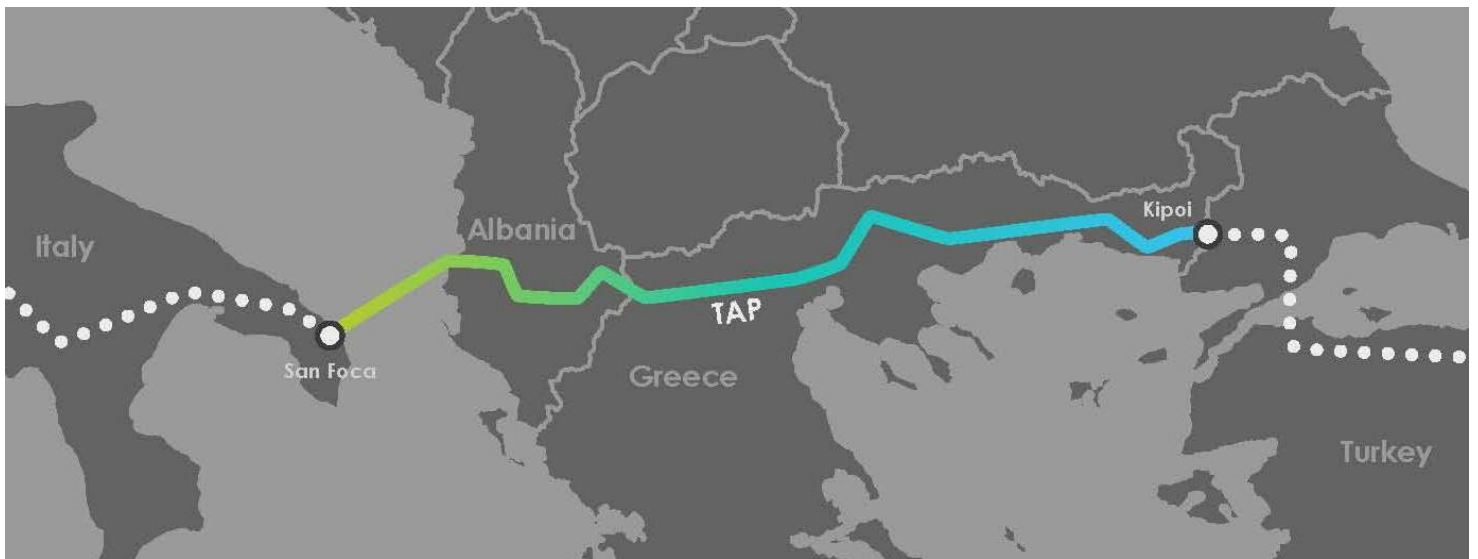




Trans Adriatic
Pipeline



Grievance Management Framework


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Glossary of Terms

Complainant	An individual, group or community that submit a Grievance
Complaint	Discontent about TAP or Contractor operations or activities expressed by an individual, group or community
Concern	An issue arising from TAP or Contractor operations or activities which has the potential to cause an impact to an individual, group or community
Consequence	The direct or indirect outcome of change and the stakeholder's ability to manage this change.
Contractor	Engineering, Procurement and Construction (EPC) contractors and their sub-contractors
Contractor Worker Grievance Mechanism	Worker dispute or grievance mechanism implemented by Contractors for their workers and subcontractors. TAP Industrial Relations Function will interface and assist with resolution as required
Direct Reporting Line	Employees direct management reporting. In-country Grievance Coordinator shall have direct reporting lines to Project Manager or in-country Environment and Social Manager
ESMS	Environmental and Social Management System
Functional Reporting Line	Employee's functional management reporting. In-country Grievance Coordinator has a functional reporting line to Social Performance and Grievance Advisor
Grievance	A concern or complaint raised by an individual, a group within affected communities or any other stakeholder resulted from either real or perceived impact caused by TAP's or Contractor activities or operations. TAP Grievance Management Framework considers both concern and complaint as grievances that are subject to grievance management process.
Grievance Resolution Process	Grievance management steps outlined in Grievance Administration Flow and approved by in-country grievance management procedures.
Grievance Task Force	Ad-hoc team tasked with resolving high risk/severity grievances, led by Country Manager or Project Manager. Includes the Community Liaison Coordinators (CLC's), Contractor Liaison Officers (CLO's), Social Field Monitors (SFM's), in-country Grievance Coordinators and Social and Grievance Performance Advisor
Incident	An incident is related to Health, Safety and Environment (HSE) and described as "A grievance related to a discrete event which leads to, or had the potential to lead to, injury, and loss of life, damage to assets (including non-TAP assets) or to the environment." Incidents will be handled according to Project ESSH Incident Procedure
Project	Trans Adriatic Pipeline Project
Project Countries	Albania, Greece, Italy and Switzerland
Request	A request is normally neutral engagement and indicates that the stakeholder is asking for information or possibly some material assistance or a certain precaution action, but implies nothing about their attitude to the Project.
Severity	The degree in which a stakeholder or Project will experience change or consequence of an action or activity. The severity rating of a grievance is based on the potential consequence (actual or potential) of the grievance in relation to various impacts.

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Stakeholder and Grievance Management Tool

An electronic software program that enables TAP to effectively record, track and manage third party grievances as they arise and facilitates real time information flow to relevant TAP and Contractor work-streams

TAP Worker Grievance Mechanism

Refers to TAP HR dispute resolution mechanism for TAP employees

Third Party

Includes but not limited to general members of public, residents of impacted communities, project affected people (PAPs), institutional stakeholders and other parties that wish to address their concerns and complaints to TAP and its Contractors in all project locations

Third Party Grievance Mechanism

The grievance process implemented by TAP for addressing/managing/resolving external stakeholder grievances. "Third Party" definition is inclusive but not limited to general members of public, residents of impacted communities, Project affected people (PAPs), institutional stakeholders and other parties that wish to address their concerns and complaints to TAP and its Contractors in all Project locations.

Third Party Grievance Procedure

Detailed description of scope, roles and responsibilities, timeframes and work processes by which TAP receives, investigates and addressed received grievances, including concerns, complaints and requests. There are three country-specific third-party grievance procedures (Albania, Greece and Italy).

Third Party Worker


All parties who are not direct TAP employees, Secondees or Shareholders and for whom separate contractual obligations, conditions and processes apply

Worker

A person who has employment contract with TAP, its Contractor or Sub-Contractor.


