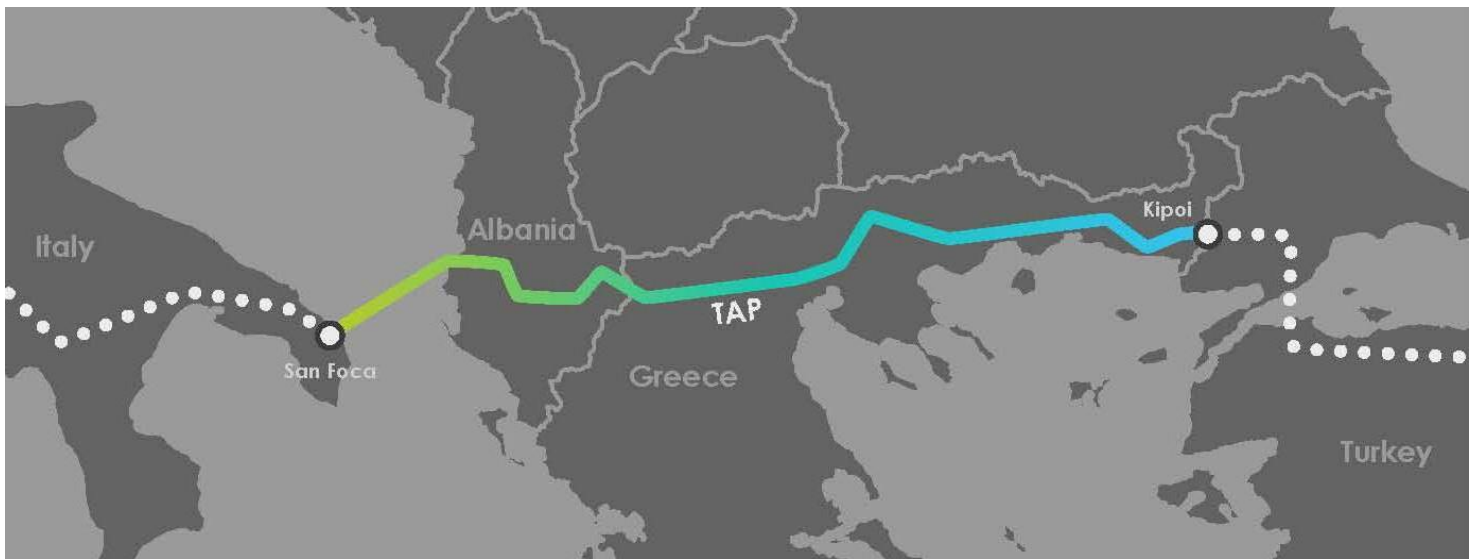




Trans Adriatic
Pipeline



Greece Stakeholder Engagement Plan

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List of Acronyms and Abbreviations

CCP	Contractor Control Plan
CLC	TAP Community Liaison Coordinator
CLO	EPC Contractor Community Liaison Officer
CO	Country Office
CSO	Cadastral Survey Office
CSR	Corporate Social Responsibility
EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
EPC	Engineering, Procurement, and Construction Contractor
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
EU	European Union
GA	Government Affairs
GIS	Geographic Information System
GLAC	Guide to Land Easement, Acquisition and Compensation
HGA	Host Government Agreement
IFC	International Finance Corporation
IPMT	Integrated Project Management Team
IPRO	Immovable Property Registration Offices
KP	Pipeline Kilometre Point
KPI	Key Performance Indicator
LEA	Land Easement and Acquisition
LGU	Local Government or Administrative Unit
LM	Land Management
LRF	Livelihood Restoration Framework
LRP	Livelihood Restoration Plan
MoEE	Ministry of Environment and Energy
MoM	Minutes of Meeting
NGO	Non-Governmental Organisation
OECD	Organisation for Economic Co-operation and Development
PAPs	Project Affected People
PR	Performance Requirement
RoW	Right of Way
RSIP	Route Social Impact Plan
SEAP	Stakeholder Engagement Action Plan
SEI	Social and Environmental Investment
SEP	Stakeholder Engagement Plan
SFM	TAP Social Field Monitor
SGMT	Stakeholder and Grievance Management Tool
SIMP	Social Impact Management Plan
SLA	Secure Land Access
TAP	Trans Adriatic Pipeline
TEP	Tier 1 Engagement Plan

1. Introduction

1.1 Purpose and Objectives of the SEP

This Stakeholder Engagement Plan (SEP) provides the framework for external stakeholder engagement in the Greek section of the Trans Adriatic Pipeline (TAP) project and is aligned with TAP's Stakeholder Engagement Strategy.

This is a live document and will be updated as needed. This issue of the SEP focuses mostly on engagement planned during the construction stage.

The specific objectives of this SEP are to:

- Provide an outline of planned stakeholder engagement during the construction stage of the project, in line with project standards, and indicate how the plan will be updated in preparation for operations.
- Ensure regular, accessible and transparent consultation with stakeholders.
- Build constructive, long-term relationships, based on two-way dialogue and communication aimed at attaining broad community support among affected communities.
- Provide the framework for ongoing stakeholder identification, analysis, mapping and prioritisation; consultation and engagement; risk and issue identification; information sharing; and documentation of engagement and required follow-up actions.
- Build on previous engagement efforts during the Environmental and Social Impact Assessment (ESIA) and Land Easement and Acquisition (LEA) phases by introducing suitable mechanisms for sharing information and receiving feedback, acknowledging key issues raised by stakeholders, assisting TAP to understand stakeholder expectations and facilitating stakeholder input relating to the project.
- Define the roles, responsibilities and resources necessary to implement the SEP, including the procedures to monitor and follow up on stakeholder feedback and grievances.

1.2 TAP Engagement Commitments

In Greece, TAP has committed to the following specific actions:

- Promoting meaningful engagement in Greece.
- Ensuring the contents and actions covered in the SEP are understood by all Stakeholder Engagement Functions in Greece, including field staff.
- Ensuring key national, regional, and local stakeholders affected by the pipeline as well as other stakeholders who have an interest in TAP, its impacts, benefits and opportunities are identified.
- Engaging with these stakeholders in a dialogue on social, environmental, safety, security and other relevant issues through regular, free, prior and informed consultations.
- Disclosing relevant project information to stakeholders.
- Promoting awareness and understanding of TAP's Stakeholder Engagement process, ensuring an open, two-way flow of information, transparency and accountability.
- Ensuring compliance with the Stakeholder Engagement Strategy and other TAP Management System documents that relate to stakeholder engagement.
- Ensuring compliance with project standards.
- Providing the necessary training to internal parties on topics related to stakeholder engagement.

2. Project Stakeholders

2.1 Stakeholder Identification

Stakeholder identification has been, and will continue to be, carried out with the objective of establishing which individuals and organisations may be directly or indirectly affected (positively and negatively), by TAP's activities or may have an interest in or influence on the project.

As part of the TAP stakeholder identification process, the following were taken into account:

- TAP's potential impacts during construction and operations.
- What type of stakeholder engagement is mandated by law and project standards.
- Who is likely to be affected (directly or indirectly) by potential impacts in the project's area of influence.
- Who are the vulnerable groups requiring special engagement efforts.
- Who supports or opposes the changes that TAP's activities and projects will bring and why.

TAP stakeholders identified in accordance with the above fall into one of the following groups:

- **Directly affected population:** including all owners and users of land and other resources affected by project land access.
- **Project affected Communities:** including residents of communities in the project area of influence¹.
- **Vulnerable groups:** stakeholders affected directly or indirectly by project land access who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, refugee/migrant status, age, disability, economic disadvantage or social status, may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits. This may include women, ethnic minorities, children, young people, the elderly/retired, single-headed families, households with low income, disabled people, households with no legal rights to land, or households dependent on limited land of low productivity.
- **National government:** government ministries, state agencies, parliamentary committees, regulators.
- **Regional and municipal government:** including the three decentralised governments of Eastern Macedonia and Thrace, Western Macedonia and Central Macedonia; 13 regional units; 31 municipalities and 145 local communities.
- **Public authorities:** education, health, hospitals, civil protection, ports.
- **Local businesses and operators, agricultural institutions / associations**
- **NGOs, civil society:** national and international NGOs and associations.
- **Media:** TAP has attracted considerable national, regional and local media attention and communicates regularly with journalists.

Early in the project, TAP developed a Stakeholder and Consultation Database as a tool to maintain the list of individual stakeholders identified in each group above and to help manage relationships with them. This database documented stakeholders' specific interests in the project, as well as issues, concerns and relevant questions raised during consultation. The system recorded Minutes of Meetings (MoMs), information on meeting agendas,

¹ Communities within the area impacted (directly and indirectly) by the project including the supporting facilities operated by EPC contractors.

attendance, questions and answers, decisions and information disclosure, as well as management of actions and commitments.

In early 2016, TAP decided to revise the stakeholder management system and engaged a specialist database development consultant to devise an enhanced stakeholder database. This revised system has been integrated with TAP's Grievance Management process and is known as the Stakeholder and Grievance Management Tool (SGMT). Its operation is based on inputs by the in-country stakeholder-facing functions and managed by a dedicated Stakeholder Database Analyst based in Baar, Switzerland, together with the Grievance Advisor in Greece who manages the grievance component of the system.

The SGMT:

- Details the various stakeholders and stakeholder groups.
- Details any consultations or formal meetings held and information provided.
- Comprises a record of specific grievances lodged and the status of their resolution.
- Incorporates an automated stakeholder mapping function.

The SGMT also prioritises stakeholders and tracks issues through to closure. The SGMT is used to systematically document detailed information on stakeholders and record engagement sessions, meetings and outcomes based on information fed into the database. Where data is entered by contractors, the in-country social experts will review these entries.

