

Yellow Door Energy Solar Portfolio, Jordan Stakeholder Engagement Plan

Date: November 2019



Yellow Door Energy Solar Portfolio Stakeholder Engagement Plan

Date: November 2019

Public

Yellow Door Energy Contact Details:

302 Prime Center ,13 Zuhar Street,
Tla Al Ali, Amman, Jordan

Table of Contents

| | |
|---|-----------|
| 1. Introduction | 3 |
| Background | 3 |
| Objectives | 3 |
| Project Background | 4 |
| Company | 4 |
| 2. Key regulations | 7 |
| National Legislative Requirements | 7 |
| EBRD Requirements | 7 |
| 3. Stakeholder Identification | 9 |
| Identification of Key Stakeholders | 9 |
| Key stakeholders identified during the development of this plan | 9 |
| Vulnerable Groups | 13 |
| 4. Prior Stakeholder Engagement | 15 |
| Company consultations | 15 |
| Project consultations | 15 |
| 5. Stakeholder Engagement Programme | 16 |
| Overview | 16 |
| Key environmental and social risks and benefits | 16 |
| Key Methods of Engagement | 16 |
| General stakeholder communication records | 17 |
| Disclosure of information | 17 |
| Consultation methods | 18 |
| Community Social Programmes and benefits | 19 |
| Programme | 19 |
| 6. Reporting and grievances | 23 |
| Monitoring, reporting and feedback mechanisms | 23 |
| Grievance Mechanism (GM) | 23 |
| Grievance Resolution | 23 |
| Roles and Responsibilities | 25 |
| Appendix A: Complaint Procedure & Grievance Form | 26 |

1. Introduction

Background

This document is a Stakeholder Engagement Plan (SEP) for the Yellow Door Energy Solar Portfolio (herein referred to as “the Project”), which includes the development, construction and operation of eight solar photovoltaic (PV) plants of 48 MW across various Governorates in Jordan. The Project is being developed by Yellow Door Energy Limited Jordan (the “Company”).

Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond the concerns of potentially affected individuals and building relationship based on trust. As such an effective engagement is essential for creating positive relations with local communities and other stakeholders.

This SEP outlines the consultation and disclosure plans for the Project (Section 5) to implement a robust, open and transparent engagement with stakeholders. The SEP aims to achieve free, prior and informed consultation and broad community support for the Project as well as improve decision-making processes.

The SEP is a ‘live’ document that will be periodically reviewed and updated during the various stages of the Project lifecycle from construction through to operation and decommissioning. A copy of the SEP will be made available to stakeholders at the Company’s office in Amman (Suite 302, Prime Centre 13, Tla'a Al-Ali, Zuhar Street, Amman, Jordan). For further detail on information disclosure, refer to Section 5.

Objectives

The purpose of the SEP is to ensure a proactive, timely and well-structured approach to stakeholder engagement. The objective of the SEP is to:

- Identify stakeholders and their interest/ influence in the Project through stakeholder mapping.
- Establish and maintain long-term relationships between the Project proponent and identified stakeholders;
- Improve and facilitate Project decision-making that involves Project-affected people and other interested stakeholders in a timely manner
- Ensure that stakeholders are provided with sufficient opportunity to voice their opinions and concerns regarding the Project.

Specific objectives of the SEP are detailed below:

- Define the Project area;

- Identify, map and assess affected parties and other interested stakeholders, and how they may be affected by or interested in the Project;
- Set out stakeholder analysis undertaken to understand Project stakeholders, so that appropriate methods and tools to engage them can be developed;
- Provide an action plan for consultation of applicable stakeholders that allows for meaningful stakeholder input into the Project;
- Ensure stakeholders have access to information on Project activities in a timely manner where applicable and if needed;
- Ensure information disclosed to stakeholders can be understood and locations for applicable stakeholders consultation are accessible to all who want to attend;
- Ensure that vulnerable and disadvantaged groups (including women, elderly and disabled etc.), are identified and that practical measures are implemented to include them in ongoing consultation;
- Establish clear mechanisms for managing stakeholders' questions, concerns, and grievances and provide appropriate conflict resolution processes;
- Manage expectations among communities and other stakeholders; and
- Document formal consultation and information disclosure activities for applicable stakeholders, define stakeholder tracking and records management system.

Project Background

Company

The Project is being developed by Yellow Door Energy Limited Jordan (the "Company"), a company incorporated in Jordan, fully owned by Yellow Door Energy Limited ADGM, a renewable energy (RE) developer and operator incorporated in the United Arab Emirates (UAE) focusing on energy efficiency and small-to medium scale solar PV projects.

