

# STAKEHOLDER ENGAGEMENT PLAN (SEP)

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# 1 INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared for Norp knit Industries Ltd. Unit-2

SEP, which identifies target groups and the specific engagement activities required for each group, has been conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project as per the national legislation and World Bank Environmental and Social Standards (“ESSs”).

This is a dynamic document which is subject to revisions and updates in case of the needs and changes in the Project.

## 1.1 Background

NORP KNIT. UNIT-02 is a apparel manufacturing facility with sustainable machinery, having process: cut-pack of garments. Washing, embroidery.

## 1.2 Project Location and Area of Influence

The locations of the Project Areas: B-01/1, Islampur, Kodda Nandun, Bason, Gazipur, Bangladesh.

## 1.3 Objectives of SEP

The objective of this document is to identify all stakeholders and their interests to the Project and to lay out the procedures and principles to create an effective communication and improve engagement with the stakeholders.

- identify stakeholders and their interest to the Project,
- set out applicable management interfaces,
- define roles and responsibilities,
- outline the applicable project standards relevant to this Plan,
- define Project commitments, operational procedures and guidance relevant to this Plan,
- define monitoring and reporting procedures, including the key performance indicators (KPIs) of stakeholder engagement activities,
- define training requirements,
- set out references for supporting materials and information,

This Plan also aims to create long-term relations between the Project and local communities based on

mutual trust and transparency. By implementation of this SEP, stakeholders will be able to access to the information about the Project, its investments, installation works and operation activities in a timely manner. Data will be fully understandable for the targeted groups and access to consultation locations is available for all.

This SEP aims to ensure vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement process and, to ensure that all relevant parties have been engaged and no group has been excluded. In this content, this SEP aims to be a useful tool for management of communication between the Project and its stakeholders.

### 1.4 Scope of this SEP

This Stakeholder Engagement Plan covers all activities including associated facilities and contractors' activities of the Project. All Contractors shall work in compliance with the related requirements and standards that have been set out in this Plan.

This Stakeholder Engagement Plan consists of a formal management system to establish and maintain a reliable communication with stakeholders of the Project during the lifetime of the Project. It should be updated periodically as stakeholder communication needs change.

This Plan is a part of the environmental and social management plans developed for the Project. It overlaps and cross-linkages to number of the other Management Plans given as follows:

- ❖ Environmental and Social Management Plan
- ❖ Emergency Response Plan
- ❖ Grievance Mechanism Procedure
- ❖ Air Quality Management Plan
- ❖ Waste Management Plan
- ❖ Occupational Health and Safety Management Plan
- ❖ Human Resources Policy
- ❖ Carbon Footprint Report.

## 1.5 Definitions

<b>Accessibility</b>	All employees and stakeholders can raise a comment or submit a grievance easily.
<b>Compliant</b>	A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.
<b>Confidentiality</b>	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
<b>Culturally Appropriate</b>	A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.
<b>External Stakeholder</b>	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.
<b>Grievance Mechanism</b>	A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behavior of the company, its contractors, or workers.
<b>Grievance:</b>	An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner. Complaint.
<b>Impartiality</b>	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
<b>Informed Consultation and Participation</b>	On-going relationship based on information, consultation and participation with the indigenous peoples affected by a project throughout the project's life cycle.

<b>Internal Stakeholders</b>	Groups or individuals within a business who work directly within the business, such as employees and contractors
<b>Project Affected People “(PAP)”</b>	Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
<b>Stakeholder</b>	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
<b>Transparency</b>	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
<b>Vulnerable People</b>	People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