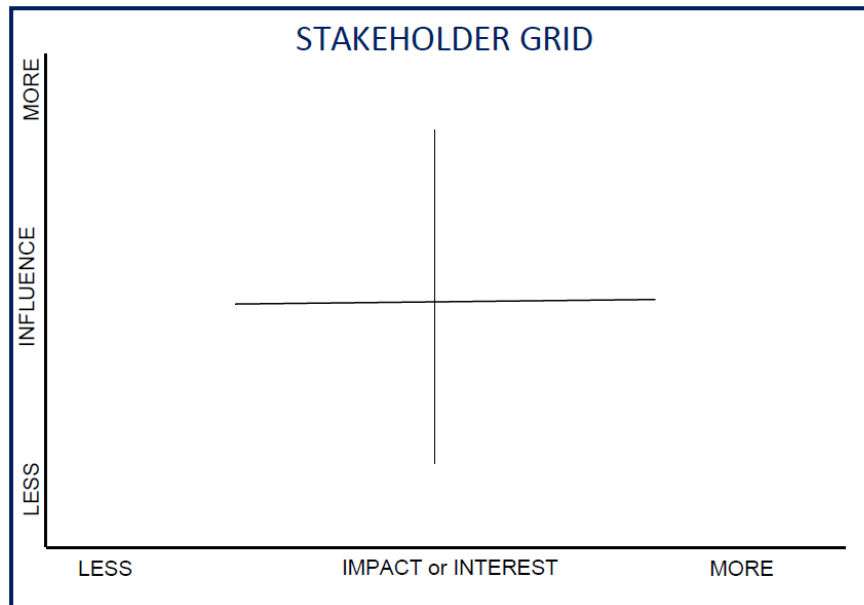
2.2 Stakeholder Analysis, Mapping and Prioritisation

To define stakeholder relationships, stakeholder vulnerability, their importance to TAP and stakeholder influence on TAP's activities, stakeholders are assessed and mapped according to influence, interest and the degree of potential impact. The Greece country team has developed regional stakeholder maps and related stakeholder registers. The objective of this stakeholder mapping exercise has been to improve the efficiency and effectiveness of proactive and reactive engagement, and to identify any potential risks and issues that TAP may face. This approach also helps TAP understand the stakeholder interfaces, stakeholder issues, set priorities, and decide on specific techniques for achieving effective stakeholder participation.

The matrix presented below is used during stakeholder mapping to determine the importance of the various stakeholders. The matrix has helped the classification of the stakeholders and the definition of the degree to which a stakeholder is affected/impacted or can impact the project. Alignment on the vertical axis indicates the ability of stakeholders to influence the project or other stakeholders.

Impact or interest, along the horizontal axis, refers to the degree to which stakeholders are interested in the project (the amount of involvement).

Figure 2.1: Stakeholder Prioritisation Matrix



Stakeholder mapping guides the degree of effort required in working with the stakeholder on an ongoing basis. After prioritising stakeholders, the information is used to determine the degree to which TAP interacts with each stakeholder.

TAP recognises that there is a continual need to maintain and update the list of individual stakeholders and their ranking to inform TAP’s interactions with these stakeholders as the project proceeds through the various implementation stages. In doing so, TAP is committed to respecting people’s privacy and the confidentiality of personal data. Regular outreach to all stakeholders is planned to identify additional interested parties, identify any potential gaps in coverage and update the list.

The mapping described above is being transferred into the SGMT which will be used by TAP to automate stakeholder mapping updates, based on ongoing stakeholder activity, their interaction with the project and the stakeholder engagement activities as recorded by the stakeholder engagement team’s inputs to the SGMT.

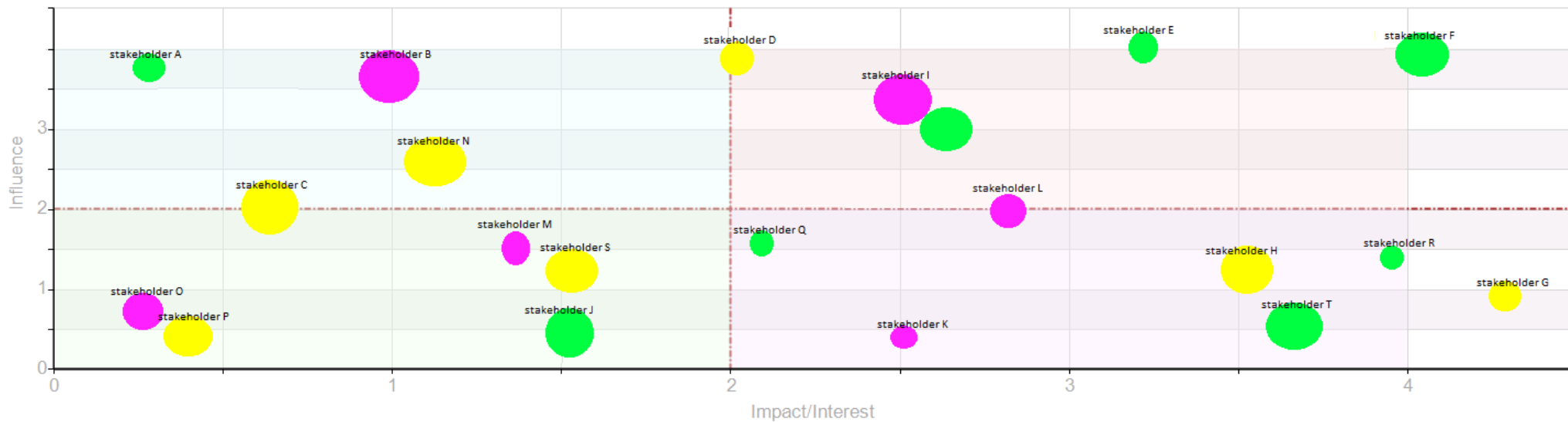
Stakeholder information in the tool’s database allows the generation of stakeholder maps that, by using specific criteria and filters (such as type of stakeholder, geographic information) can be customised to address particular analysis and engagement needs.

This function will greatly improve the ability to generate mapping of individual stakeholders and communities as needed. The previously ‘manually-generated’ maps were subject to limitations due to the large number of stakeholders.

An example of an SGMT-generated stakeholder map is provided in Figure 2.2 overleaf.

Stakeholder mapping is reviewed and updated on a quarterly basis. As part of this process, the automated SGMT-produced mapping is also checked and verified (‘ground-truthed’) by TAP’s stakeholder-facing functions to ensure that it reflects up-to-date relationship dynamics and spheres of influence.

Figure 2.2: SGMT-generated stakeholder map (for illustrative purposes only)



3. Stakeholder Engagement Completed to Date

3.1 Introduction

TAP has been engaging stakeholders since 2008 through structured, ongoing dialogue, both proactively and as required by law and project standards. TAP Greece's Community Liaison Coordinators (CLCs) have been engaging regularly with regional, municipal and community leaders and officials, keeping them updated about the project, gathering field information, and answering any concerns and requests.

TAP has used a variety of methods to communicate with stakeholders. At different stages of the project, these have included:

- Project offices (i.e. project information spots, Community Liaison Offices).
- Info points and public display processes.
- One-to-one and small group meetings, in particular with government officials.
- Community/public meetings.
- Brochures and posters.
- TAP website.
- Newspaper advertisements.
- Social media (e.g. text messaging, blogs).
- Electronic media (radio & TV).
- Digital media (e.g. e-newspaper banners).

3.2 ESIA and LEA-based Engagement

3.2.1 ESIA Engagement

The pipeline route in Greece was initially divided into East and West sections. A Stakeholder Engagement Plan (SEP) was developed for both sections to structure and guide engagement throughout the Environmental and Social Impact Assessment (ESIA) process. Finally, an integrated SEP for the entire pipeline length was produced and submitted with the integrated ESIA in June 2013.

Stakeholder engagement during the ESIA process was completed in five phases to ensure that a consistent, comprehensive, coordinated and culturally appropriate approach was taken for consultation and project disclosure. These phases comprised the following:

- Pre-scoping
- Route refinement
- Scoping
- Main ESIA phase
- ESIA finalisation and disclosure.

The schedule of TAP stakeholder engagement for the West section during the ESIA stage can be summarised as follows:

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- Phase 1 – pre-scoping: June 2008 and May 2010
- Phase 2 – route refinement: October 2010 - March 2011
- Phase 3 – ESIA scoping disclosure: June - July 2011
- Phase 4 – main ESIA phase: September - October 2011
- Phase 5 – ESIA finalisation and disclosure: September - October 2013
- Phase 5-1 - ESIA amendment consultation: June - July 2014 and November 2014
- Phase 5-2 - ESIA amendment phase, disclosure: March 2015

The schedule of TAP stakeholder engagement for the East section during the ESIA stage can be summarised as follows (Phase 5 of the ESIA stage was combined with the West section):

- Phases 1 & 2 – route verification: August - November 2012
- Phase 3 – ESIA scoping disclosure: December 2012
- Phase 4 – main ESIA phase: January 2013
- Phase 5 – ESIA finalisation and disclosure: September - October 2013
- Phase 5-1 - ESIA amendment consultation: June - July 2014 and November 2014
- Phase 5-2 - ESIA amendment phase, disclosure: March 2015

In accordance with Greek EIA legislation, TAP also held public hearings during the different ESIA phases, in close collaboration with the Ministry of Environment and Energy (MoEE) and other government authorities.

In addition, consultation meetings were held to provide additional opportunities for stakeholders to express their input on the project and to provide stakeholders with updated information on the project. Special attention was given to remote villages and communities, including women and vulnerable groups such as the Roma. TAP also conducted public meetings linked to the disclosure of the draft ESIA. Technical workshops were organised by TAP at the request of stakeholders whose queries required more than just written responses.

As a result of stakeholder engagement during the ESIA, a number of key concerns and issues were raised. By order of prevalence, these included:

- Loss of livelihoods and compensation
- Project impacts and their management
- Project benefits
- Purchase of gas
- Overview of the TAP project
- Employment
- Health and Safety
- Stakeholder engagement and information disclosure
- Role of government in implementation of the project

A full description of the issues raised and analysis by region can be found in section 7 of the ESIA. The mitigation measures devised to address project impacts (including the issues raised during consultations) are included in section 8 of the ESIA and information on routing alternatives is contained in section 2. Formal approval of the ESIA submitted by TAP for the Greek section of the pipeline was given by the Ministry of Environment, Energy and Climate Change in September 2014.

