



# 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.*

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## 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 RGWE to engage relevant stakeholders for a purpose to achieve accepted outcomes.

### Acronyms

Acronym	Full name
CDM	Clean Development Mechanism
CSR	Corporate Social Responsibility
EETC	Egyptian Electricity Transition Company
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
LTSA	Long Term Services Agreement
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	Red Sea Wind Energy
SEP	Stakeholder Engagement Plan
SGRE	Siemens Gamesa Renewable Energy

## 2. PROJECT DESCRIPTION

The project comprises of 125 units of Gamesa G97-2.1 MW wind turbines, with a rotor diameter of 97 m, a hub height of 71.5 m and a 33/220 kV substation connected to the national grid via an Over-Headline (OHL).

The site provided by NREA to the project covers an area of around 38.9 km<sup>2</sup> 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 construction of the project, the site was handed-over by RGWE to Contractors for their respective turn-key execution of the transport, construction/erection, and commissioning works. The OE was hired for the coordination of the works between Contractors.

On 31<sup>st</sup> October 2019, the project began commercial operations (COD). Starting from this date and for a duration of 20 years, the electricity produced will be sold to EETC under a Power Purchase Agreement (PPA).

The operation & maintenance of the wind turbines is performed by SGRE under a 15 years LTSA. RGWE, with its own staff, supervise SGRE works and operates and maintains the electrical substation and BOP.

By the beginning of 2021, we have completed one year of operation, achieving most of the operation objectives and targets:

- The completion of the rest of wind turbines blade painting.
- The completion of the 12 months wind turbine maintenance program, one month ahead of schedule.
- Starting of the 18 months wind turbine maintenance program, one month in advance with completed by the end of Jan 2021.
- One Terawatt-hour production milestone achieved in June 2020.
- For the first full year of commercial operation (2020), the availability was 98% versus a budget estimate of 97%.
- Starting the 2<sup>nd</sup> operational Year-to-date availability 99.4%, over the budget estimate of 97.5%.
- WTG Sonic Alignment with Laser device campaign for 125 WTGs in 20 days.

### 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 outcomes. This should take the form of **an ongoing process, in a structurally and culturally appropriate manner** with the affected Stakeholders and Communities,

To achieve an effective Stakeholder Engagement, RGWE Stakeholder Engagement Plan includes, but is not limited to, 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 **operations**.

### *Scope of Application*

The SEP applies to **all activities** from RGWE, 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 is applied to both **construction and operation phases** of the project.

### *Structure*

Stakeholder Engagement is developed as a **documented system**, deployed from the Stakeholder Engagement and Corporate Social Responsibility **policy**. To this end, all the documents are to be managed by using the same approach. To be consistent, the documents are 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 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
- Egyptian Labor Law.

*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 has identified the different Stakeholders that may be interested in and/or be affected by the implementation of the Project. In addition, they have been 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 an annual basis that the list of Project Stakeholders is complete and updated.

Stakeholder Type	Full Name of Entity	Proposed Communication media
<b>Internal</b>		
Sponsors Affiliates	Ras Ghareb Wind Energy Company S.A.E.	Regular reporting on O&M Progress and Activities
	Ras Ghareb Renewable Energy Services	
	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 (Construction phase)	Orascom Construction SAE	Email and phone correspondence, regular private meetings
	Siemens Gamesa Renewable Energy Eolic a SL	
	Siemens Gamesa Eolic a SL (Egypt Branch)	
	Siemens Gamesa Renewable Energy SA	
	Siemens Gamesa Eolic a SL (Egypt Branch)	
LTSA Contractor (Operations phase) Construction & LTSA/Subcontractors' employees and temporary workers		Contract information, induction training, grievance mechanism