## 1.6. List of Abbreviations

<b>Aol</b>	Area of Influence
<b>DCS</b>	Document Control System
<b>EIA</b>	Environmental Impact Assessment
<b>EHS</b>	Environmental Health and Safety
<b>ERP</b>	Emergency Response Plan
<b>ESAP</b>	Environmental and Social Action Plan
<b>ESMS</b>	Environmental and Social Management System
<b>ESP</b>	Environmental and Social Policy
<b>ESS</b>	Environmental and Social Standard
<b>GMP</b>	Grievance Mechanism Procedure
<b>GN</b>	Guidance Note
<b>HR</b>	Human Resources
<b>HS</b>	Health and Safety
<b>HSE</b>	Health, Safety, and Environmental
<b>IFC</b>	International Finance Corporation
<b>KPI</b>	Key Performance Indicator
<b>NGO</b>	Non-Governmental Organization
<b>OHS</b>	Occupational Health and Safety
<b>OHSMP</b>	Occupational Health and Safety Management Plan
<b>Project Company</b>	Norp Knit Industries Ltd. Unit-02
<b>PAP</b>	Project Affected People
<b>PS</b>	Performance Standard
<b>SAS</b>	Social Affairs Staff
<b>SEP</b>	Stakeholder Engagement Plan
<b>SEA / SH</b>	Sexual Exploitation and Abuse and Sexual Harassment
<b>WB</b>	Word Bank

## 2 KEY ROLES AND RESPONSIBILITIES

Key roles and responsibilities relevant for the implementation of this plan are outlined in this section.

Roles	Responsibilities
<b>General Manager – Sustainability</b> <b>(Backup person: GM – compliance)</b>	<ul style="list-style-type: none"> <li>• Determining the policies and targets regarding the social communication and stakeholder engagement,</li> <li>• Approval of this SEP from Top management.</li> <li>• Ensures this SEP will be implemented during the lifetime of the Project,</li> <li>• Appoints the Manager,</li> <li>• Evaluates the reports provided by Manager and ensures necessary actions were taken,</li> <li>• Taking approval from Top management for the social budget of the Project determined and submitted by Human Resources Manager / Social Affairs Staff (SAS).</li> </ul>
<b>Manager – HR &amp; Admin,</b> <b>Manager – Compliance,</b> <b>Manager – Sustainability</b>	<ul style="list-style-type: none"> <li>• Ensuring this plan is implemented properly during the lifetime of the Project,</li> <li>• Ensures the Teams under the SAS, HR Manager and Social Compliance / Communication Team are aware of his / her responsibilities,</li> <li>• Provides (after receiving from management) necessary resources for proper implementation of this SEP and GRM,</li> <li>• Coordinates with parties for proper implementation of this SEP,</li> <li>• Providing (after receiving from management) necessary resources for the implementation of the stakeholder engagement plan,</li> <li>• Reports to the General Manager about performance of the system,</li> <li>• Ensures national and international legislations / guidelines which are applicable to the Project activities are identified and tracked,</li> </ul>

