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“SEP”



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1. INTRODUCTION

Total Eren (“The Sponsor”) has developed a Stakeholder Engagement Plan (SEP) for a proposed 100 megawatt (MW) solar photovoltaic power plant in the Samarkand province in the Central part of the Republic of Uzbekistan, known as Tutly Solar PV Project (the ‘Project’); LTA has been provided with this SEP (the “Sponsor’s SEP”) for review .

The Sponsor’s SEP presents the broad approach and key steps to be undertaken by Tutly Solar LLC (hereinafter referred to as “Tutly Solar”), to plan and manage stakeholder engagement activities throughout various stages of the Project implementation. It aims to ensure engagement that is free of manipulation, interference, coercion and intimidation. It also aims to ensure that stakeholder engagement is conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format. This SEP seeks to provide a comprehensive revised version of the Sponsor’s SEP, and seeks to ensure that stakeholder groups are given sufficient opportunity to voice their opinions and concerns, and that these concerns are addressed adequately and influence project decisions were necessary.

This SEP adopts an inclusive life-of-mine perspective and provides a mechanism for addressing comments and potential grievances raised by all stakeholders. It is highlighted throughout this document, as it is in the Sponsor’s SEP, that engagement with stakeholders is an ongoing process, applying to the entire lifespan of the project, from design, and construction to operation and final decommissioning.

The Sponsor’s SEP details engagement undertaken with stakeholders during the pre-feasibility stage of the Project and serves as a guide to engagement during the Project feasibility stage. The version of the Sponsor’s SEP provided for review is described as “an initial guide to engagement and will need to be revised following Project approval to inform on-going stakeholder engagement through the various stages of Project development, construction, operation and closure/rehabilitation”.

The project benefits will be evident in the region when the additional energy availability will allow for further economic development. The job creation will be limited to unskilled labor (temporary); however, the local population may be incentivized to train in skilled professions which may become useful during the lifetime of the project and beyond.

Indirect benefits, depending on what will be defined as final plans by the Project Owner and the Company, may include access to a phreatic well providing drinking water to the population, which currently has to rely on imported drinking water.

The Sponsor’s currently implemented grievance mechanism has proven to a certain extent already effective as a complaint by herders using the project land for grazing purposes has been addressed and records of the meetings and measures kept (and have been reviewed by LTA).

2. LEGAL FRAMEWORK

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD’s Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

Activities specified in the SEP conform with National requirements under Uzbek laws and regulations. The requirements of the EIB, EBRD, and WB Group have been considered in the development of the SEP for the Project, which is designed to meet best international practice. Table 1 provides a summary of the National Uzbek as well as EIB’s, EBRD’s and World Bank’s requirements.

Table 1 : Legal framework requirements

European Investment Bank Requirements (EIB)	Uzbekistan Requirements
<p>EIB requirements applicable to this project are contained in the Environmental and Social Handbook (2018). Standard 10 addresses stakeholder engagement. Key objectives of this standard are the following:</p> <ul style="list-style-type: none"> • Establish and maintain a constructive dialogue between the promoter, the affected communities and other interested parties throughout the project life cycle; • Ensure that all stakeholders are properly identified and engaged; • Engage stakeholders in the disclosure process, engagement and consultations in an appropriate and effective manner throughout the project lifecycle, in line with the principles of public participation, non-discrimination and transparency; 	<p>The requirements for public consultation in relation to the Project come under several laws and regulations governing:</p> <p>1) ESIA requirements –</p> <p>(a) Law of the Republic of Uzbekistan on Environmental Expertise (no.73-II dated 25.05.2000) and</p> <p>(b) Decree (no.949 dated 22.11.2018) of the Cabinet of Ministers of the Republic of Uzbekistan “On the Approval of the Regulations On the State Environmental Expertise”;</p> <p>2) Stakeholder engagements –</p> <p>(a) Law of the Republic of Uzbekistan on Social Partnership (no. 376 dated 28.08.2014), aimed particularly at the social</p>

- Ensure that the relevant stakeholders, including commonly marginalized groups on account of gender, poverty, educational profile and other elements of social vulnerability, are given equal opportunity and possibility to voice their opinions and concerns, and that these are accounted for in the project decision-making; and,
- Duly verify and assess that the quality and process of engagement undertaken by third parties on the project conform to the provisions included in the present standard.

In addition, Standard 7 addresses specific needs of vulnerable groups, particularly in terms of their participation in the consultation process. Some particular consultation requirements are also contained in Standard 5 (Cultural Heritage) and Standard 6 (Involuntary Resettlement).

