Stakeholder Engagement Plan (SEP)

500 MW / 1000 MWh Nefertiti Battery Energy Storage Systems (BESS) Project in Egypt

REV-2

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ABREVIATION AND ACRONYMS

Acronym	Definition
AC	Alternating Current
AMR	Annual E&S Monitoring Report
BESS	Battery Energy Storage System
BMS	Battery Management System
BOO	Build Own Operate
CLO	Community Liaison Officer
COD	Commercial Operation Date
CPA	Capacity Purchase Agreement
DC	Direct Current
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EEAA	Egyptian Environmental Affairs Agency
EEHC	Egyptian Electricity Holding Company
EETC	Egyptian Electricity Transmission Company
EIB	European Investment Bank
EMS	Energy Management System
EPC	Engineering Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESR	Environmental and Social Requirement
FACP	Fire Alarm Control Panel
FGD	Focus Group Discussion
FMC	Facilities Management Company
GBV	Gender Based Violence
GDP	Gross Domestic Product
GoE	Government of Egypt
GRM	Grievance Redress Mechanism
GW	Gigawatt
HSE	Health, Safety and Environment
HV	High Voltage
IBAs	Important Bird Areas
IFC	International Finance Corporation
IFIs	International Financial Institutions
IPPs	Independent Power Producers
ISES	Integrated Sustainable Energy Strategy
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Area
KPI	Key Performance Indicator
LILO	Line In Line Out
LV	Low Voltage
MV	Medium Voltage

MW	Megawatt
MWh	Megawatt hour
NAWWCo	National Authority for Water and Wastewater Company
NCE	Nature Conservation Egypt
NFPA	National Fire Protection Association
NGO	Non-Governmental Organization
NREA	New and Renewable Energy Authority
NTS	Non-Technical Summary
OEM	Original Equipment Manufacturer
OHTL	Overhead Transmission Line
OPC	Open Platform Communications
PCS	Power Conversion System
PPA	Power Purchase Agreement
PV	Photovoltaic
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SESA	Strategic Environmental and Social Assessment
SOC	State of Charge
SOH	State of Health
SPV	Special Purpose Vehicle
TBD	To Be Determined
TBT	Toolbox Talk
TLBs	Tractor Loader Backhoes
VAWG	Violence Against Women and Girls
WMRA	Waste Management Regulatory Authority

1. INTRODUCTION

1.1 Background

The energy sector is a key driver for the socio-economic development of Egypt, representing around 13% of current Gross Domestic Product (GDP) and thus making economic growth in the country contingent upon the security and stability of energy supply.

Since 2007, Egypt has experienced an energy supply deficit due to the rapid increase in energy consumption and the depletion of domestic oil and gas resources, shifting its position as a net hydrocarbon exporter for the last three decades to that of a net importer.

This has brought a set of challenges to the energy sector, including electricity shortages, caused in part by the decline of domestic gas production, as natural gas is the main source of electricity, accompanied by highly subsidized energy prices, with negative financial implications for already dwindling government revenues. [1]

In response, the Government of Egypt (GoE) has taken bold steps to adopt an energy diversification strategy with increased development of renewable energy and implementation of energy efficiency, including assertive rehabilitation and maintenance programs in the power sector. [2]

To this extent, in 2013, the Arab Republic of Egypt (through the Ministry of Electricity and Renewable Energy) had developed and adopted the Integrated Sustainable Energy Strategy (ISES) 2015 – 2035, which provides an ambitious plan to increase the contribution of renewable energy to 42% of the electricity generated by the year 2035. [3]

In that respect, the GoE issued the Renewable Energy Law (Decree Law 203/2014) to support the creation of a favourable economic environment for a significant increase in renewable energy investment in the country. The law sets the legal basis for the Build, Own and Operate (BOO) scheme to be implemented. Through the BOO mechanism, the Egyptian Electricity Transmission Company (EETC) invites private investors to submit their offers for solar and wind development projects, for specific capacities. In addition, the GoE (through the New and Renewable Energy Authority (NREA)) provides the land for the investors.

These national efforts to expand renewable energy make the role of Battery Energy Storage Systems (BESS) increasingly important. The primary purposes of the BESS are energy shifting and grid support, both of which play a critical role in facilitating the integration of renewable energy into Egypt's power grid by shifting the energy load to peak demand periods – particularly important as the country continues to expand its renewable energy capacity.

In accordance with the above, AMEA Power has been selected to develop a 1000 Megawatt hour (MWh) BESS along with a 600 m Overhead Transmission Line (OHTL) (hereafter referred to as the '**Project**') located within Benban Solar Park, in Aswan Governorate. The Project is to be developed under the Build-Own-Operate (BOO) mechanism, under which a Capacity Purchase Agreement (CPA) has been established. AMEA Power established a Special Purpose Vehicle (SPV) known as Nefertiti that is wholly owned by AMEA Power and that will be responsible for development of this project (hereafter referred to as the '**Developer**').

[1] UNIDO – Low-Carbon Hydrogen Assessments in Egypt Highlights (PDF)
[2] Renewable Energy Outlook, Egypt (IRENA, 2018)
[3] Egypt - Countries & Regions - IEA

The Project is expected to perform two full cycles per day (each of 2 hours), implying a daily energy throughput of 1000 MWh. The Project will help stabilize the grid by balancing supply and demand, reducing blackouts, and enabling smoother integration of variable renewable sources. This initiative aligns with the government's strategy to diversify the energy mix, reduce fossil fuel dependence, and meet its greenhouse gas reduction targets under the Paris Agreement, supporting a more sustainable and resilient energy infrastructure.

This Stakeholder Engagement Plan (SEP) has been developed as an integral component of the Environmental and Social Impact Assessment (ESIA) for the 1000 MWh Nefertiti BESS Project. Stakeholder engagement forms a core element of the ESIA process and has been systematically undertaken to inform baseline data collection, impact identification, assessment of Environmental and Social (E&S) risks, and the development of mitigation and management measures.

The outcomes of stakeholder consultations conducted during ESIA preparation have been incorporated into the impact assessment and reflected in the Environmental and Social Management Plan (ESMP) within the ESIA. This SEP formalizes and documents the stakeholder engagement activities undertaken to date as part of the ESIA and establishes the structured framework for continued information disclosure, consultation, and grievance management throughout the construction, operation, and decommissioning phases of the Project.

The SEP has been prepared in alignment with applicable national regulatory requirements governing ESIA disclosure and consultation, as well as relevant international lender standards to include the European Bank for Reconstruction and Development's (EBRD) Environmental and Social Requirements (ESR), ensuring that stakeholder engagement remains proportionate to the Project's E&S risk profile and consistent with Good International Industry Practice (GIIP).

Note: The Project is located within the boundaries of the Benban Solar Park and is directly bordered by operational solar PV project sites developed by other Independent Power Producers (IPPs). A Strategic Environmental and Social Assessment (SESA)[4] was previously prepared for the overall Benban Solar Park and was referenced throughout the ESIA Report, hereafter referred to as the '**Benban SESA'**.

1.2 Stakeholder Engagement Plan (SEP)

This document constitutes a Stakeholder Engagement Plan (SEP) to be implemented by the Developer throughout the construction and operation phase for the Project. The SEP outlines a systematic method to stakeholder engagement that will assist the Developer in developing and maintaining a positive relationship with their stakeholders, particularly the locally affected communities, over time. The SEP is a dynamic document which will be modified through Project construction, operation and implementation.

The Project welcomes suggestions for improvement of this SEP. Suggestions can be submitted via the contact information for the Developer at the end of this document (Section 0).

In particular, this SEP includes the following:

- Section 1 – Introduction: provides a background and introduction on the Project and SEP;
- Section 2 – Project Description: provides a summary of the Project location, main Project components, Project schedule and job opportunities for the construction and operation phase;

[4] Strategic Environmental & Social Impact assessment Benban 1.8 GW Photovoltaic Solar Park (NREA), Egypt

- Section 3 – Regulatory Context: highlights the main requirements that are relevant for stakeholder engagement to the Project to include Uzbekistan regulations and international best practice requirements;
- Section 4 – Identification of Stakeholders: identifies all relevant stakeholders for the construction and operation phase of the Project at all geographic levels to include national, regional and local levels as well as communities within the area of influence of the Project;
- Section 5 – Summary of Past Stakeholder Engagement Activities: provides a summary of past stakeholder engagement activities undertaken for the Project during the planning and design phase of the Project;
- Section 6 – Stakeholder Engagement Strategy and Plan: identifies an engagement strategy for each stakeholder group to include objective for engagement, communication methods and tools, timeframe, and responsibilities;
- Section 7 – Stakeholder Grievance Mechanism: identifies a mechanism for managing and handling any concerns or complaints related to the Project from stakeholders during the construction and operation phase;
- Section 8 – Contact Details: provides contact details of the Developer for communication with all relevant stakeholders of the Project;
- Section 9 – Monitoring and Reporting: identifies the key monitoring and reporting requirements that are applicable for the implementation of the plan; and
- Section 10 – Roles and Responsibilities: identifies the roles and responsibilities for the Developer and other involved entities in implementation of the plan.

2. PROJECT DESCRIPTION

This section provides a detailed description of the Project in relation to its location, the key Project components, and an overview of the proposed activities that are to take place during the construction, operation, and decommissioning phase.

2.1 Administrative Setup and Project Location

Administratively, Egypt is divided into 27 Governorates. Governorates are then divided into Aqsam (singular: Qism[5]) or Marakez[6] (Districts) which are then subdivided into local units, which are finally divided into cities, villages and hamlets.

Egypt is divided into 27 Governorates as presented in **Error! Reference source not found.** and Figure 1 below. The Project site is located within Aswan Governorate around 630 km southeast of the capital city of Cairo. Aswan Governorate is divided into 7 Marakez[7] (Aswan, Daraw, Kom Ombo, Nasr Al Nuba, Edfu, Abu Simbel, and New Toshka), 12 cities, and 33 rural local units with 72 affiliated villages[8].

The Project site is located within the Daraw Markaz, where the closest village is Benban, located at a distance of 13 km east of the Project site, while Daraw city is located around 18 km southeast from the Project site.

Administratively, Benban Village is divided into Benban Qebly Village, Benban Bahary Village, Al Raqaba Village, and previously Mansoureyah Village (which has recently been administratively reassigned from Daraw Markaz to Kom Ombo Markaz). The closest village is the Benban Qebly Village and is located around 13 km to the east of the Project site.

Table 1: Region Division of Egypt (corresponding to Figure 1 below)

Governorate	Legend	Governorate	Legend	Governorate	Legend
Cairo	11	Gharbia	3	Suhag	24
Alexandria	7	Menoufia	2	Qena	25
Port-Said	14	Behera	10	**Aswan**	**27**
Suez	12	Ismaiilia	6	Luxor	26
Damietta	13	Giza	19	Red Sea	22
Dakahlia	4	Bani-Suef	8	El Wadi El Gidid	21
Sharkia	5	Fayoum	18	Matrouh	20
Kalyoubia	1	Menia	17	North Sinai	15
Kafr-El-Sheikh	9	Asyout	23	South Sinai	16

[5] Qism. In the administrative division of Egypt, the Qism is an urban district made up of neighborhoods and residential blocks (not villages). It usually has more commercial and government services than smaller neighborhoods and functions as the main local administrative unit in urban governorates and large cities.