<b>Other Contractors</b>	Anemos Hamza Associates Eco Conserve CTE/EPS Clifford Chance LLP Zaki Hashem PWC Marsh Milbank Shalakany Law Office NautaDutilh Nishimura & Asahi Mott McDonald Benatar BDO KPMG Barlovento GE:NET Petrotec Al Masria Waste removal contractor Pest Control Contractor Water supply Contractor HVAC maintenance Contractor Bedouins Security Details Group	<b>Email correspondence and private meetings</b>
<b>Lenders</b>	Commercial International Bank Japan Bank for International Cooperation Nippon Export and Investment Insurance Sumitomo Mitsui Banking Corporation Société Générale	<b>Regular reporting on project progress Comply with the Loan Agreement. Especially. Schedule 6&amp;7 (JBIC) and Schedule B (NEXI Covered Loan)</b>
<b>Owner's Engineer (Construction phase)</b>	TRACTEBEL - LAHMEYER International	<b>Email and phone correspondence, regular private meetings</b>

<b>External</b>		
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 &amp; Values, SEP, CSR Plan published on the <a href="#">RGWE website</a></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), together with Kuwait Energy (EGPC subcontractor)	Phone correspondence, private meetings
Local municipal authorities of Ras Ghareb	Municipality Chairman and all municipality staff	Permits procedure, official correspondence, private meetings
Relevant governmental secretariats of the Governate of the Red Sea	Governor of Red Sea and his administration in Hurghada	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 General Authority for Rehabilitation Projects and Agricultural Development National Center for Planning the Use of the State's Lands General Authority for Roads & Bridges	Permits and authorization procedure, official correspondence, private meetings



<b>NGOs</b>	Misr El Kheir (Ras Ghareb)	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
<b>Local Social Entities</b>	Ras Ghareb Schools	Beneficiaries from RGWE CSR Activities
	Ras Ghareb Hospital	
	Ras Ghareb Physiotherapy center	
	Ras Ghareb Nurseries	
<b>NPOs</b>	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 1,000MW 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. this Stakeholder Engagement took 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. These comments have been taken in account by RGWE, for example regarding the bird migration, an action plan is developed in close coordination with the NREA and the RCREEE.

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

- Temporary Construction Permit: June 7<sup>th</sup>, 2017
- Environmental Permit: June 8<sup>th</sup>, 2017, amended on January 5<sup>th</sup>, 2020.
- Usufruct Agreement: October 31<sup>st</sup>, 2017
- Printer Permit (for headquarter office and site): 6<sup>th</sup> February and 1<sup>st</sup> April 2018.
- Generation license: issued first on March 6<sup>th</sup>, 2018 and renewed in June 2019.
- Access Road Agreement: June 10<sup>th</sup>, 2018
- Construction Permit: June 14<sup>th</sup>, 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
- Power generation license (Permanent license): issued in 30/06/2020
- Egyptian Tax Authority: April 12<sup>th</sup>, 2017 valid till April 11<sup>th</sup>, 2022

### *Stakeholder Engagement Visit June 2018*

A Corporate Social Responsibility delegation was sent in June 2018 on site to meet the 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. Furthermore, the delegation also visited the site, met with the construction team, including 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.

### *CDM Stakeholders Public Hearing - Feb 2019*

RGWE has conducted a stakeholder meeting on February 12, 2019 for the Clean Development Mechanism 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.

In progress of the registration process under CDM (Clean Development Mechanism) for production of 2020 & 2021, by end of March registration will be completed.

### *Ras Ghareb stakeholders site visit 2019*

A site visit was arranged for all stakeholders to come to our site to become more aware of our project progress, presentation was given by the construction director, O & M director (regarding the project progress and updates) and HSSE Manager (regarding site safety rules) followed by an explanation in front of the wind turbines during their site tour.

### *Stakeholder Engagement Visit in 2021*

There were no site visits for the stakeholders 2021 due to COVID-19 crisis.

### *Engagement with the local community*

RGWE has been highly engaged with the Bedouin community residing close from the wind farm facilities. The site management team maintains regular informal meetings and telecommunications with the Bedouin community. During construction period, 12 Bedouins were employed by Orascom Construction to work on site security. Now, for the operations phase, about 10 Bedouins are currently employed by RGWE to work on site security, and we are happy to announce that we have completed the first year in the operation phase with zero security incident and positive relationship with Bedouins.