EBRD PR10 Requirements

Key EBRD requirements pertaining to the stakeholder engagement process are set out in Performance Requirement (PR) 10 "Information Disclosure and Stakeholder Engagement" (EBRD, 2014) and in the stand-alone Public Information Policy (EBRD, 2014).

Under PR10 requirements:

- Stakeholder consultations are considered as an ongoing process continuing throughout the Project life;
- The Bank requires that stakeholders, their expectations and concerns be identified in a systemic manner; significant emphasis should be placed upon keeping key stakeholder groups informed and engaged; vulnerable groups whose vital interests may be affected by the Project require special attention;
- Establishing and maintaining a grievance mechanism is a mandatory requirement as it helps avoid and resolve any potential conflicts at a very early stage; and

protection, support and increase of social activity of the population through conducting joint events, consultations and negotiations by social partnership entities (source: <https://www.lex.uz/docs/2468216>);

(b) Law of the Republic of Uzbekistan on Public Control (no. 374 dated 12.04.2018) aimed at establishing public control over state entities and agencies work through public discussions, public hearing, expertise, etc (source: <https://lex.uz/docs/3679099>).

(c) Decree of the President of the Republic of Uzbekistan (no. 5980 dated 16.04.2020) on creation of the Public Chamber under the President of the Republic of Uzbekistan". The Public Chamber consisting of 50 members and working on a voluntary basis serves as a bridge for dialogue between society and government (source: <https://lex.uz/ru/docs/4789930>)

The above-mentioned Laws on stakeholders engagements provide legal platform to conduct public consultations only, without prescribing them to be as obligatory requirement for every stakeholder engagements.

There is a pro-government NGO, Nurabad district branch of Council of Farmers, Dehkan farms and Owners of household lands of Uzbekistan (source: <https://uzfk.uz>), which can protect the interest of 3 farmers operating in Tutly settlement (along with a Private Company "Tutly Korakul Zamini" LLC).

- The identification of stakeholders, the planning of stakeholder engagement activities, and the description of the grievance mechanism should be reflected in a Stakeholder Engagement Plan, to be submitted as part of the Environmental and Social Impact Assessment process; the implementation of this plan should start as part of the pre-approval due diligence process (for Category B projects, such as the Project).

EBRD also requires that, for Category B projects such as The Project, environmental and social documents (the Environmental and Social Action Plan (ESAP) and a Non-Technical Summary (NTS)) should be publicly disclosed by the EBRD Client in a meaningful manner (i.e., in a manner that is accessible to stakeholders).

World Bank Requirements

World Bank Group requirements applicable to this project are the Environmental and Social Safeguards (2016) (ESS's) especially ESS-10 Information Disclosure and Stakeholder Engagement.

For all projects, the Project Company will consult with stakeholders to identify issues and concerns in order to inform the environmental and social assessment and the design and implementation of the project.

Disclosure of relevant project information helps stakeholders understand the risks, impacts and opportunities of the project. If communities may be affected by environmental or social impacts from the project, the Borrower will provide them with access to the following information:

- a) The purpose, nature and scale of the project;
- b) The duration of proposed project activities;
- c) Any risks to and potential impacts on communities and proposed mitigation plans;

- d) The envisaged stakeholder engagement process, if any, and opportunities and ways in which stakeholders can participate;
- e) The time and venue of any envisaged public consultation meetings, and the process by which meetings are notified, summarized, and reported; and
- f) The process and means by which grievances are raised and managed.

The information will be disclosed in local language(s) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project because of their status or groups of the population with specific information needs (such as, literacy, gender, differences in language or accessibility of technical information).

Similar to EBRD policy and PRs, stakeholder consultations are considered an essential component of the project preparation and implementation process. The purpose of these consultations is to communicate information to stakeholders and receive feedback regarding their expectations, preferences and concerns in order to ensure that the views of the public are taken into account in decision-making.

3. SUMMARY OF THE PROJECT STAKEHOLDER ENGAGEMENT AND DISCLOSURE OF INFORMATION TO DATE

According to National Legislation requirements for stakeholder engagement and public consultation, Tutly Solar has visited the project areas and conducted meetings with local representatives, specialists based in the province of Samarkand as well as agencies in the city of Tashkent. Official consultations were undertaken for the population of the Tutly settlement on the 21st December 2019 (for which 39 participants signed the registration list) and another one on the 21st of August 2020 (to which 9 households representatives attended). The August meeting was held between representatives of the Nurabad District khokim and Tutly residents to review a written complaint of the residents addressed to Nurabad District khokim with regards to their disagreement with the construction of photovoltaic solar power plant in the used pasture lands. The reason for disagreement was possible reduction of pasture area for livestock. The issue was resolved by granting the local population additional area for grazing their livestock 1 km far from the settlement, at the lands owned by Tutly Korakul Zamini LLC (who did not object to this decision).