[6] Markaz. In the administrative division of Egypt, the Markaz is the main city or village followed by a group of villages in agricultural areas (not urban), and often the most important city is a Markaz for a total of villages. The Markaz has more commercial markets than villages, and there may also be branches of government service institutions and agencies serving villages. Each Governorate of the Delta and Upper Egypt includes a number of Markaz, Cities and villages.

[7] Markaz. In the administrative division of Egypt, the Markaz is the main city or village followed by a group of villages in agricultural areas (not urban), and often the most important city is a Markaz for a total of villages. The Markaz has more commercial markets than villages, and there may also be branches of government service institutions and agencies serving villages. Each Governorate of the Delta and Upper Egypt includes a number of Markaz, Cities and villages.

[8] Urban Planning Authority, future vision and projects supporting the development of Aswan Governorate, 2017.

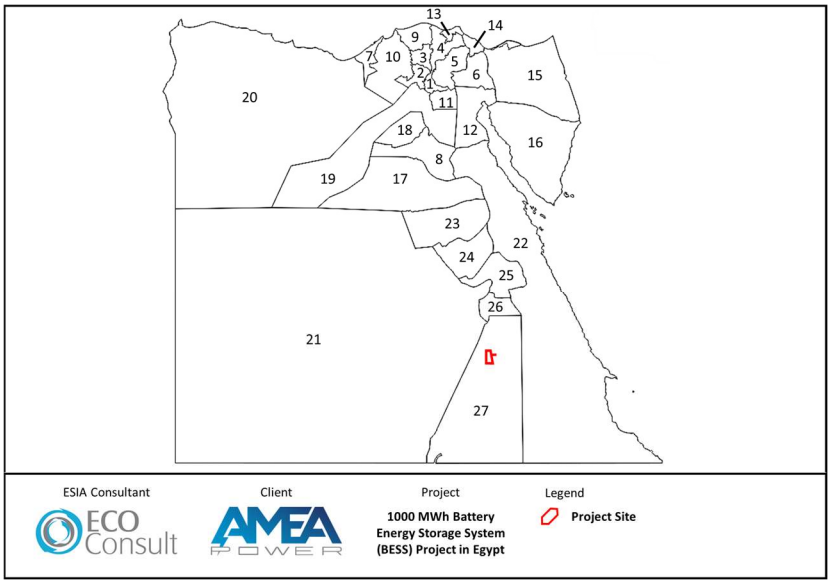

Figure 1: Administrative Division of Egypt

2.2 Local Communities

Throughout the SEP report, the term local communities will be used. This will refer to the Benban Village entirely including all of its affiliated sub-villages and Hamlets. The nearest Hamlet is Naga El-Ebada around 13 km to the east of the Project. The figure below presents the distance of the Project site from the local communities and Aswan city.

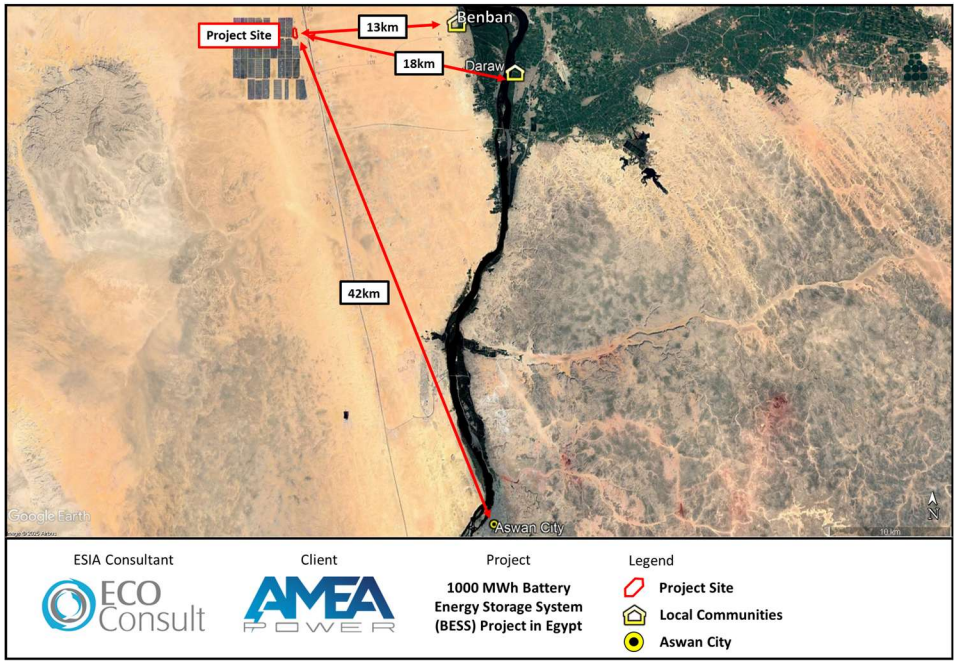

Figure 2: Project Site and Closest Communities

2.3 Project Components

2.3.1 Outline of BESS Technology

The Project aims to connect a BESS with a production capacity of 500 Megawatt (MW) to the national grid to enhance grid stability and support the integration of renewable energy sources. The BESS operates by absorbing excess electricity from the grid during periods of low demand and high generation—from renewable energy—and discharging the stored energy back into the grid when demand exceeds supply.

The system is designed to discharge at maximum power for up to two hours, followed by reduced power output for an additional six hours, offering a total discharge window of up to eight hours depending on grid needs.

To enable this functionality, the stored electrical energy passes through several conversion stages. Initially, energy is stored in the battery modules in Direct Current (DC) form. A Power Conversion System (PCS) then converts the DC into Alternating Current (AC) at medium voltage. This AC power is subsequently stepped up to high voltage through power transformers to meet the interconnection requirements of the national grid. The conditioned power is then delivered to the grid via dedicated interconnection facilities.

This process enables the BESS to play a critical role in balancing supply and demand, enhancing system flexibility, and improving the reliability of renewable energy integration.

The figure below presents the key components of a BESS each of which is discussed in further details throughout the subsequent sections.

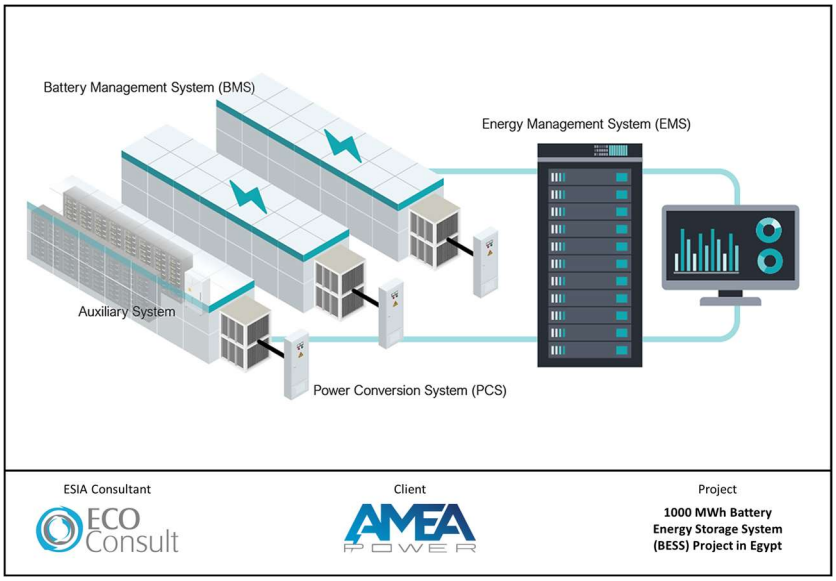

Figure 3: BESS key components

2.3.2 Infrastructure and Utilities

The following highlights the key infrastructure and utility elements that will be required for the Project.

- Substation (including associated civils works and buildings): A substation will be built within the Project site to manage the output from the BESS facility. It will include the necessary equipment to prepare the electricity for export to the grid.
- Grid Connection: The Egyptian Electricity Transmission Company (EETC) will be responsible for offsite

connection works from the onsite substation to the National Grid. This is likely to be through an Overhead Transmission Line (OHTL). EETC will be responsible for preparing the detailed design (including identification of the OHTL route), construction activities as well as operation and maintenance activities. *It is important to note that at this stage there are no details available by EETC on the OHTL specifications (route, height, number of electrical towers, etc.).* However, the OHTL will be connected to an existing 500 kilovolt (kV) OHTL around 600 m to the east of the Project site through a Line-in Line-out (LILO) configuration.

- Amenities Building: Utility infrastructure will be provided to meet project needs and comply with applicable standards. The building will include offices and up to three toilets and one shower.
- Access route and internal road: The Project will be accessed via an existing route that connects the Aswan – Luxor Highway (yellow line in Figure 4 below) to the access road leading to the Benban Solar Park. Project-related transportation will utilize the Aswan – Luxor Highway (yellow line) until reaching the Benban Solar Park security checkpoint, after which vehicles will use the existing internal road network within the Benban Solar Park (blue line in Figure 4 below) to access the Project site. Within the Project boundary, a network of internal roads will be constructed to facilitate access within the Project site (purple lines in Figure 4 below) during construction and operation. The access route and internal road layout are illustrated in Figure 4 below. The Project will utilize existing roads to the extent possible and will coordinate with the relevant authorities and Benban Solar Park management regarding road use as described in the Project's ESIA. Any damage to existing roads resulting directly from Project-related traffic will be addressed and repaired, where required, in coordination with the responsible entities.
- Drainage and Stormwater Management: Appropriate drainage infrastructure will be incorporated to manage surface runoff within the Project site.
- Telecommunications: Communication systems will be installed for operational control, data transfer, and emergency response, in line with utility and regulatory requirements.
- Water supply: Water will be supplied by water trucks. The water will subsequently be stored on-site in storage tanks for construction activities use.
- Security Measures: As mentioned earlier, the Project site is located within the Benban Solar Park, which is managed by a Facilities Management Company (FMC) responsible for overall site management, including controlled access to the solar park through security checkpoints. Access to the Project area will therefore occur through the existing Benban Solar Park security infrastructure. Within the Project boundary, access to the site will be controlled by the EPC and O&M contractor during construction and operation.