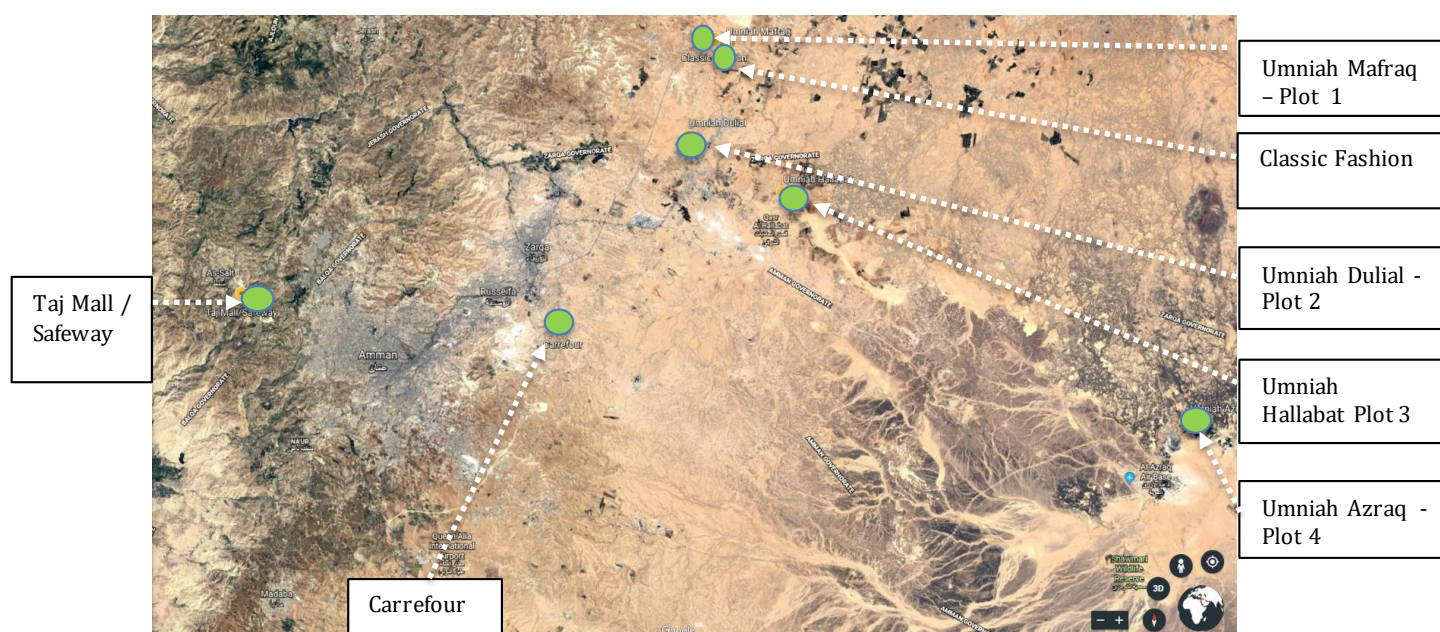
Project

The Project involves the development, construction and operation of eight plants with a capacity of up to 48 MW solar PV power plants in Jordan. The locations of the eight plants are provided below and Figure 1.

Table 1- Private Customers (Off-takers) and Site Locations in Jordan

| Project | Location |
|-------------------------|--------------|
| Classic Fashion | Mafrqa - |
| Umniah Project – Plot 1 | Mafrqa - |
| Umniah Project – Plot 2 | Dulail |
| Umniah Project – Plot 3 | Halabat - |
| Umniah Project – Plot 4 | Azraq - |
| Safeway Project | Fuhais |
| Taj Mall | Fuhais - |
| Carrefour | East Amman - |

Each plant will sell electricity to a private customer (off-taker) under the Wheeling Regulations¹ (each a “Plant” and all together forming the “Project”). The private off-takers are; (i) Classic Fashion, a garments manufacturing company, (ii) Umniah, the third telecom operator in Jordan, (iii) Taj Mall, a shopping, dining and entertainment centres company, (iv) Carrefour and (v) Safeway (the last two off-takers are supermarket chains).

Figure 1 – Solar Plants location in Jordan

¹ The Renewable Energy (RE) Electric Power Wheeling Directive allows an organisation to install a Renewable Energy System (RES) for electric power generation from renewable energy sources in a location different to the location of the organisation's premises that are connected to the grid; and connect the RES to the electric grid (transmission or distribution).

Project Status

The eight plants are at different stages of development, with 40MW out of a total 48MW already under construction. The only plants yet to commence construction are the plants for off-takers Taj Mall and Safeway. All plants are expected to be commissioned by the end of Q1, 2020.

2. Key regulations

National Legislative Requirements

The Solar PV projects are not subject to an Environmental Impact Assessment (EIA) as each Project is less than 5 MW which under national legislation excludes them from having to complete a scoping report / full EIA. Only a Preliminary EIA has been conducted for each plant.

There are no specific requirements in Jordan with regards to ongoing public consultation, stakeholder engagement, or stakeholder engagement planning to guide the consultation and engagement process throughout Project lifecycle.

EBRD Requirements

The Project needs to adhere to EBRD Environmental and Social Policy 2014, and the EBRD Performance Requirements (PRs).