<p><b>Social Affairs Staff ("SAS") / Human Resources ("HR") Manager</b></p>	<ul style="list-style-type: none"> <li>• Making the final decision concerning internal and external grievances, (if needed) in terms social issues in the light of the assessments of the Social Affairs Staff (SAS) / Human Resources Manager.</li> <li>• Implementing this SEP and GMP,</li> <li>• Ensuring the Project's compliance with the national and international standards and requirements set out in this Plan,</li> <li>• Coordinating the relevant parties for the proper implementation of this Plan,</li> <li>• Determining the social budget of the Project and reporting it to the General Manager,</li> <li>• Reporting to the Manager about the system performance,</li> <li>• Ensuring national and international legislation/guidelines which are applicable to the Project activities are identified and tracked,</li> <li>• Recording all formal and informal engagement activities with local communities in Document Control Centre ("DCC"),</li> <li>• Keeping records of the types of leaflets, brochures, newsletters prepared and distributed, by location and inserting this detail into stakeholder engagement reports,</li> <li>• Monitoring and recording the social responsibility activities carried out in the scope of the Project and inserting those details into stakeholder engagement reports,</li> <li>• Forming relationships with the Project stakeholders and organizing stakeholder meetings to collect the grievances, concerns and/or requests actively as required,</li> <li>• Providing regular reporting back to the community on the management related to community grievances,</li> <li>• Determining and providing the necessary training materials for all employees,</li> <li>• Keeping the records of the complaints and/or suggestions in the Grievance Database with details (by whom, date, status, etc.)</li> <li>• Searching the causes of the grievances and the social incidents that cause; injuries, delays or stoppage in the work and disputes among the Project and communities,</li> <li>• Monitoring all complaints and ensuring that all complaints are resolved and closed properly in a timely manner,</li> <li>• Following the results of complaint and reporting on a weekly, monthly and annual basis,</li> <li>• Recording and reporting general and local employment rates and complaints which are received verbally or observed visually,</li> <li>• Filling out the "Complaint Register Form", keeping the grievance records and monitoring the grievances and filling out "Consultation Form". Giving the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact information will be notified within 5 working days that the grievance solution process has started and after the grievance closed).</li> </ul>
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Roles	Responsibilities
<b>Social Compliance / Communication Team</b>	<ul style="list-style-type: none"> <li>• They are the teams working under the Project's SAS / HR Manager,</li> <li>• Performing internal and external communication,</li> <li>• Having responsibility for the implementation of this SEP by fulfilling the Project requirements together with SAS / HR Manager,</li> <li>• Determining necessary resources for proper implementation of this SEP and reporting them to the SAS / HR Manager.</li> </ul>
<b>Environmental Management Representative</b>	<ul style="list-style-type: none"> <li>• Reporting environmental risks to the Manager,</li> <li>• Planning and implementing environmental trainings in accordance with the national and international standards,</li> <li>• Evaluating the risks and preparing precautionary proposals by conducting investigations of the damages that the emergencies in the surrounding area can cause to the environment, to the Project and employees during and after the emergency,</li> <li>• Ensuring that measures are taken according to the risks that arise during and after the emergency and coordinating the relevant activities,</li> <li>• Performing routine environmental inspections and reporting the results of the inspections to the Manager,</li> <li>• Control of the environmental performances and records of the Contractors, preparing an annual report on environmental status of the Project.</li> </ul>
<b>Health and Safety Representative</b>	<ul style="list-style-type: none"> <li>• Determining the Occupational Health and Safety ("OHS") impacts and hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances,</li> <li>• Ensuring that all provisions in the Contractor engagements regarding environmental requirements as per the Project Standards and auditing the performance of the Contractors on those requirements,</li> <li>• Supporting SAS / HR Manager to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding OHS issues.</li> </ul>
<b>Contractor Representatives / Project Responsible</b>	<ul style="list-style-type: none"> <li>• Ensuring that all requirements in this SEP are complied with.</li> </ul>
<b>Contractors / Subcontractors /</b>	<ul style="list-style-type: none"> <li>• Not making any commitment in their interactions with the stakeholders beyond their competence,</li> <li>• Complying with the requirements of this SEP and other relevant Management System documentation of the Project.</li> </ul>



### 3 PROJECT STANDARDS

This SEP is prepared based on national and international requirements and standards. During the lifetime of the Project, “Project Standards” will be followed which consist of:

- ❖ applicable Bangladesh EIA requirements,
- ❖ other commitments to and requirements of Government authorities, Environmental and Social Policy,
- ❖ applicable international standards and guidelines,
- ❖ Word Bank (“WB”) Environmental and Social Standards (“ESS”s).

#### Applicable National Standards:

Bangladesh Labor Law, Rules, ILO core conventions, BD Environment conservation Act & Rules, WB standards related to this project,

### 4 STAKEHOLDER ENGAGEMENT ACTIVITIES

#### 4.1. Early Engagement & stakeholder Identification:

NORP KNIT. UNIT-02 has a total of 5000+ employees.