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3.2.2 LEA Engagement

Early in the project, Cadastral Survey Offices (CSOs) were established in 25 locations along the pipeline route, including one each in Athens and Thessaloniki. To ensure public accessibility and accommodate the needs of vulnerable groups within the project-affected population, more than 130 information spots were created at key locations within the affected communities and operated for three to seven months (late 2013 to early 2014), depending on the area. Staff for the CSOs and information spots were hired locally and trained in appropriate engagement methods, details of the TAP project and LEA activities. The main purpose of the information points was to make project-related information publicly accessible and to encourage potentially affected landowners and users to register their contact details with TAP, submit necessary property documentation, and verify existing cadastral information related to their property.

As part of the process of declaring and verifying the land rights of owners and users in project-affected areas, numerous public display processes were organised at the cadastral offices and information spots between 2013 and 2015:

- Three public display process periods for 21 CSOs.
- Two public display process periods for four CSOs in Kavala, Kalmadaki, Serres, Emmanouil Pappa.
- Two public display process periods in the Peplos CSO.

Outreach related to the public display process included placing more than 2,500 posters in municipal offices and in local communities along the pipeline route, 500 newspaper advertisements, 160 radio spots and 350 web banners in e-newspapers to ensure there was widespread awareness of the project. It is estimated that during the cadastral process contact was made with close to 50,000 people with an interest in the project.

The CSOs along the pipeline route were operated until the end of 2015. Stakeholders were encouraged to visit any of the offices to review their file and ask questions or lodge concerns about the pipeline routing, compensation process or the project generally. All project-related brochures and documents, including grievance forms, were available in these offices in the Greek language.

In 2015, a comprehensive data collection and asset verification exercise was undertaken with PAPs in all of the project-affected areas, i.e. more over 12,000 visits to over 10,000 affected plots, and more than 12,200 meetings with individual land owners and land users. Temporary call centres and local field offices were established to schedule individual meetings with each PAP to collect basic demographic data, solicit perceptions of the project and to review and where necessary update the asset inventory of each affected land parcel. More detailed socio-economic data was also collected from a random sample of 1,500 project-affected households to assist with the establishment of a baseline for future monitoring and to inform the design of possible livelihood restoration support programmes.

Following the Study of Compensation Values in all areas along the pipeline route undertaken in 2014, a Guide to Land Acquisition and Compensation (GLAC) was prepared.² During the census and asset verification process, a copy of the GLAC was distributed to each project-affected person. Copies were also available in each CSO and in the local municipal office, and posted on the TAP website. A further 2,720 condensed versions of the GLAC tailored to specific municipalities were circulated to local government offices.

² TAP, Guide to Land Easement and Acquisition

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In disclosing and verifying compensation values and entitlements, TAP organised a series of small group meetings with government officials at all levels, followed by open stakeholder meetings with Project Affected People (PAPs) and interested parties in each of the municipalities. Significant effort was made to ensure that PAP's were made aware of the meetings, using local media, letters of invitation, text messages and posters. TAP also made efforts to identify and differentially engage with vulnerable groups and ensure that there were male and female representatives in the survey and Secure Land Access (SLA) teams. Meetings were conducted in the homes or location of the particular stakeholder's choice. Where necessary, TAP arranged for the presence of a trusted relative or friend if needed to make the stakeholders feel more comfortable. Stakeholders were informed of the purpose, process and timetable for the census, asset verification and socio-economic survey. In total some three to four meetings per landowner were carried out to agree on land values and to make an offer, i.e. more than 33,000 meetings with over 12,000 individual landowners and land users.

In all, close to 200 government officials participated in the compensation values disclosure meetings, and more than 3,750 people attended the 36 open stakeholder meetings held between December 2014 and June 2015. Five CSOs are still in service and will remain open during the construction phase.

TAP and its LEA-contractors also made significant efforts to engage with and support vulnerable members of the project-affected population. This included more than 3,000 home visits to accommodate elderly and/or disabled PAPs who are less mobile; and approximately 2,000 additional meetings conducted at the request of PAPs, with family members and friends present to ensure full understanding of the project, its requirements and implications. This level of support continued to be provided throughout the LEA letter of intent, contract signing and compensation payment process.

In the border area with Turkey, TAP contracted a number of Turkish speakers who could respond to any language requirements in that area. This group included female team members who were always present at meetings with female PAPs.

During LEA engagement sessions, stakeholders raised a number of concerns and issues. These are summarised in the Livelihood Restoration Plan (LRP) and differentiated by stakeholder group, primarily decentralised government officials, regional district government officials, and PAPs. The most frequently asked question from PAPs in relation to LEA was compensation. Other issues raised included local development benefits, employment, safety concerns, distribution of natural gas, orphan land, forced easement, routing, land reinstatement, environmental issues, construction schedule, and easement restrictions. Responses to these questions were incorporated into face-to-face engagement sessions and communication materials distributed along the project footprint.

3.2.3 Post-ESIA Engagement on Project Impacts

Since the ESIA was approved in 2013, more than 500 open public meetings with local communities and local authorities were conducted along the pipeline corridor on ESIA and LEA-related issues and disclosure. Other recent engagement activities in the period 2014 to 2015 include:

- Quantitative and qualitative surveys in 2014 and 2015 along the pipeline route.
- The organisation of 25 focus groups across 40 communities during the qualitative surveys.
- Distribution of TAP newsletters (2014 and 2015 editions) to more than one million households in cities and communities in Northern Greece along the pipeline route.
- Dissemination of thematic leaflets covering health and safety, project benefits, environment, agriculture, LEA and construction through the 23 CSOs and open public meetings in 2014 and 2015.

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- Three large media campaigns in Northern Greece in 2014 and 2015.
- Organisation of two local content networking events during 2015 in Northern Greece, in anticipation of the award of contracts for the construction of the pipeline and compressor stations. More than 350 subcontractors and suppliers from Greece met with prospective EPC contractors.
- The preparation of LEA brochures on Disclosure of Values (compensation) for all 30 municipalities, distributed through public meetings as well as the 23 CSOs.
- Community Safety Awareness program on Road Safety has been successfully completed with 25,000 pupils attending 1330 seminars, coming from 142 elementary schools and 60 high-schools.
- Throughout 2016 and to date Stakeholder Management function have held over 900 engagement meetings and supported the collection and progression of more than 130 SEI proposals coming from the local and regional Stakeholders

3.3 Social and Environmental Investment-related Engagement

The goal of the TAP Social and Environmental Investment (SEI) Programme is to contribute in a sustainable and inclusive way to improved livelihoods and quality of life within local communities in proximity to the project. TAP's SEI strategy explicitly seeks to align SEI with communities, civil society and government, to create shared value and to build relationships that support construction. TAP SEI is delivered using a number of principles including participation, defined as ensuring community-level involvement in the design and development of TAP SEI projects and in the decision-making processes associated with such projects.

In support of the SEI programme, TAP performed a needs assessment in 2015 which included engagement with a broad range of local and regional community stakeholders to ensure that the SEI initiatives are grounded in community needs and priorities. The needs assessment also included engagement with regional and local authorities.

TAP's bottom-up approach to SEI in Greece was committed to in writing with the regional governors and mayors in November 2014. It has since been the basis for all SEI discussions and commitments with local stakeholders. Focus areas include livelihoods, community quality of life, environment, education and training.

3.4 Local Content-related Engagement

Local content engagement with EPCs, local businesses and other key stakeholders is performed continuously, with a focus on maximising opportunities for local businesses and workforce in the pipeline's area of influence, and within the framework of legislation (European Union public procurement rules) and procurement best practice.

To inform local companies of TAP processes and procurement, TAP organised two networking events along the pipeline route in January 2015, one in Alexandroupolis and one in Thessaloniki, allowing pre-qualified EPC contractor companies and potential sub-contractors to explore opportunities of mutual interest. In addition, TAP took steps to promote usage of its sub-contractor database to enhance awareness of potential sub-contractors among EPC contractors.

3.5 Outreach Engagement

TAP interacts with stakeholders across the project footprint to enable an open and transparent dialogue as part of its outreach programme.

TAP's outreach engagement, not linked to any specific project activity, is an ongoing process designed to provide an opportunity for stakeholders – individuals or communities – to voice concerns, explain their interests, and

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otherwise initiate and maintain constructive dialogue with TAP. Through outreach engagement, the project carried out thematic campaigns and consultation processes including perception surveys and introductory meetings to build shared understanding among stakeholders on specific topics that will inform TAP's longer-term stakeholder engagement strategies.

TAP's Communications team has focused on maintaining, protecting and enhancing the project's reputation among its international, national and local stakeholders in Greece by engaging with national media, participation at key conferences, milestone events, roundtables, and conducting advertising and media campaigns.

The positive outcome of TAP's engagement efforts is reflected in the 2016 public perception survey. Overall, citizens' opinions of TAP are very positive and constitute the highest enjoyed by any major project in Greece. TAP's approval rating (positive and negative) has increased since 2015 with an increasing shift to 'neutral' and a decrease in 'negative' views. TAP's average approval rating in Greece stands at 96%.

4. Stakeholder Engagement Programme

4.1 Organisation and Responsibilities

TAP stakeholder engagement is performed by an Integrated Stakeholder Engagement Team of staff from Stakeholder Management, Land Management (LM), Environmental and Social (E&S) Management, SEI, and Government Affairs functions, as well as by dedicated EPC contractor personnel.

The stakeholder engagement responsibilities of the Greece stakeholder engagement staff are summarised in table 4.1 overleaf.

The in-country Integrated Stakeholder Engagement Team members are supported at TAP corporate level by the following corporate functional leads who provide guidance and ensure consistency of practice across the host countries:

- Corporate Stakeholder Manager
- SEI Manager
- Government Affairs Manager
- Corporate LM Manager
- Grievance Advisor
- Senior Social Performance Advisor.

