Project, including but not limited to the following:

- damage to public / private assets;
- degradation / deterioration of local infrastructures (e.g. roads);
- waste and/or washing concrete dumping;
- disturbance from noise, dust, traffic accidents, pollution, excessive speed of project's vehicles;
- degradation of the environment and disturbance of wildlife;
- negative behaviour of construction workforce towards local communities and persons;
- gender-based violence and harassment;
- conduct of security providers; etc.

Generally, all claims from affected communities should be accepted and no judgment made prior to investigation, even if complaints are minor. However, according to best practice, the following claims should be directed outside of project-level mechanisms:

- Complaints clearly not related to the Project: it is sometimes difficult to determine which issues are related to the Project and which are not. If in doubt, grievances should be accepted and investigated;
- Issues related to governmental policy and government institutions;
- Complaints constituting criminal activity and violence: in these cases, complainants should be referred to the justice system;
- Labour-related grievances: a separate mechanism will be established through the Labour and Working Conditions Management Plan and include in its scope all grievances by the company employees, contractors, subcontractors and suppliers. This grievance mechanism will be aligned with IFC PS 2; and
- Commercial disputes: commercial matters should be stipulated for in contractual agreements and issues should be resolved through a variety of commercial dispute resolution mechanisms or civil courts. Suppliers will have access to the internal grievance mechanism stipulated in the previous point.

3 STANDARDS

The implementation of this grievance mechanism shall be carried out in accordance with the following standards:

National Legislations

- The Ugandan Employment Act 2006 regulates all activities involving the use of labour and is applicable to professional relations between employers and employees.

International Standards and Requirements

The main international guidelines applicable to Grievance Management which LIT is basing their GMP against are the Equator Principles and those from the International Finance Corporation (IFC, Performance Standard (PS) 1 and 2).

IFC PS1 require that a grievance mechanism be established "designed to receive and facilitate resolution of concerns and grievances about LIT's environmental and social performance". The procedure should be disseminated to the Affected Communities through the stakeholder engagement process. The process should not impede access to any judicial or administrative remedies.

PS2, Labour and Working Condition also requires that LIT provides a grievance mechanism for contractors (and their organisations where they exist) to raise workplace concerns. This procedure should be made available during recruitment / appointment and make it easily accessible to them, with no retribution and should not restrict access to judicial or administrative remedies through legislation or substitute any grievance mechanism through collective agreements.

The other international standards include:

- International Finance Corporation (IFC) Performance Standard.
- ISO 26000: 2010 on social responsibility;
- United Nations Guiding Principles on Business and Human Rights;
- ILO adopted Convention No. 190 and Recommendation No. 206 to combat violence and harassment, including GBVH;
- United Nation Global Compact SDG5 – Gender Equality.

Project specific documents

- Environmental and Social Impact Assessment (ESIA)
- Livelihood Restoration Plan (LRP)
- Environmental and Social Management System (ESMS) Manual

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-rev00)
- AMEA Power's HR Policy (AP-HR-POL-001)
- AMEA Power's Gender Equality Policy statement (AP-HR-POL-002)
- AMEA Power's Anti-Modern Slavery Policy (AP-HR-POL-003).

4 INTRODUCTION

The project site is located along the Nebbi- Arua Highway at Ombachi and Muni Villages in Laura Parish, Uleppi subcounty, Madi Okollo district in North- western Uganda. The area is approximately 1.4 km south of Uleppi town, and 500 meters off the Nebbi – Arua highway.