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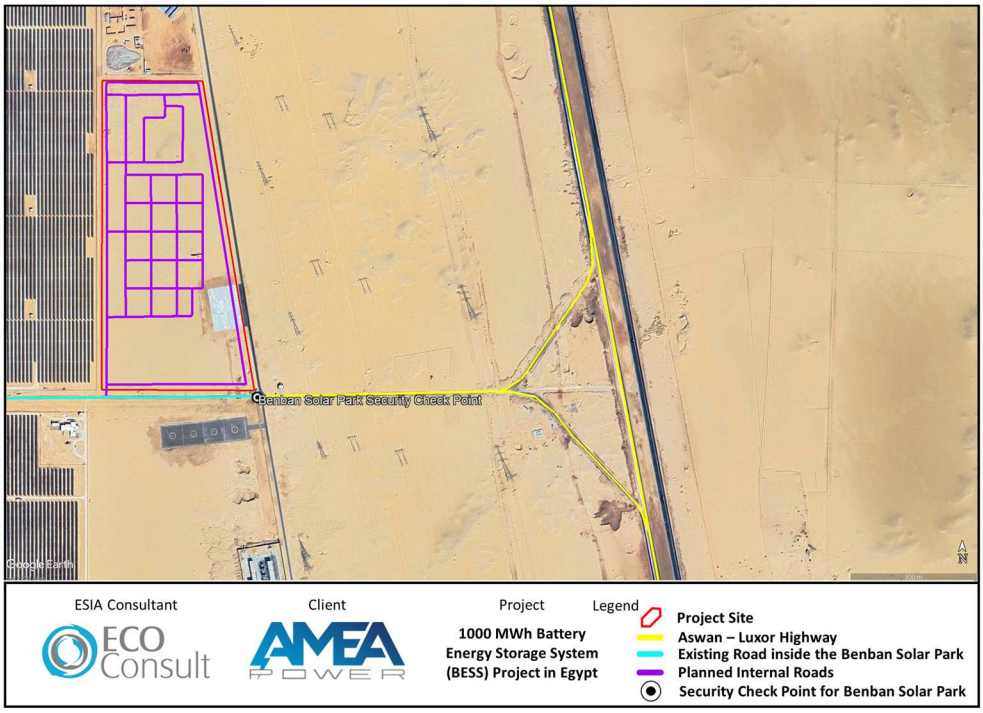

Figure 4: Project Planned Internal Roads and Existing Roads

2.3.3 Other Temporary Components

There are additional Project components that will be required on a temporary basis throughout the construction phase of the Project in particular. Those are identified below. The location of such components will be within the Project footprint.

- Site Offices: temporary offices that will be used by Developer and Engineering, Procurement and Construction (EPC) Contractor staff during the construction phase.
- Welfare Facilities: temporary welfare facilities will be established during the construction phase to support the health, safety and hygiene requirements of construction personnel. These might include sanitary facilities (toilets and handwashing stations), potable drinking water supply, shaded rest areas, designated eating areas, and first aid provisions. Welfare facilities may be located within the temporary site office compound. It is expected that these facilities will be within the Project footprint.
- Laydown areas: this is a temporary storage area where tools, materials, equipment and vehicles are stored when not in use.
- Generators: generators will be used for supply of electricity throughout the construction phase of the Project for various power supply requirements. There will be no temporary power supply lines erected before or during the construction period.
- Transport Vehicles and Machinery: During the construction phase, a fleet of machinery—including excavators, Tractor-Loader-Backhoes (TLBs), concrete mixers, concrete pumps, cranes, compaction rollers, and water trucks—will be mobilized.

2.4 Overview of Project Activities

This section presents the likely activities to take place during the Project development and which will include four distinct phases: (i) planning and design, (ii) construction, (iii) operation, and (iv) decommissioning. Each of which is summarized below.

2.4.1 Planning and Design Phase

This phase will involve the following:

- Completion of all required studies for the Project development. This will include but not limited to ESIA, topography study, geotechnical study, etc.;
- Obtaining and finalizing required financing from International Financial Institutions (IFIs);
- Obtaining required permits;
- Appointment of EPC Contractor; and
- Preparation of detailed design and layout requirements.

2.4.2 Construction Phase

The typical activities that will take place during the planning and construction phase includes the following:

- Mobilization of Project team and equipment to the site and recruitment of workers;
- Undertaking mobilization works for temporary facilities which will involve deployment of site offices and laydown areas;
- Shipment of the BESS components (i.e. containers) by road from the nearest port to the Project site. This will be through hauling trucks. Each container (i.e. each PCS and BESS) will require one (1) vehicle and one (1) trip to transport with no abnormal loads as shown in Figure 5 below. It will be a heavy load, however, not an abnormal load, but inside a standard 20-foot shipping container for the BESS and 40-foot shipping container for the PCS. No more than 297 truck trips containers in total are expected to be required.
- Site preparation for the installation of battery container foundations, involving survey works, site clearing, grading, levelling, excavation, and cement works;
- Excavation and backfilling activities for foundations and cable trenches;
- Installation of BESS components, including battery containers, associated electrical and power conversion systems, transformers, and auxiliary infrastructure, likely using onsite mobile cranes;
- Construction works to include civil works, electrical works and mechanical works for the development of the substation and building infrastructure, etc.; and
- Decommissioning of temporary facilities.

Figure 5: Loading and Transportation of BESS Components

2.4.3 Operation Phase

- BESS projects generally require regular preventative, predictive, and corrective maintenance as recommended by the Original Equipment Manufacturer (OEM).
- Maintenance activities are performed on a weekly, monthly, semi-annual, and annual basis to ensure optimal performance and safety.
- The BESS facility will maintain interconnection to the grid continuously, except during interruptions or maintenance periods, with the system actively charging and discharging for approximately 8 hours daily.
- Maintenance will also take place through a dedicated team. Typical routine maintenance time for a modern BESS is approximately 40 hours per year. Non-routine maintenance may be of a similar order. Although minimal, maintenance activities may include battery system checks, thermal management system servicing, inverter and electrical component inspections, software updates, and safety system testing.

2.4.4 Decommissioning Phase

According to the CPA that was signed between the Egyptian Electricity Transmission Company (EETC), the Developer (AMEA Power) and the Ministry of Electricity and Renewable Energy, the Project is expected to be operational for 20 years. In the case of complete decommissioning of the BESS, the battery enclosures and associated equipment will be taken down, disassembled into components, and removed from the site.

Prior to transportation, the system will be fully de-energized and all components appropriately packaged to ensure safe handling. Depending on their condition, battery modules and systems may be refurbished for use in other projects or sent for final disposal or recycled in accordance with applicable environmental regulations. Foundations will typically be removed, and excavated areas will be backfilled and restored with gravel or vegetation. Internal road networks may be retained, while gates and fences, including those surrounding the substation and battery units, will be dismantled.

2.5 Project Schedule

As stated by the Developer, the Project schedule includes a Planning and Design phase during Q1 2026, followed by Construction from Q1 2026 to end of Q1 2027. The Commercial Operation Date (COD) is expected in Q2 2027. The Project is designed to operate for a period of 20 years following the start of operations.

2.6 Workforce Requirements

The estimated workforce required for the Project during the construction and operation phases is as follows; however, this will be confirmed at a later stage of the Project.

- Around 500 job opportunities, at peak during the construction phase for a duration of approximately 15 months. This will mainly include 100 skilled job opportunities (to include engineers, technicians, consultants, surveyors, etc.) and 400 unskilled job opportunities (such as labourers, security personnel, housekeeping, etc.).
- Around 30 job opportunities during the operation phase for a duration of 20 years. This will include around 20 skilled job opportunities (such as engineers, technicians, administrative employees, HSE, Social, CLO etc.) and 10 unskilled job opportunities (such as security personnel, drivers, etc.).

The Developer is committed to adhering to transparent recruitment procedures which include local community members. In addition, the Developer is aiming to hire local community members to the greatest extent possible throughout the construction and operation phase for skilled and unskilled jobs, where community members have the prerequisite skills and qualities for the job. Recruitment will be undertaken in accordance with Egyptian law, on fair assessment of skills and qualities for the job. All employees will be subject to normal human resource practices and will have to conduct themselves in accordance with the Developer's disciplinary code. No discrimination on ethnicity, gender, race or other such demographic factors will be allowed during recruitment. The only preferential factor shall be the fact those that are directly affected, subject to meeting all the prerequisites for recruitment of the specific job.

3. REGULATORY CONTEXT

3.1 Egyptian Legislation Requirement and Legislation

In Egypt, stakeholder consultation and engagement requirements are generally linked to the Environmental and Social Impact Assessment (ESIA) process, as mandated by the Law of Environment No. 4 of 1994 and its amendments under Law No. 9 of 2009. The ESIA system, as outlined in the latest executive regulations and Ministerial Decree No. 26 of 2016, classifies projects into four categories based on the severity of potential impacts and the project's location relative to residential areas.

Solar photovoltaic (PV) development projects are typically categorized as "Category B – Scoped Study," which encompasses projects with limited environmental impacts. For Category B projects, stakeholder consultation and/or engagement activities are not required. In contrast to Category C projects—those requiring a comprehensive ESIA—must include consultations with key stakeholders, including local communities, as part of a public consultation process.

3.2 Lender Environmental and Social (E&S) Requirements

The Developer will be seeking financing for the Project from IFIs – mainly the European Bank of Reconstruction and Development (EBRD). Therefore, the Developer wishes to design and manage the Project in accordance with good international industry practice and standards. This SEP meets international best practice requirements to include the relevant EBRD Environmental and Social (E&S) requirements.

European Bank of Reconstruction and Development (EBRD)

EBRD's Environmental and Social Requirement (ESR) 10 is related to Stakeholder Engagement. The EBRD considers stakeholder engagement as an essential part of good business practice. In particular, effective community engagement is central to the successful management of risks and impacts on communities, as well as central to achieving enhanced community benefits. The requirement entailed identifying people or communities that are or could be affected by the Project, as well as other interested parties; ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation; and maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.

EBRD ESR 10 sets out the following requirements of stakeholder engagement during project preparation:

- A SEP must be developed and implemented for projects that are likely to have adverse environmental or social impacts and issues, tailored to take into account the main characteristics and interests of the affected parties and other interested parties.
- The first step in successful stakeholder engagement is for the client to identify the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project ("affected parties"), or (ii) may have an interest in the project ("other interested parties"). Resources for public information and consultation should focus on affected parties, in the first instance.
- As part of the stakeholder identification process, the client will identify individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. The client will also identify how stakeholders may be affected and the extent of the potential (actual or perceived) impacts. Where impacts are perceived, additional communication may be required to provide information and reassurance of the assessed level of impacts. An adequate level of detail must be included in the stakeholder identification and analysis so as to enable the Bank to determine the level of communication that is appropriate for the project under consideration. Employees are always considered stakeholders.
- The Client will inform the EBRD how communication with the identified stakeholders will be handled throughout project preparation and implementation.

- The Client will disclose relevant project information, as soon as available, to help stakeholders understand the risks, impacts and opportunities of the Project.
- The Client will establish a procedure for external communication, proportionate to the risks and potential adverse impacts of the project, which includes methods to receive and respond to external communications from project stakeholders.
- The Client will establish a stakeholder grievance mechanism, that is proportionate to the risks and potentially adverse impacts of the project, to be aware of and respond to stakeholder concerns about the Project in a timely manner.

Please refer to the Non-Technical Summary (NTS) for a comprehensive overview of the regulatory framework applicable to the Project, as well as the mitigation measures identified for each assessed baseline, including but not limited to visual and landscape, geology, hydrology and hydrogeology, land use, air quality, and noise, etc.

The link to the disclosed Project documents is provided in Section 8 below.

4. IDENTIFICATION OF STAKEHOLDERS

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by the impact area.

As a result of the stakeholder mapping, Project stakeholders are categorised into the following main categories:

1. People and groups who will be directly or indirectly affected by the project (such as local communities);
2. People and groups who may participate in the implementation of the project (such as investors and lenders); and
3. People and groups who are not affected by the project development per se may but have a possibility to influence and make decisions on implementation of the Project (such as Ministries or regulatory agencies).

The main groups of stakeholders identified so far are listed in the table below. The list can be updated and modified in the course of the Project development and as a result of cooperation of the parties.