Work-stream Manager

A work-stream manager is the person responsible for delivering a specific work scope, the work-stream manager is the single point of contact relating to the investigation and resolution of grievances stemming from their work scope. Work-stream managers will be responsible for assigning resources to investigate a grievance and to propose remediation measures to resolve a grievance within GMF timeframes

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List of Acronyms and Abbreviations

CLC	Community Liaison Coordinator
CLO	Community Liaison Officer
CSR	Corporate Social Responsibility
Contractor GC	Contractor Grievance Coordinator (include TAP and Contractor)
E&S	Environmental and Social
ERP	External Review Panel
GC	TAP Grievance Coordinator
GM	Grievance Mechanism (include GMF and GP)
GMF	TAP Grievance Management Framework
GMT	TAP Grievance Management Team
GP	Grievance Procedure
GTF	Grievance Task Force
HR	Human Resources
HSS	Health, Safety and Security
IPMT	Integrated Project Management Team
LEA	Land Easement and Acquisition
LT	Leadership Team
PAP	Project Affected People
PD	Project Director
PEP	Project Execution Plan
SEI	Social and Environmental Investment
SEP	Stakeholder Engagement Plan
SFM	Social Field Monitor
SGMT	Stakeholder and Grievance Management Tool
TAP	Trans Adriatic Pipeline AG

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1. Introduction

1.1 Purpose

The Trans Adriatic Pipeline Grievance Management Framework (TAP GMF) outlines the principles of grievance management and defines the organisational structure and processes required to implement a functional, effective and culturally appropriate grievance mechanism that is responsive to stakeholder needs.

The purpose of this document is to explain how grievance management can be integrated into business processes and to guide Project country teams in setting up detailed grievance management procedures.

TAP GMF describes the steps in the grievance management process, recommends timeframes and required resources, and describes key roles and responsibilities in grievance management by TAP and its main Contractors.

TAP GMF recognises that there may be different national regulatory and/or cultural requirements, specific types of community and public concerns as well as internal organisational arrangements. It provides flexibility for in-country teams in how they address those differences through TAP's third-party and worker grievance procedures.

1.2 Scope

This document details the scope, principles, responsibilities and processes associated with the TAP Third Party and Worker Grievance Mechanisms. This Framework will also be used to guide TAP's Contractors to implement, monitor and evaluate their specific best practice compliant grievance management mechanisms¹.


The "Third Party" definition is inclusive but not limited to members of the public, residents of impacted communities, Project affected people (PAPs), institutional stakeholders and other parties that wish to address their concerns and complaints to TAP and its Contractors in all Project locations.

TAP's Third Party and Worker Grievance Procedures² are two different business processes and are managed by different work streams inside the TAP organisation.

TAP Third Party and Worker Grievance mechanisms do not replace any national and international recourse channels including independent legal advice, national judicial system and any other alternative complaint and dispute resolution mechanisms available to project affected people and other stakeholders.

¹ Worker Grievance Mechanism is a Dispute resolution process led by TAP HR and the Industrial Relations Functions if related to external 3rd party contractors.

² Each Construction Contractor is required to implement its own third party and worker grievance mechanism to manage its construction related grievances and complaints.

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The Grievance Management Framework provides TAP and its Contractors with a defined basis from which to implement this business process including:

- Public information disclosure of TAP grievance management process
- Receipt and acknowledgement of complaints and concerns that are classified as grievances by TAP GMF
- First Tier or Internal Grievance Resolution process
- Second Tier or External Grievance Resolution process also known as process of mediation or arbitration
- Reporting, monitoring and evaluation of addressed grievances and
- Process of periodic reviews of TAP GMF and grievance procedures

1.2.1 Scope inclusions

The grievance management framework outlines the grievance mechanism to be implemented in all phases of Project implementation, including pre-construction, construction and post-construction phases. It applies to all TAP Project activities in Albania, Greece, Italy and to TAP headquarter in Switzerland (including offshore activities).


This document gives an overview of the TAP third party and the worker general grievance management processes and describes the requirements for the implementation of the Contractor third party and worker grievance mechanisms. The country specific grievance management procedures for Albania, Greece and Italy are referenced in this document.

1.2.2 Scope exclusions

The detailed third party and worker grievance procedures to be implemented by the Contractors across all operating countries are separate documents and not included here, nor are these documents referenced.

1.3 References

TAP-PRM-PL-0003	Project Execution Plan
AAL00-PMT-601-Y-TPG-0001	Albania Third Party Grievance Procedure
GAL00-PMT-601-Y-TPG-0001	Greece Third Party Grievance Procedure
IAL00-PMT-601-Y-TPG-0001	Italy Third Party Grievance Procedure
CAL00-RSK-601-Y-TTM-0001	ESMS Framework Document

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2. Key principles and guiding standards

The key principles followed in implementing TAP GMF are:

- **Appropriate to the TAP Project scope:** The Grievance Framework must be formalised in proportion to the level of potential risks and potential adverse impacts on affected communities, stakeholders and workers posed by the TAP Project;
- **Culturally appropriate:** to TAP's operating Countries and reflecting the ways in which each community handles their concerns;
- **Accessible:** to all workers through Worker Grievance mechanism and to all members of the public, project affected people, individual and institutional stakeholders through Third Party grievance mechanism at no cost and with no retribution and with possibility to access all available alternative grievance resolution remedies recognised by the Project and national and international legal systems;
- **Clearly communicated:** the TAP GMF and associated grievance Procedures will be communicated through appropriate and relevant channels in the operating countries;
- **Transparent, fair** and with clear grievance resolution accountabilities

TAP and its Contractors' internal grievance resolution process shall be aimed at effective grievance response based on above principles. However, if complainants are not satisfied with the outcomes of the Tier 1 resolution of medium or high severity grievances, their grievances may be referred to an External Review Panel (ERP) for additional review.


Stakeholders may appeal to independent legal advice or approach any other third-party complaint mechanisms to address their grievances at any time. These third-party mechanisms may include legal system of the operating country, industry ombudsman and TAP's lender grievance mechanisms where applicable. In the event of such third-party involvement, TAP will cooperate with these entities via the Grievance Task Force which will represent TAP.

In addition to the GMF TAP is committed to managing its impacts according to best practice standards such as Lender Institution performance standards. Therefore, standards applicable to TAP's Project are the International Finance Corporation (IFC) Environmental and Social Performance Standards (2012), the European Bank of Reconstruction and Development (EBRD) Performance Requirements, specifically:

- PR 1 Management of Environmental and Social Impacts
- PR 2 Labour and Working Conditions
- PR 5 Land Acquisition, Involuntary Resettlement and Economic Displacement
- PR 10 Information disclosure and Stakeholder Engagement

and in the International Finance Corporation (IFC) Performance Standards, specifically:

- PS 1 Assessment and Management of Environmental and Social Risks and Impacts
- PS 2 Labour and Working Conditions
- PS 4 Community Health, Safety and Security
- PS 5 Land Acquisition and Involuntary Resettlement
- PS 8 Cultural Heritage.