Table 4.1: Stakeholder Engagement Responsibilities

Stakeholders	Stakeholder Management Function					Land Management Function					E&S Management Function				EPC
	Stakeholder Manager	Community Liaison Coordinator	Governmental Affairs Senior Advisor	Communications Manager	SEI Manager	LM Manager	Social LM Advisor	LM Advisors	Land Field Monitors	LM Technical and Legal Contractor Staff	E&S Manager	E&S Management Social Expert	Social Field Monitors	Grievance Coordinator	EPC Social Staff
Land owners / users*	-	-	-	-	-	A	E	E	E	E	-	-	-	-	-
Local community members*	A	E	-	-	-	-	-	-	-	-	E	E	E	E	E
Local municipalities	A	E	-	-	-	-	-	-	-	-	E	E	E	-	E
National government	-	-	A	-	-	-	-	-	-	-	-	-	-	-	-
Local government/ public authorities, institutions	A	E	-	-	-	-	-	-	-	-	-	-	-	-	E
Local businesses (associations & operators)	-	-	-	-	-	-	-	-	-	-	A	E	E	E	E
Civil society/NGOs	-	E	A	-	E	-	-	-	-	-	E	E	E	E	-
Media	-	-	-	A	-	-	-	-	-	-	-	-	-	-	-

*Including vulnerable stakeholders

A	ACCOUNTABLE for managing stakeholder relationship. To be informed of outcome of engagement performed by other team members.	E	ENGAGES with the stakeholder and informs on weekly basis the TAP accountable functional team of engagement completed and planned.
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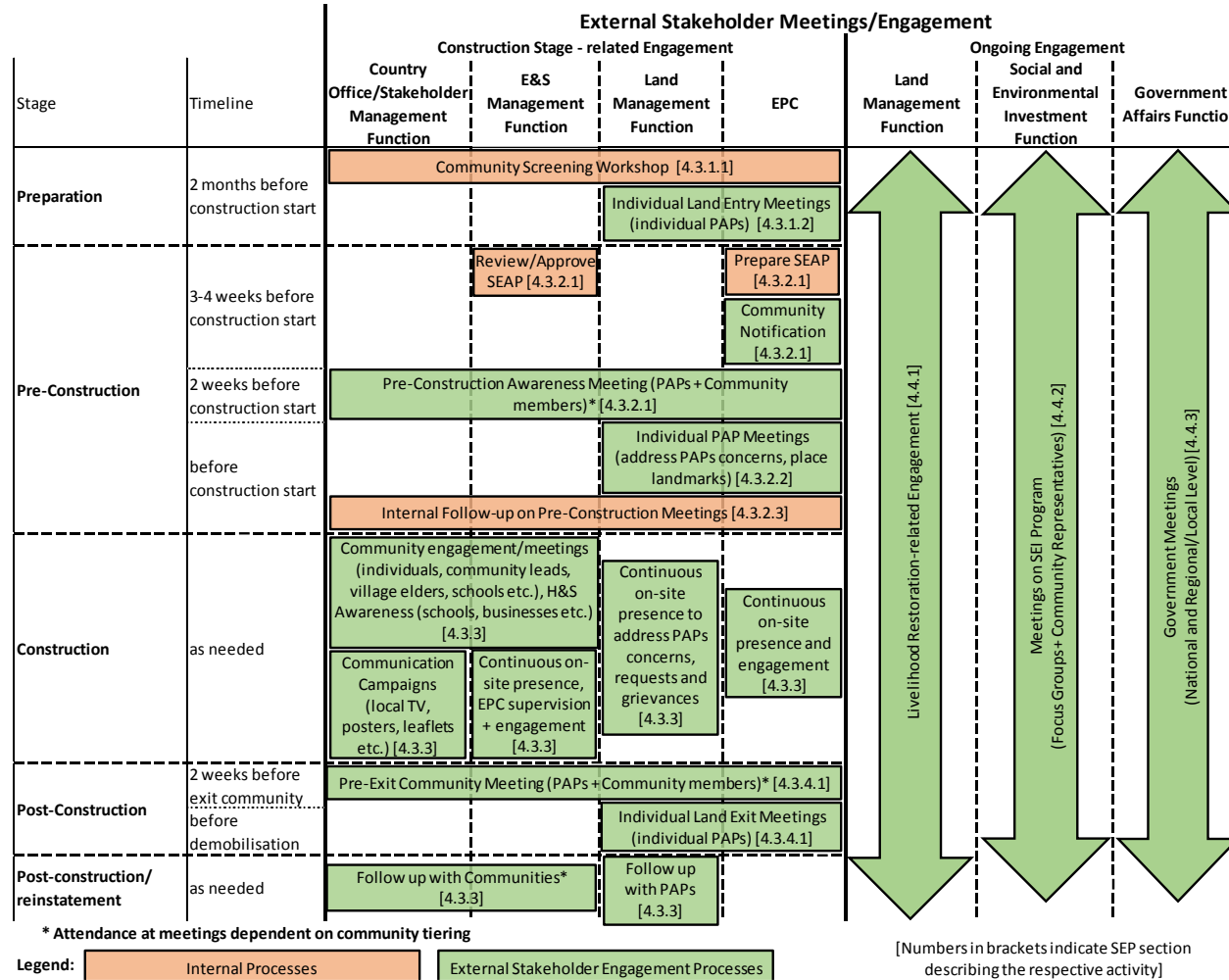
4.2 General Overview of TAP Stakeholder Engagement Process

TAP is implementing a structured approach to stakeholder engagement as illustrated in Figure 4.1 overleaf, which indicates the engagement responsibilities of each function of the Integrated Stakeholder Engagement Team.

TAP's stakeholder engagement process includes activities performed at specific stages before, during and after construction (represented as cross-functional activities in the diagram), as well as ongoing engagement not related to a particular construction stage. The process will be updated prior to operations, taking into account changes in engagement requirements.

The stakeholder engagement and internal coordination processes are described in more detail in the ensuing paragraphs.

Figure 4.1: Overview of TAP Stakeholder Engagement



4.3 Construction Stage-related Stakeholder Engagement

TAP seeks to engage proactively with its stakeholders during all stages of construction within each affected community.

This stakeholder engagement process is conducted by TAP in close cooperation with the EPC contractors as illustrated in figure 4.1 and further detailed in the following sections of this SEP.

In the border area between Greece and Turkey, TAP has foreseen hiring Turkish speaking translators to support engagement activities where necessary. EPCs have also contracted female members of staff to respond to gender-specific consultation requirements.

4.3.1 Engagement during Construction Preparation Phase

4.3.1.1 Community Screening

Process Outline

As illustrated in Figure 4.1 above, to appropriately scale and structure stakeholder engagement during the construction stages in each of the affected communities, TAP performs an initial stakeholder/community screening for distinct parts of the route, approximately two months before land entry and the start of construction works. This screening uses the integrated stakeholder and consultation database (SGMT) and is based on information from stakeholder engagement performed at earlier project stages, the grievance mechanism, the land easement and acquisition process, the KP (Pipeline Kilometre Point) Environmental and Social Constraints and Mitigation Registers, as well as the Community Livelihood Indicator³ and associated mapping prepared in support of the LATS programme. Stakeholder vulnerability and the potential project risks and opportunities are also reviewed as part of the screening. This includes consideration of any risks identified as a result of the permanent media and social media monitoring performed by TAP's Communications staff which is internally distributed on a daily basis.

The Geographic Information System (GIS) platform is used to support the Community Screening process by visually representing the social sensitivity of the areas along TAP's route and by highlighting communities where special care and attention is required as part of the engagement process. The resulting GIS-based maps consider several aspects including the number of grievances received in the past, the outcomes of previous engagement, the presence of vulnerable groups or of groups with special consultation needs, land-related sensitivities (e.g. number of PAPs with documentation issues in relation to land), and the Community Livelihood Indicator and associated mapping.

This allows identification and mapping of stakeholders in areas that may be significantly impacted or opposed to the project. As an outcome of this screening process, the project-affected communities are classified from a sensitivity perspective based on a three-tiered categorisation (Tier 1 – highly sensitive, Tier 2 – sensitive, Tier 3 – non-sensitive).

³ The Community Livelihood Indicator and associated mapping were developed to assist TAP in better understanding the communities along the pipeline RoW and in identifying priority areas for the LATS programme. The Community Livelihood Indicator categorises the economic well-being of rural communities and areas along the pipeline route based on both qualitative data (assessments from people who worked directly with PAPs in TAP information spots, cadastral offices and the secure land access process) and quantitative data collected as part of the census and socio-economic baseline survey undertaken as part of the Land Easement and Acquisition process.

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The categorisations are used to optimise stakeholder engagement in each project-affected community. Stakeholder engagement in Tier 1 communities will be performed based on Tier 1 Engagement Plans (TEPs) that are designed to address local sensitivities in the respective communities. TEPs will outline the additional engagement and related support that may be required in addition to the steps outlined in this SEP. Stakeholder engagement in Tier 2 communities will be performed with the participation of all stakeholder team functions while Tier 3 community engagement will be undertaken with the involvement of those stakeholder team functions as needed at each specific project implementation stage and with consideration of the local context.

Target Stakeholders

Stakeholder screening is performed within the framework of an internal workshop. No stakeholder engagement is undertaken at this stage.

Timing

Stakeholder Screening is performed at the initial stages of development of each specific KP section of the pipeline and revisited on a quarterly basis to allow for adjustments based on most recent developments and the outcome of stakeholder engagement undertaken in the community.

Responsibilities for Execution

Stakeholder Screening is carried out within the frame of a workshop led by the Country Office Stakeholder Management function with the participation of all stakeholder engagement functional teams.

Tier 1 Working Groups are established for the implementation of Tier 1 Engagement Plans, with members drawn from various Integrated Stakeholder Engagement Team functions and project departments as required, on a case-by-case basis.

4.3.1.2 Individual Land Entry Meetings

Process Outline

Land access to the pipeline right of way (RoW) requires appropriate engagement with project-affected land owners and users to proactively address their concerns, mitigate impacts and minimise potential land entry refusals. Engagement is conducted by the LM team function and EPC stakeholder engagement staff.