Table 2: Identified Groups of Stakeholders

Stakeholder Group	Description	Relevance
Stakeholders who may be directly or indirectly affected by the Project		
Local communities which as identified include: Benban Village which includes: Benban Qebly Village, Benban Bahary Village, and Al Raqaba Village.		This includes the following groups within the local communities specifically: ▪ Community Members: local community members have a vested interest in the Project due to mainly potential for job opportunities. In addition, local community members could be impacted by other potential negative impacts (e.g. worker influx). ▪ Community Leaders – Head of Benban Village: They are socially active members and known figureheads for local community members, who may or may not hold government positions. ▪ Business Community (local subcontractors): such groups have a vested interest in the Project due to mainly potential for procurement opportunities such as subcontracting works (e.g. civil works, provision of food and amenities, etc.). ▪ Other – which includes Benban Village along with its associated Hamlets: community directly facing the Project site are considered also to be most relevant as they will be facing key impacts such as noise, dust, etc. Such impacts are discussed and identified within the ESIA. Figure below presents these communities in particular.

Stakeholder Group	Description	Relevance
Vulnerable Groups	Individuals or groups who may be disproportionately affected by Project activities or may face barriers to participation in engagement processes. Further detailed context is provided below.	To ensure inclusive engagement and that their specific concerns and needs are appropriately considered during Project planning and implementation.
Stakeholders who may Participate in Implementation of the Project		
European Bank for Reconstruction and Development (EBRD)	International financial institution potentially providing financing for the Project.	Ensures the Project complies with the EBRD Environmental and Social Policy.
Investor / lender	Entities that will provide financing for the Project development.	They have interest in ensuring that the Project is developed and implemented in accordance with their E&S requirements and standards and will monitor the compliance of the Project against such requirements.
Workers	This includes all workforce including but not limited to workers from Developer team, workers from EPC Contractor, Project Operator and any involved subcontractors.	Issues related to labor and working conditions such as contracts, working hours, grievance mechanism, leaves, and other.
Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project		
National Governmental Ministries		
The Egyptian Environmental Affairs Agency (EEAA)	Entity authorized to regulate environmental management issues.	For this Project it will be responsible for reviewing and approving the ESIA study, issuing the environmental permit for the Project, as well as monitoring the implementation of the Environmental and Social Management Plan (ESMP) and compliance with other conditions of approval as applicable.
Egyptian Electricity Transmission Company (EETC)	Entity that has signed the PPA with the Developer to be the off taker of electricity.	For this Project, they will also be responsible for designing, building and operating the associated interconnection facilities. This will include the Project's connection to the national grid which includes an Overhead Transmission Line (OHTL) or similar.
Egyptian Electric Holding Company (EEHC)	Entity responsible for the electrical power generation, transmission and distribution of electricity in Egypt.	For this Project, the EEHC oversees electricity generation, transmission, and distribution, coordinates power purchase agreements (PPAs), and facilitates grid connections.
New & Renewable Energy Authority (NREA)	Entity that acts as the national focal point for expanding efforts to develop and introduce renewable energy technologies to Egypt.	For this Project, NREA was the entity responsible for allocation of the land for the development of the Project. Also, they are entrusted to plan and implement renewable energy programs in coordination with national and international institutions.

Stakeholder Group	Description	Relevance
Ministry of Tourism and Archaeology / Supreme Council of Antiquities	Entity that is responsible for the preservation and protection of the heritage and ancient history of Egypt, under which operates all inspector offices in the governorates.	For this Project, they are the entity that ensure development activities do not negatively impact cultural heritage sites. In areas near archaeological or historically significant locations, the Ministry is responsible for assessing potential risks, granting necessary approvals, and overseeing measures to preserve and protect antiquities during project implementation.
Ministry of Transport, Roads and Bridges	Official entity that oversees the development and maintenance of transportation infrastructure that supports project logistics.	They ensure access to project sites for the delivery of materials and equipment, coordinating the use of roads, and facilitating transport routes. Their involvement is crucial to minimizing disruptions and ensuring smooth transportation during construction and operation phases.
Local Government Ministries and District Authorities		
Aswan Governorate	The Governorate's main role is supporting the Project in all aspects as required to include providing required permissions.	They key departments of the Governorate that are related to the Project include the following: ▪ Environmental Administration: s responsible for monitoring compliance against environmental requirements along with EEAA; ▪ Labor Office: is responsible for overall management of the labor force in Aswan Governorate, monitoring recruitment by development projects within the Governorate, monitor labor grievances and other; ▪ Roads Directorate: is responsible for services and development of external roads in the governorate and issuing permits for any construction work on the external roads; ▪ Public Health Directorate: provides health services and facilities to the local districts and ensures overall local community health and safety.
Benban District	The City Council's main role is supporting the Project in all aspects as required to include providing required permissions.	The Council is responsible for administrative oversight as well as supervision and follow-up for monitoring compliance to environmental requirements along with EEAA and Aswan Governorate.
National Aswan Water and Wastewater Company (NAWWCo)	Entity responsible for water and wastewater management within the Governorate.	The party that will be responsible for providing the Project's requirements of water as well as disposal of wastewater.
Aswan Solid Waste Management Department	The entity is responsible for overseeing waste collection, disposal, and recycling within Aswan.	It ensures proper waste management during the construction, operation, and decommissioning phases of the BESS project. This includes handling construction debris, packaging materials. While ensuring compliance with local environmental regulations and promoting sustainable practices to minimize environmental impact.
Ministry of Labour – Aswan	Official governmental entity responsible for setting labor policies and	Has a vested interest in ensuring that labor rights and proper working condition are maintained for the Project in accordance with labor laws and regulations.

Stakeholder Group	Description	Relevance
Governorate Labor Office	legislations as well as ensuring protection of labor rights and working conditions.	
Ministry of Interior – Aswan Governorate Fire Department and Civil Defense	Entity that is responsible for national and local security, as well as approving emergency response and firefighting plans for establishments/projects.	The entity ensures security and public safety throughout the project's lifecycle. This includes protecting the project site, safeguarding equipment, and maintaining order during construction and operation.
NGOs		
Nature Conservation Egypt (NCE)	NCE is the Birdlife International partner in Egypt, and is a member of the International Union for the Conservation of Nature (IUCN). Nature Conservation Egypt (NCE) is an Egyptian NGO working towards conserving Egypt's natural heritage and the promotion of its sustainable use, for the benefit of present and future generations.	Egypt's leading experts in the field of nature and biodiversity conservation, NCE is specialized scientific research, advocacy, education and outreach to support species, their habitats, and local communities. NCE works in partnership with local experts and governmental bodies, as well as international organizations and partnerships to ensure efficient collaboration for conservation within and across borders.
Other		
Benban Solar Park Representatives - Facilities Management Company (FMC)	The Benban Solar Park (existing and operational solar PV park near the Project site) is operated currently by a Facilities Management Company (FMC) which also takes on E&S responsibilities such as stakeholder and local community grievance management, local community employment and procurement, etc. The Project Developer and EPC Contractor will also coordinate with the FMC for key shared services within the solar park, including security arrangements, waste management, and water supply and management.	
Benban Solar Developers Association (BSDA)	BSDA represents the developers and operators of the solar photovoltaic projects within the Benban Solar Park. The association facilitates coordination among project developers and supports initiatives related to community engagement, local development, and collaboration with stakeholders in the Benban area.	
Media (Newspaper, Television, Internet)	Public dissemination of information related to the Project, including its environmental, health, safety, and social (EHSS) impacts and benefits, as well as potential updates and information regarding Project activities and developments.	

Vulnerable People

A key stakeholder group requiring particular consideration during stakeholder identification is vulnerable groups. These are individuals or groups who may be disproportionately affected by Project activities or who may face barriers to participating in stakeholder engagement processes.

As described in the ESIA and this SEP, and confirmed during the November 2025 site visit, direct consultations with surrounding communities were not undertaken specifically for the Project. The Project

is located within the existing Benban Solar Park, where community engagement, local employment, procurement, and grievance management are coordinated centrally by the Facilities Management Company (FMC).

During ESIA preparation, focus group discussions were conducted with the FMC, FMC Community Liaison Officers (CLOs), and representatives of other developers operating within Benban Solar Park. Because the FMC is responsible for community liaison, site-specific demographic data on vulnerable groups within nearby communities was not collected as part of the Project ESIA.

Community-level information, including the identification of potentially vulnerable groups, is addressed in the Benban Strategic Environmental and Social Assessment (SESA), which is referenced in the ESIA.

Accordingly, the vulnerable groups presented in Table 3 represent groups that are generally recognized as potentially vulnerable in the Benban area and may face barriers to participation in stakeholder engagement activities. The list is therefore indicative and not based on Project-specific census data.

The Developer will continue to coordinate with the FMC and its CLOs to ensure that stakeholder engagement activities are inclusive and that concerns raised by vulnerable groups are appropriately considered throughout Project implementation.

The key vulnerable groups within the context of the Project and their relevance are summarized in the table below.

Table 3: List of Vulnerable Groups and Their Relevance

Group	Relevance
Women groups	Could be considered vulnerable as cultural norms could limit their participation in the decision-making process in general that is related to the Project.
Disabled groups	Could be considered vulnerable groups mainly due to physical disability which could limit their access to information on the Project as well as participation in the decision-making process in general that is related to the Project.
People living in poverty / underprivileged communities	Could be considered vulnerable as their status could limit their access to information on the Project as well as participation in the decision-making process in general that is related to the Project.
The Aged	Could be considered vulnerable by limitations of access to participate in the Project related community decision-making process.
The Youth	Could be considered vulnerable due to their young adult, unmarried, non-asset owning status, yet likely to be savvier in 21st century technology than their elders, but may be unable to contribute in Project related community decision-making process, which will affect their generation more than most.

5. SUMMARY OF PAST STAKEHOLDER ENGAGEMENT ACTIVITIES

The table below summarizes all stakeholders previously consulted and engaged throughout the Project, primarily as part of the ESIA process that was undertaken. It outlines the stakeholder groups engaged, the date of engagement, and the main objectives and outcomes of each interaction.

The objectives of these consultations were to:

- Introduce project (rationale, objective, location, key components, etc.)
- Explain and discuss overall methodology for ESIA study
- Explain and discuss key anticipated impacts as relevant
- Identify and determine additional requirements or key issues of concern to be taken into account for the ESIA study

Throughout the consultations a handout was prepared and distributed to such stakeholder groups with key information to include but not limited to rationale for project, project location and setting, key components and activities of the Project and other as applicable.

5.1 Targeted Consultations

The table below presents a summary for the outcomes of the stakeholder consultations undertaken.