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3. Grievance Management Framework


3.1 Objectives

The objective of this GMF as a guidance document is to ensure that TAP, at both corporate and operational levels, is aware of and responds to stakeholder concerns in TAP's operating countries (Albania, Greece, Italy and Switzerland). This Framework is designed to empower TAP's employees and its Contractors to successfully and effectively manage grievances and complaints.

To achieve this TAP will ensure that it:

- Handles grievances in accordance with this grievance management framework and country-specific grievance procedures, giving due consideration to confidentiality and legal requirements
- Undertakes to assess each complaint and grievance objectively and to fully investigate all issues
- Remedies impacts, address causes and takes all required actions
- Monitors grievance resolution and keeps stakeholders informed of the progress and outcomes of the grievance remediation process
- Develops training and implements procedures which will ensure that all TAP employees and its Contractors comply with this GMF
- Follows established reporting requirements related to grievance management and ensures that all high severity, Code of Conduct, Security and Safety complaints and grievances are given due priority
- Ensures that TAP General Counsel and Legal Department are properly informed and consulted on any grievances which have legal ramifications and
- Publishes the Third-party Grievance Mechanism in TAP's operating countries using appropriate and easily accessible avenues.

In addition, the GMF provides important management information. It enables TAP to identify emerging stakeholder and community concerns and to address these proactively through its project planning and operations.

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3.2 Core elements



Legend
Processes
Organisation
TAP Culture
Foundation

3.3 Culture and Commitment


To enable successful implementation of the Grievance Management Framework TAP engages with its stakeholders and uses the process of addressing grievances as an opportunity to add value to the TAP way of doing business. Equally, TAP Management fosters a culture of transparency and responsibility amongst its employees and Contractors towards all external stakeholders.

3.4 Process

It is important both for TAP and its Contractors to implement the process of managing and resolving grievances. To this end, TAP and its Contractors will manage grievances and complaints related to their specific activities. This means that TAP will manage grievances related to Securing Land Access (SLA) and all other activities associated with gaining and maintaining Social License to Operate. The Contractors will manage grievances and complaints relating to the construction activities and third-party (contractor) employees.

3.5 Organisation

To support the implementation of the TAP Grievance Management mechanism (GM) that is comprised of TAP GMF and three in-country grievance management procedures (GPs), a grievance support structure and a grievance management system are required. The grievance support comprises of the grievance management team, the multidisciplinary ad-hoc Grievance Task Force (GTF) and External Review Panel. These are discussed below.

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The grievance management team may include but is not limited to:


TAP organisation	Contractor organisation:
<ul style="list-style-type: none"> ▪ In-country Project Manager ▪ Environment and Social Compliance Manager (Baar) ▪ In-country E&S Manager ▪ In-country Grievance Coordinator (GC) ▪ Social Performance and Grievance Advisor (SPGA) ▪ Land Management Manager ▪ Stakeholder Engagement Manager ▪ In-country Social Expert ▪ Community Liaison Coordinators (CLCs) ▪ Social Field Monitors (SFMs) ▪ Other functions and departments (work streams) responsible for resolution of specific types of grievances 	<ul style="list-style-type: none"> ▪ Project Manager ▪ Construction Manager ▪ E&S Manager ▪ Social Manager ▪ Community Liaison Officers (CLOs) ▪ Grievance Coordinator (GC) ▪ Other functions and departments (work streams) responsible for resolution of specific types of grievances.

The GTF is an ad-hoc multidisciplinary team established to manage the resolution process for high severity or high-risk grievances or grievances filed by complainants via alternative grievance mechanisms where TAP needs to be represented in the resolution or review process. This team will be led by the respective in-country Project Manager and supported by the TAP Legal & Compliance Department, depending on the nature of the grievance. The task force will ensure that the resolution of these types of grievances is given maximum priority and that further risk is avoided. The GTF members may include:

- Project Manager (as required)
- Country Manager (as required)
- In-country Grievance Coordinator
- Construction and Engineering Manager
- In-country E&S Manager
- CLC, CLO or SFM depending on the case
- In-country Legal and Compliance Officer
- The Social Expert/Manager and
- Social Performance and Grievance Advisor.

In addition to the internal TAP grievance management team and multidisciplinary GTF, an ERP may be asked to review the Tier 1 process of medium or high severity grievances where complainants are not satisfied with the proposed resolution.

The TAP Project level third-party grievance mechanism is supported by the online Stakeholder and Grievance Management Tool (SGMT) which is an electronic software program that enables TAP to effectively record, track and manage third-party grievances as they arise and facilitates real time information flow to relevant TAP and Contractor work-streams. The SGMT enables grievance management


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teams to access grievance records, monitor performance data, understand and analyse grievances and their impact over the course of the Project.

Personal data contained in the SGMT will be kept only as long as it is necessary to investigate the complaint, implement a resolution and monitor situation at post closure stage. Personal data will then be either deleted or modified and transferred to an archive for a reasonable period pursuant to TAP's Data Privacy Policy (TAP-PRM-PO-0001).

The SGMT also supports the Contractors' third-party grievance management process. This means that each Contractor will have dedicated access to the grievance management tool to record, track and manage its grievances. Each Contractor will have access to grievance data related to their activities only.


The SGMT will not be used to record or manage the TAP Employee Dispute Resolution process. This resolution process will be managed according to the TAP Employment and HR Framework and the associated HR management tools.

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4. Roles and Responsibilities

This section provides an overview of the roles and responsibilities to support the grievance management framework. These roles and responsibilities are aligned with the TAP Accountability and Interface Framework document.