This process requires careful preparation so that any questions or concerns raised by PAPs such as, for example, compensation, orphan land, reinstatement, or land use restrictions can be addressed and responded to. For this purpose, an individual information package (a so-called 'Parcel Passport') is prepared in advance for each land parcel and made available to the team engaging with the project-affected land owners and users.

Approximately two months before accessing the land for construction, the LM team and the EPC stakeholder engagement staff meet each individual PAP in person to:

- Inform them that the land plots will be accessed to place landmarks prior to construction initiation.
- Solve/record any outstanding issues, requests or grievances.
- Sign Land Notification Protocols informing PAPs of the exact date when construction will start on their land plot.

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- Sign Land Entry Protocols (also documenting all structures, installations and features to be reinstated to similar or better condition at finalisation of construction, irrigation/drainage systems or other facilities that need to be maintained during construction, and the provision of access from one side of the parcel to the other).

Target Stakeholders

Targeted stakeholders of the individual land entry meetings are the project-affected land owners and users.

Timing

As indicated above, the individual land entry meetings with each PAP take place approximately two months before accessing the land for construction.

Responsibilities for Execution

The individual land entry meetings are performed by the LM team in cooperation with the EPC contractor`s staff.

4.3.2 Engagement during Pre-Construction Phase

4.3.2.1 Pre-construction Community Notification and Construction Awareness Meetings

Process Outline

As part of the stakeholder engagement process, timely notification of construction activities is provided to local communities to allow the appropriate management of construction-related disruption and rehabilitation-related expectations and issues.

The required actions to achieve this are performed by TAP in close cooperation with the EPC. In accordance with the requirements of the Greece Stakeholder Engagement and Corporate Social Responsibility Contractor Control Plan (CCP), before initiating construction of a specific pipeline section or at a project site, the EPC is required to prepare Stakeholder Engagement Action Plans (SEAP) describing the stakeholder engagement to be performed by the EPC in relation to the respective construction activities. The SEAPs are subject to review and approval by TAP before work commences and inform the planning of TAP stakeholder engagement and its coordination in cooperation with the EPC.

The overall engagement process is planned based on the construction works schedule, taking the provisions of the associated SEAP prepared by the EPC into consideration.

Before construction reaches a particular community area, in line with the respective SEAP, the EPC will notify the local authorities to agree on the date and location of a 'Pre-Construction Awareness Meeting' in the respective community. The EPC contractor sends notification letters, followed by meetings with local authorities' representatives, to confirm key activities to be undertaken, discuss sensitive areas for construction traffic safety (such as schools, hospitals, markets), outline potential employment opportunities, discuss issues of concern for the local authorities, and confirm contact details. These meetings are attended by TAP`s Integrated Stakeholder Engagement Team members (primarily LM and/or CLCs and/or SFMs/contractor CLOs). Otherwise, the EPC informs TAP of the outcome of these meetings by providing the respective MoMs. This information will then be used to adjust the agenda of the Pre-entry Construction Awareness Meeting. The date and location of the meeting

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is advertised locally by the EPC in cooperation with the local authorities through posters or by other means locally available.

The intended audience for the meeting includes interested community members, representatives of local agricultural associations and local businesses, land owners and users and other interested individuals.

The purpose of the meeting is to:

- Explain the upcoming construction activities in the community area and present the works schedule.
- Present TAP and contractor key points of contact.
- Discuss community health and safety aspects and arrangements.
- Notify attendees of available employment opportunities and the associated employment process.
- Remind them of the grievance process and grievance mechanism contacts.
- Get stakeholders' feedback on issues and concerns.

Target Stakeholders

Targeted stakeholder of the Pre-Construction Awareness Meetings include individual community members, project-affected people, community leaders, local authorities, local businesses and schools.

Timing

Local authorities are notified approximately three to four weeks in advance of the commencement of construction activities in the area of the respective community.

The Pre-Construction Awareness Meetings take place approximately two weeks in advance of the start of construction.

Responsibilities for Execution

The EPC representatives are responsible for notifying the local authorities of the meeting, agreeing the date and location with them, as well as advertising and organisation.

The Pre-Construction Awareness Meeting is held by the EPC staff in cooperation with TAP Integrated Stakeholder Engagement Team function representatives (SFMs, CLCs, LEA).

Meetings and engagement with Tier 1 communities are performed as defined in the Tier 1 Engagement Plans for the respective community. Meetings in Tier 2 communities are attended by team members from all Integrated Stakeholder Engagement Team functions. Tier 3 community meetings will be attended at a minimum by one TAP representative (typically an SFM and/or a CLC), in addition to the relevant EPC stakeholder engagement staff.

4.3.2.2 Individual PAP Meetings

Process Outline

Before the start of construction, PAPs are individually pre-notified and personally met by the team in the field to place construction landmarks and accurately identify and inform on the land actually affected by the upcoming

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construction works. The outcome of this engagement is documented in pre-land entry MoMs, which are followed up by the LMA team.

Target Stakeholders

Targeted stakeholders of the Individual PAP Meetings are the project-affected land owners and users.

Timing

Individual pre-notification and personal meeting with each PAP to place construction landmarks take place before construction activities start.

Responsibilities for Execution

Individual PAP Meetings are conducted by the LM team in cooperation with the EPC contractor`s staff.

4.3.2.3 Internal Follow-up on Pre-Construction Stage Meetings

Process Outline

The outcomes of the Pre-Construction Awareness Meeting and the feedback received, as documented in the Minutes of Meeting (MoMs), will be followed up internally and used to confirm or adjust the Tier 1 – 3 community classification, as well as to define subsequent engagement within that particular community during construction.

Based on the outcome of meetings and feedback received, TAP prepares an `Outreach Calendar` on an annual (high level) and quarterly basis. This provides the planning for engagement with stakeholders along the pipeline corridor, responding to stakeholders` interests and needs, primarily in relation to the progress of construction and management of associated potential environmental, social and cultural heritage impacts.

While the outreach engagement programme is designed to primarily meet these needs, it also includes engagement on other important topics such as social and environmental investment, local content, and livelihood restoration.

The Outreach Calendar is adjusted according to the outcomes and feedback received from the pre-construction awareness and individual PAP meetings. This ensures that engagement during construction will respond to the specific needs of the respective community.

Target Stakeholders

The outcomes of the Pre-Construction Stage Meetings are internally followed-up by each of the Integrated Stakeholder Engagement Team functions. No stakeholder engagement is performed at this stage.

Timing

Follow-up on pre-construction stage engagement is performed prior to the start of construction.

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Responsibilities for Execution

All stakeholder engagement functional teams are responsible for following up the outcomes of the pre-construction stage meetings and for planning the engagement required in the subsequent stages.

4.3.3 Engagement during Construction Works Execution Phase

Process Outline

A permanent presence on site is maintained by all stakeholder engagement functional teams during construction work to ensure that stakeholders' concerns and requests can be addressed.

Based on the local context and community tier classification, engagement by the Integrated Stakeholder Engagement Team during project construction in a particular community area may include:

- Stakeholder engagement/meetings with individuals, vulnerable stakeholders, community leads, village elders, schools, local businesses.
- Health and safety awareness training (schools, local businesses, etc.).
- Communication campaigns (local TV, posters, leaflets, etc.) on upcoming construction activities, livelihood restoration, employment opportunities, etc.
- Other engagement in response to stakeholder interests and needs.

Stakeholder-related activities by EPC contractors during construction include the disclosure of information and engagement concerning project impacts. This activity addresses aspects related to environmental, community health and safety and security issues, interruption to infrastructure and utilities, land entry/exit, additional land take, local content (procurement and employment) as well as grievance management. Commitments in this respect have been incorporated in the Contractor Control Plans (CCPs) and in the associated ESIPs by EPC contractors. Implementation is monitored by TAP on an ongoing basis.

The stakeholder engagement activities performed by EPC contractors are defined in Stakeholder Engagement Action Plans (SEAPs) prepared before construction of a specific KP section or project component commences and are subject to review and approval by TAP.

Particular emphasis is therefore placed by TAP on monitoring the stakeholder engagement practices of EPC contractors. To this end, specific training is delivered by TAP to the contractor CLOs and ongoing close cooperation is ensured between TAP's in-country E&S management staff and contractor personnel with stakeholder engagement responsibilities.

Target Stakeholders

Stakeholders targeted for engagement in communities during the construction stage include individual community members, PAPs, community leaders, local authorities, local businesses and schools.

Timing

Stakeholder engagement is performed as needed while construction activities are under way in the respective community area.

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Responsibilities for Execution

The Country Office/Stakeholder Management function is responsible for delivering outreach engagement in communities, including stakeholder meetings and communication campaigns. The function also delivers health and safety awareness training at schools and local businesses, in addition to similar engagement by the EPC.

The E&S Management function reviews and approves the EPC contractor's SEAPs and supervises their implementation by the EPC through SFMs permanently on site during construction. Engagement oversight of the EPCs ensures that existing and emerging issues can be identified and addressed in a timely and transparent manner. As part of this process, the SFMs also engage directly with local community members (in addition to engagement by EPC CLOs) to address any issues that may arise during the execution of construction works in the respective community area.

The LM function ensures the continuous presence of its advisors and field monitors on site during construction works to address any PAP concerns or requests and to engage with them as necessary.

4.3.4 Engagement associated with Route Social Impact Plan

The Route Social Impact Plan (RSIP) augments the ESMS and associated management plans to provide effective responses to potential residual social impacts. The RSIP identifies all assets and businesses in proximity to the Right of Way and other project infrastructure potentially impacted by construction activities, assesses risks associated with those sites, and identifies cases for further assessment, engagement and mitigation as appropriate. Within this, the project focuses particularly on:

- Areas of known project opposition.
- Areas with land related issues.
- Areas of high productivity land or high value crops.
- Grazing/beekeeping.
- Business (particularly those susceptible to environmental changes / construction impacts).
- Areas known for tourism and with operators in the area.
- Irrigation systems and other types of infrastructure/utilities.
- Crossings of heavily used roads.
- Highly populated areas in the vicinity of the pipeline route.
- Secondary access to land (e.g. for agricultural purposes or access to houses).
- Educational facilities (primary, secondary, tertiary) and medical facilities.
- Recreational areas.
- Cemeteries, churches and other religious facilities (e.g. monasteries) where access/ceremonies could be interrupted during construction.
- Communities with a high concentration of vulnerable groups.