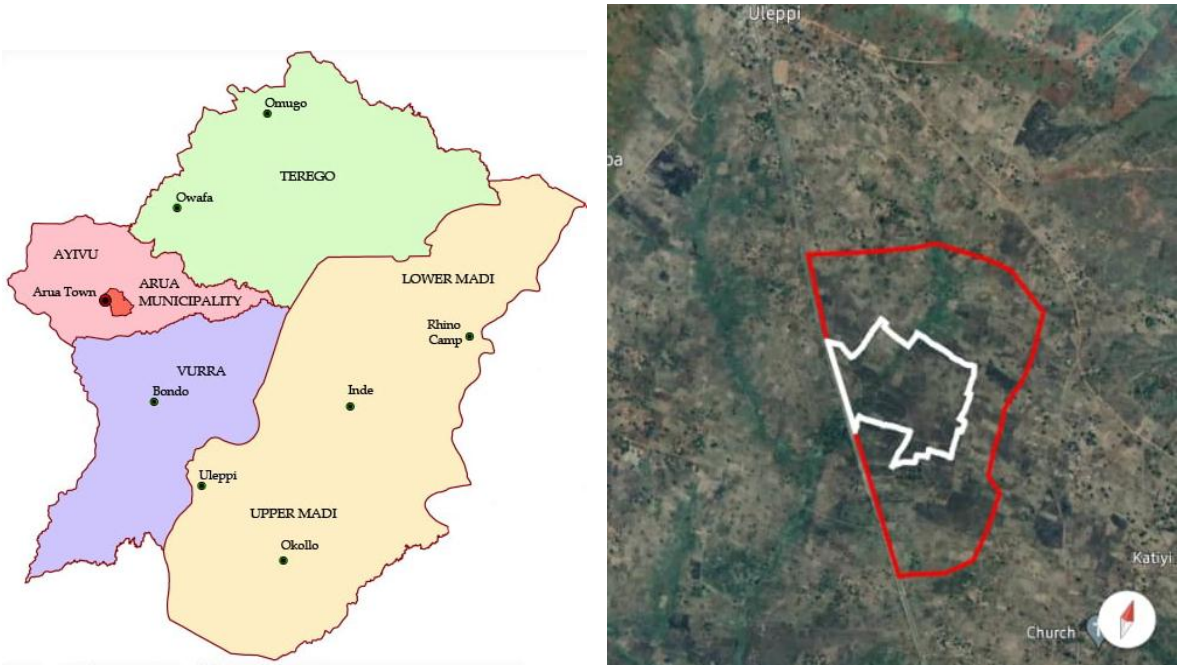

FIGURE 1 - PROJECT LOCATION

AMEA Power LLC, through its Local company in Uganda, Ituka West Nile Uganda Limited, has contracted Danway Electrical $ Mechanical Engineering LLC to carry out the Engineering, Procurement, and Construction (EPC) for the Project. Danway EME will be responsible for preparing the detailed design, delivery of project components to the site, and overall construction of the Project.

The ESIA was undertaken, and relevant permits were obtained to comply with the requirements laid out in the Uganda National Environment Management policy ,1994. The Project received finances and is therefore completed to conform to international good practice including the International Finance Corporation (IFC) Performance Standards (PS), the Equator Principles (EPs) and the World Bank Group's (WBG) Environmental and Social Guidelines

5 PRINCIPLES

The United Nations Guiding Principles (UNGP) on Business and Human Rights lists several "effectiveness criteria" for the successful implementation of a Grievance Mechanism (GM). The UNGP states that it should always be:

- Legitimate: it must have a clear transparent and sufficiently independent governance structure to ensure that no party to a grievance process can interfere with the fair conduct of that process;
- Accessible: it must be publicised to stakeholders who may wish to access it and provide adequate assistance for aggrieved parties who may face barriers to access, including language, literacy, awareness, finance, distance, or fear of reprisal;

- Predictable: it must provide a clear and known procedure, with time frames for each stage; clarity on the types of process and outcome it can (and cannot) offer, and means of monitoring the implementation of any outcome;
- Equitable: it must ensure that aggrieved stakeholders have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair and equitable terms;
- Rights-compatible: it must ensure that its outcomes and remedies accord with internationally recognised human rights standards; and
- Transparent: it must provide sufficient transparency of process and outcome to meet the public interest concerns at stake and should presume transparency wherever possible.

Additionally, this GM aims to:

- Establish a permanent dialogue between the project and the local communities on the project;
- Recognize, promote and protect the rights of PAPs to voice their concerns and / or lodge complaints;
- Give clear instructions on how to handle complaints by defining simple, practical and effective procedures that will be widely disseminated within the intervention communities to manage complaints and take appropriate action in accordance with human dignity;
- Help to grasp and solve problems before they become more serious and spread or degenerate into conflicts.
- Clarify at the outset what is the purpose of the procedure;
- Assure people that there will be neither cost nor retribution associated with lodging a grievance; and
- The entire process (i.e. how a complaint is received and reviewed, how decisions are made and what possibilities may exist for appeal) will be made as transparent as possible by putting it into written form, publicising it and explaining it to the stakeholders

To proper manage the potential impacts identified in the ESIA, this grievance mechanism has been designed based on the appointment of a Community Liaison officer, in charge of managing community complaints.