The main PR associated with Stakeholder Consultation and Information Disclosure is PR 10. The key relevant requirements of this PR are presented in **Error! Not a valid bookmark self-reference..**

Table 1: Stakeholder Engagement Requirements of EBRD PR10

| Objective | Key Requirements |
|----------------------------|--|
| Stakeholder Identification | <ul style="list-style-type: none"> Identify Project affected stakeholders, including disadvantaged or vulnerable groups who are affected or likely affected by the Project; or may have an interest in the Project. Develop and implement a Stakeholder Engagement Plan and Grievance Mechanism. |
| Information Disclosure | <ul style="list-style-type: none"> Provide stakeholders with access to timely, relevant, understand, accessible information in a culturally appropriate manner. Including access to: <ul style="list-style-type: none"> Purpose, nature, scale and duration of the Project Any risks, potential impacts and mitigation measures Proposed stakeholder engagement process Time and venue of public consultation meetings Grievance Mechanism Where applicable, differentiated measures will be implemented to allow the effective participation of those identified as disadvantaged or vulnerable groups. |

| Objective | Key Requirements |
|---|--|
| Meaningful Consultation | <ul style="list-style-type: none"> • Consultation will be in line with the degree of potential project impacts and will: <ul style="list-style-type: none"> ○ Begin early and continue throughout the Project lifecycle ○ Be based on prior disclosure and dissemination of information ○ Be free of manipulation, interference, coercion or intimidation ○ Enable meaningful participation ○ Be documented |
| Ongoing engagement and external reporting | <ul style="list-style-type: none"> • Provide stakeholders, on an ongoing basis, with appropriate information on the Project regarding risks, impacts and grievances raised. • Communicate any updates to stakeholders on the Project, including disclosure of updated ESMP if adverse impacts, risks, concerns are identified or raised. • Report to the community with frequency that is proportionate to the concerns of affected communities but not less than annually. |
| Grievance Mechanism | <ul style="list-style-type: none"> • Establish a Grievance Mechanism to receive and facilitate resolution of stakeholders' concerns and grievances about the Project. • The Grievance Mechanism should: <ul style="list-style-type: none"> ○ Resolve concerns promptly and effectively ○ Use a transparent, culturally appropriate and readily accessible consultative process • Allow for anonymous complaints to be raised and addressed |

The investment programme is categorised a Category B Project in terms of the EBRD's Environmental and Social Policy. As a Category B Project, the Company will implement this SEP throughout the Project lifecycle.

3. Stakeholder Identification

Identification of Key Stakeholders

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Project stakeholders are identified as stakeholders that may be directly or indirectly affected by the Project, have an interest in the Project or have the potential to influence the development of the Project.

It is important to note that stakeholder identification is an ongoing process, and key stakeholders will continue to be identified and consulted with throughout the life of the Project. A systematic approach is used to map stakeholders based on their level of impact. As a result of stakeholder identification, the Project stakeholders have been categorised into two main categories:

- primary stakeholders: individuals and groups that may be directly / indirectly impacted by the Project; and
- secondary stakeholders: stakeholders that may have a direct / indirect influence on, but are not necessarily directly impacted by, the Project.

Key stakeholders identified during the development of this plan

The project stakeholders identified at this stage are presented in Section 5, Table 4. The identification of relevant stakeholders is of crucial importance to ensure meaningful consultation on the Project.

Table 4: Key Identified Stakeholders and Method of Engagement

| Type | Stakeholder Category | Name | Impact/influence | Preferred Method of Engagement |
|---|----------------------|--|--|---|
| Project financing / Internal Stakeholders | Primary | <ul style="list-style-type: none"> • EBRD Arab Bank | This group will directly impact / influence the project through making decisions at each stage of the process. | Direct consultation with Yellow Door Energy. |
| Project Shareholders / Internal Stakeholders | Primary | <ul style="list-style-type: none"> • Yellow Door Energy Limited • Jordan employees • Private Off-takers | This group will directly impact / influence the project through making decisions at each stage of the process. | Company employees, including contractors will be consulted through the HR department and a grievance form is available for use if required; |

| Type | Stakeholder Category | Name | Impact/influence | Preferred Method of Engagement |
|--|----------------------|---|--|--|
| National Government Authorities | Primary | <ul style="list-style-type: none"> Ministry of Environment Ministry of Energy and Mineral resources Ministry of Agriculture JEPCO IDECO EDCO Municipalities | This group has direct influence / impact on the project through enforcing regulations, and approving relevant permits. | <p>Yellow Door Energy Limited Jordan will be required to submit official letters and e-mails to the relevant authorities as required.</p> <p>Yellow Door Energy Limited Jordan will facilitate permitting meetings with ministries to discuss any issues or concerns regarding permitting, new regulations and project implications.</p> |
| Local Government Department | Primary | <ul style="list-style-type: none"> Municipalities | This group has direct influence / impact on the project as the Governorates within which the projects operate.. | <p>Yellow Door Energy Limited Jordan will be required to submit official letters and e-mails to the relevant authorities as required.</p> <p>The Yellow Door Energy Limited Jordan will facilitate meetings with Governorates to discuss any issues or concerns regarding and project implications.</p> |
| Local Communities | Primary | <ul style="list-style-type: none"> Communities and residential area surrounding the plants | Communities could be affected directly and indirectly through construction and operation activities | <p>Yellow Door Energy Limited Jordan to undertake consultations with the public via regular public meeting during construction and operation.</p> <p>A complaint and suggestion box will be available for communities to raise the concern</p> |
| Vulnerable Groups | Primary | <ul style="list-style-type: none"> Disabled People living in poverty Elderly with chronic illnesses Single women headed families Syrian refugees, including Bedouin communities | This group could be affected directly and indirectly through construction and operation activities | Yellow Door Energy Limited Jordan to undertake group focus meeting with vulnerable groups throughout the Project life cycle |