Role	Responsibility
Project Director (TAP Headquarters)	Overall accountable for Project implementation including grievance work stream
TAP E&S Manager (TAP Headquarters)	Budget and decision-making support for grievance management work-stream. Review Grievance Framework and Procedural documents. Over-see Expert Review Panel and approve specialist involvement for E&S grievances
Social and Grievance Performance Advisor (SGPA)	Facilitate timely resolution of grievances in all Project countries. Provide capacity building support to in-country Grievance Coordinators. Advise on specialist engagement for Environmental and Social grievances. Analyse trends and prepare reports on grievance management progress. Initiates External Review process and obtains clearance from TAP E&S Compliance Assurance Manager.
In-country Grievance Coordinators (GC)	Responsible for ensuring effective operation of grievance management process including registration, investigation and resolution of grievances. Conduct grievance reporting. Submits proposals for and requests external review process by External Review Panel.
TAP Human Resources Department (HR)	Responsible for ensuring transparent employment practices at TAP and ensuring a clear and well communicated complaint/grievance process for TAP employees.
Industrial Relations Manager (IR)	Support workers grievance process both within TAP and Contractors. Represent TAP in discussions with Contractors relating to workers grievances which may affect TAP or pose a risk to TAP
Community Liaison Coordinators (CLC)	Public Interface. Communicate grievance management process to communities. Monitor Contractor grievance management. Grievance reporting and resolution monitoring.
Social Field Monitor (SFM)	Communicate grievance management process to communities. Provide grievance management assistance to GC as required. Monitor Contractor grievance management. Grievance reporting and resolution monitoring.
TAP Grievance Management team (GMT)	Tier 1 resolution process, normally comprised of in-country Grievance Coordinator, Social Performance and Grievance Advisor and responsible work streams.
Grievance Task Force (GTF)	Tier 1 grievance resolution team established to manage High Severity/Risk grievances and represent TAP in external grievance resolution process initiated by stakeholders known as 3 rd Tier grievance review.
LEA Interface Advisor	Responsible for coordinating the resolution of LEA specific information requests.


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Role	Responsibility
External Review Panel (ERP)	Tier 2 grievance resolution process involving external expert party to review outcomes of Tier 1 medium or high severity grievance process where complainants are not satisfied or question the outcomes and request additional mediation or arbitration.

4.1 Responsibility of TAP Work-Streams

Relevant work-stream managers within TAP and Contractor organisations will be responsible for first-tier resolution of grievances in coordination with the TAP Grievance management team. It is expected that work-stream managers will assign the human, financial and logistical resources to resolve grievances in a transparent and timely manner.

Work-Stream	Responsibility
Technical and Design Assurance and Support (TD)	Address grievances related to engineering design, Project layout, routing activities for both off-shore and on-shore engineering works. Construction related grievances will be addressed by the Contractor with TAP's input.
Land Management (LEA)	Address grievance related to land easement and acquisition activities.
Livelihood Restoration (LHR)	Address grievances related to livelihood restoration activities
Health, Safety, Security and Quality Assurance (HSS, Q&A/Q&C)	Manage all incidents related to HSSQA and as covered in TAP's Incident Management System (TAP-HSE-PR-0011)
Environmental and Social Performance (E&S)	Address grievances related to alleged breaches made in TAP's Environmental and Social Impact and Performance commitments.
Industrial Relations (IR)	Lead TAP's management/investigation of industrial relations grievances stemming from the Contractor's employment, human and community rights practices.
Legal and Compliance	Lead processes which have a legal ramification for TAP. The Compliance function will lead the investigation and resolution of grievances resulting from alleged breaches in TAP's Code of Conduct, Anti-Bribery and Ethical behaviour commitments.
Stakeholder Engagement (SE)	Address grievances related to access to Project information and stakeholder engagement which may impact long-term relationships.
Social and Environmental Investment (SEI)	Address grievances resulting from alleged breaches in TAP's SEI, CSR and Community Investment Commitments.
Finance and Accounting	Support grievance related payments, as necessary.

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5. TAP Grievance Management Process: Overview

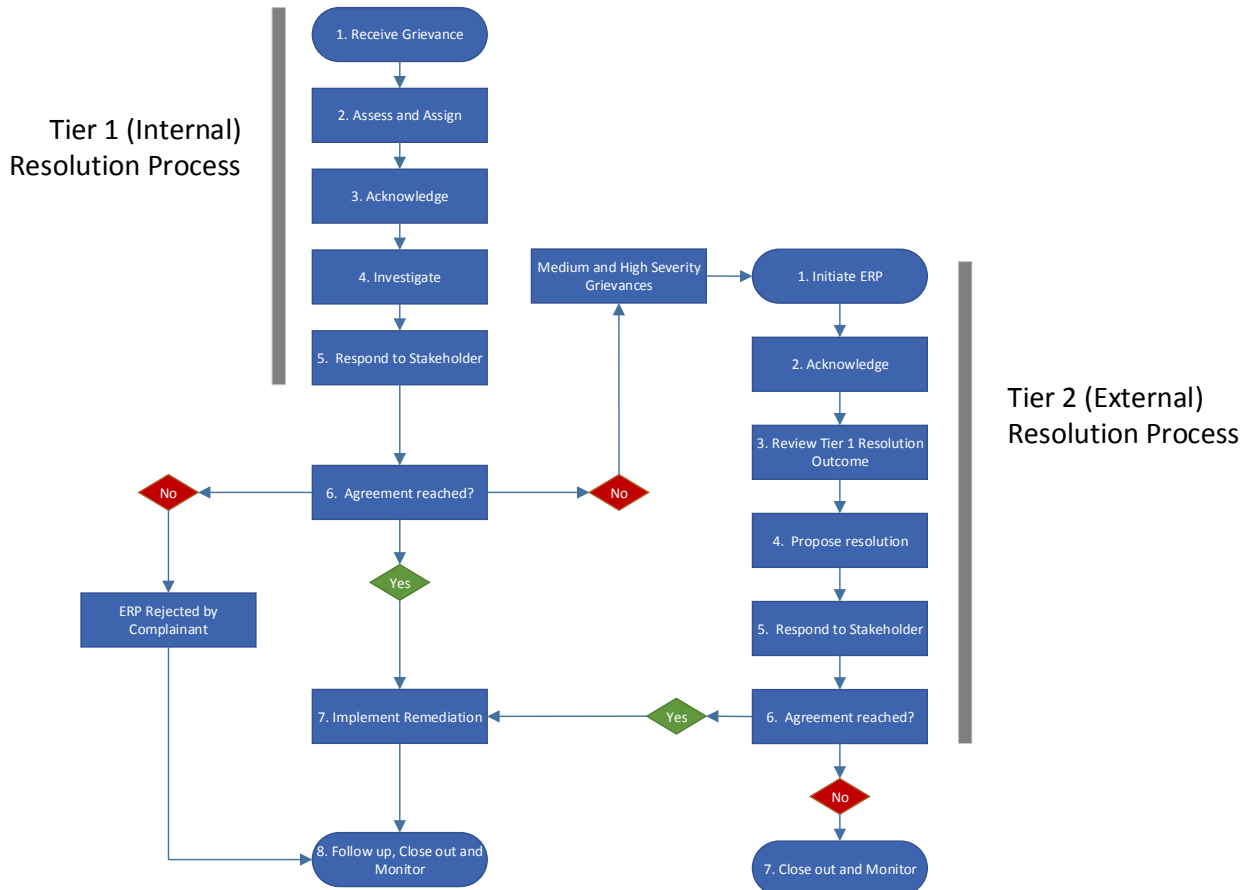



Figure 1: TAP Grievance Management Process: Overview

The Figure 1 outlines the Two-Tier grievance management approach adopted by TAP. Internal grievance resolution process and external review are further detailed in this document. Each Tier is comprised of specific administrative steps and associated timeframes required for grievance resolution.