6 EXAMPLES OF GRIEVANCES TYPICALLY ENCOUNTERED

TYPE	COMPLAINANT(S)	EXAMPLES	RISK
Relatively minor and onetime problems related to company operations	An individual or family	A company truck damaging a community member's fence; a one-time disrespectful encounter between a company employee and a community member	Low
Relatively minor but repetitive and widespread problems	Multiple individuals, families, or larger groups	Company-related road traffic raising dust that settles on clothes hung out to dry	Medium
Significant and larger repetitive problems	Community groups, nongovernmental or Community-based organizations, or local governments	Company activities allegedly causing noise or dust to nearby receptors, including public roads	High
Major claims that company activities have resulted in significant adverse impacts on larger populations of people	Community groups, nongovernmental or community-based organizations, or local governments	Company operations adversely impacting a community's water supply, making it unsafe for drinking, livestock, and/or irrigation	Very high
Major claims over policy or procedural issues	Non-governmental organizations, community groups or community-based organizations, or local governments	A company's noncompliance with its own policies; failure to follow guidelines of multilateral lenders for adequate consultation to achieve prior and informed consent; inadequate resettlement and compensation of affected populations	Very High
Any grievance related to GBVH issues	Individual or group of individuals	Reporting of sexual discrimination, direct or indirect, sexual discrimination or harassment on the basis of sexual orientation or gender identity, bullying of a nature to ridicule a person's masculine or feminine identity, sexual abuse or sexual exploitation.	Very High

7 COMMUNITY EXPECTATIONS

When local people present a grievance, they generally expect to receive one or more of the following:

- Acknowledgment of their problem
- An honest response to questions about company activities
- Modification of the conduct that caused the grievance
- Some other fair remedy (options include: an apology /compensation)

In voicing their concerns, they also expect to be heard and taken seriously. Finally, Ituka, contractors, or government officials must encourage people that they can voice grievances and work to resolve them without retaliation. Stakeholders are to be informed that the grievance mechanism can be used to submit complaints anonymously.

8 METHODS TO ACCESS

The methods to access the grievance mechanism have been disclosed to the local communities during the ESIA consultations. The grievance mechanism will be publicised at the site gate, at the Uleppi subcounty offices, and at the Project Company's website.

All information about grievance procedures and grievance registers kept on site will be in English, but grievances forms can be filled in the local language.

However, since the project-affected communities have no or minimal access to internet, but the great majority of them has a mobile phone, it's expected that a number of grievances will be received by phone. For such a reason the grievance mechanism will provide a phone number that will be made available to the communities.

Access to the mechanism will be free of cost. No costs nor retributions will be associated with lodging a grievance.

9 TRANSPARENCY & ACCOUNTABILITY

Coming out with a complaint can pose risks for people, especially if it concerns issues such as corruption, misconduct, monetary compensation, or if it interferes with local social norms, including gender norms. The grievance mechanism includes precautions such as a clear non-retaliation policy, measures to ensure confidentiality and safeguarding of the personal data collected in relation to a complaint, as well as an option to submit anonymous grievances.

The grievance mechanism provides a feedback-system to inform and update the claimant on the handling of his/her complaint. Responses to anonymous complaints will be posted on Project's public channels (web site, social media, and handouts at CLO office).

10 TIMELINE

The community grievance mechanism aims at:

- acknowledge receipt of grievances/ complaints within 2 working days;
- inform about the decision taken within 10 working days; and
- close grievances within 4-weeks from receipt.

11 PUBLICIZING GRIEVANCE MECHANISM

The grievance mechanisms will be publicized in the following ways:

- Posters at the site entrance and at the location of the grievance boxes (LC chairman's offices);
- Stakeholder Engagement Activities; and
- Online.

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

- What the Grievance Mechanism is and its key characteristics;
- Who can raise complaints (i.e. all stakeholders);
- Where, when, and how community members can file complaints (to agree during the stakeholder engagement process);
- Who is responsible for receiving and responding to complaints;
- What sort of response complainants can expect from the company, including timing of response; and
- What other rights and protection are guaranteed.

The CLO will clarify in English or local language any of the points above, if required, during stakeholder engagement activities and engagement with grievant.

The CLO will inform the local communities about this mechanism, arranging face-to-face meetings at the following levels:

- villages around the Project site;
- local administrations / health care unit; and
- sensitive areas, such as mosques, market areas, schools.

In addition to the explanation provided verbally, the Community Officer Desk will provide the communities with printed materials (e.g. posters) to be affixed in prominent areas, providing the key facts about the mechanism and contact information, consisting in a dedicated phone number.

Communication and awareness raising activities regarding the Grievance Mechanism will be repeated in regular intervals.

12 GRIEVANCE MECHANISM PROCEDURE

Handling grievances encompasses a step-by-step process as well as assigned responsibilities for their proper completion, as detailed in the sections below.

12.1 Submitting a complaint

The grievance mechanism will allow for complaints to be filed in several ways:

- By post;
- By phone;
- Online: By email and/or through an online form;
- At the project gate;
- At the Mailboxes (project gate, LC chairman's Offices) and
- During meetings with the Community Liaison Officers.

