



Ras Ghareb Wind Energy Project

Gulf of Suez, Egypt

Stakeholder Engagement Plan



Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts.

Version	03
Approval Date	03/03/2019
Process Owner	Chief Executive Officer

Table of Contents

1. DEFINITIONS	3
<i>General Definitions</i>	3
<i>Acronyms</i>	3
2. PROJECT DESCRIPTION	3
3. OBJECTIVE, SCOPE OF APPLICATION AND STRUCTURE OF SEP	4
<i>Objective</i>	4
<i>Scope of Application</i>	4
4. LEGAL FRAMEWORK	5
5. STAKEHOLDER IDENTIFICATION AND ANALYSIS	5
6. SUMMARY OF PAST ACTIVITIES	8
7. INFORMATION DISCLOSURE	11
8. GRIEVANCE MECHANISM	12
9. MONITORING AND REPORTING PROCESS	14
10. PERMANENT RESPONSIBILITY SUMMARY TABLE	14
ATTACHMENT 1. 2019 Action Plan	15

1. DEFINITIONS

General Definitions

Affected Communities: local communities, within the Project's area of influence, directly affected by the Project.

Stakeholders: Groups who affect and/or could be affected by RGWE's activities, products or services and associated performance.

Stakeholder Engagement: The process used by an RGWE to engage relevant stakeholders for a purpose to achieve accepted outcomes

Acronyms

Acronym	Full name
CSR	Corporate Social Responsibility
ESIA	Environmental Social Impact Assessment
GRM	Grievance Mechanism
HSE	Health, Safety and Environment
HSSE Plan	Health, Safety, Security and Environment Plan
IFC	International Finance Corporation
JBIC	Japan Bank for International Cooperation
NEXI	Nippon Export and Investment Insurance
NREA	New and Renewable Energy Authority
OE	Owner's Engineer
PEP	Project Execution Plan
RCREEE	Regional Center for Renewable Energy and Energy Efficiency
RGWE	Ras Ghareb Wind Energy
SEP	Stakeholder Engagement Plan

2. PROJECT DESCRIPTION

The project is to install 125 units of Gamesa G97-2.1 MW wind turbine, with a rotor diameter of 97 m and a hub height of 71.5 m and a 33/220 kV substation connected to the national grid via an Over-Head Line (OHL). The entire inter-array cable network is underground except for 2 OHL sections near the substation.

The site covers an area of around 38.9 km² between the coastal city of Ras Ghareb on the Gulf of Suez and the mountain Jebel Ghareb culminating at around 1500 m. The climate is arid, with virtually no precipitation, high temperatures during the day and cool nights and a strong relatively constant wind coming from the North-West direction.

For the realization of the project, the site is handed-over by RGWE to Contractors for their respective turn-key execution of the transport, construction/erection and commissioning works. The OE is in charge of the coordination of the works between Contractors.

3. OBJECTIVE, SCOPE OF APPLICATION AND STRUCTURE OF SEP

Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts.

Objective

Effective Stakeholder Engagement can lead to improved financial, social and environmental outcome and must take the form of **an ongoing process in a structurally and culturally appropriate manner** with Affected Communities and, where relevant, other Stakeholders.

In order to achieve an effective Stakeholder Engagement, RGWE Stakeholder Engagement Plan involves, in varying degrees, the following elements:

- stakeholder analysis and planning
- disclosure and dissemination of information
- consultation and participation
- grievance mechanism
- ongoing reporting to Affected Communities.

The nature, frequency, and level of effort of stakeholder engagement varies and is commensurate with the project's **risks and adverse impacts**, and the project's **phase of development**.

Scope of Application

The SEP applies to **all activities** from RGWE , the Owner's Engineer itself, to the Contractors and respective sub-contractors, manpower suppliers and any other party contracted by the Contractors working on the RGWE project.

RGWE's SEP shall apply to both **construction and operation phase** of the project.

Structure

Stakeholder Engagement is developed as a **documented system**, deployed from the Stakeholder Engagement and Corporate Social Responsibility **policy**. All the documents shall be managed by the same approach. In order to be consistent, the documents shall be situated at different management levels of the organization. The SEP is defined by RGWE. The minimal requirements set out in this plan are **translated on an operational level by the Contractors**. The Contractors shall therefore develop their own SEP, procedures and instructions based on this SEP.