Table 4: Identified Groups of Stakeholders

Entity	Date	Key Outcomes
National Governmental Entities in Egypt & Regional Governmental Entities in Aswan Governorate		
Egyptian Environmental Affairs Agency (EEAA) Office in Cairo	11 Aug 2025 25 Aug 2025	▪ EEAA officials clarified that BESS projects are not yet included in the national classification system. However, EEAA indicated that the Project along with its OHTL will be classified as Category B – Scoped Study, and the survey methodology is considered sufficient. ▪ The Project site is not located near any registered national protected area under Law 102/1983. However, the ESIA must verify the presence of sensitive receptors and incorporate biodiversity, habitat and land use finding from both secondary data and field surveys. Please note that this was undertaken as part of the biodiversity assessment, refer to Section 11.1 of the ESIA. ▪ EEAA advised that the biodiversity surveys should address Important Bird Areas (IBAs), threatened species, habitat loss, and impacts on migration corridors, in line with Aswab biodiversity survey requirements. However, it was also confirmed that the Project site is not located within any Key Biodiversity Area (KBA) or protected areas (existing or proposed) as per Law 102/1983[9][10]. ▪ The ESIA methodology covering construction, operation, and decommissioning phases was presented. No objections were raised, though EEAA will conduct a full review during the formal ESIA submission. ▪ EEAA requested that the ESIA define safety and sanitary setbacks (from residential areas, infrastructure, and facilities), with particular attention to fire safety and emergency access. Waste management (hazardous and non-hazardous) and occupational health and safety must also be comprehensively addressed. ▪ EEAA clarified that it does not issue non-objection letters. EEAA is the competent authority to review ESIA reports and issue environmental approvals upon submission through the relevant licensing entity.
EEAA Relative Governmental Branch, Aswan Governorate	27 Aug 2025	▪ The Project site is located within the Benban Solar Park, an area allocated for renewable energy development. ▪ Relevant environmental data on the Benban area is limited; any available information can be accessed through the Ministry of Environment's official channels. No unpublished data were provided. ▪ No licensed hazardous waste disposal facilities exist in Aswan Governorate. Project developer must coordinate with certified companies outside Aswan for transport and disposal of hazardous waste. ▪ Cement factories may be considered as end-users for hazardous waste as part of their fuel mix. ▪ The ESIA must clearly detail expected hazardous waste quantities (especially spent batteries), handling procedures, and contractual arrangements for final disposal. ▪ Officials emphasized the need for detailed provisions related to decommissioning, including end-of-life battery removal, transport, and treatment. ▪ Setback distances must follow Egyptian Electricity Law and include fire safety and emergency access measures. ▪ Aswan Governorate has no dedicated hazardous waste landfill or treatment facility; waste from the Project must be transported to licensed national sites such as the Nasreya facility in Alexandria or other facilities approved by the Waste Management Regulatory Authority (WMRA). ▪ Data on hazardous waste facility capacities is managed centrally by WMRA; governorate branches do not maintain this information. Licensed facilities are expected to operate under international standards, with compliance verified by WMRA. ▪ EEAA Regional Branches serve only a monitoring and coordinating role; permits for transport, handling, and disposal of hazardous waste are issued exclusively by WMRA. ▪ All hazardous waste must be collected, stored, and transported in compliance with Law No. 202 of 2020 on Waste Management and its executive regulations. ▪ Transport of hazardous waste is limited to contractors licensed by WMRA and authorized to deliver materials to approved facilities. ▪ The ESIA must identify the types and estimated volumes of hazardous waste expected from the Project, together with the licensed disposal routes. ▪ Direct liaison with WMRA is required to confirm facility capacities, approved transport routes, and disposal arrangements. ▪ The ESIA should state that final disposal will typically be at the Nasreya facility in Alexandria or other WMRA-approved sites, with the final destination confirmed following WMRA approvals and contracts with authorized operators. ▪ A detailed logistical plan for the safe transport and tracking of hazardous waste must be included in the ESIA, aligned with WMRA approvals and in compliance with Law No. 202/2020 and its executive regulations. ▪ No additional concerns or issues were raised by the authority. ▪ EEAA does not issue non-objection letters, however an environmental approval will be issued after submission and reviewal of the ESIA.
Egyptian Electric Transmission Company (EETC) & Egyptian Electric Holding Company (EEHC)	11 Aug 2025 25 Aug 2025	▪ Buffer zones and safety setbacks discussed by EETC representatives, with clarification that Egyptian regulations (Electricity Law and executive regulations) set the clearance distances for electrical facilities and transmission lines as the primary national reference, while international financiers such as European Investment Bank (EIB) and International Finance Corporation (IFC) require compliance with global safety codes (National Fire Protection Association (NFPA) 855, UL 9540A, International Fire Code). The representatives were informed that the ESIA will reflect both national legal requirements and relevant international codes to ensure alignment with the expectations of regulators, financiers, and technical authorities. ▪ Concerns were raised regarding the effectiveness of the cooling systems in maintaining safe battery temperatures and preventing fire risks. Officials highlighted the need for the ESIA and the Emergency Response Plan to incorporate specific fire prevention and suppression standards, particularly as the Project site is located adjacent to existing renewable energy projects (solar and wind farms), which increases the importance of avoiding fire incidents.

[9] Law No 102 of 1983 for Nature Protectorates
[10] Protected Areas of Egypt: Towards the Future (EEAA)

Entity	Date	Key Outcomes
		▪ Officials emphasized that batteries and all related components are classified as hazardous waste under the Waste Management Law (Law No. 202 of 2020) and must be disposed of in strict compliance with national hazardous waste regulations and standards. ▪ EETC representatives explained that detailed requirements for grid connection and energy storage operation are outlined in the Grid Connection Plan, which is part of the contractual framework between the Ministry of Electricity and the Developer. ▪ The non-objection letter is not issued by either EEHC or EETC; the Project development is instead based on the contractual agreement between the Ministry of Electricity and the Developer, which outlines the technical, financial, and regulatory requirements and constitutes implicit approval for Project development.
New and Renewable Energy Agency (NREA)	21 Aug 2025	▪ Officials confirmed that the Project site is located within lands under the jurisdiction of NREA, making NREA the competent administrative entity "land-owning authority" responsible for land allocation, facilitating project development, and reviewing environmental studies. ▪ Officials provided maps showing the location and total land area allocated for the Project site, formally designated for renewable energy projects through ministerial decrees and not allocated for other uses such as agriculture, industry, or housing. ▪ NREA officials clarified that the Authority does not issue a non-objection letter; project development is authorized through a formal land allocation contract granted to the developer, which serves as the legal basis for implementation ▪ It was emphasized that the ESIA must comprehensively address decommissioning, particularly end-of-life battery management after 15–20 years of operation, including procedures for removal and safe disposal, estimates of hazardous waste volumes, and identification of licensed hazardous waste disposal facilities ▪ It was also stressed that decommissioning requirements must be clearly incorporated into the ESIA, despite the long-term timeframe, to ensure future risks are adequately anticipated and managed.
Ministry of Labor – Aswan Governorate Labor Office	7 Sep 2025	▪ Recruitment must follow the National Employment Bulletin; use of third-party labour intermediaries is prohibited by law and therefore must be publicly announced. ▪ All job vacancies must be publicly announced and coordinated through the Directorate of Labour. ▪ Employment conditions must ensure issuance of contracts, social insurance enrolment and compliance with legal provisions on working hours, leave and disciplinary measures. ▪ Occupational health and safety measures must be implemented in accordance with Egyptian Labor Law. ▪ Informal workers should be registered and integrated into formal systems to access legal protections. ▪ Vocational training programs should be provided to enhance worker skills and promote safety awareness. ▪ Officials expressed full support for transparent, lawful recruitment processes aligned with national labour legislation.
Ministry of Interior, Aswan Governorate Fire Department and Civil Defense	26 Aug 2025	▪ The Ministry confirmed that the Project site is not located near any military or defense installations. The only nearby security presence is a police checkpoint at Gate No. 2 of Benban Solar Park, which serves as an official security post for site access control and general safety. ▪ Fire protection requirements will be reviewed upon submission of detailed engineering designs. A specialized fire protection consultant must prepare a full fire safety package in accordance with the Egyptian Fire Code. ▪ Fire safety design must include risk classification of the facility, firefighting technologies proposed for the site, firewater tank design and capacity, fire pump specifications, hydraulic calculations, discharge rates and pressure calculations, and compliance with national fire codes and standards. An electrical safety report must also be submitted to ensure compliance with fire safety requirements for electrical installations. ▪ The Project must develop emergency response procedures and fire safety training programs for workers which will be reviewed, approved and overseen by the Civil Defense. ▪ The Ministry confirmed that it does not issue non-objection letters; its role is to review and certify fire protection system designs to ensure compliance with Egyptian fire safety codes. ▪ Setback distances and buffer zones will be reviewed as part of the fire protection design review, in line with the Egyptian Fire Code. ▪ Full adherence to civil defense protocols and national fire safety codes is mandatory.
Ministry of Interior, Aswan Governorate Security Directorate	27 Aug 2025	▪ The Directorate confirmed that the Project lies within the secure Benban Solar Park, which includes perimeter fencing, gated access, and on-site security. Additional security is recommended during construction due to high-value imported equipment. ▪ All transportation of oversized or hazardous components must be coordinated with the Traffic Police Department. Convoy escorts or road closures may be required to ensure safe passage. ▪ A comprehensive emergency response plan is required, covering fire, accidents, medical emergencies, and security threats. Designated contacts with police, fire, and health services must be identified. ▪ Prior permits may be needed for installing permanent security infrastructure (e.g., guard posts, surveillance systems, private security) outside the existing Solar Park framework. ▪ Inter-governorate coordination may be required along equipment delivery routes crossing neighbouring governorates. ▪ Recommended measures include 24/7 on-site security during construction and early operations, and routine fire safety and emergency preparedness drills for site personnel.
Ministry of Tourism and Archaeology / Supreme Council of Antiquities	12 Aug 2025	▪ The Council confirmed no registered archaeological or cultural heritage sites exist within the Project site or its 5 km buffer zone. ▪ No undocumented or unmapped features are known in the area based on expert knowledge and previous surveys undertaken during development of the Benban Solar Park. ▪ No ongoing or planned archaeological activities are taking place within the Benban Solar Park area. ▪ All available reports and data can be accessed via the Ministry of Tourism and Archaeology or the local Antiquities Inspectorate in Aswan. No additional unpublished records exist. ▪ The proposed archaeological survey methodology (field walking and visual transects) was acknowledged and will be reviewed upon ESIA submission. ▪ Compliance with Law No. 117/1983 on the Protection of Antiquities was emphasized, including mandatory chance find procedures during construction.