Written complaints will be received by post, email and mailboxes. Verbal complaints will be received at the project's gate and during meetings with the CLO. Therefore, the security personnel have to be aware and trained to deal with the complainant appropriately. The training of security personnel will be addressed through a Project-specific Security Management Plan, in compliance with the requirements of the Community Health and Safety chapter of the ESIA. Security personnel should communicate to the Community Liaison Officer that a stakeholder wants to submit a grievance. For complainants from stakeholders that prefer to submit their complaints verbally, the Community's Liaison Officers will meet them at the company's gate (or could offer them to go into the company's offices, if the complainant is comfortable to do so) and will take notes on the details of the complainant and read them out loud to the complainant to confirm that the key elements of the complaint have been captured.

The community liaison officer will regularly meet stakeholders during construction, operation and decommissioning. Specific details on meeting frequency are provided in the following sections.

12.2 Receiving complaints

Upon receiving, grievances shall be assigned a case number, and records of communication/consultation shall all be attached with the relevant entry and filed. The database shall be monitored regularly for recurring grievances so that appropriate mitigation can be developed.

ITUKA anticipates that the following direct impact grievances could be categorised as follows:

- Job issues.
- Third party injuries or conflicts.
- Damages to infrastructure.
- Loss of livestock.
- Damage and temporary interruption of access roads.
- Road congestion.
- Nuisance caused by noise or dust.
- Unplanned use / damage to land.
- Environmental issues (soil and water contamination, erosion, damage to wildlife or vegetation, hunting and fishing, improper right of way restoration etc).
- Behaviour of personnel.
- Community health and safety.
- Cultural issues.

The categorisation of grievances will allow ITUKA to establish trends and adapt its own, and EPC Contractor's management system where needed to improve environmental and social performance and reduce the overall number of grievances resolved. If a grievance is the result of a non-compliance to project environmental and social project commitments and could result in harm to people or serious environmental impact, the Community Liaison Officer (CLO) and Social Specialist will consult directly with the Construction Management Team and may recommend a temporary suspension of an activity. Any member of staff or contractor has the right to refuse or stop work that is unsafe.

The company will publicly commit to a certain time frame in which all recorded complaints will be responded to. By letting people know when they can expect to be contacted by company personnel and/or receive a response to their complaint the uncertainty related to the grievance resolution process may be reduced.

In addition to categorising a grievance, the following information will also be collected in a standards format:

- Name, address, contact number, place or community of residence.
- When and where the grievance was received.
- Name of the person who received the grievance.
- Basic information about the party making the grievance for providing feedback.
- Corrective actions and dates when they were initiated and completed.
- Dates when the required notifications and feedback were given to the affected party.
- Date when all parties agreed the grievance was closed out.

It is voluntary for the individual making the grievance to provide personal information.

The following receipt procedure will be followed for grievances:

- All incoming grievances will be acknowledged as soon as possible, preferably at the time of submission, and no later than two days from submission. A formal confirmation—with a complaint number, or other identifier, and a timeline for response— assures the complainant that the organization is taking the grievance seriously, and it gives the project a record of the allegation. As a good practice, complaints received in person will be acknowledged on the spot;
- Once a comment/complaint has been received it must first be logged in a Stakeholder Grievance Register (document present within the 'QHSE Statistics' report that will be submitted monthly to Lenders and available on site for consultation).
- If a more complex investigation is required, the complainant will receive an update within two weeks of the grievance being received, explaining the actions required to resolve the complaint, and the likely timeframe; and
- The Project Company will explain in the first letter of acknowledgment which claims are clearly outside the scope of the mechanism and what alternative mechanisms communities can use to address these potential issues.

12.3 Reviewing and Investigating grievances

To ensure that all grievances are adequately investigated and closed out, a grievance log will be kept, documenting all the actions taken to address each grievance.

An extensive investigation may be required when grievances are complex and cannot be resolved quickly. The company will take full responsibility for investigating the details of grievances coming through its grievance mechanism, following the principle of "no cost to communities".

In cases of sensitive grievances - such as those involving multiple interests and a large number of affected people - it may help to engage outside organizations in a joint investigation, or allow for participation of local authorities, only if the complainants agree to this approach.

For complex grievances an investigation team will have to be appointed. If the investigation team is formed internally, issues that will be taken into consideration include potential conflicts of interest, qualifications, gender composition, and budget.

Meetings with complainants and site visits can be useful for grievance investigation and will be undertaken, as appropriate.