| Type | Stakeholder Category | Name | Impact/influence | Preferred Method of Engagement |
|--|----------------------|---|--|--|
| Non-Governmental Organisations (NGOs) | Secondary | <ul style="list-style-type: none"> Local NGOs | Local NGOs could influence the Project both directly and indirectly. | Yellow Door Energy Limited Jordan to collaborate with local NGOs on raising awareness about environmental issues |
| Contractors | Primary | <ul style="list-style-type: none"> EPC contractor Maintenance, repair contractors | This group will have direct influence/ impact on the project through incorporation of stakeholders' input/comments into contracts and procedures | Legal binding agreement with the assigned contractor (EPC BELECTRIC), to include all the Environmental and Social terms of reference in the contract (if possible) |

Table 5: Plant Specific Stakeholders

| Type | Stakeholder Category | Name | Impact/influence | Preferred Method of Engagement |
|--|----------------------|--|------------------|--------------------------------|
| Classic Fashion Plant | | | | |
| Residents | Primary | <ul style="list-style-type: none">Residential properties located in close proximity of the plant (around 50 metres) | See Table 4 | See Table 4 |
| Government / state | Primary | <ul style="list-style-type: none">Mafraq Governorate | | |
| Local Business | Primary | <ul style="list-style-type: none">Hamouda Food Industries Factory (600 m to the southeast) and a Cactus Farm (800 m to the south east) | | |
| The Umniah Telecom Plant – Plot 1, Mafraq | | | | |
| Government / state | Primary | <ul style="list-style-type: none">Mafraq Governorate | See Table 4 | See Table 4 |
| Local Businesses | Primary | <ul style="list-style-type: none">Potato farm adjacent to the plant to the south, and a yoghurt factory adjacent due north | | |
| The Umniah Telecom Plant – Plot 2, Duhlail | | | | |
| Residents | Primary | <ul style="list-style-type: none">Residential area from the north east and clockwise towards the south (at a distance of | See Table 4 | See Table 4 |

| Type | Stakeholder Category | Name | Impact/influence | Preferred Method of Engagement |
|---|----------------------|--|------------------|--------------------------------|
| | | 25-30 metres from the plant) | | |
| Government / state | Primary | <ul style="list-style-type: none"> Maftaq Governorate | | |
| The Umniah Telecom Plant – Plot 3, Halabat | | | | |
| Residents | Primary | <ul style="list-style-type: none"> Al-Hallabat (2.5 km from the plant) | See Table 4 | See Table 4 |
| Government / state | Primary | <ul style="list-style-type: none"> Zafraq Governorate | | |
| Umniah Telecom Plant – Plot 4, Al-Azraq | | | | |
| Residents | Primary | <ul style="list-style-type: none"> Around four Bedouin tents (within 50 metres of site boundary) | See Table 4 | See Table 4 |
| Government / state | Primary | <ul style="list-style-type: none"> Zafraq Governorate | | |
| Local Businesses | Primary | <ul style="list-style-type: none"> Date Farm to the north east (around 300 metres) Factory to the west (factory border adjacent to boundary with building around 50 metres distance) | | |
| Taj Mall Safeway Project | | | | |
| Government / state | Primary | <ul style="list-style-type: none"> Governorate of Balqa | See Table 4 | See Table 4 |
| Local Businesses | Primary | <ul style="list-style-type: none"> A Farm house and a residential house overlooking the plant (at a distance of around 500 metres) | | |

Vulnerable Groups

The stakeholder identification process examined if there are any groups of affected people who might be more vulnerable to current and potential Project impacts. EBRD defines vulnerable people² as “*vulnerable groups refer to people who, by virtue of gender identity, ethnicity, 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. Vulnerable individuals and/or groups may also include people living below the poverty line, the landless, the elderly, women and children headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons*”

² EBRD Performance Requirement 5, paragraph 12, footnote 11.

who may not be protected by national and/or international law.". Within the Project context, the following people are categorised as "vulnerable groups":

- Disabled;
- People living in poverty;
- Elderly;
- Single women headed families;
- Syrian refugees, including Syrian Bedouin communities.

It is considered that the vulnerable groups listed above could be potentially disproportionately disadvantaged as result of the development of the Project, which is primarily related to their disadvantaged status. However, given the nature and scale of the Project, it is anticipated that the impacts will be minimal in relation to nearby households including the vulnerable groups as listed above. Impacts and mitigation measures are detailed in the Project Non-Technical Summary.

During Project implementation the Company may identify other categories of vulnerable groups than those listed above.

4. Prior Stakeholder Engagement

Company consultations

Although the Company reported that stakeholder activities have been carried out with local communities, there is a lack of formal records to demonstrate actions undertaken regarding stakeholder engagement.

Project consultations

As part of undertaking the ESDD, a number of informal consultations were held during site visits undertaken in September 2019.