Site investigations undertaken by LTA have confirmed that the consultations have been carried in a manner compliant with the requirements. Consultations between LTA and the local population were undertaken on the 8th September 2020. The meeting participants confirmed that they are aware of the Project. One of the participants expressed her concern that during the flood season (March-April) run-off stormwater of up to 50 cm depth could be diverted towards the Tutly settlement from the Project land as a result of the mud-flow protections that would be installed around the PV Plant. As a result of this information and concert the Project Owner has undertaken to take into account the drainage system during a detailed study of the power plant construction project.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

The objective of stakeholder¹ identification is to establish which organizations and individuals may be directly or indirectly affected (positively and negatively) or have an interest in the project.

A list of the organizations identified to date and a plan for their involvement at the various stages of the Project is provided in Table 2 below. The list of stakeholders is to be kept up to date as new stakeholders are identified or express an interest in the project.

It should be noted that, in addition to the stakeholders identified in the Sponsor's SEP, the following stakeholders should be considered when implementing the SEP: suppliers of goods and services, job seekers and local media. NGOs considered should include local as well as international NGOs. Contact details of the majority of the individuals/ institutional stakeholders have been compiled by the EIA team to enable the Project to readily communicate with each stakeholder. This information may be kept on a database for ease of use, but will not be shared with any third party. At the time of writing this SEP, the role of Community Liaison Officer (CLO) has been performed by Aizade Saitniyazova, Tutly Solar's (the Project Owner) manager. In the future, it is envisaged that an appointment will be made specifically to cover this position as a fulltime job.

4.1. Project workers & suppliers (goods and services)

Project workers, contractors and subcontractors shall receive details of employment conditions offered as well as the envisaged duration of employment, together with an explanation of the procedures of the grievance handling mechanism.

The procurement process (goods and services) shall lead to a fair selection and allow potential suppliers and contractors to provide qualitative and quantitative capacity for the required services. Tutly Solar shall manage the disclosure to local businesses of necessary information so as to maximize local procurement where possible.

In addition, Tutly Solar shall ensure that relevant EHS and Social requirements are incorporated into the procurement contracts. Therefore, the required EHS/ OSHAS standards to supply Tutly Solar / the EPC contractor (Metka) must be communicated efficiently to suppliers before entering into contract, and subsequently audits shall be undertaken regularly to ensure that they are supported in such way so as to be able to comply with the EHS/OSHAS and Social requirements without undermining the performance of the contract.

¹ A "stakeholder" is defined as any individual or group who is potentially affected by the project or who has an interest in the project and its potential impacts.

Table 2 : Project stakeholder and information disclosure methods

Stakeholder	What to disclose	Where to disclose	How to disclose	When to disclose
Government Agencies (Country and Regional Level)	ESIA, NTS, SEP, Employment plan, Discussions results ECRP	Sakhoba MRG Council Office Notice boards in "Sakhoba" MRG, Tutly and in the administrative center of Nurabad district.	Phone / email / text messaging Face-to-face interviews Formal meetings, hand delivered letters if necessary.	As soon as possible and as required by National Legislation
Government Agencies (Local level)		Tutly Council Office	Phone / email / text messaging Face-to-face interviews Formal meetings, hand delivered letters if necessary; Information board	As soon as possible and as required by National Legislation
Resident and Neighboring Communities	NTS, SEP, ESIA, list of vacancies with qualifications required, CSR.P.	Notice boards in "Sakhoba" MRG, Tutly and in the administrative center of Nurabad district.	Print media, text messaging and radio announcements Public meetings Focus group meetings Surveys Information Centre, and Information Board	As soon as possible and then bulletins at the beginning of each construction phase.
Vulnerable Groups	NTS, SEP, ESIA, list of vacancies with qualifications required, CSR.P.	Notice boards in "Sakhoba" MRG, Tutly and in the administrative center of Nurabad district	Print media, text messaging and radio announcements Public meetings Focus group meetings	As soon as possible and then bulletins at the beginning of each construction phase.