4. LEGAL FRAMEWORK

The legal framework applying to the RGWE SEP is made of:

Relevant Egyptian law, permits, and authorizations:

- Egyptian environmental law no. 4/1994 (Public Consultation)
- Temporary Construction Permit
- Construction Permit
- Usufruct Agreement
- Generation License
- Environmental Permit
- Operation Permit
- Access Road Agreement with Egyptian General Petroleum Corporation
- Printer Permit
- Authorization from the Armed Forces Operations Authority
- Authorization from the Ministry of Civil Aviation
- Authorization from the New Urban Communities Authority
- Authorization from the Supreme Council of Antiques
- Authorization from the Tourism Development Authority
- Authorization from the General Authority for Rehabilitation Projects and Agricultural Development
- Authorization from the National Center for Planning the Use of the State's Lands

International legal obligations:

- Equator Principles III (5;6)
- IFC Performance Standards (1;5)
- JBIC Environmental Guidelines
- NEXI Environmental Guidelines

5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

RGWE identified the different Stakeholders that may be interested in and/or be affected by the implementation of the Project, subdivided into two categories: internal and external Stakeholders.

After Stakeholder identification, RGWE also reported the type of communication proposed for each Stakeholder as well as the entity responsible for setting in place this communication method.

RGWE shall review on a biannual basis that the list of Project Stakeholders is complete and updated.

Stakeholder Type	Full Name Of Entity	Proposed Communication media
Internal		
Sponsors Affiliates	Ras Ghareb Wind Energy Company S.A.E.	Regular reporting on project progress
	Engie Egypt Wind B.V.	

	Orascom Egypt Wind B.V. Toyota Eurus Egypt Wind B.V. ENGIE S.A. Toyota Tsusho Corporation Eurus Energy Holdings Corporation Eurus Energy Europe B.V. Orascom Construction S.A.E.	
Construction Contractors	Orascom Construction SAE Siemens Gamesa Renewable Energy Eolica SL Gamesa Eolica SL (Egypt Branch) Siemens Gamesa Renewable EnergySA	Email and phone correspondence, regular private meetings
Construction contractors' employees and temporary workers		Contract information, induction training, grievance mechanism
Other Contractors	Anemos Hamza Associates EcoConserv Regional Center for Renewable Energy and Energy Efficiency CTE/EPS Clifford Chance LLP Zaki Hashem PWC Marsh Milbank Shalakany Law Office NautaDutilh Nishimura & Asahi Mott McDonald Benatar BDO KPMG Barlovento GE:NET	Email correspondence and private meetings
Lenders	(Egyptian Bank) Japan Bank for International Cooperation Nippon Export and Investment Insurance Sumitomo Mitsui Banking Corporation Société Générale Commercial International Bank	Regular reporting on project progress Comply with the Loan Agreement. Especially. Schedule 6&7 (JBIC) and Schedule B (NEXI Covered Loan)

Owner's Engineer	Tractebel - Lahmeyer International	Email and phone correspondence, regular private meetings
-------------------------	------------------------------------	----------------------------------------------------------

External		
Residents and business owners living and/or operating in or near the area affected by the project		<p>Safety signs, public notice boards, community meetings, local media, leaflets</p> <p>NB for Bedouins specifically: regular phone correspondence and informal meetings</p> <p>Ethics & Values, SEP, CSR Plan published on the RGWE website</p> <p>ESIA published on website of the Ministry of Electricity, the NREA and funding agencies</p>
Land Right owners	New and Renewable Energy Authority (NREA)	Permits procedure, official correspondence, private meetings
Other Land Usufruct Beneficiary	Egyptian General Petroleum Corporation (EGPC)	Phone correspondence, private meetings
Local municipal authorities of Ras Ghareb		Permits procedure, official correspondence, private meetings
Relevant governmental secretariats of the Governate of the Red Sea		Permits procedure, official correspondence, private meetings
Relevant state ministries of the Arab Republic of Egypt	Ministry of Finance Egyptian Environmental Affairs Agency (EEAA Ministry of Environment) Ministry of Civil Aviation	Permits procedure, official correspondence, private meetings
Provincial and State Agencies	Egyptian Electricity Transmission Company (EETC) Armed Forces Operations Authority New Urban Communities Authority Supreme Council of Antiques Tourism Development Authority	Permits and authorization procedure, official correspondence, private meetings

	General Authority for Rehabilitation Projects and Agricultural Development	
	National Center for Planning the Use of the State's Lands	
NGOs		Local media, public notice boards. Ethics & Values, SEP and CSR Plan published on RGWE website. ESIA published on website of the Ministry of Electricity, the NREA and funding agencies
NPOs	Regional Center for Renewable Energy and Energy Efficiency (RCREEE)	

6. SUMMARY OF PAST ACTIVITIES

Overall 1000MW wind farm project

A SEP has been carried out by NREA for the overall 1000MW wind farm project. During the scoping phase of the 1,000MW ESIA, a project design document was prepared and distributed to key stakeholders. Only one of the contacted stakeholders provided comments. A public meeting in Hurghada in 2011 was held to disclose the results of the draft ESIA and to obtain comments and input to the ESIA.