- Halabat plant, discussions were held with employees from the local community, all were Jordanian and were positive about working for BELECTRIC (the EPC contractor for Yellow Door Energy).
- Umniah Telecom Mafrqa plant, discussions were undertaken with a Jordanian employee from the local community. Again, positive reports received.
- Classic Fashion plant visit, a non-Jordanian worker (Egyptian) was interviewed. An in-date work permit was provided and the employee provided a positive response in relation to working for BELECTRIC.
- Umniah Telecom Azraq plant, discussions held with Bedouin community member working for BELECTRIC again provided positive response.
- Taj Mall/Safeway plant, discussions held with a family residing near to the plant. The family residence overlooks the proposed site. Mixed responses were received, some family members were positive about employment opportunities and others were concerned about potential visual impacts.

5. Stakeholder Engagement Programme

Overview

As presented in Section **Error! Reference source not found.** (Stakeholder Identification) key stakeholders have been identified that will be directly or indirectly affected by, or have an interest / influence in, the Project. Engagement activities provide an opportunity for affected and interested stakeholders to express their concerns and opinions regarding the development of the Project, including any proposed environmental and social management measures.

Key environmental and social risks and benefits

The potential environmental and social risks and benefits associated with the development of the Project are:

Potential risks

- Potential for construction impacts mainly related to reduced access rights for livestock grazing, dust and noise affecting households living nearby to the Safeway and Taj Mall plants.
- Roads may be busier during the construction phase resulting in an increase in emissions and dust affecting local air quality and amenity. There is also the potential for an increase in the number of accidents particularly on roads that are very narrow and winding such as the Taj Mall/ Safeway project plants.
- The potential for some IUCN Red List species to be present in one site area (Fuhais, where the proposed Taj Mall/Safeway plants are located) was identified, and recommendations have been outlined to minimise the impact on biodiversity.
- As Jordan is the second most water scarce country in the world recommendations have been made for alternatives to washing of the solar panels for cleaning, including using a brush trolley and/or a dust broom.

Potential benefits

- A new road (funded by Yellow Door Energy) is being constructed between the Classic Fashion and Umniah Telecom plant in Mafraq as the existing road was in poor condition. This will have a positive impact on surrounding communities
- Potential increased employment opportunities contributing to local economic development and increased social cohesion.

The Project is not anticipated to cause any significant environmental and social risks.

Key Methods of Engagement

Future stakeholder engagement will build on the informal engagement process currently being implemented by Yellow Door Energy alongside the formal engagement requirements outlined in this SEP. The planned future activities will provide for a more systematic way of consulting, disclosing information, and formal

recording of engagement between Yellow Door Energy and relevant and interested stakeholders.

General stakeholder communication records

Consultation records, minutes of meetings and write-ups of informal consultations will be maintained by Yellow Door Energy Limited Jordan. These communication records will record key information provided to stakeholders and the key incoming communications, complaints and questions along with a summary of actions taken.

The Company will record and update these stakeholder engagement activities on an on-going basis and prepare annual reports summarising the activities and any key emerging themes raised by affected people.

Stakeholder engagement activities will be recorded by the appointed Community Liaison Officer (CLO) in a formal “Stakeholder Engagement Register” which will include the following information on an on-going basis:

- Type of information disclosed, date and form of disclosure and distribution channels.
- Minutes of meetings, lists of participants and locations of any meetings organised with affected people.
- Individuals, groups, organisations and institutions that have been consulted.
- Key issues and concerns discussed and raised by affected people.
- Response mechanism, follow-up actions and investigations.
- Documentation of activities and processes and response to stakeholders.

The “Stakeholder Engagement Register” will record all engagement activities and be updated on an on-going basis.

Disclosure of information

The types of information disclosed and the specific methods of communication to be undertaken for this project are summarised in the Stakeholder Engagement Programme in Table 6 below.

At this stage, the following documents will be disclosed for effective stakeholder communication:

- Non-Technical Summary
- Stakeholder Engagement Plan

The information above will be accessible to the public. Hard copies of the related documents will be available at the Yellow Door Energy offices in Amman as well as public community centres. Project information will also be distributed through local newspapers, media and Yellow Door Energy’s website.

Yellow Door Energy Limited Jordan (Contact Details/web link):

www.yellowdoorenergy.com

302 prime center, 13 zuhar street, Amman, Jordan

Yellow Door Energy Limited Jordan is responsible for internal and external communications regarding the existing and future projects and will be the main contact point for affected people. All related Project documents and communication related to the Project will be available and undertaken in English and Arabic languages.

Consultation methods

The Company will use a number of methods in order to consult with different key stakeholders. The main communication methods and mechanisms that will be used to consult with key stakeholders are:

- Permitting meetings
- Project meetings
- Public consultations (including any focus groups targeting women, the elderly, disabled people, Syrian refugees and Bedouin communities).

Additional information on these approaches and methods are provided in the sub sections below.

Permitting and Monitoring Meetings

The Company will engage national government authorities and relevant local government departments on a regular basis:

- Project updates
- Any issues or concerns regarding permitting and monitoring requirements (e.g. if any facilities require permitting)
- Status updates regarding environmental and social monitoring.