Stakeholder	What to disclose	Where to disclose	How to disclose	When to disclose
			Surveys Information Centre	
Local and International NGO's and conservation organizations	NTS, SEP	Russian-language newspaper "Samarkandskiy Vestnik", newspaper "Ovozi Samarkand" in Tajik language	Phone / fax / email / text messaging Face-to-face interviews Focus group meetings Information Centre	As per EBRD/EIB/WB's disclosure requirements
Employees and managers	Employment conditions, up-to date grievance mechanism	Tutly Solar LLP's Offices	Phone / fax / email / text messaging Print media and radio announcements Workshops Focus group meetings Surveys	Before the construction starts and from then on continuously.
Suppliers of Goods and Services	Early notice of requirement of goods and services and/or variation of demand. EHS / OSHAS compliance requirements.	Tutly Solar LLP's website –invitation to tender		Before the construction starts and from then on continuously.
Job Seekers	Vacancies and lists of positions with required qualifications, at that particular moment in time and during all stages of the Project.	Television and radio, www.samarkandnews.uz, websites such as zarnews.uz, www.nurnews.uz, (www.nurobod.uz),		Before the construction starts and from then on continuously.
Local Media	NTS, SEP, Detailed Project Information on request.	Russian-language newspaper "Samarkandskiy Vestnik", newspaper "Ovozi Samarkand" in Tajik language, city private TV		As soon as possible and then bulletins at the beginning of each construction phase.

Stakeholder	What to disclose	Where to disclose	How to disclose	When to disclose
		channel STV (http://uzb.stv.uz) and the regional state TV channel MTRK Samarqand. Notice boards in "Sakhoba" MRG, Tutly and in the administrative center of Nurabad district.		

4.2. Local Population

A variety of social issues can be identified in the Project Area, one of the major ones being the very poor state of the roads. Water supply is also a major issue in the Tutly settlement.

Approximately 75% of the working-age population of Tutly is temporarily unemployed; men work in seasonal work as day laborers, and women are engaged in household work, or weave carpets. "Tutly Korakul Zamini" LLC is a private company based in Tutly owning more than 12,300 heads of sheep and goats and represents the only employer for the residents of "Tutly".

There are 50 live-stock farmers in Tutly, 27 of which are associated to the Tutly Cattle Association. The private company "Tutly Korakul Zamini" LLC (livestock farming) owns over 12,300 heads of sheep and goats and represents the only employer for residents of "Tutly".

As part of the social DD, LTA has interviewed the Manager of Tutly Korakul Zamini" LLC, Mr. R. Suyarov, who reported that at the time the company employs 52 workers, of which 46 are shepherds and shepherd's assistants.

The local population can be generally characterized as socially vulnerable to poverty. The literacy of the population is good with most of the population having completed secondary education.

The Local population is very interested by the opportunity of employment, and as such the CLO shall ensure that a list disclosing the positions to be covered during the lifespan of the project and skills required is appropriately publicized, so that the local population may have the time and opportunity to train in the right areas so as to gain employment as a result of the Project.

Besides unemployment, the availability of qualified medical care are the main socio-economic problems of the settlement. There is no medical centre in the settlement, which represents an issue to address with regards to the possible COVID related issues that the Project workers and employees might face during construction and later operation of the PV Plant. An ambulance (DAEWOO DAMAS) is permanently on duty and available in case of emergencies in the settlement area. The travel time to reach the nearest medical centre in Nurabad (90 km from Tutly) is over two hours due to the poor state of the roads.

The CLO shall ensure that all required information on all generally sanitary and specifically COVID related issues and management is disclosed appropriately (for example through the regular use of mass media). This information shall be publicized amongst members of the residents as well as workers and suppliers of goods and services interested in the Project area.

The existing complaints mechanism is effective, since complaints from the public have already been accepted and all the nuances that were reflected in the complaint have been clarified.

4.3. Local Media

Broadband is not available in Tutly. In the region of Samarkand there are many printed newspapers such as the newspaper “Samarkandskiy Vestnik” (in Russian), “Ovozi Samarkand” (in Tajik). Electronic mass-media available include websites such as: www.samarkandnews.uz, zarnews.uz, www.nurnews.uz, websites (www.nurobod.uz), and television and radio stations include city private TV channel STV (<http://uzb.stv.uz>) and the regional state TV channel MTRK Samarqand.

The CLO shall provide these media with information relating to the Project, job opportunities, COVID related issues (e.g. provision of medically trained staff around the project area for the benefit of all workers as well as residents) in a culturally acceptable manner to a wider audience.