Entity	Date	Key Outcomes
		▪ Chance find procedure must include immediate work stoppage, site protection, notification to the Antiquities Directorate, and resumption only upon official clearance. If archaeological features are discovered during construction, buffer zones or protective setbacks may be required. ▪ Chance find protocols should be incorporated into construction contracts. ▪ Site clearance certification may be required prior to construction, with potential for archaeological supervision during excavation if needed. ▪ Continuous coordination with the Aswan Antiquities Inspectorate is required throughout the construction phase.
Aswan Governorate	26 Aug 2025	▪ Officials confirmed that the Project site is located within the jurisdiction of Aswan Governorate, near the Benban community and other surrounding villages. Coordination with local units and the Daraw City Center is required for engagement activities. ▪ It was recognized that the Project may generate temporary employment and procurement opportunities during construction. These should be transparently communicated and comply with national labour laws, ensuring fair access for local residents. ▪ Project information and updates should be shared through formal governorate channels such as the official website, public notice boards at local units, and in coordination with village leaders and associations. ▪ Public meetings and consultations must be pre-coordinated with the Governor's Office. Local units will facilitate outreach and ensure appropriate community representation. ▪ The Project lies within a designated renewable energy development zone. While planning is led by NREA, the Governorate oversees compliance with local planning requirements and infrastructure coordination. ▪ All administrative procedures, including permits for oversized load transport, construction, and site access, must be coordinated in advance with the Governor's Office and relevant technical directorates (e.g., roads and bridges, traffic, security).
National Aswan Water and Wastewater Company (NAWWCo)	26 Aug 2025	▪ Water supply in Aswan Governorate primarily depends on the Nile River, with limited supplementary reliance on groundwater in desert areas. ▪ Water demand is increasing due to population growth, agricultural expansion, and industrial activity, placing pressure on supply systems. ▪ Existing wastewater treatment plants, particularly in Daraw and surrounding areas, are operating near capacity. ▪ The New Aswan wastewater treatment plant has greater capacity but is managed under the new urban communities (not the Holding Company for Drinking Water and Wastewater) and requires direct coordination prior to the construction phase to be able to allocate Project wastewater loads. ▪ The Project must ensure that all water consumption is efficiently planned and monitored to avoid overuse. ▪ Wastewater generated during construction and operation must comply with Egyptian standards and exclude hazardous materials. ▪ Regular reporting is required to confirm compliance with water quality and wastewater discharge standards. ▪ Coordination must be undertaken with both the Aswan Water and Wastewater Company and the New Aswan wastewater treatment plant prior to construction. ▪ The entity reaffirmed the structural strain on Aswan's water infrastructure and stressed the need for proactive planning to prevent additional pressure.
Aswan Solid Waste Management, the relevant entity responsible for Solid Waste in Aswan Governate	27 Aug 2025	▪ The Solid Waste Management Department was established in 2022 following the executive regulations of Law No. 202/2020 and is now the competent authority for overseeing solid waste in Aswan. ▪ The El Alaqi landfill remains the primary disposal site for the Benban area; a new sanitary landfill in Edfu (inaugurated in late 2024) is designed to support future demand. ▪ Landfills in Aswan operate in compliance with national standards and accept municipal, demolition and construction waste. ▪ Based on previous experience with solar projects in Benban, typical project waste includes packaging, scrap wood, plastics, and municipal waste from workers – all manageable with proper sorting and licensed disposal. ▪ Key Project requirements include: - No on-site accumulation of waste; daily or scheduled removal must be enforced. - Use of contractors licensed by the Department to transport and dispose of waste at approved landfills, with official receipts. - Hazardous or contaminated materials must be handled separately through EEAA-licensed operators. - Documentation of waste volumes and submission of periodic reports for compliance. - The Project must coordinate with the Department prior to construction to review projected waste quantities and confirm disposal logistics.

5.2 Focus Group Discussions

One (1) key Focus Group Discussion (FGD) was undertaken with the nearest stakeholders that are relevant to the Project as identified within "Section 2.2" earlier, which was held at the Benban PV solar park's Facilities Management Company (FMC).

The session was organized as an open invitation coordinated with FMC, in recognition of their central role and proximity to the Project site. The consultation included 9 participants, with a gender breakdown of 6 male and 3 female participants, representing FMC, FMC CLOs, and developers within Benban Solar Park as shown in Figure 6. Initial contact with the FMC team was made by phone on 9 August 2025, followed by a formal invitation sent via email at their request to confirm the meeting date and enable them to invite developers operating at Benban sites closest to the Project location.

At the beginning of the session, a presentation on the Project was first provided along with a handout on the following key topics. The session was attended by developers operating within the Benban Solar Park and representatives from the FMC environmental and social team:

- Description of the Project location along with maps;
- Description of key Project components along with figures and illustrations;
- Description of the key activities anticipated in each key phase of the Project (planning, construction and operation)
- Description of ESIA study and its key components and requirements;
- Explanation of key anticipated E&S impact under each phase of the Project; and
- Explanation of the methodology and scope of work that will be undertaken for the ESIA.

Upon completion of the above informative session, each group was separated for general discussions as well as discussion on any comments or key issues of concern on the overall Project and/or the ESIA process in particular. Key discussions were undertaken in relation to the following key aspects:

- Economic activities and livelihood strategies
- Land use activities
- Community quality of life
- Perceptions towards the Project
- Community structure (ethnic and tribal groups, religion, ethnic minorities, etc.)
- Cultural and Heritage sites

The presentation and handouts were provided in Arabic language, as well as the delivery of the presentation.

Annex I present the handout and presentation that was provided during each of these FGDs as well as the forms used throughout the FGD.

The table below presents an overall summary of the outcomes of these FGD for Benban Solar Park's FMC.

Community	Date	Key Outcomes
Benban Solar Park	26 August 2025	▪ Several participants emphasized that fire protection systems will be critical for the safe operation of the BESS, given the unique risks associated with lithium-ion batteries. ▪ Questions were raised about the type of fire suppression systems to be installed and whether they would comply with international standards suitable for large-scale energy storage facilities. ▪ FMC representatives stressed the importance of coordination with local civil defense authorities and the establishment of robust emergency response procedures. ▪ Concerns were expressed regarding the operational challenge of extreme summer temperatures in Benban, where temperatures often exceed 50°C. Participants noted that conventional split-unit cooling systems in the park frequently fail at around 47°C, as compressors are designed to shut down automatically beyond this threshold. ▪ Recommendations were made that cooling systems for the BESS should be shaded and equipped with sensors capable of handling extreme conditions to avoid automatic shutdown. ▪ Participants asked whether the Developer, by developing a project inside Benban Solar Park, would be expected to join the Benban Developers Association or remain independent, leading to broader discussion on the importance of institutional alignment and collaboration within the park. ▪ Clarification was sought on whether AMEA Power would require FMC services (such as waste management and emergency support), which are currently provided to developers across the solar park. FMC representatives highlighted the advantages of integrating into existing frameworks, as these services are already standardized. ▪ Some participants stressed the importance of ensuring minimal disturbance to surrounding communities (Benban and Daraw), particularly during transportation of Project components. ▪ It was acknowledged that maintaining effective communication and good community relations is significant, building on the experience of other solar developers operating in Benban.

Figure 6: FGD with Benban Solar Park FMC

6. FUTURE STAKEHOLDER ENGAGEMENT STRATEGY, PLAN AND RESPONSIBILITIES

The table below identifies the stakeholder engagement strategy and plan to include stakeholders relevant to the Project (as identified in earlier under Table 2), objective of consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations.

A Project Stakeholder Register will be updated monthly for the Project which serves as a log for all consultation and engagement undertaken for the Project. This shall be reviewed and updated regularly by the assigned Social Manager. A template is provided in “Section 11.4” which will be used either in Microsoft Word or Excel format.

Table 5: Future Stakeholder Engagement Activities

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Stakeholders who may be directly or indirectly affected by the project				
Local communities which as identified earlier includes: ▪ Benban Village	1. Announce key project milestones 2. Updates on project construction schedule and phasing 3. Announce stakeholder grievance mechanism 4. Setup employment and procurement procedure 5. Updates on employment and procurement opportunities 6. Updates on stakeholder engagement activities 7. Updates on E&S management plan implementation 8. Educate on key E&S risks 9. Potential risks of influx, and how influx-related impacts are to be monitored and controlled. 10. The presence of security personnel and the steps taken to ensure their good behavior towards local people. 11. Obtain Feedback	1. Undertake consultation sessions with the local community which will include two (2) sessions as follows: ▪ Two sessions (one male and one female) in Benban Village.	Semi-annually during Construction Annually during Operation	Developer Social Manager along with EPC Contractor Community Liaison Officer (CLO) (as applicable)
		▪ Prepare and distribute adverts/flyers with key update messages to local communities. This should include Benban Village along with its affiliated Hamlets. ▪ Information may also be shared through online channels (e.g., social media platforms and relevant online job or information portals), as appropriate.	Quarterly during construction Annually during operation	Developer Social Manager along with EPC Contractor CLO (as applicable)
		2. Publish SEP in English and Arabic language online with hard copies at the Aswan Governorate office (given that the Project is located administratively within the Aswan Governorate), and Benban Village.	Once / to be checked monthly to ensure documentation is in place	Developer Social Manager along with EPC Contractor CLO (as applicable)
Women and youth groups		Local community session, where required, will target female and youth representatives, coordinated through FMC CLOs and existing community communication channels. Engagement activities will consider appropriate timing, accessible locations, and suitable communication methods to facilitate participation of these groups. In specific at the end of the local community session a focus groups will be held with women attendees to obtain any feedback and provide any additional information required in specific.	Once every 6 months during construction Once every year during operation	Developer Social Manager along with EPC Contractor CLO (as applicable)
Stakeholders who may participate in implementation of the project				
Investor/Lender - EBRD	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.)	1. Individual/Internal Meetings (if required)	TBD	Developer E&S team as applicable
		2. Submission of Annual E&S Monitoring Report (AMR).	Annually	
Workers	Provide updates on contract requirements on employment to include duration, salary, leaves, etc.	1. Individual/Internal Meetings	Upon employment	Developer Team as applicable / EPC Team as applicable
	Provide explanation on worker grievance mechanism	1. As part of Induction Training 2. As part of Toolbox Talks	Upon employment / continuous	
	Provide general/specialized training requirements as applicable to include but not limited to induction, Toolbox Talks (TBT), occupational health and safety, waste management, etc.	1. As per training plan to be developed	Upon employment / continuous	
FMC	Coordination of shared services within Benban Solar Park (e.g., security, water supply, waste management) and alignment of stakeholder engagement activities and grievance mechanisms	1. Monthly coordination meetings, email communication, technical coordination meetings	Design / Pre-Construction, Construction, Operation, and Decommissioning	Developer E&S team as applicable/ EPC Team as applicable / Project Operator
BDSA	Coordination with other developers within Benban Solar Park on common operational matters and information exchange related to Project activities and stakeholder engagement where relevant	1. Coordination meetings, email communication	Design / Pre-Construction, Construction, Operation, and Decommissioning	Developer E&S team as applicable/ EPC Team as applicable / Project Operator
Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project				
Central and Local Government				
1. Egyptian Environmental Affairs Agency (EEAA)	Some governmental stakeholders might require to undertake certain inspections or auditing exercises and/or	1. Individual/Internal Meetings (if required)	Upon occurrence	Developer team as applicable

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
2. Egyptian Electricity Transmission Company (EETC) 3. Egyptian Electric Holding Company (EEHC) 4. New & Renewable Energy Authority (NREA) 5. Ministry of Civil Aviation 6. Ministry of Antiquities 7. Ministry of Interior 8. Ministry of Transport, Roads and Bridges 9. Aswan Governorate (EEAA Branch, Environmental Department, Labor Office, Roads Directorate, Public Health Directorate, Civil Defense) 10. Daraw District Office 11. Benban Village 12. NAWWCo 13. Aswan Supreme Council of Antiquities	might require certain updates/information on the implementation of the project	2. Correspondence and official letters (if required)	Upon occurrence	Developer team as applicable
General Authority for Roads & Bridges and Land Transport	Obtain approval on the traffic management requirements and consultation on transport and traffic management plan.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction	EPC Contractor
Egyptian Environmental Affairs Agency (EEAA)	Coordination for list of private contractors approved for collection of hazardous waste from the site to approved facilities	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Environment Department in Aswan Governorate	Coordination for list of private contractors approved for collection of solid waste from the site to approved facilities	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Aswan Governorate – Labor Office	Determine and agree on the key principles and methodology implementation for the local recruitment and procurement procedure including identification of priority for employment for Benban Village and Daraw District.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	When required during construction and operation	EPC Contractor / Project Operator
NAWWCo	Coordination for list of private contractors approved for collection of wastewater from Project site.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
	Coordination to secure the water requirements of the Project (if required)	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Supreme Council of Antiquities	Reporting and communication in case archeologically remains are found through construction of project along with chance find procedures implemented.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Upon occurrence	EPC Contractor
Civil Defense, Aswan Governorate	Present Project, location and emergency plans to take into account any relevant requirements. In addition, coordinate for any emergency response requirements related to incidents on site, including workshops or coordination meetings with relevant authorities on battery fire response and emergency preparedness.	1. Individual/Internal Meetings (if required) 2. Correspondence and official letters	Once before commencement of construction Once before commencement of operation	EPC Contractor Project Operator
"El Alaqi" Sanitary Landfill	Coordination to dispose of non-hazardous solid waste according to the facility's current capacity	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Non-Governmental Organizations (NGOs) and Other Organizations				
Nature Conservation Egypt (NCE)	1. Announce key project milestones	1. Prepare leaflet and submit to these entities as applicable in relation to their specific focus with key E&S updates. Or this could be part of a general E&S update leaflet prepared.	Semi-annual during construction (every 6 months)	Developer Social Manager along with

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
	2. Announce stakeholder grievance mechanism 3. Obtain feedback		Annually during operation	EPC Contractor CLO (as applicable)

7. STAKEHOLDER GRIEVANCE MECHANISM

The Developer understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for a project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities, and other stakeholders. Monitoring grievances will signal any recurrent issues or escalating conflicts and disputes.