The Company will engage with both national and local government authorities if there is any requirement for environmental permitting, monitoring and labour inspections.

Project Meetings

Meetings will be held between selected employees of the Company, who have ultimate responsibility for overseeing the implementation of the Project. Key team members to undertake meetings will include: Site Managers, EHS manager, the appointed CLO, Human Resources Manager and Company director.

Monthly meetings will be undertaken at the Company offices to discuss:

- Overall supervision of the Project
- Implementation of Environmental and Social Actions
- Monitoring results and any corrective actions to improve the E & S performance

- Better integration of the provision of services of the day-to-day activities in the Project at different stages, from preparation to implementation and evaluation including procurement, Project monitoring and evaluation, financial management, progress and annual reporting.
- Management of local and international suppliers
- Escalation of unresolved issues and grievances to relevant stakeholders
- Identification of training requirements for employees (such as health and safety, management of safety and security in case of harassment)

Public Consultation Meetings

The Company will collaborate with the relevant authorities/governorates to ensure that the public will be consulted on key benefits and impacts of the Project and its associated activities (such as employment opportunities for local communities). The Company will ensure that local concerns and grievances will be obtained and addressed as appropriate. The Company will also ensure that the vulnerable groups including Syrian refugees and transient Bedouin communities are involved in focus group discussions.

The public meetings will be collaborated and coordinated via Yellow Door Energy and the relevant Governorates for specific plants.

Programme

Stakeholder engagement activities that will be undertaken by the Company with regards to the development of the Project are detailed Table 6 below.

Table 6 – Stakeholder Engagement Program

| Stakeholders | Activity | Methods of Engagement | Information to be disclosed | Timeframe / Frequency |
|---|---|---|-----------------------------|---|
| 1. All Plants | | | | |
| Ministry of Environment and other national authorities | Consult with Ministry of Environment. and other authorities for any potential permitting requirements | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | Immediate and ongoing, as necessary (frequency to be agreed with authorities) |
| Energy and Minerals Regulatory Commission (EMRC) | Consult regarding approval where the generation capacity exceeds 1 MW | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | Immediate |
| Ministry of Local Administration | Consult regarding construction permit to proceed with construction activities | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | Immediate and ongoing, as necessary (frequency to be agreed with authorities) |
| Energy and Minerals Regulatory Commission | Consult regarding approval about generation capacity | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | Immediate and ongoing, as necessary (frequency to be agreed with authorities) |
| Private Off-takers | Consult regarding Project schedule and start of operation and any other concern / issues | Correspondence through letters and emails to relevant Off-takers | NTS,SEP | Immediate and ongoing, as necessary |
| Electricity Distribution Company | Consult with Electricity Distribution company to ensure capability of the grid to withstand the electricity to be generated by the Project, conditions and provisions of connecting the system to the distribution system | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | Immediate and ongoing, as necessary (frequency to be agreed with authorities) |
| Civil Aviation Regulatory Commission (CARC) | Consult with CARC about safety and security conditions in the case of 15 km proximity from a civil airport. | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | Immediate and ongoing, as necessary (frequency to be agreed with authorities) |
| Operators/owners of local infrastructure (water pipelines, roads etc.) | Consult with owners/operators of local infrastructure regarding proposed use of infrastructure and Project requirements | Correspondence followed by site visits | NTS,SEP | During Design, construction and operation |
| Contractors | Discussion to ensure that any engagement between contractors and external stakeholders will follow the Company's processes. Monitoring of Contractors' grievance mechanism | Correspondence followed by site visits | NTS,SEP | Ongoing |
| Local emergency services – specifically the fire department | Share details of the design including access, Emergency Response Plan | Correspondence followed by site visits | NTS,SEP | During construction / during operation |
| Land owners and land users adjacent to the site | Consult potential impacts arising from Construction activities | Face to Face Meetings | NTS,SEP | During construction / during operation |
| 2. Classic Fashion Plant | | | | |
| Residential properties located in close proximity of the site and local business | Consult and provide information regarding construction activities, schedule, impacts and any potential grievances relating to project impacts and general concerns | Face to Face meetings | NTS, SEP | During construction / during operation |
| Mafrq Governorate | Consult to discuss any issues or concerns regarding project implication | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | Immediate and ongoing, as necessary (frequency to be agreed with authorities) |
| 3. The Umniah Telecom Plant – Plot 1 | | | | |
| Residential properties located in close proximity of the site and local business (Potato farm to the south and a yogurt factory) | Consult and provide information regarding construction activities, schedule, impacts and any potential grievances relating to project impacts and general concerns | Face to Face meeting | NTS,SEP | During construction / during operation |
| Mafrq Governorate | Consult to discuss any issues or concerns regarding project implication | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | Immediate and ongoing, as necessary (frequency to be agreed with authorities) |
| 4. The Umniah Telecom Plant – Plot 2 | | | | |
| Residential area from the north east and clockwise towards the south | Consult and provide information regarding construction activities, schedule, impacts and any potential | Face to Face meeting | NTS,SEP | During construction / during operation |

| Stakeholders | Activity | Methods of Engagement | Information to be disclosed | Timeframe / Frequency |
|--|--|---|-----------------------------|--|
| | grievances relating to project impacts and general concerns | | | |
| Zarqua Governorate | Consult to discuss any issues or concerns regarding project implication | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | During construction and as necessary hereafter (Ongoing) |
| 5. The Umniah Telecom Plant - Plot 3 | | | | |
| Al-Hallabat (2.5 km from the site) | Consult and provide information regarding construction activities, schedule, impacts and any potential grievances relating to project impacts and general concerns | Correspondence followed by site visits | NTS,SEP | During construction / during operation |
| Zafraq Governorate | Consult to discuss any issues or concerns regarding and project implication | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | During construction and as necessary hereafter (Ongoing) |
| 6. Umniah Telecom Plant - Plot 4 | | | | |
| Azraq refugee camp and Bedouin tents | Consult and provide photo montages of the site, information on potential dust generation, the potential impacts of transport to site, and employment opportunities | Focus Groups meeting | NTS,SEP | During construction and as necessary hereafter (Ongoing) |
| Governorate of Balqua | Consult to discuss any issues or concerns regarding implication | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | during construction / during operation |
| 7. Taj Mall / Safeway Plants | | | | |
| A Farm house and a residential house overlooking the site | Consult and provide information regarding construction activities, schedule, impacts and any potential grievances relating to project impacts and general concerns | Face to Face meeting | NTS,SEP | As construction activities have not yet commenced, it is recommended to start engagement activities before the construction starts. Before and during construction / during operation |
| Governorate of Balqua | Consult to discuss any issues or concerns regarding project implication Construction permit | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | Before construction / during operation |
| 8. Carrefour Plant | | | | |
| Amman | Consult and provide information regarding construction activities, schedule, impacts and any potential grievances relating to project impacts and general concerns | Correspondence followed by site visits | NTS,SEP | during construction / during operation |
| Zarqa Governorate | Consult to discuss any issues or concerns regarding project implication | Correspondence through letters and emails to relevant authorities as required | NTS,SEP | during construction / during operation |

6. Reporting and grievances

Monitoring, reporting and feedback mechanisms

Successful stakeholder engagement depends on performance monitoring, analysis and adapting to changed circumstances and stakeholder information needs. Transparent documentation of engagement activities will be necessary in order to meet EBRD PR 10 and ensure the successful implementation of the engagement activities outlined in this SEP.

It will be the responsibility of the appointed Company CLO to implement the SEP and will update it regularly throughout implementation of the Project and associated facilities. The CLO will also review the SEP regularly to ensure that all the consultation activities are implemented and are in accordance with the planned schedule.

The Company's appointed CLO will be responsible to monitor social performance of the Company and its on-engagement with key stakeholders including bus users. The CLO will visit plants and conduct regular engagements with employees and contractors, and local residents and businesses to ensure that any concerns and grievances will be identified and addressed accordingly.

Grievance Mechanism (GM)

Any comments or concerns can be brought to the attention of the Company verbally or in writing or by filling in a grievance form. The grievance form will be made available on the company website, and at the project plants during construction³, alongside a description of the grievance mechanism.

Grievance Resolution

The Company will be responsible for developing and implementing a formal grievance (complaint) procedure to receive the affected communities' concerns and views through a transparent and impartial process. The complaint procedure will be used as a tool to assist the timely and successful resolution of stakeholder concerns, as well as to monitor the Project's relationship with the affected communities on the use and access to new buses and implementation of associated facilities (including use of smartcard, construction of new bus stops and their locations). A summary of complaints and the measures taken to resolve them will be made public on a regular basis via the Company website, in accordance with EBRD PR 10.

Stakeholders will be informed about the complaints procedure during consultation activities, such as public meetings, letters/ leaflets, and via the Company website.

³ Before Construction for Taj Mall / Safeway Projects

The appointed CLO will be responsible for coordination and handling of all grievances received from the community. Any verbal or written complaints will be raised through the Company complaints landline and email address as provided below:

- Contact Name) :
- Mohammad Swaid
 - o 0096275898592
 - o Mohammad.Swaid@yellowdoorenergy.com

A grievance form (Appendix A) is available in this SEP for use by the public, and hard copies will be made available at both the Company head office and the relevant Governorate offices. It will be a requirement to record all complaints in the log book within 5 working days of the complaint being received and responded to within a maximum period of 30 working days (shorter time period if the complaint is straightforward). Both signed and anonymous grievances will be accepted. Each complaint will initially be screened, and the facts of the case verified by the CLO.

The agreed solution or response will be signed off by the CLO and management. The corrective action and status of a complaint (closed, open) will be recorded in the grievance/complaints log book. All claims and answers will be kept at the Company head office. Any gender specific complaints will be addressed confidentially and will be handled by a relevant person.

Roles and Responsibilities

The Project Manager / CLO will have the overall responsibility for handling the consultation and information disclosure process, including organisation of the consultation process, communications with identified stakeholder groups, collecting and processing comments / complaints, and responding to any such comments and complaints. Depending on the nature of a comment / complaint, some comments or complaints will be provided to the appropriate person in the company for a response.