4.4. Non-Governmental Organizations

The CLO shall establish contact with all representatives of the relevant National (such as the Uzbekistan Society for the Protection of Birds (UzSPB) is National NGO and international NGOs).

4.5. Vulnerable groups

Socially vulnerable groups in “Sakhoba” MRG include: 31 families who have lost their breadwinners, 43 disabled people, 465 pensioners. The main problem for the entire local population, not only for socially vulnerable groups, is availability of livestock pastures.

Local issues of domestic nature include the very poor state of the roads as well as the lack of water supply, while unemployment and provision of qualified medical care are the main socio-economic problems of the Tutly settlement.

5. STAKEHOLDERS ENGAGEMENT AND INFORMATION DISCLOSURE MECHANISM

Tutly Solar will implement and maintain the SEP which will include public disclosure of relevant information, consultations with stakeholders, and mechanisms by which people can make comments and raise grievances.

At the time of writing this document the ESIA was in the process of being finalized. SEP activities conducted during the first phase ESIA Baseline Engagement are reported in para 6 of the SEP disclosed by the Sponsor.

The engagement methods identified in the Sponsor's SEP include the following:

- Establishment of Information Centers and Information Boards within each project area;
- Correspondence by phone/e-mail/texting/instant messaging;
- Print media and radio announcements
- Face to face interviews
- Formal & Public meetings
- Workshops / focus groups meetings
- Surveys

In order to ensure effective consultation with community members during construction and operation of the Project, Tutly Solar will establish a project information centers at the Nurabad district Khokimiat and Tutly Makhalla Citizen's Assembly Office, aiming to divulging project information to community members and receiving grievances, if any. At both information centres Tutly Solar will install notice boards which will be regularly updated with Project information, employment opportunities and impact management measures including the grievance mechanism. Noticeboards will also include the grievance/letter box for suggestions. Project information board will also be installed at the construction site itself, which will display information about the Project, and provide contact details of CLO/appointed nominees to deal with additional inquiries.

The SEP considers the SEP as an ongoing process throughout the life span of the project. Therefore, it has been acknowledged that the SEP may require modifying as a result of consultations with stakeholders.

Table 3 : proposed disclosure plan for the ESIA according to the SEP disclosed by the Sponsor

Stakeholders group	Timeline and Frequency	Engagement method	Purpose
Government Agencies (Country/Regional)	Project preparation Phase	Face-to-face meetings; Official applications.	Provide update on Project status; Get the views and opinions on potential Project impacts; Receive official permissions and licenses.
	Quarterly	Notification	Regular project updates
Local Government Agencies	Project preparation Phase	Face-to-face meetings; Official applications.	Provide update on Project status; Get the views and opinions on potential Project impacts; Obtain the necessary approvals.
	Monthly	Notification	Regular submission of Grievances Received by Local Government Agencies
Local Communities	Before the Construction works	Notification	Setting up Project Information Boards in Tutly and Nurabad District Khokimiat; Announcement on job opportunities for locals
	Monthly	Notification; External grievance mechanism.	Regular update of Project Information Boards; Check GRM received to grievance boxes at Information Boards
	On need basis	Public Meetings; External grievance mechanism.	- Meetings with local community to respond to urgent concerns or claims
Local Construction Companies and NGO's	Regular	Notification	Provide update on Project status; Announce on bidding and cooperation opportunities
All Stakeholders	Regular	Notification; Media announcements; Website announcements	Disclose and discuss the construction status and any major events due to take place (component delivery for example). Project status update.

In addition to the National requirements and what has been proposed in the SEP disclosed by the Sponsor and outlined above, Tutly Solar LLP should provide on its company's website, in both Russian and Uzbek language:

- The Project's Non-Technical Summary (NTS) with relevant schedules;
- The SEP with Grievance Mechanism;
- Vacancies and employment procedures;
- Answers to frequently asked questions;
- Annual report to EBR/EIB on the implementation of the ESAP.

In addition, the following should be displayed on the information boards in each project area:

- The NTS summary with relevant schedules;
- The grievance mechanism;
- Vacancies and employment procedures;
- The contact details of the Community Liason's Officer as well as where it is possible to obtain the ESIA;
- Project Bulletins (in A5 size) describing the various tasks (completed as well as planned), the implemented mitigation measures;
- Replies to stakeholders' queries and subsequent corrective actions taken (if any).

Once the construction is completed and the Plant is operating Tutly Solar LLC will provide annual environmental and social performance reports as well as a summary of grievance management on their company website as well as on the information boards in the project areas.

6. RESOURCES AND RESPONSIBILITIES

Tutly Solar shall be the executing agency (EA) in delivering stakeholder engagement activities.