The facility has been evaluated according to ECA, ECR, labor law & rules and different other rules. Required all the applicable licenses are already taken and operating as per conditions within the licenses. Identified stakeholders are represented in the below table:



**BGMEA**  
(Bangladesh Garment  
Manufacturers and  
Exporters  
Association)

**Engagement Point: Membership and other  
export related issues.**

**Way of engagement: Membership  
renewal & following meetings.**



**FSCD**  
(Fire Service  
and Civil  
Defense)

**Engagement Point: Fire License, Fire safety  
training, Preparedness and Emergency  
Response. Fire drill.**

**Way of engagement: Discussion during their  
factory visit.**



**DoL**  
(Department of  
Labor)

**Engagement Point: Labor related different  
issue like freedom of association.**

**Way of engagement: Discussion during PC  
Committee & Safety Committee election.**



**DIFE**  
(Department of  
Inspection for Factories  
and Establishments)

**Engagement Point: Factory License.**

**Way of engagement:**  
During renewal of Factory License.  
Regular visit of DIFE.



**DoE**  
(Department of  
Environment)

**Engagement Point: ECC (Environmental  
Clearance Certificate, CPP (Captive  
Power Plant)**

**Environment related issue: During renewal  
of ECC, CPP, Waste water test, or others  
environmental issues, Regular visit of DoE.**



**BERC**  
(Bangladesh Energy  
Regulatory  
Commission)

**Engagement Point: BERC License.**

**Way of engagement: During renewal of  
BERC license or any amendment,  
Regular visit of BERC authority.**



**EPB**  
(Export Promotion  
Bureau)

**Engagement Point: IRC & ERC License.**

**Way of engagement: During renewal of  
IRC & ERC License & others Import and  
Export related issues.**

**Boiler  
Inspection**

**Engagement Point: Boiler license.**

**Way of engagement: During renewal of  
boiler license & boiler inspection.**

**Employee**

**Engagement Point: Environmental  
Issues, Health & Safety Issues & others.**

**Way of engagement: During PC Committee  
& Safety Committee election, Training,  
Meeting and other CSR related program,  
Grievance procedure etc.**

**Supplier**

**Engagement Point: Different type of  
program (Environmental, Health &  
Safety & other).**

**Way of engagement: Discussion during  
meeting and any supplier engagement  
program.**

**Buyer**

**Engagement Point: Commitment for  
Environmental Issues, Health & Safety  
Issues & others, increasing business.**

**Way of engagement: Discussion during  
factory visit, meeting and other  
program.**

**NGO**

**Engagement Point: Community  
program, training etc.**

**Way of engagement: Discussion during  
their factory visit or arranging training.**

**Local  
Communit**

**Engagement Point: Environmental, Health  
& Safety and other program Issues.**

**Way of engagement: CSR program, During tree  
plantation program, Free medical checkup and  
others social program, Compline box etc.**

**City  
Corporatio  
n & Union  
Parishad.**

**Engagement Point: Water permit &  
Trade license collect.**

**Way of engagement: During renewal of  
water extraction permit, Regular visit to  
them.**

**Regulatory  
Body**

**Engagement Point: Local Law regulation  
implementation.**

**Way of engagement: During factory visit  
& our visit to them.**

#### 4.1.1 Stakeholder Engagement Program

The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the Project activities, including Project performance, Project development and investment plans and their implementation.

The methods of communication to be utilized are summarized in the following Stakeholder Engagement Program and will include:

- Publication for public review of the Stakeholder Engagement Plan and Environmental and Social Action Plan,
- Meetings with regulatory bodies,
- Public meetings,
- Published on local municipalities' website (if available) and/or on a dedicated Project website,
- Announcements to locals,
- Provision of general information on noticeboards at key public locations.