Name: **Mohmmad Swaid**

Title: **Project Manager**

Telephone: **+00962795898592**

E-mail: Mohmmad Swaid <mohmmad.swaid@yellowdoorenergy.com>

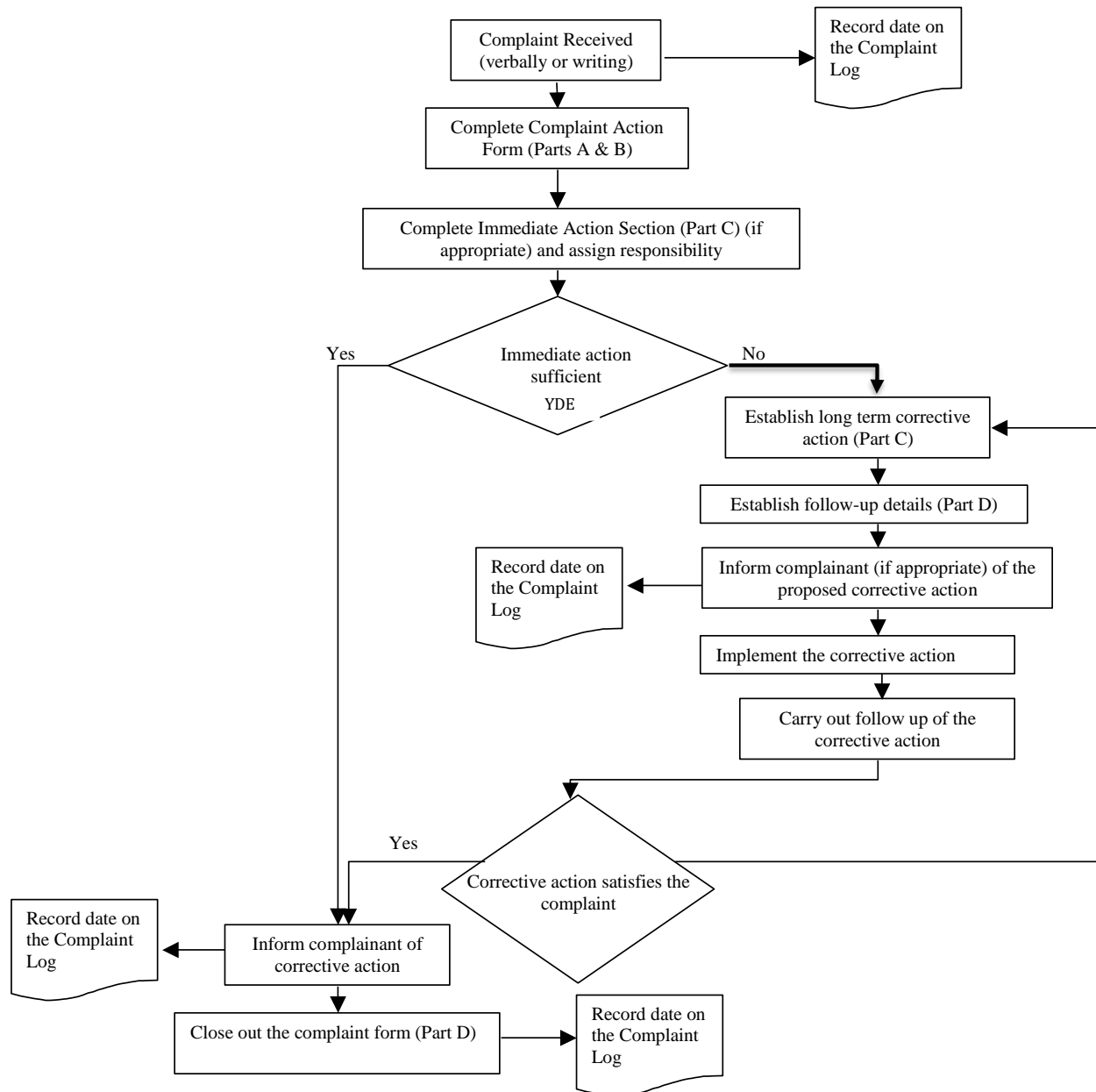
Name: **Azmi Sallam**

Title: **VP Project Management**

Telephone: **00962797818353**

E-mail: azmi.sallam@yellowdoorenergy.com

APPENDIX A: COMPLAINT PROCEDURE & GRIEVANCE FORM



Grievance Form

| | | | |
|--|--|--|--|
| Reference No: | | | |
| Full Name | | Date Received | |
| Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i> | <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent | | |
| Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail). | <input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail: _____ | | |
| Language Please mark your preferred language for communication | <input type="checkbox"/> Arabic <input type="checkbox"/> Other | | |
| | | | |
| Description of Incident or Grievance: | | What happened? Where did it happen? Who did it happen to? What is the result of the problem? | |
| | | | |
| Date of Incident/Grievance | | | |
| | <input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? ____) <input type="checkbox"/> On-going (currently experiencing problem) | | |
| | | | |
| What would you like to see happen to resolve the problem? | | | |
| | | | |