The RSIP enables TAP to proactively manage identified impacts and monitor the implementation of impact mitigation measures to ensure the maintenance and/or restoration of affected livelihoods and living standards.

As part of the RSIP process, TAP determines levels of local community sensitivity and identifies the need to develop a TEP. TEPs are established where there are particular social or stakeholder sensitivities in a project-

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affected location or clusters of households or businesses experiencing similar significant impacts. The scale and complexity of stakeholder issues in Tier 1 communities typically requires the commitment of levels of engagement, resourcing and support in excess of those generally applied in country SEPs.

4.3.5 Engagement during Land/Community Area Exit Phase

4.3.5.1 Pre-exit Community Meetings

Process Outline

Before construction works finish in the area of a particular community, TAP will notify the local authorities and agree the details of a 'Pre-exit Community Meeting', aiming for an attendance similar to the Pre-Construction Awareness Meeting.

The main scope of the Pre-exit Community Meeting is to:

- Inform the community of reinstatement, land handback, and any land use restrictions upon completion of works.
- Remind attendees of the grievance process and relevant contacts.
- Get stakeholders' feedback on any open issues and concerns, and agree how these will be addressed and closed.

Target Stakeholders

Targeted stakeholders for these meetings include individual community members, project-affected people, community leaders, local authorities, local businesses and schools.

Timing

The completion of construction works will be notified approximately two to three weeks in advance and the Pre-exit Community Meetings held about one to two weeks before construction equipment is removed from the respective community area.

Responsibilities for Execution

The Pre-exit Community Meeting is held in cooperation with the EPC contractors and with the participation of TAP stakeholder engagement functional team representatives. Meetings and engagement in Tier 1 communities are performed as defined within the TEPs for the respective community. Meetings in Tier 2 communities are typically attended by team members from all Integrated Stakeholder Engagement Team functions. Tier 3 community meetings will be attended by at least one TAP representative (primarily a LM member and/or an SFM/CLC), in addition to the relevant EPC stakeholder engagement staff.

4.3.5.2 Individual Land Exit Meetings

Process Outline

Upon completion of construction and reinstatement in temporarily occupied land (pipeline construction corridor and temporary facilities), the LM team and EPC contractors perform exit inspections with all owners/users of all

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land used during the construction works execution phase. If the inspection concludes that reinstatement is satisfactory, the usage right of the affected land plot will be handed back to the land owner or user for agricultural activities. Any claim arising from potentially unsatisfactory reinstatement will be managed through the grievance management mechanism. During the exit inspection, the LM team also provides the land owner/user, both in writing and verbally, with all required information about permissible and restricted activities on the land plot, and contact details of the team responsible for monitoring the project during operations. The contents of the Easement Agreement signed upon entry into land is re-explained to the land owner.

Target Stakeholders

Targeted stakeholders of the Land Exit Meetings are project-affected land owners and users.

Timing

Inspection of each affected land plot is conducted with the land owner/user upon completion of construction and reinstatement.

Responsibilities for Execution

The Land Exit Meetings are performed by the LM function in cooperation with EPC staff.

4.3.6 Post-Construction Phase Engagement

Process Outline

After the completion of construction and reinstatement works within a particular community area, TAP periodically meets the local authorities and community leads to follow up any open issues associated with the project and will engage with relevant parties and stakeholders to address them as needed. This engagement is aimed at closing any social issues related to construction, following up residual concerns or grievances, and ensuring that any potential land management/restoration-related issues are addressed and closed.

Follow-up engagement with project-affected landowners and users, including vulnerable stakeholders, is performed as part of the monitoring of the Livelihood Restoration Plan (LRP) and implementation of the LATS programme. This engagement is aimed at assessing the extent to which the livelihoods of affected households have been restored, verify that measures to restore or enhance project-affected peoples' quality of life and livelihoods are being implemented, and assess their effectiveness.

Target Stakeholders

The Post-Construction Phase Engagement is envisaged as following up on any issues and addressing the needs of all stakeholders within a specific area where construction works were finalised.

Timing

Post-Construction Phase Engagement is performed as needed after construction and reinstatement works are finished. However, as this version of the SEP focuses on the construction phase of the project, the plan will be revised before operations commence to determine the engagement that will be performed on an ongoing basis.

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Responsibilities for Execution

Post-construction follow-up engagement with the local community leads and local authorities is performed by the Country Office/Stakeholder Management and E&S Management functions while the LM function is responsible for follow-up engagement with land owners and users.

4.4 Ongoing Stakeholder Engagement

In addition to construction phase-related stakeholder engagement, TAP also engages with its stakeholders on an ongoing basis through the implementation of its LATS and SEI programmes, the grievance management process, and by regular outreach engagement actions that include interactions with government authorities at all levels. These stakeholder engagement processes are not related to a particular construction stage and are described briefly within subsequent sections of this document.

4.4.1 Livelihood Restoration-related Engagement

Process Outline

Throughout the construction phase, TAP will continue to engage with individuals and communities affected by land easement and acquisition as part of the implementation of its Livelihood Restoration Plan (LRP). This includes monitoring the execution of land entry and exit protocols by EPCs, overseeing any necessary additional land take undertaken by contractors, and follow-up monitoring with PAPs to document the effectiveness of livelihoods restoration.

TAP also undertakes stakeholder engagement activities through its Livelihood Assistance and Transitional Support programme (LATS). Its goal is to ensure that those people whose land is temporarily or permanently acquired are able to restore their livelihoods to pre-project levels or improve where possible.

Several tools have been developed by TAP to support the implementation of LATS. These include a Community Livelihood Indicator, a Vulnerable Household Watch List and a Vulnerable Assessment Tool.

The Community Livelihood Indicator was developed to help TAP better understand the communities along the pipeline RoW and identify priority areas for the LATS programme.

The Vulnerable Household Watch List identifies and helps TAP monitor those PAPs considered to be 'vulnerable'. Special measures taken by TAP for this category of stakeholders include home visits to review contracts and agreements, support with transportation to notaries/banks and meetings with extended family members to ensure there is a thorough understanding of the land access process. The Social LM Advisors are also using this list to keep EPCs informed of vulnerable PAPs who may require extra support through the land entry and exit process.

A Vulnerable Assessment Tool was also developed to help TAP identify PAPs who are at a higher risk of experiencing negative project impacts, such as very poor families with limited assets who are highly dependent on the affected land parcel for their livelihood, elderly widows/widowers with failing health and limited social support who rely on the income from perennial trees, and those who may require transitional support and/or additional, specialised assistance.

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Detailed LATS components and implementation schedules are provided in the TAP Greece LATS document.

Livelihood restoration process and LATS implementation are monitored continually. Reports on their overall progress are produced for internal purposes on a quarterly basis and summaries are made available publicly on TAP's website annually.

Target Stakeholders

Stakeholders targeted for Livelihood Restoration-related engagement are project-affected land owners and users and any other stakeholders with a demonstrated loss of income source or means of livelihood as a result of project restrictions on land use.

Timing

Livelihood Restoration-related engagement is performed on an ongoing basis throughout project execution.

Responsibilities for Execution

Implementation of Livelihood Restoration-related engagement is the responsibility of the LM team, in cooperation with the SEI team. They identify synergies with the SEI programme and coordinate implementation with the Stakeholder Management team.

4.4.2 Social and Environmental Investment (SEI)-related Engagement

Process Outline

The goal of the TAP SEI programme is to contribute in a sustainable and inclusive way to the improved livelihoods and quality of life within local communities in proximity to the project.

The objectives of the TAP SEI Programme are to:

- Strengthen livelihoods within local communities⁴.
- Support improved community quality of life along the pipeline route.
- Enable improved skills and abilities through support for education and training initiatives.
- Enhance environmental management including through support for biodiversity.

The programme's funding framework includes grants, local community initiatives and regional development partnerships.

Implementation requires stakeholder engagement, including qualitative and quantitative data collection from communities, local, national and regional government and key development actors and NGOs. This engagement will ensure there is a clear and up-to-date understanding of community needs and that communities have the

⁴ Note: the SEI programme focuses on livelihoods as one of the priority development needs identified through baseline analysis and stakeholder consultation. The programme goes above and beyond impact mitigation both in terms of the target beneficiaries and the intended outcomes. The LATS programme's more limited and specific focus is the restoration of livelihoods to at least pre-project conditions for those impacted by TAP.

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opportunity to contribute to the priorities for development interventions. It is hoped that communities will themselves contribute to the majority of SEI interventions, either financially or in kind.

Target Stakeholders

Stakeholders targeted for TAP's SEI-related engagement include local communities, businesses, institutions and civil society.

Timing

TAP SEI-related engagement is performed on an ongoing basis throughout project execution.

Responsibilities for Execution

SEI-related engagement is the responsibility of the SEI team which cooperates with the LM team to identify synergies with the Livelihood Restoration programme and coordinate implementation.

4.4.3 Outreach Engagement

Process Outline

The goal of TAP's Outreach Engagement programme is to maintain open communication channels with a range of stakeholders to listen to their views, issues and concerns in relation to project activities and, based on this engagement, to adopt corrective actions where appropriate. Achieving this goal requires a regular presence in communities and engagement with a broad range of stakeholders as part of an engagement calendar or as a result of ad hoc information requests. Other interactions may be unplanned, responding to questions and issues raised during field trips or visits to TAP offices.

Target Stakeholders

Outreach engagement activities target a broad range of stakeholders, including communities and other identified stakeholders present at a local level. These may include local government, NGOs/civil society, public authorities, local businesses and operators and agricultural institutions.

Timing

TAP outreach engagement is performed on an on-going basis throughout project execution and into operations.

Responsibilities for Execution

The Stakeholder Management function is responsible for outreach engagement. They are supported by other stakeholder-facing functions to ensure the consistent communication of key messages.