The following summarizes the stakeholder engagement program in terms of:

Table 4.1.1. Stakeholder Engagement Program

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
All affected settlements and Interested parties Local communities, Local government, Local businesses and industries	<b><u>Information Disclosure</u></b> <ol style="list-style-type: none"> <li>1. Purpose, start date, duration, and nature of operations activities,</li> <li>2. Status and effectiveness of implementation of mitigation measures related to relevant social and environmental impacts,</li> <li>3. Impacts on local communities,</li> <li>4. Grievance mechanism disclosure,</li> <li>5. Ongoing monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results,</li> <li>6. Continue disclosing information via the Project company website.</li> </ol>	Dependent on stakeholder classification	Implementation and review for updates every 2 years and as required	Social Affairs Staff (SAS) / Human Resources (HR) Manager
All affected settlements and Interested parties Local communities, Local government, Local businesses and industries	<b><u>External Grievance Mechanism</u></b> <ol style="list-style-type: none"> <li>1. Disclosure of grievance mechanism to communities,</li> <li>2. Disclosure of grievances received and resolved to communities.</li> </ol>	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation	Social Affairs Staff (SAS) / Human Resources (HR) Manager
Local business and industries, All affected settlements	<b><u>Employment and Procurement Strategies</u></b> <ol style="list-style-type: none"> <li>1. Recruitment of employees,</li> <li>2. Training of staff,</li> <li>3. Procurement of supplies and services.</li> </ol>	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	Social Affairs Staff (SAS) / Human Resources (HR) Manager
All affected settlements and Interested parties Local communities, Local government	<b><u>Use of Emergency Response and Preparedness</u></b> <ol style="list-style-type: none"> <li>1. Provision of information on code compliance / emergency preparedness to engage in public consultation and disclosure about issues of concern with potentially affected stakeholders,</li> </ol>	Drills Workshops  Community meetings	Annual drill programs or as required	Environment and HS Representatives

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
NGOs	<p><b><u>Social progress, economic and social development, and environmental protection</u></b></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> <li>1. Mitigation measures against potential environmental and social risks,</li> <li>2. Sustainability criteria,</li> <li>3. Social responsibility projects, implementation principles.</li> </ol>	<p>Focus group meetings</p> <p>Workshops</p> <p>Company website</p>	As required / As requested	Social Affairs Staff (SAS) / Human Resources (HR) Manager
Local industries All affected settlements	<p><b><u>Road Transportation and Traffic Safety</u></b></p> <ol style="list-style-type: none"> <li>1. Road safety awareness, including on safe crossing of the bypass and access roads, if required,</li> <li>2. Types, number, and frequency of vehicles that can be anticipated through different phases of the Project,</li> <li>3. Collaboration with local communities and responsible authorities to improve signage, visibility, and overall safety of roads, particularly along stretches located near schools or other locations where children are present,</li> <li>4. Collaborating with local communities on education about traffic and pedestrian safety (e.g., school education campaigns),</li> <li>5. Communication of traffic measures</li> </ol>	<p>Face to face meetings</p> <p>Dependent on stakeholder classification</p>	As requested, / as needed for others	Social Affairs Staff (SAS) / Human Resources (HR) Manager Environment and HS Representatives

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
All affected settlements	<p><b><u>Management of environmental and social risks of the Project</u></b></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> <li>1. Environmental and social monitoring program</li> <li>2. Environmental and social monitoring results</li> <li>3. Overall information about progress of the Project</li> </ol>	<p>Meetings with local community</p> <p>Brochures</p> <p>Workshops</p>	<p>As required/ As requested</p>	<p>Social Affairs Staff (SAS) / Human Resources (HR) Manager</p> <p>Environment and HS Representatives</p>
Vulnerable Groups	<p><b><u>Employment and any other interest of vulnerable groups</u></b></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> <li>1. Recruitment of employees,</li> <li>2. Training of staff,</li> <li>3. Use of roads, water, and other infrastructure, increase in traffic density,</li> <li>4. Local employment,</li> <li>5. Important commercial opportunities,</li> <li>6. Environmental impacts.</li> </ol>	<p>Meetings targeting any identified vulnerable groups</p> <p>Women meetings and focus group discussions</p>	<p>As requested/ as required for other meetings</p>	<p>Social Affairs Staff (SAS) / Human Resources (HR) Manager</p>
<p>Workforce</p> <p>All affected settlements and</p> <p>Local industries</p> <p>Local government</p> <p>Municipality</p>	<p><b><u>Community Health</u></b></p> <ol style="list-style-type: none"> <li>1. Provide training on Company policies (employees and contractors) on respectful and appropriate behavior with communities,</li> <li>2. As part of Project orientation training, include awareness raising of the prevention and treatment of communicable diseases.</li> </ol>	<p>Face to face meetings</p> <p>Dependent on stakeholder classification</p>	<p>At least annually face to face meetings</p> <p>As requested/ as needed for others</p>	<p>Social Affairs Staff (SAS) / Human Resources (HR) Manager</p>
Employees of the Project	<p><b><u>Employee welfare</u></b></p>	<p>Face to face interview</p>	<p>Monthly or when required due to the</p>	<p>Social Affairs Staff (SAS) / Human</p>