The CLO shall discuss the grievances that have been received, the investigation progress and the proposed / agreed resolution with the with the Project Company (Ituka west Nile Uganda Limited). For complex grievances, AMEA Power will participate in the grievance investigation and resolution.

Complainants will be informed weekly of the status of their grievance.

12.4 Grievance Resolution options and responses

One of the potential advantages of a grievance mechanism is its flexibility. Rather than prescribe a specific procedure for each particular type of complaint, a list of possible options appropriate for different types of grievances will be provided. Options may include altering or halting harmful activities or restricting their timing and scope (e.g. for construction noise), providing an apology, replacing lost property, providing monetary compensation, revising the community's engagement strategy, and renegotiating existing commitments or policies.

The grievance investigation team will provide a proposal to resolve the complaint, which will have the backing of the Senior Management. The Community Liaison Officer will then contact the complainant to get an agreement on the proposed solution.

If all parties accept the proposed solution, the agreed actions will be implemented in the established timeframe. In the case that complainant does not accept the proposed resolution, the Project Company shall re-assess the situation and make sure that all alternatives within the grievance mechanism are explored. If agreeing on a solution acceptable to all parties is not possible within the grievance mechanism, the complaint will be referred to external mechanisms.

Close-up monitoring of a complaint will be undertaken, if possible, by collecting proof that the necessary actions have taken place. For example:

- If the issue was resolved with the satisfaction of the complainants, get a confirmation and file it along with the case documentation; and
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how these were resolved.

The system for responding to the complainant should specify who communicates and how. In some cases, it may be appropriate that feedback be provided by the staff member responsible for assessment accompanied by the coordinator of the complaints' procedure.

ITUKA Senior Management may participate in feedback, depending upon the seriousness of the complaint. Any complaint classed as high seriousness would include the ITUKA Senior Management. Medium complaints would include ITUKA Senior Management where deemed appropriate.

When formulating a response ITUKA will ensure that:

- The complaint coordinator or relevant department may prepare the response. The response should consider the complainants' views about the process for settlement as well as provide a specific remedy. The response may suggest an approach on how to settle the issues, or it may offer a preliminary settlement.

- To present and discuss the response to the complainant, consider holding a meeting with the complaint coordinator, relevant company manager, and the complainant. If a direct meeting is not possible, consider meeting with a neutral third party serving as facilitator. The group would also discuss appropriate next steps during this meeting. If the proposal is a settlement offer and it is accepted, the complaint is resolved successfully and there is no need to proceed to the next step of selecting a resolution approach. If the complainant is not happy with the response about a resolution process or substance, the group should try to reach an agreement that would be mutually acceptable.
- If the case is complex and a resolution time frame cannot be met, provide an interim response—an oral or written communication—that informs the person of the delay, explains the reasons, and offers a revised date for next steps.

All comments and complaints will be responded either verbally or in writing, in accordance with preferred method of communication specified by the complainant in the Comments and Complaints Form. Comments will not be considered as complaints and may not, therefore, be responded to unless the commenter requests a response.

ITUKA will respond to the complaint within one week. It is possible that some responses may take longer than one week to implement, but even in those instances ITUKA will inform the complainant what actions will be taken and when.

13 GBVH AND MODERN SLAVERY GRIEVANCES

13.1 GBVH

GBVH is an umbrella term that covers a range of behaviours, including sexual, physical, psychological and economic abuse. What sets it apart from other types of violence and harassment is that it is directed at people because of their sex or gender, or disproportionately affects people of a particular sex or gender.

The ILO adopted Convention No. 190 and Recommendation No. 206 to combat violence and harassment, including GBVH, in the world of work.25 Convention No. 190 recognises that GBVH can constitute a human rights violation or abuse, that it is a threat to equal opportunities and is incompatible with decent work. Violence and harassment are also explicitly referenced in UN Sustainable Development Goal (SDG) 5 on achieving gender equality.

Construction, particularly of major infrastructure projects, can be a high-risk environment for GBVH affecting community members, workers and service users.

GBVH risks can intensify within local communities when there are large influxes of male workers from outside the area. Such workers often come without their families and have large disposable incomes relative to the local community and can pose a risk in terms of sexual harassment, violence and exploitative transactional relationships. These risks are higher where workers come into close contact with the local community, for example on access routes or when living together in remote areas.

During the construction phase, workers are also vulnerable to various forms of harassment, exploitation and abuse, aggravated by traditionally male working environments.

Risk factors that increase the potential for GBVH in construction include:

- Large-scale influx of transient male workers into small and often rural host communities with low capacity to absorb the sudden increase of workers.

Remote locations where people have limited access to resources to report GBVH and receive support.