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4.4.4 Government Affairs-related Engagement

Process Outline

TAP's Government Affairs engagement seeks to mitigate risk and monitor and manage arising issues that could potentially affect the project's reputation and hinder its ability to secure key permits for construction. TAP's Government Affairs engagement aims to protect and maintain the project's reputation by promoting messages that are related specifically to the project and the benefits it brings, through the use of targeted communications activities and campaigns.

In addition, TAP's Government Affairs engagement includes regular briefings provided to relevant diplomatic missions in Athens on matters related to the project.

Target Stakeholders

Stakeholders targeted for TAP Government Affairs-related engagement are national and local-level government agencies and civil society organisations.

Timing

TAP Government Affairs-related engagement is performed on an ongoing basis throughout project execution.

Responsibilities for Execution

The implementation of TAP Government Affairs-related engagement is the responsibility of the Government Affairs team.

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5. Grievance Mechanism

5.1 Introduction

This section provides a brief summary of TAP's Third-Party grievance mechanism. Full details are set out in TAP's Grievance Management Framework (GMF), TAP's Greece Third Party Grievance Procedure (Greece Grievance Procedure), and the EPC Contractors Third Party Grievance Procedures.

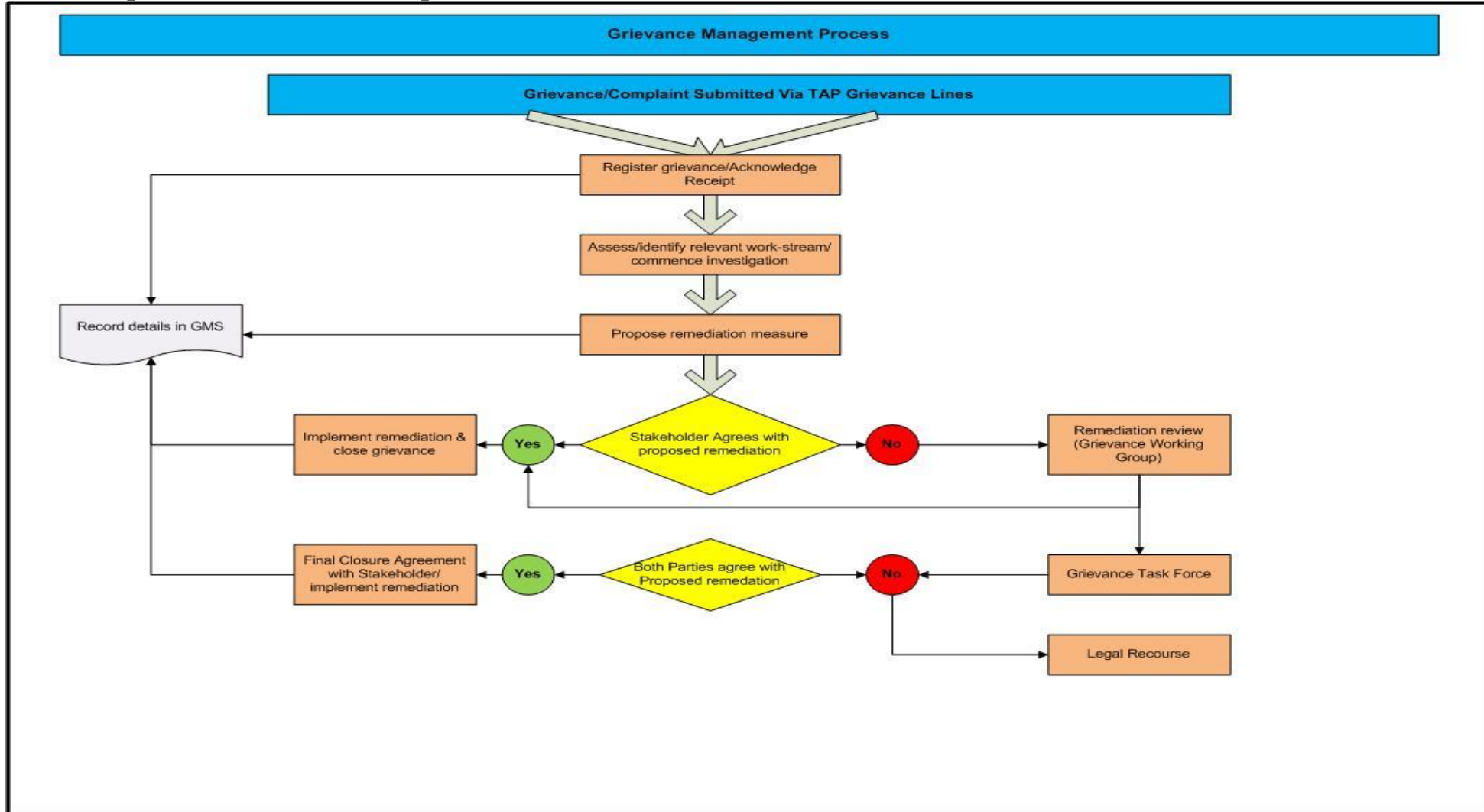
The corporate GMF outlines the principles of grievance management and defines the organisational structure and processes required to implement a functional, effective and culturally appropriate grievance mechanism that is responsive to stakeholder needs. It is supported by the Greek Third-Party Grievance Procedure which aims to address, manage and resolve stakeholder grievances, concerns, complaints and LM requests related to TAP construction activities and to ensure that TAP is aware of and responds to stakeholder concerns. Both the GMF and the Greece Grievance Procedure are continuously updated to ensure the grievance management process remains relevant, accessible and effective.

TAP communicated its pre-construction grievance mechanism to stakeholders during the ESIA consultation phase and throughout LM-related activities. TAP's Grievance Mechanism was then revised for the construction phase and made available through all identified channels that are accessible to local stakeholders. The grievance mechanism is communicated in a format and language readily understandable to the local population. To ensure that all stakeholders are aware of how to submit grievances, TAP has also created additional grievance communication materials, such as posters and pamphlets, as well as an engagement plan for the Grievance and Information Hotline. These materials are distributed at TAP regional offices and worker camps.

5.2 Grievance Management Process

TAP's Grievance Management Process is illustrated in Figure 5.1 overleaf.

Figure 5.1: TAP Grievance Management Process



The following timeframes apply to the grievance administrative process.

Table 5.1: Applicable timeframes in Grievance Administrative Process

Action	Timeframe
Register grievance in database	Within 7 working days
Acknowledge Grievance	Within 7 working days
Issue grievance rejection letter (if required)	Within 30 days
Issue grievance feedback explaining time required for resolution and on-going progress (if not yet resolved)	After 30 days
Issue grievance feedback (when mitigation established)	30/60/90 days (see case and severity levels)
Issue compensation payments	30 days after signing agreement

The grievance management process is described in detail in the TAP Greece Grievance Procedure on TAP's website. Grievance forms are also available on the website, from TAP in-country personnel and its contractors, and from TAP project offices. Grievances can also be submitted directly through the TAP website. EPC contractor GMs are available from contractors directly. Any grievances submitted in these GMs are recorded in the TAP SGMT.

All incoming grievances are recorded, tracked and managed in the SGMT by the in-country Grievance Coordinator. This allows an on-going information flow, enabling the project to understand and monitor its impact over the course of implementation. Any requests for information captured in the grievance process that are not related to grievances will be sent to the affected TAP work-stream or relevant EPC contractor to be addressed.

The TAP grievance team periodically reviews the grievance management process to eliminate systemic problems and to ensure that the resolution process is working efficiently and delivering effective outcomes. TAP staff and contractors receive continual grievance training, including training in using the SGMT tool. The in-country Grievance Coordinator monitors compliance against relevant commitments using the grievance monitoring and verification forms.

6. Stakeholder Engagement Coordination and Monitoring

6.1 Alignment of Social and Stakeholder Management Functions

The Social Impact Management Plan (SIMP) describes the alignment of social functions within TAP. Overall responsibility for TAP social impacts and stakeholder management rests with the Commercial and External Affairs Director who heads the TAP Corporate Assurance Team. The Assurance Team ensures the integration of the project's environmental and social management organisation at corporate level and, through the various Country Offices, the country-level integration of stakeholder relations, government affairs and social investment functions.

Stakeholder engagement functions are represented in the Corporate Assurance Team by the corporate staff responsible for coordination of stakeholder management, social investment, government affairs and communications, across the TAP project. The Country Offices are generally responsible for in-country stakeholder engagement, although Environmental & Social (E&S) teams are responsible for construction related-community-level engagement and Land Management teams conduct engagement on land access and compensation matters. Where engagement is conducted by EPC contractors, project requirements are defined in Contractor Control Plans (CCPs) and implementation monitored on an on-going basis. All contractor-managed processes comply with the standards established by TAP for stakeholder engagement and grievance management.

The Corporate Assurance team conducts monthly cross-functional meetings to review TAP's social performance and to agree strategic responses to emerging social issues, identified areas of underperformance or changes in the project's social or stakeholder environments. Monthly cross-functional meetings ensure effective integration between the E&S Manager and other social functions such as Stakeholder Engagement, SEI, Security, Communications and Land Managers. There is a similar arrangement at country level to provide coordination between the Integrated Project Management Team (IPMT) and the Country Office Stakeholder Manager, CLCs and SEI Manager functions. The monthly cross-functional meetings are based on country-level reports coordinated by the E&S teams with input from Land Management, Country Offices, EPCs and others.