The Developer will implement a Grievance Mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. The Developer will accept all comments and complaints associated with the Project and individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Egypt.

The Developer will monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below. The Developer will also report regularly to the public on the grievance mechanism implementation, protecting the privacy of individuals.

The figure below presents a process diagram for the stakeholder grievance procedure which is further explained throughout the section below.

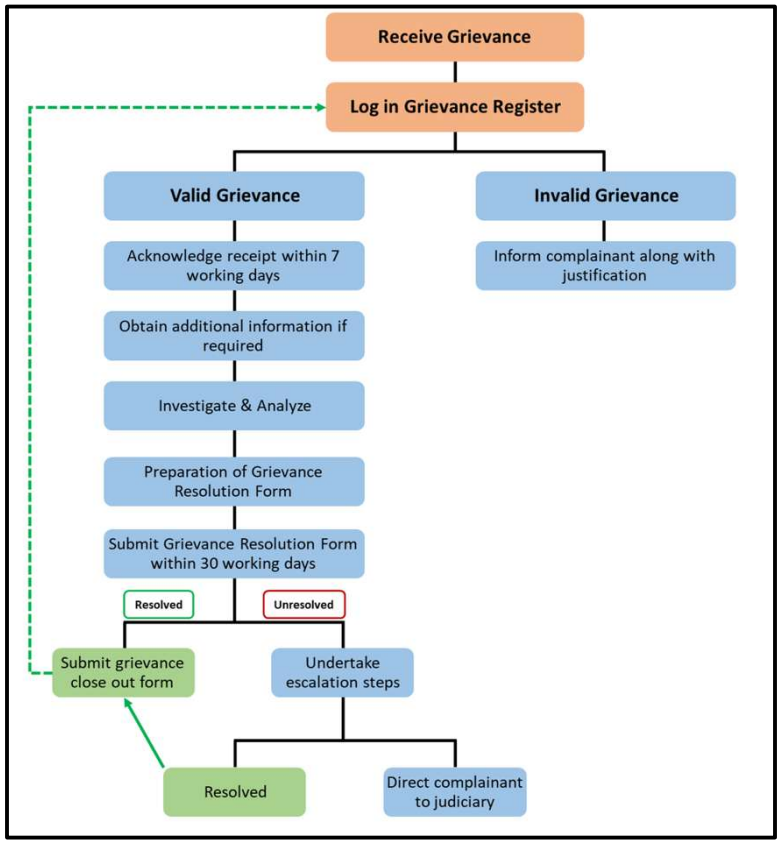

Figure 7 : Grievance Mechanism Process Diagram

7.1.1 Benban SESA Suggested Grievance and Redness Mechanism (GRM)

According to the Benban SESA[11], a unified Grievance and Redress Mechanism (GRM) was established to cover all individual developers operating within the Benban Solar Park. The SESA recommends that this mechanism be managed collectively through the Developers Association under the oversight of NREA to ensure consistency, transparency, and accessibility. The objective of the GRM is to provide community members, workers, and other stakeholders with a simple, transparent, and timely process to raise and resolve complaints related to any aspect of project activities, environmental or social performance, or impacts on livelihoods and quality of life, without resorting to complex formal procedures.

The mechanism allows any individual or group to submit grievances verbally or in writing through email, telephone, fax, post, or in person to the designated social officer or, until fully established, directly to NREA. All grievances must be registered and acknowledged within six working days and resolved within one month. Each complaint is logged in a grievance register that records the name of the complainant, date received, nature of the issue, corrective actions taken, and the date of response. Information about the GRM is to be disclosed publicly in Arabic and accessible formats through community leaders, public notice boards, and meetings, as well as online through NREA and Developers Association platforms.

According to the Benban SESA, until the Developers Association assigns a Social Officer, NREA remains the responsible entity for receiving and managing grievances through the following official channels:

Email: reic@nreaeg.com
Telephone: +20 22725891
Fax: +20 22717173
Postal Address: Ibrahim Abu El Naga Street, Abas El Aqad, Nasr City, Cairo Governorate

Separate but harmonized channels are also to be maintained for workers to lodge grievances at any time during employment, ensuring confidentiality and protection from retaliation. The overall performance of the Benban-wide GRM, including the number, nature, and resolution status of grievances, is to be monitored, documented, and reported annually as part of the broader environmental and social monitoring framework.

Coordination with the Benban Solar Park Grievance Mechanism

Given that the Project is located within the Benban Solar Park, which operates under a shared governance framework coordinated through the BSDA and supported by the FMC, coordination will be maintained between the existing Benban Solar Park grievance mechanism and the Project-level GRM established for the Project.

The FMC is responsible for managing grievances related to shared infrastructure, services, and operational matters associated with the Benban Solar Park. The Project Developer will be responsible for managing grievances specifically associated with the construction and operation activities of the Project. Where grievances related to the Project are received through the Benban Solar Park GRM, the FMC may communicate such grievances to the Project Developer for follow-up and resolution as appropriate. Similarly, grievances received directly through the Project GRM that relate to shared park services may be communicated to the FMC for appropriate handling.

[11] Strategic Environmental & Social Impact assessment Benban 1.8 GW Photovoltaic Solar Park (NREA), Egypt

The Project Developer, through its Community Liaison Officer (CLO) and Environmental and Social (E&S) team, will serve as the primary point of contact for receiving and managing grievances related to the Project. Coordination between the Project Developer and the FMC will ensure appropriate communication, tracking, and resolution of grievances where responsibilities overlap.

All grievances related to the Project will be recorded and maintained within the Project grievance register and will be monitored and reported as part of the Project's environmental and social monitoring and reporting processes. Where relevant, coordination with the FMC will ensure that grievances received through the Benban Solar Park GRM that relate to the Project are appropriately captured and addressed.

Confidentiality of complainants will be maintained throughout the grievance management process. Sensitive grievances, including those related to gender-based violence and harassment (GBVH), will be handled in accordance with the survivor-centred principles outlined in this SEP and in alignment with the procedures established in the Project Environmental and Social Management System (ESMS) Manual.

7.1.2 Stakeholder Grievance Procedure

- A Grievance Disclosure Sheet will be disclosed at key locations below. The Grievance Disclosure Sheet will inform the local communities on how and where to lodge a grievance in accordance with step 2 below.
  - Benban Village – Local Unit Office
  - Daraw District Office
  - Entrance Office of the Project
- Stakeholders willing to lodge a grievance should be able to use the following avenues:

A. Grievance sheets (Annex 1) with grievance boxes will be made available at the following locations:

Project Office, Location: Nefertiti Site, Benban Solar Park, Benban Village, Daraw City, Aswan Governorate, Egypt

Telephone: 01129844276

Benban Village – Local Unit Office

Location: Benban Qebly village, Daraw City, Aswan Governorate, Egypt

Telephone: 01062448050

Daraw District Office

Location: Daraw City, Aswan Governorate, Egypt

Telephone: 01158407050

B. Direct Contact through the following:

Social Specialist Manal Hamed

Address: Nefertiti Site, Benban Solar Park, Benban Village, Daraw City, Aswan Governorate, Egypt

Telephone: 0 11 29844276

E-mail: Manal.Hamed@nefertitibess.com

C. Developer website at the following link:

Link: https://www.ameapower.com/

- All grievances (whether submitted through a grievance form, e-mail, telephone, etc.) will be recorded on a grievance log sheet by the Social Manager (Annex 2).
- This mechanism is applicable for any project related stakeholder group to raise a grievance. This includes but not limited to national / regional governmental entities, local communities, Non-Governmental Organizations (NGOs), media, research, and academic institutions, and others. This mechanism addresses grievances related to the following:
  - Any grievance related to Project activities to include but not limited to: (i) damage to public / private assets; (ii) degradation / deterioration of local infrastructure (e.g. roads); (iii) disturbance from noise, dust, traffic accidents, pollution, excessive speed of project's vehicles; (iv) degradation of the environment; (v) disturbance to land uses, (vi) other similar issues.
  - Any grievance against involved person/entity in the project to include but not limited to the Developer, EPC Contractor, subcontractors, and suppliers. This could include but not limited to: (i) negative behaviour of construction workforce towards local communities; (ii) misconduct of security service providers; (iii) inappropriate behaviour of workers in terms of managing employment and procurement opportunities, (iv) other similar issues.
- However, the following grievances will not be addressed in the case they are submitted. In this case, the applicant will be informed that the grievance will not be addressed along with a justification. This includes the following in particular:
  - Grievances that are not related to the Project or its activities
  - Grievances against an entity / person / worker that is/was not involved in the Project in any way directly or indirectly
  - A complaint that is currently being reviewed by the judiciary system and/or for which a final and definitive court ruling has been issued
- Grievance procedure starts with formal acknowledgment in accordance with the preferred method of communication specified by the complainant within 7 working days of submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

- In coordination with the relevant personnel, the Social Manager will analyze the root cause of the grievance, investigate if the grievance is correct or not, and identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable). For other more complex grievances, third parties could be involved in the investigation as applicable. Specific examples on this includes the following:
  - Grievances that entail safety concerns such as personal threats. Such grievances might require the involvement of local Police
  - Grievances that entail damage to property which have been verified might require an assessment of the damaged asset with the support of an external specialist in agreement with the complainant.
- The Social Manager will prepare a grievance resolution form (see Annex 3) which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance along with the timeline for their completion. Grievance resolution form will be submitted within (30) days of receiving the grievance.
- The grievance resolution form, including the necessary budget to resolve the grievance, must be approved and signed-off by the Project Manager.
- The outcomes of the grievance resolution form will be communicated to the complainant by the Social Manager in accordance with the preferred method of communication specified.
- In case the grievance resolution form identifies proposed actions to be implemented, the Social Manager will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form. The Social Manager will contact the complainant once such actions are completed in accordance with the preferred method of communication specified.
- The Social Manager will ensure that the grievance forms, grievance log sheet, and grievance resolution form are always updated and maintained onsite.
- The grievance mechanism will be implemented promptly and at no cost and without retribution to the party that originated the issue or concern.
- The use of grievance mechanism shall not impede access to judiciary means.
- The grievance mechanism allows submission of anonymous complaints by community members.
- In the case the complainant does not accept the proposed resolution the following steps will be undertaken:
  - The Social Manager will raise the issue to the Project Manager for discussion and adoption of new resolutions for the grievance.
  - In the case the complainant does not accept the new resolution, the Project Manager will raise the issue to the E&S Department at headquarters for discussion and adoption of new resolutions for the grievance. Where necessary, the grievance may be further reviewed by senior management. If the grievance remains unresolved, the complainant will be informed of available external grievance mechanisms, including those of relevant authorities or applicable lenders.