With regards to RGWE specifically, Stakeholder Engagement has been a priority to the company, which has engaged with various Stakeholder at different levels since its creation:

ESIA and permits procedure

This engagement has been the most intense during the environmental, social and safety discussion of the project with the local and national governmental authorities or agencies. Such Stakeholder Engagement would take the form of both official and non-official meetings as well as regular correspondence.

The Environmental and Social Impact Assessment (ESIA) of RGWE Project was subject to public disclosure, comments as well as recommendations of the different concerned Stakeholders. Those comments were taken in account by RGWE, for example regarding the bird migration, an action plan is under development in close coordination with the NREA and the RCREEE.

Further, with regards to permits, RGWE has already obtained all of the authorizations necessary for the construction of the wind farm:

- Temporary Construction Permit: June 7th 2017
- Environmental Permit: June 8th 2017
- Usufruct Agreement: October 31st 2017
- Printer Permit (for headquarter office and site): 6th February and 1st April 2018

- Generation license: March 6th 2018
- Access Road Agreement: June 10th 2018
- Construction Permit: June 14th 2018
- Authorization from the Armed Forces Operations Authority
- Authorization from the Ministry of Civil Aviation
- Authorization from the New Urban Communities Authority
- Authorization from the Supreme Council of Antiques
- Authorization from the Tourism Development Authority
- Authorization from the General Authority for Rehabilitation Projects and Agricultural Development
- Authorization from the National Center for Planning the Use of the State's Lands

Stakeholder Engagement Visit June 2018

A Corporate Social Responsibility delegation was sent in June 2018 on site to meet the local residents and business owners of Ras Ghareb as well as the site Stakeholders. The delegation held a community meeting with the city Chairman and met with schools and hospital directors of the city. Further, the delegation also visited the site, met with the construction team, some of the current workers and the Bedouins. Finally, the delegation held a housing and minimum salary audit with regards to the construction subcontractors. A detailed report of the visit was written and shared with RGWE.

Engagement with the local community

With regards to the community, RGWE has been highly engaged with the Bedouins residing close from the wind farm facilities. The site management team has regular informal meetings with the Bedouin community as well as good phone correspondence. Finally, 12 Bedouins are currently employed by Orascom to work on site security.

Stakeholder Engagement on site

On site Stakeholder Engagement has been demonstrated through the set-up, by both RGWE and Orascom HSE Officers, of a grievance procedure as well as an induction training for construction workers to understand HSE requirements on site. The details of Stakeholder Engagement on site can be found in RGWE's HSSE Plan.

CDM Stakeholders Public Hearing - Feb 2019

RGWE has conducted a stakeholders meeting on February 12, 2019 for the Clean Development Mechanism (CDM) project. The objective of the meeting was to make sure that the project activity together with positive and negative impacts are transparently explained to the relevant stakeholders.

It was an open invitation to receive comments from the stakeholders and involving the public into the decision making of the project.

Meeting invitations were published in 3 of the main Egyptian newspapers.

CDM aims to assist developing countries in achieving sustainable development by promoting environmentally friendly investment from industrialized country governments and businesses.

The CDM projects should assist developing countries in reaching some of their economic, social, environmental, and sustainable development objectives.

The consultation was attended by representative of EETC, NREA and the ministry of environment.

RGWE's website

RGWE's website currently has a section with detailing RGWE Commitments. This section provides a summary of all of RGWE's commitments with regards to Ethics & Values, Human Rights, Environmental and Social, Health and Safety. A summary of the project ESIA is provided there.

The website has a Contact page through which Stakeholders can find an emergency phone number and can also make either inquiries, either grievances, which are then managed and answered to in the shortest delay.

The website has a Procurement section which provides RGWE's code of conduct in suppliers relations, its procurement policy and the company's General Terms & Conditions of Purchase.