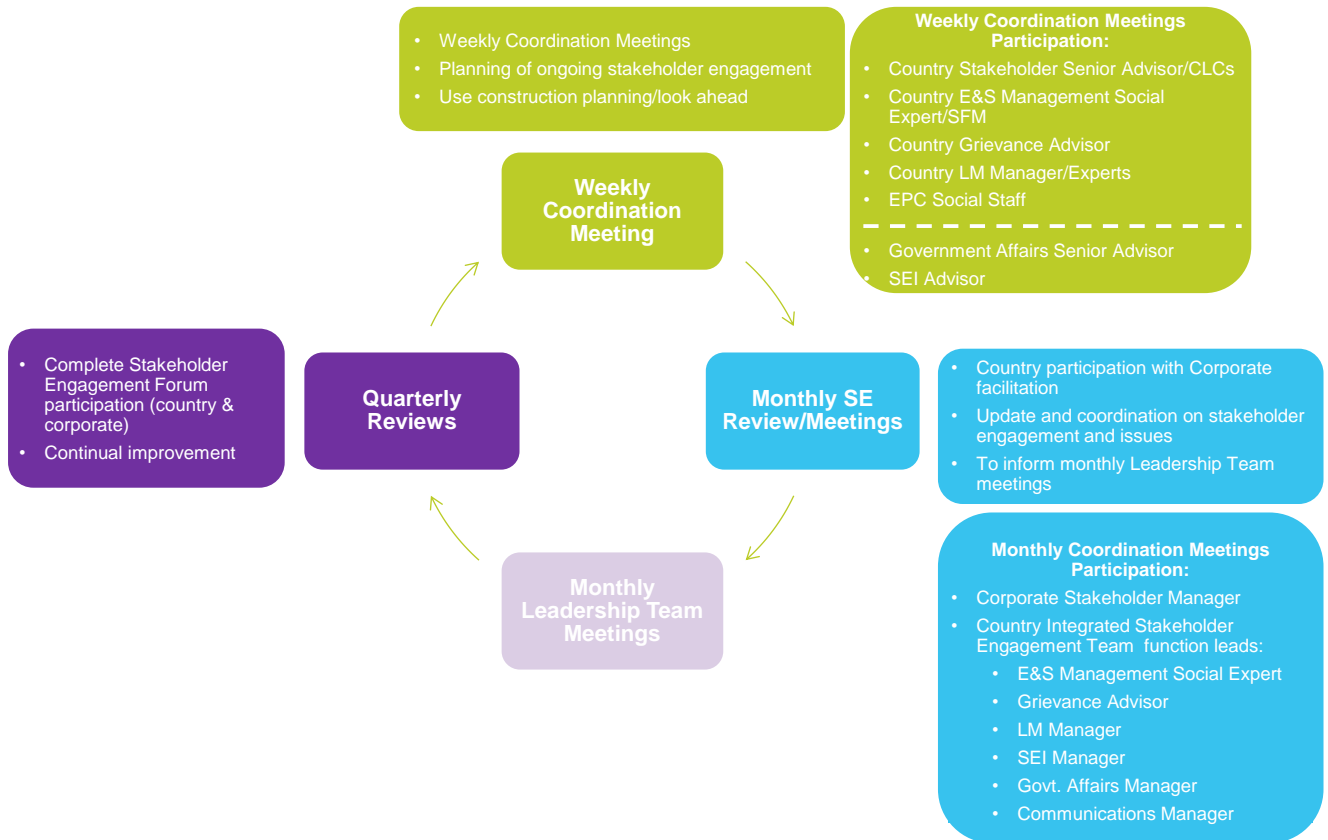
6.2 Internal Coordination and Monitoring

TAP has set up a process aimed at ensuring ongoing coordination and monitoring of the effectiveness of its stakeholder engagement processes and those of its EPC contractors.

The Integrated Stakeholder Engagement Team members and the EPCs participate in regular coordination meetings as illustrated in figure 6.1 below.

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Figure 6.1: Stakeholder Engagement – Coordination Meetings



Weekly coordination and monitoring meetings take place in the field, at the EPC contractor facilities. These meetings are attended by the EPC social staff and TAP stakeholder engagement team members from the E&S Management (Social Expert, SFMs, Grievance Coordinator, E&S Manager), LM (LM Manager and experts) and Country Office Stakeholder Management (Stakeholder Manager, CLCs) functions and the EPC (CLOs). Should specific situations or issues need to be addressed with additional inputs, the SEI and Government Affairs team units` representatives also participate as needed, either in person or remotely via teleconference.

Aspects addressed during these meetings include ongoing stakeholder engagement topics, closure of actions/issues from the previous week, operational issues, construction-related aspects including community health and safety, engagement planning for the upcoming week and further based on the construction schedule look-ahead, grievances received and aspects of grievance management. The E&S Management function is in charge of organising the weekly coordination meetings.

On a monthly basis, the country stakeholder engagement functional leads (Country Office Stakeholder Engagement Manager, E&S Management Social Expert, Grievance Advisor, LM Manager, SEI Advisor, Government Affairs Advisor, Communication Advisor) participate in a Stakeholder Engagement Review Meeting by country, co-ordinated and facilitated by the Corporate Stakeholder Manager. These monthly meetings are held by teleconference and are aimed at reviewing the foregoing month's engagement, ensuring coordination and

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monitoring of the engagement process between in-country and corporate-level teams, and looking ahead to the next monthly phase of stakeholder engagement.

The monthly review meetings take place in advance of the monthly TAP Leadership Team Meetings, allowing the provision of updates to the TAP management on key aspects of stakeholder engagement.

TAP conducts quarterly reviews of the performance and risks associated with stakeholder engagement. These quarterly reviews are part of TAP's continual improvement process and take place with similar participation to the monthly review meetings.

The Corporate Stakeholder Manager oversees organising the Monthly Stakeholder Engagement Review Meetings and the Quarterly Risk/Performance Reviews

Contractors report to TAP on a monthly basis on stakeholder engagement performed.

6.3 Key Performance Indicators (KPIs)

Examples of key performance indicators (KPIs) used by TAP for evaluating the effectiveness of stakeholder engagement activities and analysis of trends are provided in Table 6.1 overleaf.

Table 6.1: KPIs

Outreach	Actual	Planned	%
Number of outreach sessions/meetings conducted.			
HSE community training sessions conducted.			
% of pipeline corridor communities informed.			
% of participation in pre- entry/pre-exit construction awareness meeting.			
Planned number of participants in outreach sessions.			
Visits	Actual	Planned	%
Number of visits and visitors received in TAP offices.			
Gender of visitors to TAP offices.			
Number of requests for information responded to within 3 working days.			
Number of MoMs entered into SGMT.			
Issues/Commitments	Actual	Planned	%
Number of informal meetings.			
Number of issues raised (during office visits and outreach sessions), vs. issues addressed and issues outstanding.			
Number of commitments received and delivered within the timeframe (this is for commitments made during stakeholder engagement meetings).			
E&S Management	Actual	Planned	%
Total number of social incidents.			
Social incidents (category 3/4/5)*			
Social incidents (category 1/2) *			
Number of social incidents by type (land related, non-land related, industrial action).			
Number of stakeholder meetings/community awareness sessions.			
Employees from local project affected communities.			
Employees from host countries.			
Euro spend on goods and services in host country.			
Grievance	Actual	Planned	%
Efficiency: total number of grievances received and resolved, number of grievances resolved according to prescribed timeframes, median days to closure.			
Effectiveness: total number of grievances received by region, number of grievances by work-stream, number of grievances by category, number of recurring grievances.			
Awareness: number of grievance training sessions completed by TAP and contractors; areas provided with grievance communication; recorded number of grievances using recourse mechanisms and number of hot topics escalated from assessment of overall grievance and stakeholder information.			

*Ref TAP-HSE-PR0011

7. Change Management

7.1 Annual SEP Review

In accordance with TAP's Commitment Register (GAL00-PMT-601-Y-TLX-0001), the Stakeholder Engagement Plan will be reviewed on an annual basis (GR309) and updated to take into account the results of the review. The Corporate Stakeholder Manager will be responsible for facilitating this review, in collaboration with the in-country stakeholder-facing functions, and incorporating any agreed changes.

7.2 Operations Readiness

Before TAP enters its operational phase, the Stakeholder Engagement Plan will be updated to take into account the following:

- Resources required by different stakeholder-facing functions during operations.
- Review of stakeholder mapping, tailored to the operations phase and engagement requirements.
- Operations plans for other stakeholder-facing functions (Stakeholder Management, SEI, Livelihood Restoration, Environmental and Social, Grievance Management).
- Residual grievances carried over from the construction phase and requiring ongoing monitoring.

TAP's Commitment Register (GAL00-PMT-601-Y-TLX-0001) specifies that the Stakeholder Engagement Plan for Operations will be finalised six months before the start of operations and will be shared with key stakeholders (GR304).

8. Sources of Information

8.1 TAP Website

A wide range of information relating to the project is available on the TAP website. In terms of stakeholder engagement, the following sections are of particular interest:

Website Section	Link
ESIA - Greece	https://www.tap-ag.com/our-commitment/to-the-environment/esia-greece
Corporate Social Responsibility	https://www.tap-ag.com/about-us/corporate-social-responsibility
Land Access Summary	https://www.tap-ag.com/land-access
Guide on Land Easement and Acquisition - Greece	https://www.tap-ag.com/assets/03.land_access/english/GLAC%20in%20Greece_in%20English_March%202016.pdf
Livelihood Restoration Plan - Greece	https://www.tap-ag.com/assets/03.land_access/english/Livelihood%20Restoration%20Plan%20Greece.pdf
Livelihood Assistance and Transitional Support - Greece	https://www.tap-ag.com/assets/03.land_access/english/Livelihood%20Assistance%20and%20Transitional%20Support%20Greece_Sept%202016_EN.pdf
Health and Safety Policy	https://www.tap-ag.com/assets/07.reference_documents/english/hse/150811_HSE%20Policy.pdf

8.2 Newsletters/Leaflets/Posters

Newsletters published in Greek have been distributed to more than one million households in Northern Greece. These were in two editions: 2014 and 2015.

Leaflets published in Greek covering health and safety, project benefits, environment, agriculture, LEA and construction have been distributed from the 23 cadastral offices as well as through community engagement in open meetings in 2014 and 2015.

Project information is available in Greek from TAP local offices. A hard copy of the ESIA has been distributed to all 3 Regions and all 30 Municipalities and other institutions. A copy of the non-technical summary is held at each TAP local office.

8.3 Media Campaigns

Media campaigns were organised in Northern Greece in 2014 and 2015.

8.4 Local TAP offices

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