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
Project employees Contractor	Provision of information on: 1. Employee Grievance Mechanism, 2. Labor rights, 3. OHS procedures, 4. Contractor management.	OHS Board Labor audits	results of grievance mechanism	Resources (HR) Manager Environment and HS Representatives

## 4.2 Tools & Methods for Information Disclosure

The Project will provide transparent informative material to the affected communities and the stakeholders in a consistent and timely manner. The manner in which this material will be disclosed as discussed in the sections below.

Project specific web site will keep information on the operations updated on an assigned webpage in Bangla/English.

The contact page contains the links and information of NORP KNIT. UNIT-02 communication channels such as LinkedIn & mail. On the other hand, external complaints are received through the virtual assistant via e-mail.

Moreover, EIA, EPT (environmental parameter test) and Stakeholder Engagement Plan shall be disclosed on this assigned website for the Project.

Information sheets including a non-technical summary of the activities in the facility, key project issues and details regarding Project's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the assigned website and at the Project offices.

### *Responding to Stakeholders*

Authorities of the Project will give full and timely responses to requests, comments, and questions of local communities in addition to implementing the Grievance Redress Mechanism in the case of complaints. All requests shall be treated respectfully. In the event that it is not possible to meet a particular request, then a detailed explanation as to why not, will be given through the use of social plans.

On the Project website, material providing information about the Project will be available, and stakeholders will be kept posted. When needed, matrices and informative documents will be prepared as a response to concerns, complaints and requests of stakeholders and local communities based on impact assessment surveys carried out by the Project. As long as it is appropriate, relevant Project information will be disclosed to the public.



### *Disclosure Activities*

During this engagement phase, disclosure and consultation activities will be designed along following the general principles:

The information presented (via presentations, leaflets, website publications etc.) will be clear and non-technical and will be presented in the local language understood by those in the communities,

Simplified system will be provided to ensure that stakeholders are able to raise their concerns and the Project will encourage the stakeholders to raise their concerns/complaints and suggestions.

Issues raised are to be answered at the meeting or, if an answer is not immediately available, these issues will be actively followed up, the person who raised the issue will be informed after the meeting when the issues resolved.

## 5 MANAGEMENT OF GRIEVANCES

### Grievance and Feedback Procedure

Grievances are complaints, suggestions and problems that employees and external stakeholders raise on a specific issue. The spectrum of grievances ranges from major and potentially illegal issues such as discrimination or victimization in the workplace to more minor day-to-day disputes of local stakeholders or Project Affective People (“PAP”).

Grievance procedures will be coordinated through the appointed Social Affairs Staff (SAS) with the help of Environment and HS Representatives who are the primary interfaces between the community and the Project. Complainants will have the chance to provide their names in order to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. The SAS is expected to conduct a bridge between the company and the employees, in order to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

The grievance mechanism will be informed to the stakeholders so that they are aware of the process, having knowledge of the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with the Project SAS, if it is not anonymous.

In addition, the mechanism shall also constitute an internal grievance process, conducted specifically for employees, subcontractors and other suppliers of the Project.