The website has a News section which provides RGWE monthly construction updates and quarterly CSR newsletters.

Finally, the website has a CDM section which provides RGWE Project Design Document with an Executive Summary.

An Arabic version of the website was made available.

RGWE's LinkedIn

RGWE established a Linked In page where it regularly publishes photos and videos of the project.

RGWE's leaflets

RGWE published bi-lingual English-Arabic leaflets and distributed them at several events, at the school and deposit some at several commercial outlets of Ras Ghareb.

RGWE's Site Entrance Sign

RGWE has place a sign near the main road, at the entrance of the site access road. The sign provide for the names of the main contractors and the Owner's Engineer.

RGWE's in the Media

An interview regarding RGWE project passed in a program called “The View” on a channel called “Sada Al Balad”, with the presenter name is Hamdy Rizk on Friday 8th February 2019.

A CEO & Construction Director interview was published in the French media (newspaper Figaro & radio France Inter).

Communication with top-level management

International lenders as well as RGWE shareholders have been regularly updated on the project's progress through regular reports, correspondence and meetings. The detail of the communication with top-level management can be found in RGWE's PEP.

7. INFORMATION DISCLOSURE

It is of utmost necessity to ensure that stakeholders are kept well informed about the project throughout its life cycle.

RGWE's CEO and the Site Admin & CSR Officer shall take on the role and responsibilities of “Stakeholder Manager” with the support of:

- The Chairman and the Admin & HR Director for local Egyptian Stakeholders
- The Construction Director, the Operations Director and the RGWE HSSE Officer for the site Stakeholders
- The Chief Financial Officer for the financial Stakeholders

The Stakeholder Manager has overall responsibility for handling the consultation and information disclosure process, including organization of the consultation process, communication with identified stakeholder groups, collecting and processing comments/complaints, and responding to any such comments and complaints.

The Stakeholder Manager should share information and respond to inquiries in a monthly meeting. This would result in:

- Facilitating access to information on the project through conducting informal meetings with the community members regularly;
- Informing stakeholders of on-going communications and meetings;
- Informing stakeholder about project progress, issues to expect, construction time table etc.;
- Providing feedback from stakeholders on issues that have been raised through having an active channel with the NREA.

A summary of the SEP, Ethics & Value, CSR Plan as well as a newsletter about the project's progress shall to be published on the RGWE website in both Arabic and English, to acknowledge linguistic differences.

Posters and leaflets about the project and an agreed contact person shall be published in the main streets of the village and in the local unit in Ras Ghareb in Arabic.

RGWE shall also initiate disclosure of the complete ESIA and related reports on the website of the Ministry of Electricity, the NREA and funding agencies. This is aimed at having information available for the local communities and all other stakeholders and interested groups. Regarding the illiterate people, they should be informed about the main contents of the reports through meetings with the community leaders and NREA.

RGWE shall work closely with NREA. Alongside NREA, RGWE will facilitate implementing community projects as appropriate through mobilizing community members. It shall initially meet monthly, though more frequent meetings can be convened if requested by the local communities. Minutes of all meetings will be taken and follow-up on actions identified and agreed will be available on request and monitored.

Additionally, separate focus group meetings should be conducted with women, young people and vulnerable groups in order to be able to voice their concerns and worries. NGOs should be engaged in order to cooperate with them to pass information in simple dialect to poor marginalized women. Young people could be reached via informal meetings in the Youth Center.

Overall, RGWE should look for:

- Establishing information sharing channels
- Providing information to the community about the construction program and timing.
- Informing directly affected stakeholders in advance of construction works

8. GRIEVANCE MECHANISM

The objective of a grievance procedure is to ensure that all comments and complaints from any project stakeholder are considered and addressed in an appropriate and timely manner

It is expected that no major grievance issue will arise. However, to ensure that stakeholders have avenues for redressing their grievance related to any aspect that may result from the project, detailed procedures of redressal of grievances have been established. The objective is to respond to the complaints of stakeholders in a timely and transparent manner, without resorting to complicated formal channels to the extent possible. The procedure covers stakeholder grievances generated during construction and operation activities.

Anyone shall be eligible to submit a grievance to the Project if they believe a practice is having an adverse impact on the community, the environment, or on their quality of life. It is the Stakeholder Manager's role to handle the grievance and redress mechanism.

Disclosure of the GRM:

The Community shall be fully informed about the Grievance procedures in simple language. Information about grievance mechanism shall be tailored according to the community. Community leaders, social entities and the governmental units shall be informed about the GRM.