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6. Third Party Grievance Process: Tier 1

Practical implementation of the TAP GMF will be achieved through country specific third-party and worker grievance procedures. The grievance resolution procedure differs in each of TAP's operating countries according to the prevalent way of working. The implementation of the Worker Grievance Mechanism will be led by TAP Human Resources and will follow the process outlined in Section 8 of this document.

The specific grievance procedures for each country are detailed within the following documents:

- TAP-ESM-PR-0001 Albania Third Party Grievance Procedure
- TAP-ESM-PR-0002 Greece Third Party Grievance Procedure
- TAP-ESM-PR-0003 Italy Third Party Grievance Procedure

The shared components of the grievance resolution process are outlined below.

6.1 Receiving Grievance


Stakeholders will be able to submit grievances in Albanian, English, Greek, Turkish and Italian. Stakeholders will have the ability to submit grievances anonymously and TAP will keep the grievance resolution process confidential. Grievance will still be considered and addressed. Stakeholders will be able to submit a grievance in the following ways:

- By speaking to a TAP or Contractor employee
- By speaking directly to a TAP or Contractor CLC or SFM
- By submitting an online grievance form on the TAP grievance website page
- By submitting a completed grievance form in one of the grievance boxes in TAP's regional offices and/or the Contractors construction camps and/or work areas (Complainant can opt out from signing the carbon copy, which will not affect grievance registration and processing)
- By calling TAP's grievance hotline and
- By sending an e-mail, letter and/or fax to TAP.

The grievance hotline is operated from Monday to Friday, 9:00AM – 18:00PM by the in-country Grievance Coordinator. However, if a stakeholder leaves a grievance (in a voice-message) outside the operating hours or at weekends, the in-country Grievance Coordinator will attempt to contact the stakeholder within 3 working days of receiving the original message to record the details of the grievance. Any information request which comes through the grievance hotline will be recorded by the in-country Grievance Coordinator and passed on to the relevant work-stream to respond and communicate.

The in-country Grievance Coordinator is the focal point of grievance resolution and is responsible for ensuring the resolution process from receipt, through investigation, remediation and till closure with the support of different work streams as assigned by Grievance Coordinator.

The in-country Grievance Coordinator will be responsible for coordinating grievance support required from the TAP CLC's, SFM's and Contractor CLO's, who collect, report and communicate grievances as they occur. The in-country Grievance Coordinator will be responsible for assessing the severity of a

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grievance and assigning the grievance accordingly based on consultation with responsible work stream managers.

6.2 Assessing and assigning severity


Grievances are defined according to three severity levels: low, medium and high. The severity rating of a grievance is based on the potential consequence (actual or potential) of the grievance in relation to:

- Social and Environmental impact, including:
 - Health
 - Safety
 - Security
 - Livelihoods
 - Income
 - Amenity / Lifestyle
 - Access to services
 - Social Relations / Community Cohesion
 - Environmental quality
 - Natural resources
- Impact on TAP corporate reputation
- Impact on Project schedule

Categorization of severity may partially be determined by Complainant vulnerability: similar effects may impact differently on vulnerable and non-vulnerable households. Severity level is determined by the highest level of impact associated with the grievance. Each severity level is described in the Table 1 below:

Table 1: Grievance severity matrix


Impact	Consequence/ Severity		
	Low	Medium	High
Social and Environmental	Minimal impact, likely to have little real effect. Mitigation is easily achieved; compensation unlikely to be necessary.	Impact is real but not substantial or long-lasting. Mitigation is both feasible and easily achieved; compensation likely to be moderate.	Significant impact and potentially long-lasting. Mitigation is likely to be difficult: expensive, time consuming and requiring difficult negotiation; compensation may be significant.
Corporate reputation	No Impact	Local or Moderate Reputation Damage	Significant Loss of Shareholder/ Public Trust
Project schedule	No Delay	Moderate Delays	Significant Disruption
Input required for resolution	Local: frequently in-field discussion with complainant	Local/ National: may require technical input from relevant work stream and Project Manager decision	Project: may require Corporate level input and decision-making
Effect on construction and operations	No effect	May require some limited or local adjustment in construction planning and operations	May require substantial or widespread change in construction planning and operations

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6.3 Categorising grievances

To assist the Grievance Coordinator in correctly assessing and escalating grievances to the correct work-streams the following grievance categories have been identified:

- a) **Technical and Design Assurance and Support:** these grievances will result from engineering design planning activities which have a potentially negative impact on stakeholders
- b) **Construction:** these grievances will result from pipeline construction activities including dust, noise, vibration and any damages caused during construction. In addition, the following sub-categories will be employed:
 - b.1 Nuisance (dust, noise, vibration, light pollution, wastewater, etc.)
 - b.2 Accidental damage
 - b.3 Access roads construction
 - b.4 Reinstatement
- c) **Land Easement and Acquisition (LEA) activities:** these grievances will result from LEA and securing land access (SLA) activities. In addition, the following sub-categories will be employed:
 - c.1 Land entry process
 - c.2 Compensation rate/methodology dispute
 - c.3 Compensation payment delay
 - c.4 Land exit process
 - c.5 Boundary marking or boundary dispute
 - c.6 Land titling and ownership disputes
- d) **Livelihood Restoration activities:** these grievances will result from a failure to deliver livelihood restoration activities or from a failure of TAP affected stakeholders to restore their livelihoods. In addition, the following sub-categories will be employed:
 - d.1 LATS program acceptance / qualification
 - d.2 LATS – Farm support
 - d.3 LATS – Business support
 - d.4 Vulnerable assistance
 - d.5 Construction impact on agricultural productivity or animal welfare
 - d.6 Other livelihood impacts
- e) **Legal and Compliance:** Grievances with legal ramifications for TAP and those alleging breaches of TAP's Code of Conduct, Anti-Bribery and Ethical behaviour commitments
- f) **Social Conduct in the Communities:** these grievances will result from unfavourable interactions between TAP or Contractor employees in the community environment
- g) **Community safety and security:**
 - g.1 Transport: these grievances will result from transport related activities
 - g.2 Accommodation: these grievances will result from activities taking place around the Contractor camps or Contractor accommodation
 - g.3 Pipeline: these grievances will result from safety concerns expressed by individuals and communities located near pipeline construction sites.
- h) **Cultural Heritage:** these grievances will result from the failure to protect cultural heritage areas
- i) **HSSE Incidents:** any event which leads to or has the potential to lead to injury, loss of life, damage to assets (including non-TAP assets) or to the environment. These incidents will be managed directly by TAP's In-country HSSE Function
- j) **Environment:** these grievances will result from activities deemed detrimental to the local environment and biodiversity