The details of the Grievance Mechanism of the Project is given in factory’s Grievance Mechanism Procedure.

## 6 MONITORING

### 6.1 Review and Revision of this Plan

This SEP will be reviewed annually. This Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs of the Project. Revision of this Plan will be the responsibility of SAS in coordination with the Social Compliance / Communication Team.

If the circumstances change, this Plan may be updated on an “as required” basis.

Any revisions to this Plan will be updated to the Document Control System and the Project website to ensure that all internal and external stakeholders have access to the latest version of this SEP.

### 6.2 Key Performance Indicators (KPIs)

The following table summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of the stakeholder engagement performance.

*Table. Key Performance Indicators (KPIs)*

KPI	Target	Monitoring Measure
Number of community complaints or grievances	Total number reduced year on year	Grievance Database
Number of customer complaints or grievances	Total number reduced year on year	Grievance Database
Number of internal complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 working days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 calendar days	100% of the complaints are closed within 30 calendar days	Grievance Database
% of visitors that are received Visitor Training/Instructions on general site rules, especially OHS issues	100% of the visitors are received Visitor Training/Instructions	Visitors Registers
Auditing Grievance Procedure to ensure that it is being implemented and grievance are being adequately addressed	Annual audit complete target of 100% of grievances close out to satisfaction of complainants within 30 working days	Audit Report

KPI	Target	Monitoring Measure
% item of Social Responsibility activities that implemented	Target of 80%	Annual Reports

### 6.3 Key Monitoring Activities

The Project will monitor the implementation of the stakeholder engagement process (consultations, grievance mechanism etc.). The outputs of this monitoring will also provide input on the management and monitoring of the overall environment, health and safety (labor rights) and social performance of the Project mainly through:

- ❖ Revision, improvement or extension of the monitoring activities, parameters, locations and frequency; and
- ❖ Reviews and revisions of the management plans and procedures.

The Project will monitor the effectiveness of the engagement processes by analyzing the feedback received from engagement activities, thus involving the engaged stakeholders into the monitoring process.

During all engagement activities, where appropriate, questions will be asked to stakeholders on the effectiveness of the meeting and the process of stakeholder engagement. These questions will be tailored for the engaged stakeholder, but will address mainly:

- Transparency and accessibility of the engagement process, Provision of relevant information,
- Timely responses (ongoing communication),
- Clarity and simplicity of the information provided, and Applicability and relevancy of the information provided.

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries.

The key monitoring activities will focus on ensuring compliance with the requirements set out in this Plan using the key performance indicators.

*Table. Key Monitoring Activities*

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Grievances/ Concerns	<p>The Project will review Grievance Log / Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include:</p> <ul style="list-style-type: none"> <li>• number of outstanding complaints and grievances opened in the month,</li> <li>• number of complaints and grievances opened in the month and evolution since Project start (graphic presentation),</li> <li>• number of complaints grievances closed in the month; and type of grievance.</li> </ul>	Grievance Database	Monthly	Factory office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Factory office
Community Engagement Activities	The SAS will record formal and informal engagement with local communities.	Community Engagement Records (grievance box)	Weekly	Factory office
Disclosure Materials and Feedback to Communities	SAS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SAS will monitor feedback to local communities	Community Info System on the Website	Yearly	Factory office
Social Responsibility Program	SAS will monitor and record the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement reports.	Annual reports	Annually	Factory office

## 7 TRAININGS

All necessary training will be provided as induction training to provide general awareness for all employees of the Project and its contractors. Job-specific training for responsible personnel will be also provided as necessary including stakeholder engagement and grievance management. The implementation of this SEP will be followed by the Social Affairs Staff and other personnel and supervisors of the Project Contractors are also involved in or overseeing the stakeholder engagement activities and Grievance Mechanism Procedure.

### 7.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers (i.e. workers of contractors and/or subcontractors). The trainings will be given in the first “Induction Training” session. All employees of the Project and contractors are required to participate in community relations and human rights training.