Mode of Grievance:

The Company shall accept all comments and complaints associated with the project from any stakeholder. Comments can be made via [RGWE's website contact page](#), email, post, fax, on the telephone or in person. The comments and complaints shall be summarized and listed in a Complaints/Comments Log Book, containing the name/group of commenter/complainant, date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate) and the date of response sent to the commenter/complainant.

Response to grievances:

All comments and complaints shall be responded to either verbally or in writing, in accordance to preferred method of communication specified by the complainant.

Registration of GRM:

All grievances shall be registered and acknowledged within 6 working days and responded to within one month. The project management shall keep a grievance log and report on grievance management, as part of annual project progress reports.

Grievance channels:

Comments and concerns regarding the project can be submitted in writing in through the following channels:

- [RGWE website](#)
- Or, at the office's physical address indicated on the website

Confidentiality:

The name of individuals who submit their comments or grievances should be kept confidential, though this may mean that the company is unable to provide feedback on how the grievance is to be addressed.

Management of GRM:

During construction of the RGWE'S wind farm, grievances in relation to construction activities shall be managed by RGWE in full cooperation with the construction contractors. The residents of Ras Ghareb shall have the contact information for both RGWE and the construction contractor.

NB: A separate grievance mechanism is available in the same manner for workers, including employees of RGWE project and contractors.

9. MONITORING AND REPORTING PROCESS

Monitoring of grievances

All grievances activities should be monitored in order to verify the process. The monitoring process should be implemented on the level of NREA.

Monitoring of community engagement activities

It is important to monitor the implementation of the SEP and report on the status of the plan's implementation, along with explanations for delays or changes.

RGWE shall prepare a quarterly action plan for all Stakeholder engagement activities, which should indicate:

- Groups to be engaged
- Objective of engagement
- Method of engagement and main information to share with them

Having prepared the quarterly plan and implementing the planned activities, all information related to stakeholder engagement should be available summarized and reported to the funding agencies.

See attachment 1 for the current action plan.

10. PERMANENT RESPONSIBILITY SUMMARY TABLE

Task	Responsibility	Frequency
Stakeholders Identification and Analysis	RGWE senior management	Biannually
Information disclosure process through communication identified Stakeholders groups	Stakeholder Manager	On an ongoing basis
Grievance mechanism	Stakeholder Manager, (managed in full cooperation with construction contractors during construction phase)	On an ongoing basis
Monitoring of the grievance mechanism	NREA	(To be defined with NREA)
Monitoring of community engagement activities	RGWE senior management in full cooperation with the Stakeholder Manager	On a quarterly basis

ATTACHMENT 1. 2019 Action Plan

With regards to information disclosure process

- Continue regular publications on the website and Linked In.
- Establish a Facebook page of the project.
- Continue regular (quarterly) Stakeholders meeting with Ras Ghareb Chairman where the Stakeholder manager should share information about the project and respond to inquiries. Where possible such meeting shall be made **in collaboration with NREA**.
- Publication of an English summary of the SEP and CSR Plan on RGWE website
- Further publications in the local media.
- Initiating the disclosure of the ESIA and related reports on the website of the Ministry of Electricity, the NREA and funding agencies.
- Informing the illiterate people and marginalized groups about the project as well as the content of the ESIA and related reports through holding a meeting with the community leaders and NREA.

With regards to grievance mechanism

- Information of the community (community leaders, social entities, Ras Ghareb residents or business owners, and governmental units) about the Grievance procedures in simple (Arabic) language.
- Providing the Ras Ghareb community with both an RGWE grievance contact and a grievance contact of their construction contractor during the construction phase of the project.
- Setting up a Complaints/Comments Log Book, containing the name/group of commenter/complainant, date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate) and the date of response sent to the commenter/complainant.
- Keeping, by the senior management, of a grievance log and report on grievance management, as part of annual project progress reports
- Checking that all comments and complaints have been responded to either verbally or in writing, in accordance to preferred method of communication specified by the complainant.
- Checking that all grievances have been registered and acknowledged within 6 working days and responded to within one month.
- Checking that it is possible for individuals who submit their comments or grievances to request that their name be kept confidential (though this may mean that the company is unable to provide feedback on how the grievance is to be addressed.)
- Contacting the NREA to set up the monitoring of the grievance mechanism, which should be implemented at the NREA level according to the ESIA.