### *Stakeholder Engagement on site*

On site Stakeholder Engagement has been demonstrated through a close collaboration between RGWE and SGRE HSE Officers. Induction training and a grievance procedure have been developed and implemented for construction and O&M workers. The details of Stakeholder Engagement on site can be found in RGWE's HSSE Plan.

Notable accomplishments so far include:

- Completed 2020, the first year in operation phase with zero LTI, no environmental incident and zero fatality.
- First Aid training.
- H&S management system for the operation phase.
- H&S weekly training program.
- O&M excellence with the excellent results.

### *RGWE's website*

[RGWE's website](#) currently has a [section](#) with detailing RGWE [Commitments](#). This section provides a summary of all 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 operation updates and quarterly CSR newsletters.

Finally, the website has a [CDM section](#) which provides RGWE Project Design Document with an Executive Summary and the Validation Report.

An Arabic version of the website was made available (but not all published documents are translated).

### *RGWE's Social Media*

RGWE established Linked In & Facebook page where it regularly publishes photos and videos

of the project and its CSR and environmental activities.

### *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 updated the site entrance sign near the main road, at the entrance of the site access road. The sign provides the company name and Logo, sponsors.

### *RGWE in the Media*

Participation of RGWE Team in some Engie videos.

The Sponsors and SGRE have made several publications to announce the commercial operations of the project.

### *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 details of these communication with Sponsors management can be found in Reporting Procedure (for the operation phase).

## **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 Operations Director and the RGWE HSSE Manager 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, 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, SEP plan as well as a newsletter about the project's progress shall be published on the RGWE website in both Arabic and English, to acknowledge linguistic differences.

Posters and leaflets about the project shall be published in Arabic and displayed in the main streets of the village, as well the local unit in Ras Ghareb. In addition, the annual CSR event, reception, or celebration in Ras Ghareb city with the attendance of all stakeholders. This is to ensure that the project progress is acknowledged to them and all our CSR activities.

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, stakeholders and interested groups. In addition, special provisions will be made to ensure that people who are unable to read Arabic or English are fully informed.

RGWE shall work closely with NREA. Alongside NREA, RGWE will facilitate implementing community projects as appropriate through mobilizing community members. Meetings will be scheduled 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.

Separate focus group meetings will be conducted especially for women, young people, and vulnerable groups, to ensure that their unique concerns are adequately raised and dealt with. Moreover, NGOs should be engaged to cooperate with these groups to ensure that information is conveyed in simple dialect specifically for poor and or marginalized women. Furthermore, young people will be engaged via informal meetings in the local Youth Center.

Overall, RGWE should look for:

- Increase the information sharing channels.
- Providing information to the community about the updates and progress in the operation program and timing.
- Informing directly affected stakeholders in advance of construction works in the operation phase.
- Announce availability and feasibility of needed vacancies for the site in Ras Ghareb city.

## **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 issues will arise. However, to ensure that stakeholders have a process for redressing their grievances, related to any aspect that may result from the project, detailed procedures 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.

Until now, no grievances have been raised within the construction or operation phases, and we consider this as an achievement itself due to our respect and because of applying the ethics rules and values.

Anyone is 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, telephone or in person. The comments and complaints shall be summarized and listed in a Complaints/Comments Logbook, 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 with the 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 team 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
- At the office's physical address indicated on the website.
- On Site premises.

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

### PERMANENT RESPONSIBILITY SUMMARY TABLE

Task	Responsibility	Frequency
Stakeholders Identification and Analysis	RGWE senior management	Annually
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 CSR activities in accordance with CSR Plan	Site CSR & Admin Officer in cooperation with the senior management of the company	On a quarterly basis

## ATTACHMENT 1. 2021 Action Plan

### *With regards to information disclosure process*

- Continue regular publications on the website, Facebook, and Linked In.
- 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 updated 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.
- Implement new CSR activities upon the stakeholders needs within our 2 main fields which are (Health and Education).
- Arrange for a stakeholder's site visit to have a site tour and get acknowledged with project updates and progress within operation phase.
- Expanding more CSR activities and interact more with Ras Ghareb stakeholders.

### *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 Logbook, 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.