### 7.2 Job Specific and Other Training Requirements

Job-specific training and additional specialist training (if there any) for key personnel involved in the community, then it will be provided to those and employees for grievance management. Specific training on the application of the Stakeholder Engagement Plan and Grievance Management is also provided to the Social Affairs Staff and other personnel with supervisors of the Project.

## AUDITING AND REPORTING

### 7.3 Internal and External Auditing

Routine internal inspections will be carried out by Social Affairs Staff to ensure the assessment of the social responsibility program and overall stakeholder engagement. The conformance will be monitored in accordance with the requirements set out in this Plan. The aspects of this management plan are subject to regulatory audits. Internal annual audit will be conducted by assessing KPIs and monitoring activities defined in this SEP.

### 7.4 Record Keeping and Reporting

Record keeping will be done by SAS during the following cases:

- Consultation meetings,

- Community engagement activities,
- Grievances actions and close out of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- Audits, investigations and incidents which will be managed according to the Project procedures.

## Appendix A: Complaint Register Form

Complaint Register Form		
<b>Reference No:</b>		
<b>Full Name</b>  <i>Note: You can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent.</i>	<input type="checkbox"/> <b>Name &amp; Surname:</b> _____  <input type="checkbox"/> <b>wish to raise my grievance anonymously</b>  <input type="checkbox"/> <b>request not to disclose my identity without my consent</b>	
<b>Contact Information</b>  <b>How the complainant wants to be contacted (mail, telephone, e-mail).</b>	<input type="checkbox"/> <b>By Post:</b> <b>Mailing address:</b> _____  <input type="checkbox"/> <b>By Telephone:</b> _____  <input type="checkbox"/> <b>By E-mail</b> _____  <input type="checkbox"/> <b>I don't want to be contacted</b>	
<b>Details Related to Grievance:</b>		
<b>Description of Incident or Grievance:</b> _____ What happened? Where did it happen? Who did it happen to? What is the result of the problem?		
Case summary: _____		
<b>Date of Incident/Grievance</b>		
	<input type="checkbox"/> <b>One-time incident/grievance (Date _____)</b> <input type="checkbox"/> <b>Happened more than once (how many times? ____)</b> <input type="checkbox"/> <b>On-going (Provide details)</b>	
<b>What would you like to see happen to resolve the problem?</b>		
<b>Only for internal usage: Status of complaint</b>		
	<b>Date:</b>	<b>Signature:</b>
The complaint is closed by:		
Actions taken (Provide details): _____		



## Appendix B: Consultation Form

Consultation Form				
<b>Reference No:</b>				
Person Filling the Form:			Date:	
Interview Agenda:			Reference No:	
<b>Information on Consultation</b>				
Interviewee Institution:			Communication Type <input type="checkbox"/>	
Name-Surname of the Interviewee:			Phone/Free Line <input type="checkbox"/>	
Phone:			Face to face interview <input type="checkbox"/>	
Address:			Web-site/ E-Mail <input type="checkbox"/>	
E-Mail:			Other (Explain)	
<b>Stakeholder Type</b>				
Public Institution <input type="checkbox"/>	Project Affected People <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Trade Association <input type="checkbox"/>	NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industry Associations <input type="checkbox"/>	Workers' Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
<b>Detailed Information on Consultation</b>				
Questions related to Project				
Concerns/feedbacks related to Project				
Responses to the views expressed above:				

[illegible]

## Appendix D: Grievance Closure Form

Grievance Closure Form	
Reference No:	
Determination of Corrective Action(s)	
1	
2	
3	
4	
5	
Responsible Departments	
Close Out the Grievance	
<i>This section will be filled and signed by the complainant in case the complaint stated in the "Grievance Registration Form" is resolved.</i>	
Complainant Date:	<div> <div>Name Surname / Signature of the Person Closing the Complaint</div> <div>Name, Surname / Signature of</div> </div>
<div>...../...../.....</div>	