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- k) **Employment:** these grievances will result from unclear employment practices either by TAP or the Contractors or alleged breaches in employment and Human Rights Practices. Employment grievances directed at TAP will be dealt with by the TAP Industrial Relations and Human Resources Department. The following sub-categories will apply:
- k.1 Recruitment
 - k.2 Retrenchment
 - k.3 Welfare
 - k.4 General HR
 - k.5 Remuneration and working hours
- l) **Stakeholder Engagement:** these grievances will result from a lack of stakeholder consultation or a general lack of information for community stakeholders
- m) **Corporate Social Responsibility³:** these grievances will result from the implementation of TAP's CSR or Community Investment activities
- n) **Multi-category grievances:** these grievances will result in two or more categories and require several work streams to address them
- o) **Extra-judicial letters:** these are formal letters submitted to TAP or Contractor by complainant's lawyers requesting immediate remediation actions before Complainant decides to use other legal or judicial channels. Such letters can relate to any of the Project execution activities and fall into any of the above described categories and are normally dealt by TAP's and/or Contractor's Legal functions.

6.4 Initiation of Grievance Resolution Process: Tier 1


The in-country Grievance Coordinator will initiate the grievance resolution process by assigning grievances for investigation to the relevant TAP work-stream or to the Contractor. The in-country Grievance Coordinator will provide the full grievance file (evidence trail) to the relevant work-stream manager to aid the investigation process. If appropriate, the in-country Grievance Coordinator will provide the relevant work-stream manager practical advice on how to manage the grievance.

6.4.1 Grievance management steps: Tier 1

Table 2: Grievance management steps: Tier 1

Step	Grievance Activity	Description
1	Receive	Receive grievances through all available avenues (phone, text, email, grievance forms, websites, Contractor, CLC, SFM's etc)
2	Assess & Assign	Assess whether grievance is related to TAP Assess severity (check for Stakeholder Engagement evidence) Assign to relevant work-stream
3	Acknowledge	Send Acknowledgement to stakeholder/complainant Provide outline of grievance resolution process

³ Questions or recommendations relating to strategic investment or TAP's broader Corporate Social responsibility (CSR) activities will be managed directly by the Commercial Department.

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Step	Grievance Activity	Description
4	Investigate	Relevant work-stream investigates grievance and proposes remediation measures
5	Respond to stakeholder	Discuss grievance remediation proposal with Stakeholder and detail implementation plan
6	Reach agreement with stakeholder	Stakeholder agrees - TAP & stakeholder agree terms of resolution. TAP implement remediation actions or pays grievance compensation if remediation is not feasible. Stakeholder disagrees – trigger Tier 2 External Review Process for medium and high severity grievances upon agreement with the Complainant
7	Remediation	Implement remediation actions and where remediation is not feasible compensate
8	Follow up, close out and monitor	Follow up on remediation, document closure and continue monitor as required


6.4.2 Applicable timeframes: Tier 1

Below timeframes are associated with TAP grievance management process. It is important to note that these timeframes are indicative and will be better defined once the grievance investigation process has begun. The in-country Grievance Coordinator will also inform the work-stream manager or GTF of the applicable timeframes in which a response and remediation measure needs to be defined to resolve a grievance.

It is also important to note that these timeframes may also vary according to complexity of each grievance. In case of outstanding resolutions, TAP and its Contractors will inform the Complainant about the reasons behind delays.

Table 3: Applicable timeframes: Tier 1

Action	Timeframe	Responsible
Register grievance in database	Within 7 working days	In-country Grievance Coordinator
Acknowledge Grievance	Within 7 working days	
Issue grievance rejection letter (if required)	Within 30 calendar days	
Issue grievance feedback explaining time required for resolution and on-going progress if not yet resolved	After 30 calendar days	
Issue grievance feedback when mitigation established within the assigned timeframes	30/60/90 days (see case and severity levels)	


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Approve and issue compensation payments	30 days after signing agreement	In-country Project Manager and responsible work-stream
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6.5 Implementing Remediation Measures and Close out

The in-country Grievance Coordinator will discuss the proposed remediation measure with the impacted stakeholder and come to an agreement on the appropriateness of the measure and the proposed timing of its implementation. In the event that the in-country Grievance Coordinator cannot discuss directly with the impacted stakeholder, the TAP CLC's or SFM's will hold this discussion. Once an agreement has been reached, the in-country Grievance Coordinator will ensure that this agreement is documented and recorded in the SGMT.

The in-country Grievance Coordinator will inform the relevant work-stream manager that remediation can proceed and request regional CLC or SFM to monitor the implementation of the grievance remediation measures on site to ensure feedback is received from the Complainant upon execution of remediation measure. The in-country Grievance Coordinator will close the grievance resolution process after the remediation measure has been successfully implemented, feedback received, and no further actions are required. Actions from all closed grievances will be verified within 30 days of their closure and feedback from Complainant received. This post-closure monitoring will aim at verification of remediation measure and its effectiveness to ensure that stakeholder has no residual issues.

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7. External Review Process: Tier 2

7.1 External review panel

The in-country Grievance Coordinator will have visibility and monitor outcomes of internal resolution process (Tier 1) and ensure that the External Review Panel (ERP) arbitration is initiated for:

- high and medium severity grievances that could not be resolved through internal Tier 1 grievance resolution process
- grievances where mutually acceptable resolution could not be reached.

The ERP is known as Tier 2 grievance management process supported by TAP with involvement of external expert party, the Complainant and TAP grievance management team. The composition of the ERP is decided on case by case basis depending on nature of the grievance requiring involvement of specialist advisors and endorsement of TAP management.