- Presence of security personnel, who can provide protection but can also abuse their positions of power and status to perpetrate GBVH.
- Male workers transporting goods (e.g. truck drivers), who can perpetrate GBVH on routes and at truck stops associated with the project, even if not on the project site.
- Poorly designed or maintained physical spaces on project sites and in worker accommodation. For example, bad lighting in and around grounds and access routes.
- Informal workers, whose informality means they may either be more vulnerable to GBVH due to lack of contracts or that potential perpetrators may go unidentified due to lack of background checks.
- Income-earning opportunities for women through direct employment in construction or operations, or indirect employment (e.g. catering, traders), which may also increase household tension and create community backlash against women in areas where the perception is that they should not work outside the home.

The project will adopt the following actions:

- Appoint senior focal points in both ITUKA and EPC contractor with responsibility for ensuring that commitments and policies to prevent GBVH are implemented.
- Increase women's representation, including at senior and decision-making levels in engineering, procurement and construction (EPC) companies.
- Put in place monitoring systems at the highest levels for regular reporting on GBVH.

- Ensure codes of conduct are publicly disclosed in local languages and are widely accessible to all workers and all groups of people in project areas.
- Develop confidential grievance reporting, referral and support systems for workers.
- Establish safe, confidential and accessible grievance mechanisms for local communities.
- Include options to report anonymously, if preferred
- Assess and revise HR policies, materials and training to encourage male and female applicants and improve female retention and promotion.
- Ensure all workers have contracts and background checks including references from most recent employers.
- Use robust recruitment processes to select, train, manage and monitor security companies and personnel.
- Deliver periodic mandatory training on GBVH to all workers, including contractors, subcontractors and core suppliers, as well as relevant consultants and clients;
- Provide safe, secure and separate living spaces for male and female construction workers.
- Provide lighting around project sites, including around latrines and access routes.
- Install separate, lockable latrines for female construction workers.

13.2 Modern Slavery

Child Labour

Child labour, as defined by the ILO Convention is "work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under of age of 18 that is hazardous to the physical or mental health of the child. In conducting its business, the Project:

- Will not employ children that falls into the definition as stipulated by the ILO Convention, notwithstanding any national law or local regulation.
- Will comply with all other applicable child labour laws, including those related to wages, hours worked, overtime and working conditions.
- Is against all forms of exploitation of children. The company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities.
- Expects its business partners and associates to have and uphold similar standards and abide by country-governing laws in countries wherein they operate. Should violation of these Principles become known to ITUKA and not be remediated, ITUKA will take action including discontinuation of the business relationship.

Forced Labour

ITUKA expressly prohibits any form of work or service, not voluntarily, obtained under threat of any punishment or that is requested as a way of cancelling a debt. Moreover, it is not required, under any circumstances, that employees leave any kind of deposit during the working relationship maintained.

13.3 Principles of GBVH and Modern Slavery grievance assessment

The assessment, monitoring and response measures need to be underpinned by these fundamental principles:

- Survivor-centred: The rights of GBVH survivors need to be consistently prioritised and used as the starting point for all decisions on efforts to assess, prevent, monitor and respond to GBVH. Maintaining confidentiality and checking with whom survivors want information to be shared are

important aspects of a survivor-centred approach. When responding to reports of GBVH, it is important to listen to and respect survivors' wishes and decisions in order to help their recovery.

- Safe: Survivors, witnesses and those who report and seek to address GBVH can be at risk of retaliation, including threatening and violent behaviour, often from those who do not like their position of power being challenged. The threat of retaliation may be used to silence those who speak out about GBVH. This can leave those who report GBVH in a vulnerable position and fear of reprisal can deter people from reporting incidents or raising concerns. It is important to prioritise the safety of those who have experienced, witnessed and/or reported GBVH. Confidentiality and checking with survivors and witnesses about sharing identifiable information are important aspects of ensuring safety.
- Context-specific: All measures need to be rooted in a thorough understanding of the local context. As such, it is important to first understand the legal and social context and identify the support mechanisms that are in place.
- Non-discriminatory: All survivors need to be listened to and treated equally.

13.4 Survivor-centred Approach

ITUKA Senior Management will ensure a survivor-centred approach is followed for all GBVH or Modern Slavery grievances reported.