- In the case the complainant does not accept the new resolution proposes, the compliant will be asked to access judiciary means to resolve his/her grievance.

7.1.3 Stakeholder Grievance Mechanism for Gender Based Violence, Sexual Harassment and Sexual Exploitation and Abuse

The requirements set below are considered applicable for handling grievances related to the following and in accordance with the requirements set within the "Good Practice Note Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works" (2018, World Bank).

- Violence Against Women and Girls (VAWG): defined violence against women and girls as any act of gender-based violence that results in, or is likely to result in, physical, sexual, or mental harm or suffering to women, including threats of such acts, coercion, or arbitrary deprivation of liberty, whether occurring in public or in private life
- Gender-based Violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. Women and girls are disproportionately affected by GBV across the globe.
- Sexual Exploitation and Abuse (SEA): any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Sexual abuse is further defined as "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions." Women, girls, boys, and men can experience SEA. In the context of World Bank supported projects, project beneficiaries or members of project-affected communities may experience SEA.

For the above complaints, there are risks of stigmatization, rejection, and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. Therefore, the following steps should be considered for any grievances related to the above.

- The Social Manager will receive appropriate training from an authorized GBV Service Provider on how to collect GBV cases confidentially and empathetically (with no judgement). It is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs, and wishes are prioritized in every decision related to the incident. The survivor who has the courage to come forward must always be treated with dignity and respect. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's informed consent. These steps serve to minimize the potential for re-traumatization and further violence against the survivor.
- Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.
- No identifiable information on the survivor should be stored including in particular the grievance log register. In addition, if a grievance is submitted through a grievance form it will be kept confidential.

- Should the grievance be received by the Social Manager through a grievance form, telephone, email or other, the Social Manager should not ask for, or record, information on more than three aspects related to the incident and which include the following:
  - Nature of the complaint (what the complainant says in her/his own words without direct questioning)
  - If, to the best of their knowledge, the perpetrator was associated with the project; and,
  - If possible, the age and sex of the survivor.
- The Social Manager should assist the survivor by referring them to the GBV Services Provider for support immediately after receiving a complaint directly from a survivor. It is up to the survivor, and only the survivor, whether to take up the referral. The list of services providers are included below:
- The GBV Services Provider provides the necessary support to the survivor until it is no longer needed. Survivors may need access to police, justice, health, psychosocial, safe shelter and livelihood services to begin healing from their experience of violence. This will be arranged by the GBV Services Provider on their behalf in accordance with the survivor's wishes.
- The Social Manager will immediately notify the Project Manager (if the consent of the survivor is obtained). The survivor must give consent to data sharing and know what data will be shared, with whom and for what purposes.
- The Social Manager, Project Manager and GBV Services Provider will meet immediately to agree on a plan for resolution as well as the appropriate remedy for the perpetrator in accordance with the below. Note: The survivor must give the service provider representative consent to participate in the resolution mechanism on her/his behalf.
  - Reviews the case and collectively agree upon the appropriate actions to be taken and sanctions, if any.
  - Refers the case to the police as appropriate (see note below).
  - Assigns the appropriate 'Focal Point' to implement the actions—with the assistance of the GBV Services Provider.
  - Upon resolution, the Focal Point and GBV Services Provider advise that it has been resolved, who in turn advise the Social Manager.
  - The Social Manager notes the resolution and closes the cases and submits a close-out report to the Project Manager whom in turn reviews and approves the report.
- All entities involved above in case resolution, need to understand their legal obligations when it comes to reporting cases to the police. Reporting should be done in accordance with the law, especially in cases that require mandatory reporting of certain types of incidents, such as sexual abuse of a minor. When there is no legal obligation to report the case according to the local law, survivors hold the decision of whether to report cases for resolution and other service providers and reporting of a case to anyone can only be made with the consent of the survivor.
- If a case is first received by the GBV Services Provider, a report should be sent to the Social Manager to ensure it is recorded in the system. If any follow up is required by the Social Manager, it will be provided immediately with the consent of the survivor as applicable.

- If the survivor does not wish to place an official complaint through the grievance mechanism, the complaint is considered closed.
- If the alleged perpetrator is an employee of the Developer, EPC Contractor, or subcontractor, to protect the safety of the survivor, and the workplace in general, the worker, in consultation with the survivor—and with the support of the GBV Services Provider—should assess the risk of ongoing abuse to the survivor. Reasonable adjustments should be made to the alleged perpetrator's work schedule and work environment—preferably by moving the perpetrator rather than the survivor—as deemed necessary.

8. CONTACT DETAILS

Throughout the Project, all stakeholders can contact the Developer throughout the contact details provided below.

Contact Details for the Public

Social Manager / Social Specialist
Name: Manal Hamed
Telephone 0 11 29844276
E-mail: Manal.Hamed@nefertitibess.com

The Developer intends to provide all relevant information to the public (in Arabic and English) and which will include but not limited to the following:

- Environmental and Social Impact Assessment (ESIA);
- Stakeholder Engagement Plan (SEP) (this document);
- Non-Technical Summary (NTS);

The above will be provided at the Developer's website at the following link below:

www.ameapower.com

In addition, hard copies of the above will be available at the following locations. These documents will remain in the public domain for the duration of the Project and will be updated as appropriate.

Project Office
Location: Nefertiti Site, Benban Solar Park, Benban Village, Daraw City, Aswan Governorate, Egypt
Telephone: 01129844276

Benban Village – Local Unit Office
Location: Benban Qebly village, Daraw City, Aswan Governorate, Egypt
Telephone: 01062448050

Daraw District Office
Location: Daraw City, Aswan Governorate, Egypt
Telephone: 01158407050

Aswan Governorate office
Location: Cornish Street, Aswan City, Aswan Governorate, Egypt
Telephone: +20972316800

9. MONITORING AND REPORTING

9.1 Monitoring Requirements

The following monitoring requirements will be undertaken by the Social Manager with regards to the implementation of the SEP:

- Weekly inspections will be undertaken: (i) at stakeholder grievance boxes to collect any grievance forms, and (ii) review of grievance log updates.
- Monthly inspections will be undertaken to ensure: (i) SEP is disclosed in hard copy at required locations; (ii) summary advertisements of grievance mechanism are available at local community platforms.
- Submission of minutes of meetings as per SEP implementation.
- Quarterly inspections will be undertaken to: (i) ensure project update leaflets are available at local community platforms; (ii) stakeholder grievance boxes and forms are available at designated locations.
- Monitoring requirements are to be updated once available for implementation of the local employment and procurement procedure as well as the social responsibility program. This could include for example submission of employment and procurement databases, proof of announcement advertisements, etc.

Monthly audits will be undertaken by the SPV, covering both Health, Safety and Environment (HSE) and social aspects. These audits will include an updated Grievance Log and will be submitted to AMEA Power as part of the monthly reporting requirements.

9.2 Reporting Requirements

The following reporting requirements will be prepared by the Social Manager with regards to the implementation of the SEP:

- On a monthly basis the stakeholder register form will be submitted as provided in Annex 4.
- On a monthly basis the stakeholder grievance form will be submitted as provided in Annex 2.
- The SEP will be updated and resubmitted on a semi-annual basis during the construction phase and on an annual basis during the operation phase.
- The following Key Performance Indicators (KPI) will be reported monthly:

No.	KPI	Measurement Action
1	Number of stakeholder engagement activities undertaken	All communication to be reported in stakeholder register
2	Number of stakeholders involved	All communication to be reported in stakeholder register
3	Number of vulnerable groups engaged (including women groups)	All communication to be reported in stakeholder register
4	Number of requests for information via websites, Community Liaison Officers (CLOs) and local information centers	All communication to be reported in stakeholder register

No.	KPI	Measurement Action
5	Number of stakeholder valid grievances submitted (and number rejected as outside of scope)	All grievances to be reported in grievance register
6	Number of resolved – unresolved stakeholder grievances	All grievances to be reported in grievance register
7	Number of stakeholder grievances related to GBV	All grievances to be reported in grievance register
8	Average time for resolution of stakeholder complaints	All grievances to be reported in grievance register
9	Type of stakeholder grievances submitted	All grievances to be reported in grievance register

10. ROLES AND RESPONSIBILITIES

This section identifies the roles and responsibilities for the key personnel involved in the implementation of this plan.

Project Manager – Developer

- Ensure resources required (budgetary, human, and logistical resources) are available for the implementation of this Stakeholder Engagement Plan
- Oversee the overall implementation of this Stakeholder Engagement Plan, including frequent interfacing with the Social Manager.
- Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.

Social Manager – Developer

- Update the SEP as required during the Project's lifetime, to include planning, construction, operation, and decommissioning.
- Overall responsibility for implementing the requirements of the stakeholder engagement plan as identified
- Overall responsibility for implementing the requirements of the stakeholder grievance mechanism to include distribution of grievance disclosure sheets, collection of grievance forms, updating grievance log sheet, filling grievance resolution forms and grievance close-out forms.
- Coordinate with the EPC Contractor's team / oversee the implementation of the EPC Contractor and its subcontractors of all requirements related to SEP.

EPC Contractor / Project Operator

EPC Contractor will be required to appoint a CLO that will have the following roles and responsibilities:

- Implementing the requirements of the stakeholder engagement plan as identified within the SEP as they primarily under EPC Contractor's responsibility. Those are mainly related to those requirements for the project that are mainly with governmental entities such as securing water requirements, assigning authorized waste collectors, etc.
- Support the Developer's Social Manager, as requested, in implementing SEP requirements that fall under their responsibility. This could include, but is not limited to, assisting with local community sessions, messaging updates, and the preparation and distribution of advertisements or flyers, etc.
- Submission of proof of completion of required engagements to the Project Developer's Social Manager.

Note: The EPC Contractor and its subcontractors(s) will have no role in the implementation of the stakeholder grievance mechanism. Any complaints received directly or indirectly by any EPC or subcontractor staff shall be redirected to the Developer's Social Manager.

11. ANNEXES

11.1 Annex I – Grievance Form

PUBLIC GRIEVANCE FORM

Reference No.	
Full Name: ***(Anonymous submission is allowed)***	
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:**

11.2 Annex 2 – Grievance Log Sheet

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

11.3 Annex 3 – Grievance Resolution Form

GRIEVANCE RESOLUTION FORM

How was grievance received	
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	

Social Manager:

Signature:

Date:

11.4 Annex 4 – Project Stakeholder Register Form

Stakeholder Engagement Register

Stakeholder			Details of Engagement	Communication Methods and Tools	Date of Engagement Activity	Responsibility
#	Name, position, group, etc.	Role				