7.2 Initiation of Grievance Resolution Process: Tier 2

In-country Grievance Coordinator shall submit such grievances to TAP Social Performance and Grievance Advisor requesting to initiate the external review process and obtain all required internal approvals for setting up ERP. All grievances proposed for external review based on criteria described above will then be cleared with complainants to confirm their consent for external mediation or arbitration. During external review process, the Complainant will be actively involved into review together with external expert specialised in the subject of the grievance.

7.2.1 Grievance management steps: Tier 2

Table 4: Grievance management steps: Tier 2

Step	Grievance Activity	Description
1	Initiate External Review	External Review process is initiated by Grievance Coordinator via TAP Social Performance and Grievance Advsiior. All required approvals received and documentation on the process and outcomes of the Tier 1 resolution for external review prepared.
2	Acknowledge	Complainant is informed about additional mediation or arbitration process with their involvement and with support of external expert on the subject of the grievance agreed with the complainant.
3	External review of Tier 1 resolution outcomes	ERP will assess the investigation of the initial grievance and determine whether the Tier 1 outcome or proposed actions were appropriate, given the evidence provided.
4	Propose resolution	The ERP will issue results of verification process by external expert party either confirming outcomes of Tier 1 process or proposing alternative resolution where it finds that TAP has failed to redress the grievance.

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Step	Grievance Activity	Description
5	Respond to stakeholder	ERP notifies the stakeholder via in-country Grievance Coordinator about the outcomes of Tier 2 review
6	External review resolution agreement	The process of required engagement and approvals in case of new proposed resolution accepted by all parties
7	Close out and Follow up	Implement remediation, document closure, follow up and monitor

7.2.2 Applicable timeframes: Tier 2

Timeframes associated with the External Review Process (Tier 2) are provided below. It is important to note that these timeframes are indicative and will be better defined once the grievance investigation process has begun. It is also important to note that these timeframes will also vary according to the availability of external expert party and complexity of the grievance. In any case Grievance Coordinator will keep Complainant updated on the progress and timeframes.

Table 5: Applicable timeframes: Tier 2

Action	Timeframe	Responsible
Initiate external review process and obtain all required internal approvals	Within 30 calendar days since grievance closure by Tier 1 process	Grievance Coordinator and Social Performance and Grievance Advisor
Confirm Complainant's consent on external review process		Grievance Coordinator
Set Up External Review Panel (ERP)	Within 30 calendar days upon obtaining consent from the Complainant	Grievance Coordinator and Social Performance and Grievance Advisor
Issue external review resolution decision	Within 10 working days upon completion of external review	External Expert with support of Social Performance and Grievance Advisor and Grievance Coordinator
Implement agreed remediation measures	Dependent on the type of remediation and terms of agreement reached with the complainant	Responsible work stream within TAP or Contractor

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8. TAP Worker Grievance Mechanism

8.1 Management Principles

TAP's HR Strategy and Employment Policies govern the employment practices and workers conditions in the respective TAP operating Countries. These policies ensure that:


- TAP communicates its values and expected way of working
- TAP complies with all relevant legislation and minimises the risk of employment related claims
- TAP ensures the fair and transparent treatment of all workers
- TAP Management makes decisions which are consistent and predictable and
- TAP and its employees are protected from retribution.

8.2 Dispute Resolution

The TAP dispute resolution process is context-specific, allowing flexibility to resolve disputes quickly and effectively. This process is managed by the TAP HR Department and it is the TAP HR Department which provides guidance to employees on which steps to follow in the event of employment related disputes and grievances.

8.3 Industrial Relations

For worker disputes involving third parties (such as the Contractors), TAP has an Industrial Relations Function whose responsibility is to ensure that TAP meets its obligations in relation to Contract worker employment rights, relevant workers unions, Government employment and other relevant agencies. This Industrial Relations Function forms part of the TAP HR Department and works closely with the TAP Legal and Integrated Project Management Team (IMPT).

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9. Information Management

The in-country Grievance Coordinator is responsible for recording the individual grievance files (evidence trail) in the SGMT. This online management system will include both stakeholder engagement and grievance management modules. By having a single tool to manage both stakeholders and grievances⁴ TAP can better manage its impact and engagement process across its work areas as well as easily identify problem areas. In-country Grievance Coordinators will provide continuous input into the design and implementation of the grievance management tool. The in-country Grievance Coordinator will be responsible for ensuring the quality of all information recorded in the SGMT including Tier 1 and Tier 2 grievance resolution outcomes.

In situations where the grievance files are not complete it is the responsibility of the in-country Grievance Coordinator (supported by the TAP CLC or SFM) to follow up with the relevant stakeholders and to capture all required information. This information shall be recorded in the TAP SGMT.

TAP's Contractors will also use the TAP SGMT to manage construction related grievances and document stakeholder engagement records. TAP SGMT Data Analyst will provide support and administer the online stakeholder engagement and grievance management tool.

⁴ Even LEA Information Requests dealt with by the LEA Interface Advisor will be recorded in the Grievance and Stakeholder tool to ensure a single data source related to the management of grievances.

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10. Cost Recovery Process

If TAP is required to assist the Contractors to resolve a grievance (Medium or High Severity) and costs are incurred in providing such assistance, TAP and the relevant Contractor will come to an agreement on recovery of all costs incurred. This cost recovery process will be defined between the two parties, led by the TAP Legal and Procurement Departments.

The conditions which need to be met for TAP to provide assistance to the Contractor to manage grievances are as follows:


- The stakeholder requests a review of the Contractor's proposed remediation measure
- The Contractor remediation implementation fails
- The grievance or complaint re-occurs with greater negative consequences
- The grievance relates to accusations of breaches in TAP Code of Conduct, bribery, corruption and political interference⁵
- The grievance is rated a High Severity
- Difficult/Problematic Industrial Relations (e.g. strikes) grievances and
- The grievance is an HSSE incident.

10.1 Grievance Remediation Budget

It is expected that most grievances reported to TAP will occur during the construction phase and will relate to construction activities and therefore the Contractors will be responsible for implementation of required remediation measures. The Contractors are responsible for ensuring that they have a relevant grievance budget with which to implement grievance resolution.

For TAP related grievances filed throughout any phase of project implementation, the grievance mechanism will ensure that the relevant TAP work-stream has resources and personnel to implement grievance remediation measures based on TAP GMF and country specific grievance management procedures.

⁵ The Construction Contractor will immediately notify TAP of the occurrence of any activities related to breaches on the TAP Code of Conduct, or allegations of bribery, corruption and political interface. Any information provided on the above will be immediately sent to the respective Country Manager and the TAP Legal and Compliance teams in country and in Baar if required and investigated accordingly. The Construction Contractor will provide the necessary support to this investigative process.