Key elements of a survivor-centred approach are to:

- Treat survivors with dignity and respect, taking time to listen to what they have to say rather than rushing to take action.
- Enable survivors to make informed decisions about what they want, providing them with information about support options available.
- Help survivors to be safe, including keeping their information confidential.
- Treat all survivors equally and non-judgementally, making sure their experience is not unfairly dismissed, for example, because they are young, old, disabled, a sexual or gender minority, or work in prostitution.
- A survivor-centred approach is to be used in addressing GBVH. It helps to reduce the potential for further harm to survivors and, the likelihood of further financial and reputational risk to companies. Anchoring decision-making in a survivor-centred approach is, therefore, in the interests of companies and investors

13.5 Investigation

When a report of GBVH or Modern Slavery is received, the ITUKA CLO or Social Specialist will receive the Grievance. The ITUKA CLO or Social Specialist will be trained in how to respond to reports of GBVH or Modern Slavery and has the skills and confidence to take a survivor-centred approach. The lead person's responsibilities are:

- Report all safeguarding grievances to the AMEA Power Head of ESG within 24-hours of receipt.
- Ensuring the GBVH or Modern Slavery report is appropriately and securely logged in the company's internal system and that confidential records are kept.
- Ongoing monitoring of the support and safety needs of survivors and any witnesses and/or whistleblowers.
- Ongoing communication with survivors to ensure their wishes inform all decisions about the company's response to the report, including initial decisions on how to proceed.

13.6 Investigator Requirements

ITUKA Senior Management ensure that the investigator is trained / experienced in:

- Comprehensive training on company grievance mechanisms and investigation procedures, including scenarios and group exercises (such as role playing) to ensure staff are prepared to respond effectively.
- Understanding how GBVH or Modern Slavery risks can be exacerbated by various factors (such as seasonal deadlines or the presence of temporary workers).
- Thorough understanding of a survivor-centred approach and the importance of confidentiality.
- Comprehensive understanding of the local support services available to survivors and witnesses.
- Knowledge of GBVH or Modern Slavery and legal protection expertise available to the company and the qualified third-party providers the company has identified to undertake investigations.
- Basic training on psychological first aid to guide interactions with survivors

13.7 Maintaining confidentiality

It is crucial that confidentiality is maintained in relation to reports of GBVH or Modern Slavery to protect survivors, witnesses, whistleblowers and alleged perpetrators. It is critical that all details of the report – and any subsequent investigation and associated interviews be kept confidential. The identities of everyone involved, including any investigators, will need to be protected.

To do this:

- the number of people with whom information is shared will be limited.
- the timing and location of any investigation activities, including interviews, will be conducted so that they are away from worksites and not observed by others.
- all paper and electronic information in is to be filed in secure locations.
- failure to maintain confidentiality will be linked to disciplinary procedures and communicated to all parties involved.
- Rumours are to be control by ensuring that managers who are informed about the report are aware of what they are/are not allowed to communicate to others.

13.8 Response

When a GBVH or Modern Slavery grievance is reported, the ITUKA Senior Management will ensure that the immediate priority is to enable survivors to access the professional support they want and to work with survivors, witnesses and whistleblowers to identify safety measures to protect them from further harm.

The ITUKA Senior Management will need to provide private spaces where support options and potential safety measures can be discussed with survivors (or witnesses and whistleblowers). This is an important aspect of maintaining confidentiality and enabling any concerns to be discussed.

Support options and safety measures offered to survivors, witnesses or whistleblowers ought to be:

- Independent of any other action taken in response to the report of GBVH or Modern Slavery.
- Proactively offered, rather than only made available on request.
- Presented in a way that gives survivors (and witnesses and whistleblowers) choice and control, so they can make informed decisions.
- Provided by trained staff, so as not to cause further harm.

It is important that survivors, witnesses and whistleblowers are able to access support services during working hours so there is no additional cost to them.

14 ROLES AND RESPONSIBILITIES

14.1 Community Liaison Officer

The Community Liaison Officer will be appointed by the Project Company. He/she is responsible for the overall administration of the Community Grievance Mechanism, for coordination with Developers and Contractors on community grievances, and for overall Project's community relations. As such, he\she is the first point of contact for community members with complaints and grievances. The CLO reports directly to the Project Company Social Specialist.

In relation to the grievance mechanism procedure CLO shall:

- implement the grievance mechanism during the project's lifecycle, under the supervision of the Social Specialist;
- inform and consult project-affected communities about the grievance mechanism procedure provision and its access modalities;
- fill and record the received complaints in Grievance Forms and the Grievance Management Database;
- engage with complainants. This could include providing complainants with information or clarification on any issues of concern;
- communicating with the complainants, giving updates about the examination process and resolution process;
- investigate the grievance and assigning an appropriate resolving officer or Developers/ Contractors responsible;
- inspect the areas, if needed, in order to assess the reported grievances;
- report the grievances to the ITUKA Social Specialist;
- promptly inform the Site Security about the complaint, if security risks may arise; and
- define corrective actions, in coordination with social specialist and Managers of the involved departments.