Tutly Solar's Project Team will be responsible for the SEP throughout the life of the Project. Roles for managing the SEP may be filled by existing Tutly Solar's staff, or new employees yet to be hired, or outsourced consultants. To implement the SEP Tutly Solar will employ a Community Liaison Officer who will be responsible for communication with stakeholders, implementation of SEP and record and monitoring of Grievance Redress Mechanism (GRM) process, liaise with the appropriate company personnel to ensure that grievances are tracked, reported and responded to accordingly as necessary.

Community Liaison Officer will also be responsible for the timely update of the current SEP, manage arising community matters and provide reports to Senior Management for onward submittal to lenders.

At the time of writing and until a new appointment is made, the CLO's role was temporarily covered by Aizade Saitniyazova, Tutly Solar's Manager.

At the time of writing this SEP Tutly Solar had its head office in the capital city of Tashkent and planned to establish an office in Tutly once construction works begin. The main office will be mostly engaged with Country/Regional level group of stakeholders, and the local office in Tutly will be managing relations with local community and local organizations.

The Project's Environmental & Social consultant will assist the Project Team with engagement activities during the ESIA process, as per the pre-agreed allocation of roles. Tasks of the Consultant include:

- Preparation of E&S due diligence reports;
- Providing support to Tutly Solar Project Community Liaison Officer;
- Supporting Tutly Solar with organization, logistical arrangements and attendance at stakeholder meetings;
- Documenting stakeholder engagement activities.

7. MONITORING AND REPORTING

Monitoring and reporting will be done by implementing the SEP, and the following will be recorded:

- Updates to the stakeholder database
- Recording of all consultations held
- Updates to the GRM log.

The list of stakeholder groups to be consulted on an on-going basis will be continually revised and updated as additional stakeholders are identified and will include, but not be limited to the following:

- Regulatory authorities
- National, State and local government
- Local community leaders (chiefs and leaders of groups etc.)
- Community groups representatives.

Minutes of all engagement activities will be uploaded onto the stakeholder database so that they can be referred to by the project team for consideration if needed. The database will be interrogated on a regular basis by the social consulting team to identify any trends in grievances and corrective actions that are required.

An annual report shall be prepared by the CLO on the environmental and social performance of the Project, the implementation of the various measures and commitments contained in the Environmental and social action plan as well as the implementation of the grievance mechanism. The CLO report on those matters shall be posted on Tutly Solar LLC's website as well as displayed on the relevant information boards.

In addition, employees and contractors shall be kept informed regarding the grievance mechanism's procedures, employment conditions and/or any relevant variations to their engagements.

8. GRIEVANCE MECHANISM

The GRM for the current project takes into account the national legislation, the specificity of the project sites, and the results of public consultations.

Tutly Solar LLP will be responsible for the implementation of the GRM. The following GRM has been proposed for the Project:

Table 4 : Project Grievance Redress Mechanism

Level / Steps	Process
<p>Level 1- Local makhalla committee, the working office of Contractor and Nurabad district Khokimiyat</p>	<p>The aggrieved person applies directly to the local makhalla committee or working office of the Contractor. EA Sociologist will be in charge of receiving and registration complaints and EA will collect information about received complaints from makhalla committee and working Contractor offices on a weekly base.</p> <p>The alternative entry point for complaints will be also khokimiyats due to their obligations defined by national legislation: (i) khokimiyats of the respective districts (cities) are obliged to notify owners of residential, production and other buildings, constructions and plantings on the made decision in writing for signature not later than six months prior to demolition, (ii) there is a 1st deputy of khokim responsible for industry, capital construction communications and utilities, who is usually responsible for any issues/complaints regarding the construction and land allocation; After registration of received complaints, designated staff of Tutly Solar will review nature/specificity of the complaint and will forward it to relevant party for resolving. In parallel, will inform Tutly Solar safeguard specialist in Tashkent about the received complaint and further actions undertaken for its solution. Depending on the nature of the complaint it may go to the Contractor, Land Cadaster, Makhalla, or district branch of Nature Ecology and Environment Committee. For example, complaints related to resettlement issues may be forwarded to Land Cadaster, hokimiyat, and makhallas. In the case of environmental issues, complaints will be forwarded to the Contractor or District Ecology and Environment Protection Committee. At this level, the complaint should be resolved for 2 weeks.</p>
<p>Level 2 – EA secretariat in Tashkent</p>	<p>In case the grievance was not redressed on the first stage or applicant is not satisfied with the decision made/solution, s/he can submit the grievance directly to the main office of Tutly Solar in Tashkent. In accordance with the established procedure, the secretariat of PIU will review the complaint and will forward complaints to the respective department to the made decision on its redress. In case the grievance is not related directly to the project, the further instance will be recommended to the applicant where s/he should apply for the decision making.</p>

Level / Steps	Process
	In case, if the complaint is required more time and resources for resolution, the PIU may establish complaint handling team with following members such as representatives from secretariat Tutly Solar, district Khokimiyat: cadastral department and makhalla or village assembly of Citizens or/and farmer's councils, or/and women association. All complaints will be resolved in 15 days, and in case additional details are required, a maximum of 30 days will be used to resolve and close the complaint with prior notification of complainant.
Level 3- Economic Court	If the issue was not solved or the applicant is dissatisfied with the decision/resolution, the aggrieved person may submit the grievance to the Economic Court (Court of Law) where decisions will be made in accordance with relevant national legislation. However, APs can approach the court of law at times during the grievance redressed process independent of GRM and the grievance mechanism should not impede access to the country's judicial or administrative remedies.

The CLO shall be responsible for handling the collection of grievances (whether from the letter box or other sources) and ensuring that the appropriate procedure is followed.

The flowchart below shows the process designed to provide an efficient grievance mechanism.

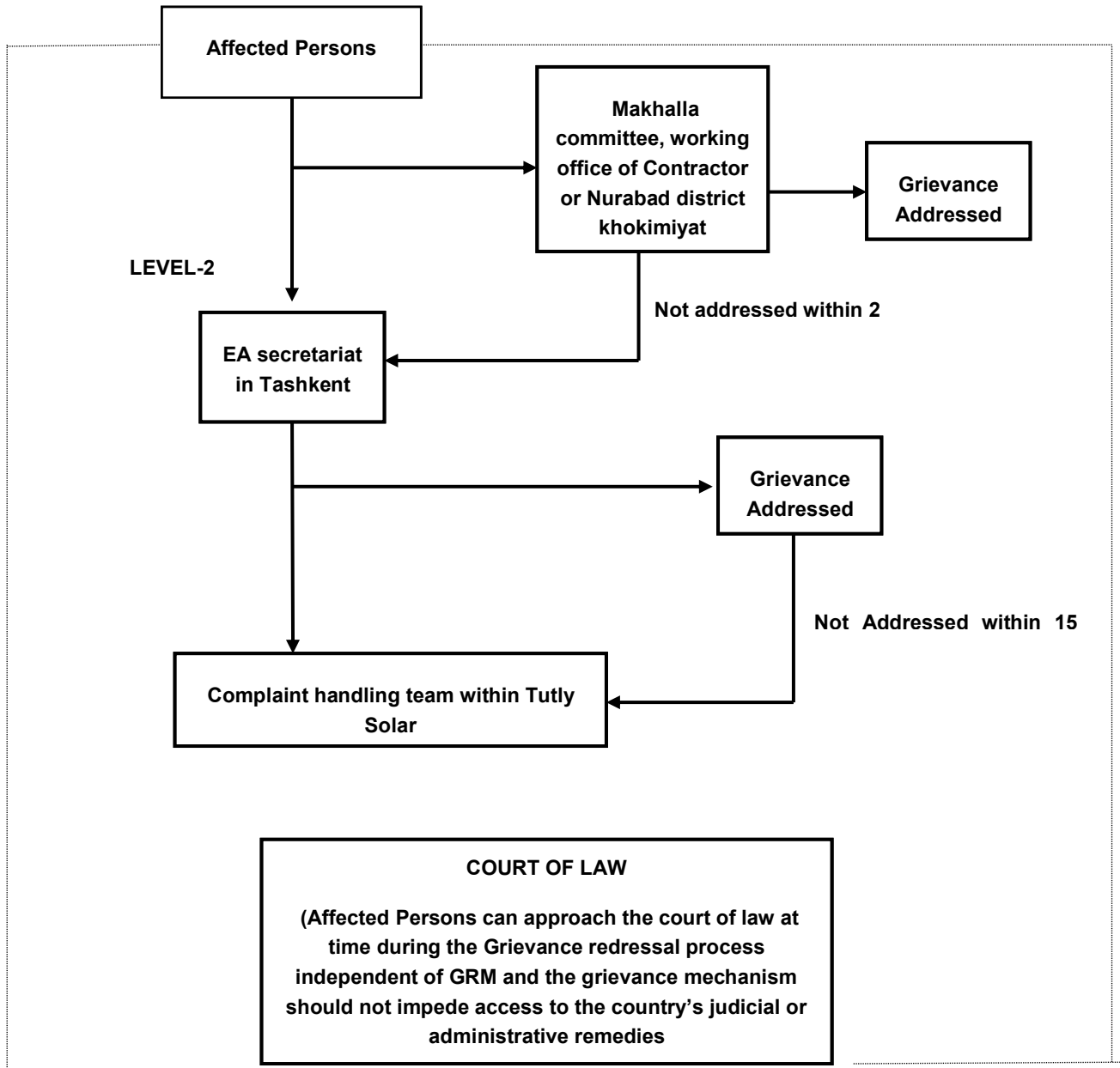


Fig. 1 : Grievance Redress Mechanism chart

APPENDIX 1 – CONSULTATIONS UNDERTAKEN TO DATE

DATE	STAKEHOLDERS	STAKEHOLDER ENGAGEMENT METHODS	LOCATION	PURPOSE	SUMMARY FEEDBACK
15 May, 2019	<ul style="list-style-type: none"> - Shepherds from Tutly - Chairman of Tutly Makhalla Committee - Beekeepers 	Face-to-face meetings	Tutly town (Administration building) Nurabad district, Samarkand province	<ul style="list-style-type: none"> • Information of project details • Biodiversity data and survey 	Consultant team obtained information about wildlife in the project area for evaluation of the project impact to Biodiversity.
10 Aug, 2019	<ul style="list-style-type: none"> - Head of UzgeoCadastre, Nurabad district branch; - Head of Electricity Network of Nurabad district branch - Chairman of Tutly Makhalla Committee 	Group Discussions	Site of the Solar Power Plant (Tutly town)	<ul style="list-style-type: none"> • Information of project details • Environmental and Social plans 	<ul style="list-style-type: none"> • Project information was shared among local stakeholders; • E&S impact survey was held

DATE	STAKEHOLDERS	STAKEHOLDER ENGAGEMENT METHODS	LOCATION	PURPOSE	SUMMARY FEEDBACK
21 Dec, 2019	<ul style="list-style-type: none"> - Tutly Community Representatives (39 people); - Deputy Khokim of Nurabad District; - Head of UzgeoCadastre, Nurabad district branch; - Chairman of Tutly Makhalla Committee 	Common meeting at the local settlement	Tutly town (Secondary school #59), Nurabad district, Samarkand province	<ul style="list-style-type: none"> • Inform local community members about the proposed project; • Capture views and concerns of the local residents about the project; • Collection of local valuable information to make informed decision. 	The project goals and activities were explained to local community members. Local community members were interested in opportunities for employment, repair of local roads, and possible negative impacts of the project.
20 Feb, 2020	<ul style="list-style-type: none"> - Deputy Khokim of Nurabad District; - Head of UzgeoCadastre, Nurabad district branch; - Head of Electricity Network of Nurabad district branch - Chairman of Tutly Makhalla Committee 	Group Discussions	Site of the Solar Power Plant (Tutly town)	<ul style="list-style-type: none"> • Information of project details • Environmental and Social plans 	<ul style="list-style-type: none"> • Update of stakeholders with the project plans; • Discussions of the project design and mitigation measures of E&S impact
22 Aug, 2020	<ul style="list-style-type: none"> - Deputy Khokim of Nurabad District; - Chairman of Tutly Makhalla Committee; 	Face-to-face meeting	Nurabad Khokimiat, Samarkand Province	<ul style="list-style-type: none"> • Information of project details • Environmental and Social plans 	<ul style="list-style-type: none"> • Update of stakeholders with the project plans; • Discussions of the project design and mitigation measures of E&S impact

DATE	STAKEHOLDERS	STAKEHOLDER ENGAGEMENT METHODS	LOCATION	PURPOSE	SUMMARY FEEDBACK
24 Aug, 2020	<ul style="list-style-type: none"> - Tutly Community Representatives (9 people); - Chairman of Tutly Makhalla Committee; 	Common meeting at the local settlement	Tutly town, Nurabad district, Samarkand province	<ul style="list-style-type: none"> • Inform local community members about the proposed project; • Capture views and concerns of the local residents about the project; • Collection of local valuable information to make informed decision. 	<p>Main concerns of the villagers:</p> <ul style="list-style-type: none"> • Solar Radiation impact; • Compensations in case of resettlement issues; • Job opportunities for local residents; • Decrease of pastures for local farmers.