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11. Publishing TAP Grievance Mechanism

To ensure that all stakeholders (including TAP's employees and contractors) are aware of how to access Project related information or have the knowledge of how to submit grievances (if required) TAP has published the grievance mechanism in each operating country and other appropriate avenues.

The following grievance submission information has been communicated on TAP website:

Grievance Submission: Greece

Email: grievancegreece@tap-ag.com

Postal address:

C/o TAP In-country Grievance Coordinator,
5, Chatzigianni Mexi Street 115 28 Athens, Greece

Telephone: + 30 210 7781881 or 800 11 81881 (local calls only)

SMS: + 30 6930918020

Fax: +30 213 010 4533

Grievance Submission: Albania

Email: grievancealbania@tap-ag.com

Postal address:

C/o TAP In-country Grievance Coordinator
Building No.12 (ABA Business Centre), 9th Floor, Office No.906, Papa Gjon Pali II Street
1010 Tirana, Albania

Telephone: + 355 69 60 98 188

SMS: +355 69 60 98 188

Fax: + 355 42 265 685

Grievance Submission: Italy


Email: grievanceitaly@tap-ag.com

Postal address:

C/o TAP In-country Grievance Coordinator
TAP Italia, Via Templari 11 – 73100, Lecce

Telephone: +39 0832 24971

Fax: +39 0832 249744

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12. Monitoring, Reporting and Reviews


12.1 Monitoring and Reporting

TAP is committed to preventing the reoccurrence of grievances and monitoring management of grievances and disputes as they occur. Therefore, the TAP Grievance mechanism will be subject to periodic reviews to eliminate systemic problems and to ensure that the resolution process is working efficiently and produces effective outcomes. Biannual external reviews of TAP GMF will take place. The overall grievance management performance will be monitored and evaluated against the indicators below.

Table 6: Grievance reporting indicators

Commitment	Indicator (the target is 100%)
Efficiency (Timely resolution)	<ul style="list-style-type: none"> ▪ Total number and percentage of grievances received, logged, acknowledged, processed, resolved and closed within set time frame of 30 days (low severity) and 60-90 days (medium and high severity) ▪ Number and percentage of grievances closed versus open ▪ Number and percentage of outstanding non-resolved grievances ▪
Trends (Qualitative data)	<ul style="list-style-type: none"> ▪ Number and percentage of grievances received per categories ▪ Number and percentage of grievances received per severity level ▪ Number and percentage of grievances resolved versus rejected ▪ Number and percentage of grievances per region/location ▪ Number and percentage of grievances per receiving organization (TAP and Contractors) ▪
Effectiveness (Awareness, usage, satisfaction of complainants)	<ul style="list-style-type: none"> ▪ Number and percentage of stakeholders satisfied with solution ▪ Number and percentage of stakeholders satisfied with level and timing of information they received during a grievance process ▪ Number and percentage of cases requesting external review or alternative third-party arbitration
Contentious improvement (Commitment to integrate procedural lessons learned)	<ul style="list-style-type: none"> ▪ Qualitative indicators shall be reported monthly and include root cause analysis, specific case examples and lessons learned.

The above listed indicators will be used by TAP Grievance management teams in preparation of weekly and monthly reports. The regular grievance reporting, and analysis shall inform TAP Project Management in trends and lessons learned and may trigger revisions to the grievance mechanism and TAP's Grievance Framework more broadly. TAP will also monitor the efficacy and relevance of the Third-Party Grievance Mechanism and make adjustments to the procedures and the grievance management tool, as required.

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13. Contractor Grievance Responsibilities


Whilst TAP has overall accountability for all its activities and operations in the Project, the Contractors have specific responsibilities in relation to managing third-party and worker grievances arising from their activities. These responsibilities include:

- Implementing Contractor Specific Third-Party and Worker Grievance Mechanisms in line with TAP's principles and procedures governing Grievance Management Framework
- Providing adequately trained and experienced grievance management personnel for resolving and managing grievances
- Cooperating closely with TAP's grievance management team including weekly coordination and monthly grievance reporting
- Consulting TAP on the management and resolution of Medium Severity grievances caused by Contractor's activities
- Managing High Severity grievances caused by Contractor's activities jointly with TAP's Grievance Task Force and Contractor grievance team under close supervision of Project Managers on both sides. The Contractor will participate in the third party/external mediation process or any judicial processes required. All costs incurred for and resulting from the TAP resolving such grievances will be recovered through an agreed cost recovery process with the Contractor
- Implementing the agreed remediation measures resulting from grievances which have been resolved by a Third-Party Arbitration procedure or judicial grievance resolution mechanism. The Contractors will solicit advice and support from TAP's Grievance Management team to ensure full compliance
- Compensating for any damages caused by their activities and implementing adequate remediation measures for such damages. The Contractor will solicit guidance and support from TAP (even for low severity grievances – if required) prior to undertaking remediation measures or compensation payments where remediation is not feasible, to ensure that all applicable principles and procedures are followed
- Should TAP have to compensate for damages caused by a Contractor due to the relevant Contractor not having a resolution mechanism in place or in the event of the Contractor being too slow to respond, such costs will be recovered through an agreed cost recovery process with the Contractor
- Registering and documenting Contractor's grievances in the TAP SGMT for monitoring and reporting purposes.

13.1 Third-Party Grievance Management - TAP and Contractor Interface

To ensure a transparent, easy to follow and understandable grievance management process, interfaces are required between the TAP and Contractor grievance management teams. The following interface process shall be in place once Contractors are mobilised:


- In-country Grievance Coordinator establishes a weekly grievance update process to review new grievances, progress of on-going resolution process, follow up and monitoring of agreed

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resolutions and close out of grievances with support from TAP CLC's and SFM's. Similar process shall be encouraged by Contractor grievance team

- Contractor grievance management team updates TAP In-country Grievance Coordinator on status of their grievance resolution via their weekly and monthly reports
- TAP related grievances are managed according to the process described in this document and the country specific grievance management procedures
- Contractor related grievances are managed according to the Contractor's Third-Party and Worker Grievance Mechanisms. In the cases where the Contractor is unable to effectively manage grievances, TAP's grievance management team provide assistance to the Contractor.

Contractors will conduct regular assessments of their Third-Party and Worker Grievance Mechanism to ensure that these mechanisms are up to date and adequate to manage grievances. These assessments will also include regular audits conducted by TAP Grievance Management team.

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14. Changes since last revision