14.2 Social Specialist

The Social Specialist to be appointed by the Project Company. The Social Specialist reports directly to the Site Manager and functionally to the AMEA Power's Head of ESG.

In relation to the grievance mechanism procedure, the Social Specialist shall:

- provide training to Project Company's staff on grievance mechanism for its implementation
- coordinate the management of complaints at all levels;
- assist to disseminate information among the local community;
- ensure the traceability of the management of complaints;
- ensure that the complainant is returned with an action that acceptable to the community;
- follow-up on effective resolution and/or closure of the grievance according to this mechanism;
- communicating the outcome to the complainant;
- update the community grievance mechanism when it is need after assessment the implementation; and
- prepare, review, update and submit the grievances registers, grievance notification, grievance close-out forms to Project Company and AMEA Power on a monthly basis.

14.3 Site Manager

The Site Manger will be appointed by the Project Company. His main role is to participate in the investigation of all grievances that are related to activities under EPC / O&M / Decommissioning Contractor scope, including activities related to the subcontractors and suppliers.

The Site Manager additionally shall:

- ensure that there is a well-staffed and trained Community Liaison Officer, and that the required resources (e.g. vehicles, company phones, office materials) are provided to them;
- supervise the processing and resolution of all grievances;
- supervise the disclosure of Project information;
- oversee that the grievance mechanism is complied with; and
- ensure that the grievance mechanism is publicised.

14.4 EPC CONTRACTOR

EPC Contractor has the responsibilities to:

- Direct any grievances made by a person or group in contact with a member of the EPC Contractor's workforce, to the Company CLO for formal recording, investigation and resolution.
- Provide their full support during the process of the investigating and resolving any grievances that occur.
- Adherence to all ITUKA policies and plans, including this procedure.
- Developing and executing their own grievance mechanism, in accordance and aligned with this Grievance Management Procedure.
- Receiving grievances directly from the individuals or groups concerned, including community members, employees and workers, or through sub-contractors.
- Handling grievances resolution through their own Community Liaison (CL) teams but in close coordination with the ITUKA Community Liaison Officer and Social Specialist.
- Reporting to ITUKA Social Specialist regarding grievances tracking (received, registered, in process and resolved) on a daily and weekly basis.
- Resolving a grievance immediately in the field when practicable.
- Informing ITUKA Social Specialist in writing of all grievances received, including those immediately resolved in the field.
- Proposing alternative approaches to activities which may result in an impact of concern to stakeholders, in order to avoid and to reduce the number of grievances received.
- Attending all coordination meetings requested by ITUKA Social Specialist on a daily and weekly basis, and as needed.
- Reporting to ITUKA Social Specialist on a daily and weekly basis and as needed to manage social incidents and other community relations issue.

It is important that all members of the team are adequately trained in stakeholder engagement and grievance mechanism.

15 TRAINING

The Project Company shall ensure that all site personnel (including security staff) are informed about this procedure and are made aware of the possible impacts on the project-affected communities.

Particular attention shall be paid in training personnel that also work outside the project site, such as the drivers (linkage to the Traffic Management Plan). Such personnel will be provided with copies of the grievance mechanism form and contact details of the CLOs.

16 MONITORING, AUDIT AND REPORTING

The implementation of this grievance mechanism will be monitored through the periodic review of the complaints register which will be updated and submitted by Project Company (Ituka west Nile Uganda Limited) to the AMEA Power's Corporate ESG team on a monthly basis (or more often as needed), to assess whether engagement activities under this plan are being undertaken successfully and in a timely manner.

The implementation of this plan will be monitored through ongoing monitoring of the email access channel and review of the grievance register. The performance of its implementation and the timely resolution of complaints are assessed monthly and also 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.

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

- Grievance Registration Form (Annex 1)
- 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 this grievance mechanism to AMEA Power that in cascade will inform the Lenders and Advisors.

17 KPI

The KPIs that should be implemented are summarized in the table below and should be included within the reporting requirements identified within the Construction ESMS Manual as applicable

No.	KPI	Measurement Action	Frequency	Goal
1	Number of public consultation meetings held to provide accurate updates on project status and manage expectations regarding job requests and local electrification.	Submission of log sheet	Monthly	To be agreed prior commencement
2	Number of unresolved complaints	Submission of log sheet	Monthly	ZERO
3	Number of incidents and/or non-compliances in relation to this plan	Submission of incident report and/or Non-Compliance Report (NCR)	Monthly	ZERO

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: