

China Power International Holding Ltd.

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**AKMOLA WIND FARM,  
KAZAKHSTAN**

**Stakeholder Engagement Plan**

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**PROJECT NO. P000823**

**OUR REF. NO. SEP**

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## ACRONYMS

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Abbreviation	Description
CBO	Community-Based Organisation
CLO	Community Liaison Officer
CPIH	China Power International Limited
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
GM	Grievance mechanism
HSE	Health, Safety and Environmental
MW	Megawatt
NGO	Non-governmental organisation
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
SPIC	Chinese State Power Investment Corporation
WPP	Wind Power Project

# 1 INTRODUCTION

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This Stakeholder Engagement Plan (SEP) describes the key stakeholders and information and communication plans applicable to a series of wind power plant (WPP) development projects located in northern Kazakhstan. The Asian Infrastructure Investment Bank (the “AIIB”, or the “Lender”) is providing finance to these development projects, which comprise five already developed projects, the 100 MW Borey WPP, the 50 MW Energo Trust WPP, the 40 MW Sofievskaya WPP, the 15 MW Arkalyk WPP and the 15MW JJE WPP. The projects are in aggregate of up to 220 MW (together the “Project”; and separately “Sub-projects”).

All projects have been constructed and are now connected to the grid. The sub-project companies are subsidiaries of the China Power International Ltd (“CPIH” or “the Sponsor”).

The SEP reflects best international practice in relation to information disclosure and outlines the general engagement principles that the Sponsor will adopt in relation to the Project. The overall approach for the SEP and the wider Environmental and Social reporting have been based on the AIIB’s Environmental and Social Policy.

The SEP defines a technical and culturally appropriate approach to consultation and disclosure. The goals are to ensure that adequate and timely information is provided to Project-affected people and other stakeholders, to allow groups to have sufficient opportunity to voice their opinions and concerns, and to ensure that these concerns influence Project decisions.

The first version of this SEP was developed for the Project in 2021 and this document is the latest iteration. The SEP is a ‘live’ document and will be reviewed and updated as necessary at each stage of the Project. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during Project implementation and updated as necessary.

The specific objectives of the SEP are as follows:

- The methods, procedures, policies and actions undertaken by the Sponsor to inform stakeholders, in a timely manner, of the potential impacts of the Project are the key subject of this document.
- A level of stakeholder engagement has already taken place during the Project, and a brief summary of stakeholder engagement is presented in the SEP.
- Communication will continue following the completion of construction and during operation.
- Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact the Sponsor and ask to be included in future communications / engagement opportunities. Furthermore, this document describes the way in which any concerns or grievances will be handled by the Sponsor.

Stakeholder engagement activities are currently managed by FAN Chunfeng, [cffan@cpibj.com.cn](mailto:cffan@cpibj.com.cn) or +7 717 279 29 99.

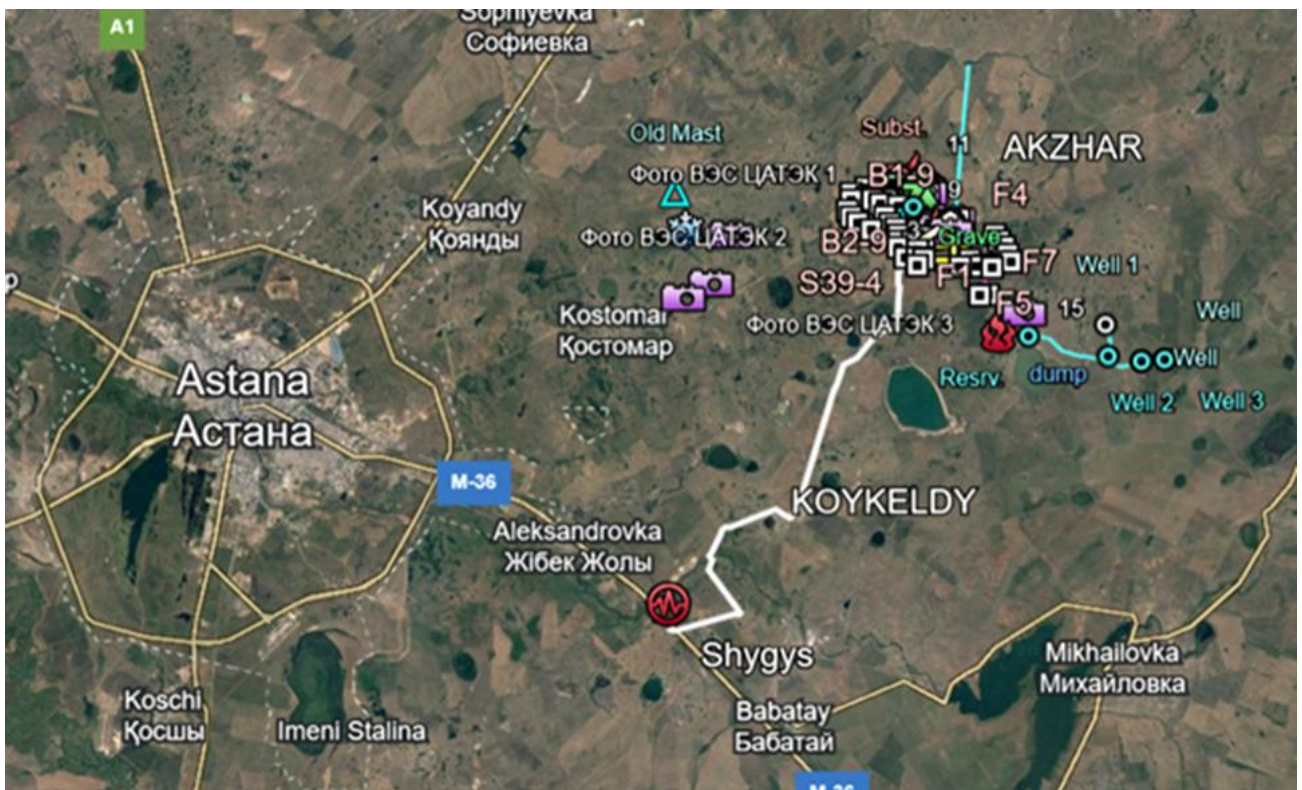
## 2 PROJECT DESCRIPTION

The Project is a greenfield development of a 220 MW installed capacity wind farm located near the villages of Bulaksay and Saryoba in the Akmola Region of Central Kazakhstan, approximately 30 km northeast of Astana (Figure 2-1).

The Project site is accessible throughout the year by a mixture of asphalt and gravelled roads, although some of these are in very poor condition, with access affected by poor weather. The area is also accessible by railway.

The surroundings are flat farmland and pastureland used to graze livestock including sheep, goats and cows. Total land area for the Project is 343.15 ha. Land rights have been secured, land state registration acts have been obtained, and land lease was approved for a period of 49 years.

**Figure 2-1 - General Location of the Project Site**



The nearest residential areas surrounding the Project are:

- The village of Bulaksay surrounded to the north-west, west and south by Project components with the closest point approximately 1 km south-east of turbine A10-1;
- The village of Saryoba surrounded to the north-west, north, east and south-east by Project components with the closest point approximately 750 m south-east of turbine S39-9;
- The village of Saryoba Station, surrounded to the north-west, north, east and south-east by Project components with the closest point approximately 1 km north-west of turbines B1-13 & B1-14.

The Project is comprised of the following key components:

- 44 Windey WD172-5000 turbines, each with rated power 5 MW,
- Medium voltage underground cabling of 35k kV,
- New Step-Up Substation 35/110kV including administrative facilities (admin and control building),
- Overhead Transmission Line linking Borey Step-Up Substation with national grid (Shygys substation), and
- Access roads.

The Project sponsor is China Power International Holding (CPIH), a wholly owned subsidiary of the Chinese State Power Investment Corporation (SPIC). The Project is divided into several companies, each assigned to a separate sub-project:

- Borey Energo LLP (Borey),
- Energo Trust LLP (Energo Trust),
- Sofievskaya Wind Power Plant LLP (Sofievskaya),
- Arkalyk Wind Power Plant LLP (Arkalyk), and
- Jasyl Jel Energy (JJE).

Construction activities have now been completed, and all sub-projects have been connected to the grid.



### 3 ROLES AND RESPONSIBILITIES

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Responsibilities of parties of the Project are as follows:

The Project proponent is CPIH, the Sponsor. The management of the WPP assets is undertaken by the CPIH subsidiary Kazakhstan Energy Investment LLP (KEI) under asset management agreements signed with each WPP for the provision of Operation and Maintenance (O&M) services.

The Sponsor retains overall responsibility for ensuring that all Project activities comply with the Lender standards, including in relation to stakeholder engagement. However, whilst retaining legal responsibility the delivery of stakeholder engagement responsibilities is contractually passed down to KEI.

KEI (including any future party as may be engaged to perform asset management for the Project) is responsible for and may assign a third-party professional consultant with developing, reviewing, and updating the SEP and Environmental and Social Management Plan (ESMP)<sup>1</sup> and the day-to-day management and implementation of the SEP, ESMP and related contract obligations of the O&M Contractors. It will also on a regular basis, monitor and audit the implementation of the SEP and ESMP. KEI will provide appropriate training for its staff (and those of relevant contractors and sub-contractors) in relation to implementing the SEP and ESMP.

The Lender and Shareholders will require compliance with the respective standards as set out in Section 4.

A Community Liaison Officer (CLO) will be appointed who will be responsible for community liaison and arranging communications with local communities. The CLO will be available throughout the Project, and be largely responsible for implementing the SEP, as well as managing the grievance mechanism. The CLO will be located in the vicinity of the Project and easily accessible to local stakeholders.

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<sup>1</sup> The ESMP is a document that sets out the actions that will be taken by the project parties to mitigate environmental and social risks and impacts. The ESMP was informed by the environmental and social impact assessment undertaken for the Project.

## 4 REGULATIONS AND REQUIREMENTS

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### NATIONAL REQUIREMENTS

The key legislation in Kazakhstan, relating to public participation in environmental decision making, is the Environmental Code of the Republic of Kazakhstan. The most recent Environmental Code entered into force in July 2021 and ensures that members of the public affected by an environmental decision have the right to participate in environmental assessments and other environmental decision-making processes. Stakeholder engagement for environmental impact assessments (EIA) is undertaken via public hearings which involve the representatives of the concerned stakeholder state bodies and public.

Public hearings are announced in Kazakh and Russian in at least one newspaper and via at least one television or radio channel distributed or broadcasted within the affected area. Information provided should include the subject of the hearing, the place, date, and time of the hearing, a weblink to where the draft EIA can be viewed, the details (including contact information) of the promoter of the planned activity, information (including contact details) on how to request further information and contact details for the environmental body where comments and suggestions on the proposed activity can be sent. Anyone can participate in a public hearing, regardless of where they live, and make comments and suggestions on the draft EIA.

Comments and suggestions made on the draft EIA (and not withdrawn during the public hearing process) should be used to revise the draft EIA. Following the revision of the draft EIA, the public hearing process will be repeated to review the changes made in response to the comments received.

### AIIB REQUIREMENTS

AIIB requires the consideration of E&S issues in all aspects of AIIB's operations, and the requirements for stakeholder engagement, information disclosure and grievance management are described in the AIIB ESP.

**Consultation:** The Bank requires to conduct meaningful consultation with stakeholders during the project's preparation and implementation phases in a manner commensurate with the risks to, and impacts on, those affected by the project.

**Information Disclosure:** The Bank requires to disclose information on the E&S risks and impacts of the project in a timely and accessible manner and a form and language(s) understandable to the project-affected people, other stakeholders, and the general public so they can provide meaningful inputs into the design and implementation of the project.

**Grievances:** The Bank requires the establishment of a project-level GRM to receive and facilitate the resolution of the concerns and grievances of those who believe they have been adversely affected by the project's E&S impacts and inform project-affected people of GRM availability.

A summary of AIIB stakeholder engagement requirements is presented in Table #.

**Table #: Stakeholder Engagement Requirements as set out in AIIB ESP**

Aspects	AIIB ESP Reference	Key Requirements
Disclosure of E&S Information by the Bank's Client	ESS 1, paras 19 to 22	<ul style="list-style-type: none"> <li>• As early as feasible, disclose the following E&amp;S information:               <ul style="list-style-type: none"> <li>○ Draft E&amp;S assessment reports and the documents required to complement these reports (including the ESIA, ESMP, ESMPP, LARP/LAP/RP, RPF/LARPF/LAPF, IPP, IPPF, and/or other Bank-approved form of documentation).</li> <li>○ Information on Project GRM and IAM.</li> <li>○ Final versions of the above E&amp;S reports, documents and information, and any updates to them.</li> <li>○ E&amp;S documentation disclosed pursuant to E&amp;S Frameworks.</li> <li>○ Material Changes to E&amp;S Information.</li> <li>○ E&amp;S Monitoring Reports.</li> <li>○ Bank Signage at Project Site.</li> </ul> </li> <li>• Disclose the E&amp;S documentation: (a) in English, together with summaries incorporating elements of this documentation that are relevant to stakeholders, including the Project-affected people, in language(s) understandable to them; and (b) on the Client's website, with the summaries also disclosed in an accessible manner in the Project area.</li> </ul>
Consultation	ESS 1, para 23	<ul style="list-style-type: none"> <li>• Carry out meaningful consultation with Project-affected people and other stakeholders and facilitate their informed participation in the consultations.</li> <li>• Ensure "meaningful consultation" as defined in sub-section 23.2.</li> <li>• Continue consultation with Project-affected people throughout Project implementation as necessary on issues related to E&amp;S performance and implementation of the Project-level GRM.</li> </ul>
Grievance Redress Mechanism	ESS 1, para 24	<ul style="list-style-type: none"> <li>• Establish a suitable Project-level GRM as early as feasible, to receive and facilitate resolution of the concerns of people who believe they have been adversely affected by the Project's E&amp;S impacts and inform Project-affected people of its availability.</li> <li>• Scale the GRM to the risks and impacts of the Project, and develop it in such a manner that it does not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration or mediation procedures.</li> <li>• Design the GRM to address promptly Project-affected people's concerns and complaints.</li> <li>• Include provisions so that the concerns of the Project-affected people are brought to the attention of the GRM, and the GRM records, responds to, and resolves or escalates these concerns in a timely manner.</li> <li>• Include provisions to: (a) protect complainants from retaliation, grant them confidentiality and enable them to remain anonymous, if requested; and (b) protect those who defend the rights of complainants to make such complaints.</li> <li>• Make the Project-level GRM operational at latest by the time implementation of the relevant Project activities commences and for the</li> </ul>

Aspects	AIIB ESP Reference	Key Requirements
		<p>duration of the Project.</p> <ul style="list-style-type: none"> <li>• Make provisions for the maintenance of a publicly accessible case register and reports on grievance redress and outcomes to be disclosed in the manner set out section 20 of ESS 1.</li> </ul>

In addition, the Project-affected People's Mechanism (PPM) has been established by the AIIB to provide an opportunity for an independent and impartial review of submissions from Project-affected people who believe they have been or are likely to be adversely affected by AIIB's failure to implement its ESP in situations when their concerns cannot be addressed satisfactorily through Project-level GRM or AIIB Management's processes. For information on how to make submissions to the PPM, please visit <https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/how-we-assist-you/index.html>

## 5 IDENTIFICATION OF STAKEHOLDERS

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The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation during each stage of the project, taking into consideration the range of engagements that have already been completed. Stakeholder identification is an ongoing process, and potentially new stakeholders will continue to be identified during different stages of the Project.

A stakeholder is defined as any individual or group who is potentially affected by a project or who has an interest in the Project and its potential impacts. The objective of stakeholder identification is therefore to establish which organisations and individuals may be directly or indirectly affected (positively and negatively) by, or have an interest in, the Project.

Stakeholder identification is an ongoing process, requiring regular review and updating of the stakeholder database as the Project progresses.

The various stakeholder groups include (but not limited to):

**Government agencies** – National, regional and local / district Government agencies are important stakeholders within the Project's engagement process, both as sources of information, and as those issuing the necessary permits for the Project, and for their role in informing local communities and citizens and contributing to the management of local concerns and expectations. It is therefore important to engage with all appropriate regulators from an early stage and to maintain relationships with these agencies throughout the Project lifecycle.

**National and International Non-Governmental Organisations (NGOs) and Community-based Organisations (CBOs)** – NGOs and CBOs, particularly those who represent communities directly affected by a project, can be important stakeholders for companies to identify and engage on a proactive basis. NGOs may have expertise valuable to effective stakeholder engagement. For example, they can be sources of local knowledge, sounding boards for project design and mitigation, conduits for consulting with sensitive groups, and partners in planning, implementing and monitoring various project-related programs<sup>2</sup>.

**Local Workforce and Local Businesses** – This includes the local workforce required for the operation of the Project.

**Vulnerable Groups** - Vulnerable people may require special assistance measures because they are less able to cope with potential economic displacement compared with others.

**Lenders** – Any lending institution financing the project.

The following stakeholder groups have been defined for this Project:

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<sup>2</sup> Stakeholder Engagement: A Good Practise Handbook for Companies doing Business in Emerging Markets (IFC) 2007.

**Table 5-1 – List of Project Stakeholders**

<b>Stakeholder</b>	<b>Role</b>
Rural area councils	Local governments representing the Bulaksay and Saryoba communities directly affected by the Project. The local councillors for each village <sup>3</sup> will play a key role in identifying local needs and problems related to the Project, and raising these concerns on behalf of their constituents.
District council departments	Akimat of the Arshaly District
Regional regulatory bodies	The Office of the Akim for the Akmola Region
Suppliers	Companies providing goods and services to the Project.
Job seekers	Individuals seeking employment
Local project workers	Employees working on the Project (including those employed directly by the Sponsor as well as those employed by contractors).
Local residents	Individuals living with the local communities of Bulaksay and Saryoba directly affected by Project activities, with impacts arising from the landscape, roads and pastures, shadow flicker, noise and vibration, construction activities, and job opportunities.
Vulnerable groups	Individuals in the local communities who may be more sensitive to Project activities, e.g. disabled and older people.
Media	Digital and print media reporting on activities of interest to the general public. These include the national television channel KTK, Newspapers in the Arshaly District (Vperyod and Arshaly Arnasy) as well as bloggers including K_Asia and Akmola Media.
Local and international NGOs	Independent organisations with an interest in the Project including ASBK, GreenNGO, AcoAlliance, and EcoJer.
Lenders	Asian Infrastructure Investment Bank (AIIB)

<sup>3</sup> At the time of writing there was one councillor temporarily representing both Bulaksay and Saryoba communities.

## 6 PUBLIC CONSULTATION AND DISCLOSURE

### STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement is an ongoing process of sharing Project information, understanding stakeholder concerns, and building relationships based on collaboration. Stakeholder consultation is a key element of engagement and essential for effective project delivery. Disclosure of information is equally as vital. If there are risks or adverse impacts from a project, consultation must be inclusive and culturally appropriate and provide stakeholders with opportunities to express their views.

The stakeholder engagement process is designed to conform to the Kazakhstan EIA requirements and AIB ESP.

Prior to construction, several stakeholder activities were undertaken which are summarised below.

**Table 6-1 – Stakeholder Activities**

Date	Description
25/02/2020	The Arshaly District Council held a meeting in Bulaksay, which was advertised on the village noticeboard, for attendees to review the allocation of land required for the 156MW extension. The meeting was chaired by the Bulaksay rural area council, with the head of the Arshaly District Council Entrepreneurship Department and attended by 19 village residents. While the land required for the project is designated State Reserve land, because it is located in the Bulaksay rural area the District Council needed to gain approval from local villagers for it to be allocated to the Project. During this meeting the villagers approved the land allocation for the Project, which was documented and included as part of the application for the land lease.
03/11/2020	The Arshaly District Council, along with representatives from the project, held a meeting with residents from Saryoba Station to explain the Project, a video was used which was prepared by the national television channel KTK. 30 residents attended.
30/09/2021	Collages of images showing the visual impact from various locations in Bulaksay and Saryoba were shared in three local WhatsApp chat groups. No responses were received from the Saryoba village chat group, 58 out of 60 responses from the Saryoba Station chat group were against the development, and 17 out of 18 responses from Bulaksay residents chat group were against the development. The two key concerns raised by these consultations were about how residents were worried about the loss of their current rural view (reduced visual amenity) and that they didn't see what benefits the Project would bring. Following this consultation exercise the Sponsor engaged further with the affected residents and has provided social assistance to these communities, though full details of what this included have not been documented (example projects funded by the Sponsor are listed below).
20/09/2023	A meeting was held with the current Councillor from Saryoba, who was also covering the role for Bulaksay, to understand how the local communities engage with the Project, what issues have arisen recently, and whether there were any issues outstanding. The interview concluded that there were no current outstanding concerns amongst the communities, and past issues had been resolved in a satisfactory manner. Two examples discussed in the interview included a complaint by Saryoba residents about heavy good vehicles (HGVs) using the local roads, which was resolved by the Sponsor who worked to establish two routes; one for HGVs and one for light vehicles. There was also an instance where the Councillor had requested a number of crossings over the trenching work to allow for agricultural machinery and animals to cross safely. The Sponsor worked with six herders to determine where best to situate these crossings to meet the herders needs.

Date	Description
12-14/10/2023	<p>EcoSocio Analysts, on behalf of the Sponsor, undertook meetings with representatives in both Bulaksay and Saryoba communities to understand how residents raise issues or concerns, and whether they have any outstanding concerns, related to the Project. Generally, the local population did not have any complaints and reported that issues raised in previous consultations had been resolved positively through social assistance (for example; the sports complex in Saryoba was reconstructed, the school at Saryoba station was reconstructed and a sports ground was built near it, the water tower in Saryoba was reconstructed, and water was supplied to the house of a lonely elderly woman in Saryoba). The interviews highlighted that there was no mechanism to raise concerns or grievances anonymously.</p> <p>EcoSoci Analysts also interviewed a selection of construction workers to understand their views on working conditions, including accommodation. Workers seem generally satisfied with appropriate contracts in place and salaries paid on time. However, and with the local community, workers were not aware of how to raise anonymous grievances.</p>

## FUTURE STAKEHOLDER ENGAGEMENT

To ensure meaningful and relevant communications as the Project stages progress, the Project CLO will be responsible for providing information to stakeholders, collecting and feedback, and be involved in providing responses to incoming communications (e.g., emails and post). The CLO will be responsible for maintaining this SEP and keeping it up to date, with particular attention paid to maintaining Table 5-1 (List of Project Stakeholders). The CLO will hold records of all forms of communication between Project stakeholders, including dates and participants/audience, issued raised, and resolutions achieved (where applicable).

During all future stakeholder engagement activities, a Stakeholder Engagement Log shall be used to record the date of the engagement, key findings, details of any additional actions necessary, the date these additional actions were completed, and any other relevant information. A template Stakeholder Engagement Log is provided as Appendix A.

The common language for all identified stakeholders is Russian, and therefore any information will be displayed and published in Russian. Documents forming part of the ESIA Disclosure package are also available in English.

The CLO will ensure that the following information is disclosed on the Sponsor's or its related parties' website, and kept up to date:

- Project Non-Technical Summary,
- This SEP including the grievance redress mechanism (GRM),
- Answers to Frequently Asked Questions about the Project, and
- Annual report to the Lenders on the ESMP implementation.

The CLO will ensure that the following information is disclosed on information boards accessible to stakeholders (e.g., in villages, in the substation building) and updated regularly:

- Project Non-Technical Summary,
- Grievance Redress Mechanism including location of the closest grievance post-box,
- Vacancies and employment policies and procedures,
- Contact details for the CLO, and



- Project bulletins describing planned and completed tasks, mitigation measures for any identified impacts, and responses to stakeholder comments with any corrective actions taken.

Annual reports on the environmental and social performance of the Project will be prepared by the Sponsor for AIIB which will include a summary of grievance handling. The CLO will provide village Councillors with the periodic updates and status of all issues raised by local communities and other stakeholders to ensure further distribution among their constituencies.

In addition to using the Sponsor's website and information boards, other methods of communication will include:

- WhatsApp or other chat app chats including groups established for the local villages,
- Direct emails to contacts including the village Councillors,
- In person visits to members of the community and/or organised community meetings, and

Information about the Project that should be communicated to Stakeholders could relate to both the benefits and impacts that have been identified as being associated with the Projects operations.

These are summarised as follows:

- The Project is important in supporting Kazakhstan as it seeks to increase the amount of renewable energy generated in the country and meet increasing energy demands.
- Current livestock activities (primarily unsupervised grazing) are not anticipated to be affected by the Project.
- While road conditions are poor around the Project site, once the Project is operational, Project-related traffic is not anticipated to affect road conditions.
- The visual impacts of the turbines will be high, and any negative impact will be monitored and required measures will be implemented under the corporate social responsibility programme.
- There should not be any noise impacts resulting from the Project, however complaints relating to noise can be raised via the Grievance Mechanism (detailed below).
- There are times when shadow flicker (when the rotating wind turbine blades cause a flickering shadow) could affect residents in Bulaksay. Project operators will manage this by switching off specific turbines if necessary, during those times when the shadow flicker is expected to occur and where negative impact is assessed and verified. Any complaints relating to shadow flicker can be raised via the Grievance Mechanism (detailed below).
- Re-seeding and planting will take place in areas where topsoil was disturbed during the construction stage, and rehabilitation of topsoil in these areas will be monitored.

## **STAKEHOLDER ENGAGEMENT PROGRAMME**

Future stakeholder engagement activities shall be undertaken during the operation of the Project:

The outcomes of future stakeholder engagement activities will be documented in the Stakeholder Engagement Log. Future stakeholder engagement should be built upon the activities that have taken to date and include the full range of stakeholders identified in Table 5-1. Recommended methods for consultation with these groups are set out below.

**Table 6-2 - Engagement Methods**

<b>Stakeholder</b>	<b>Methods to engage</b>	<b>When</b>	<b>Who</b>
Rural area councils	Telephone, email, formal letters and/or meetings at the local Council office with the local Councillor	Monthly	CLO
District council departments	Telephone, email, formal letters and/or meetings	Quarterly	CLO
Regional regulatory bodies	Formal submission of information (e.g., accident reports) through community centres as required by legislation.	As required	KEI EHS Lead
Suppliers	Information on the Company website and through emails (following subscribing to early warnings).	As needed	KEI Procurement Lead
Project workers	Information board at WPP onsite office, company website, during Induction, and via Sponsor HR	As needed	CLO Sponsor HR
Local residents	Rural areas WhatsApp chats, project information boards in local communities, company website, local council meetings, and via the local Councillor(s)	Monthly	CLO
Vulnerable groups	In-person visits, WhatsApp messaging, phone calls	Monthly	CLO
Media	Emails to point of contact and press-releases published on company website	As needed	CLO
Local and international NGOs	Information on the Company website and through emails if registered to receive updates.	As needed	CLO
Lenders	Regular (at least annual) reports providing updates on the Project's environmental and social performance.	As required by the ESAP	CLO KEI EHS Lead

## 7 GRIEVANCE REDRESS MECHANISM

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The AIIB's ESP emphasize that a grievance mechanism should help the Sponsor understand the community's concerns and perception of Project risks and impacts so as to adjust its measures and actions to address the community concerns. This part of the document describes grievance redress mechanism (GRM) which is going to be implemented for the project for internal (construction, commissioning and operation/maintenance personnel, workers, project staff) and external parties including the supply chain system and affected communities. The objective of the Sponsor's GRM is a set of measures that enable stakeholders to raise concerns about the project and seek redress when stakeholders perceive an adverse impact arising from the project activities together with recommendations and feedback. It is to ensure that all comments and complaints from people directly affected by the Project, including local communities, farmers and their families are processed and considered in an appropriate way. The GRM sets out clear systematic steps for affected individuals and communities to submit complaints and feedback and simultaneously for the Project in responding to queries, feedbacks and complaints received. The mechanism will be applied to guarantee the project is responsive to any concerns and grievances particularly from affected stakeholders and communities.

The mechanisms will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, and at no cost and without retribution to the external or internal party that originated the issue or concern. The key principles of the external and internal grievance mechanism will be to:

- Ensure impartiality, confidentiality, and free of coercion or intimidation.
- Ensure resolution of concerns within the time frames specified in the Project SEP.
- Provide an understandable and transparent consultative process that is culturally appropriate and readily accessible.
- Provide the option of submitting grievances and feedback anonymously.
- Provide access at no cost and without retribution to the party that originated the issue of concern.
- Not impede access to judicial and administrative remedies

Besides the right to appeal the outcomes of the grievance process, the rights of the grievance/feedback holder include more than only the right to appeal the outcomes of the grievance process, as indicated below:

- The grievance/feedback holder does not have to participate in the grievance and feedback mechanism and can choose to follow other remedies, including other judicial, administrative, civil, etc. remedies. The judicial or administrative remedies will be applicable as per the Government of Kazakhstan and relevant legislation.
- The grievance/feedback holder cannot be coerced to participate in the grievance management process.
- The grievance/feedback holder can choose to stop participating in the Project grievance and feedback mechanism at any time and elect to follow other remedies.

GRM will be available to construction, commissioning and operation/maintenance personnel, workers, project staff and people living or working in the areas impacted by the project activities. Any impacted or concerned person or group of people about the project activities have the right to participate in the GRM and be encouraged to use it. Moreover, the developed GRM does not replace the public mechanisms for filing complaints and resolving conflicts in the legal system of Kazakhstan, but, on the contrary, seeks to minimize its use as much as possible.

The external and internal grievance collection channels to be used during the construction and operation phase are described in Table 16. The Project Company will review and adapt these channels, as appropriate and consistent with their internal/institutional procedures and mechanisms, within the SEP to be updated prior to start of operation phase and implemented throughout the operation phase.

The Project will enable GRM focal points: (i) local level (Project site) offices including (a) EPC contractor during the construction phase (if any) and (b) O&M office during the operation phase; and (ii) central level in Almaty/Astana and Beijing both during construction and operation phases. By this arrangement, the Project will intend to address effectively and efficiently all grievances raised at the grass root level.

- The first tier will be at the Project site level. Both the EPC contractor and the O&M office have the primary responsibility for uptake grievances as well as handling them as per the adopted GRM. Unresolved grievances will be elevated to the second tier.
- The second tier will include the Grievance Redress Commission (GRC) established at the central level at the office of the Project owner. The GRC will be available for any parties to submit a grievance directly. GRC will resolve issues that could not be resolved at the local level or those that came directly. The GRC will deal with issues before referring to legal recourse.

To promote the transparent and efficient implementation of the project, the GRM will accept and investigate queries from any Project-affected parties, including anonymous queries.

*Table ##: External and Internal Grievance Collection Channels for Construction and Operation Phase*

Grievance Collection Channels	Explanation
<b>Central level – CPIH (Construction and Operation phases)</b>	
Project Phone Line	0086 (010) 83479265
Project Web-site	www.cpihl.com.cn
Project E-mail	xfzhou@cpihl.com.cn
Official Letter Address	East Bldg, Hui Huang Shi Dai Plaza, 56 North West Fourth Ring Road, Haidian District, Beijing 100080, China
<b>Plant level – O&amp;M Office of the plant (Operation phase)</b>	
Operation and Management office of the plant	Kazakhstan Energy Investment Limited Liability Partnership

Project Phone Line	+7 717 279 29 99
Project Web-site	www.cpihl.com.cn
Project E-mail	cffan@cpibj.com.cn
Official Letter Address	Almaty, Al-Farabi Avenue 17, Business Center Nurly Tau, Block 4B, 9th Floor, Premise 2B
Project Owner Social Manager	Social Manager will collect grievances during stakeholder meetings, through phone calls, e-mails, etc. and manage them as per Project SEP.

**Plant level – EPC Contractor (Construction phase)**

EPC Contractor CLO	XU Mingfeng
	CLOs will collect grievances during public and individual meetings, through phone calls, e-mails, etc. and manage them as per Project SEP. Where required, CLOs will help stakeholders on how to fill in grievance forms.

Grievance Collection Channels	Explanation
Grievance forms and boxes	Grievance forms and boxes will be placed in all communities affected by the Project and at relevant work sites.

Local people need a trusted way to voice and resolve concerns linked to a project's operations. A locally based grievance resolution mechanism provides a promising avenue by offering a reliable structure and set of approaches where local people and the company can find effective solutions together.

The Sponsor has developed and implemented a grievance mechanism which:

- Increases the likelihood that small disputes can be brought to a resolution relatively quickly.
- Offers an early, efficient, and less costly way to address concerns.
- Promotes a responsible business climate for companies and enhances accountability to and acceptance by the host community.

A successful grievance redress mechanism helps achieve the following goals:

- Open channels for effective communication.
- Demonstrate that a company is concerned about community members and their well-being.
- Mitigate or prevent adverse impacts on communities caused by company operations.
- Improve trust and respect.
- Provide structures for raising, addressing, and resolving issues that reduce imbalances in power.
- Promote productive relationships.
- Build community acceptance of a company's "social license" to operate.

At all times, the Sponsor will accept comments and complaints concerning the Project in both verbal and written formats. Anonymous grievances shall also be accepted, recorded and investigated.

A Community Liaison Officer (CLO) will be used to raise awareness of the grievance mechanism, provide practical assistance to people who wish to raise a concern, and shall provide support in resolving grievances as well.

The responsibilities specifically associated with grievance management are summarised below.

Entity	Responsibilities
Sponsor Project Manager	<p>Ensure that the Community Liaison Officer has the necessary resources and personnel required to meet the commitments described in the SEP and GRM.</p> <p>Approve before their release, all external communications such as posters, press and media releases, etc.</p> <p>Support the resolution of grievances.</p> <p>Ensure that grievances raised are used to improve the Project's environmental and social performance in the future, so that similar grievances do not re-occur over time.</p>
Sponsor Community Liaison Officer	<p>Take ownership of the SEP and GRM including the Grievance Register (which is kept updated with each grievance raised).</p> <p>Oversee the assessment and resolution of grievances.</p> <p>Raise awareness of the GRM</p> <p>Provide practical assistance to people seeking to raise a grievance.</p> <p>Support the investigation and resolution of grievances in close coordination with other concerned parties, including the person/group raising the concern.</p>
Contractor	To direct any grievances made by a person or group in contact with a member of

Representatives	<p>the Contractor's workforce present on site, to the CLO for formal recording, investigation and resolution.</p> <p>To provide their full support during the process of the Sponsor investigating and resolving any grievances that occur.</p>
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## RECEIVING AND REGISTERING GRIEVANCES

Any written and/or verbal complaint will be recorded by the CLO, and potentially other Sponsor representatives. Grievance boxes will also be in place within the Bulaksay and Saryoba communities to enable anonymous grievances to be raised, which shall be checked at a reasonable interval by the CLO. These boxes should be locked, with only the CLO having access to them, to avoid unauthorised parties access to complaints.).

In addition to the above, a post-box will be provided at the entrance of the Administrative Building located at the sub-station to allow local people to raise grievances in a more informal way, and this shall be checked daily. This box will also be locked to prevent unauthorised access to grievances submitted in this way.

In all cases, the date of gathering the grievance from a post-box will be the date the form is collected as this is the date from when it is received.

Any comments and complaints received either from the Councillors on behalf of their constituents, directly from community members or workers, via phone calls, chat app messages, SMS texts or a post-box, will be summarised and listed in a Grievance Register, containing the name/group of commenter/complainant (if provided), date the comment was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate) and the date of response sent to the commenter/complainant.

The Sponsor will maintain all records in confidence by ensuring that paper records are kept stored in a locked file, and a secure password shall be used to keep electronic records confidential.

## SCREENING AND ASSESSMENT OF A GRIEVANCE

Following a grievance being recorded, the Sponsor will acknowledge the grievance, in writing, within a period of up to five working days and state that this is now being investigated in accordance with the grievance mechanism.

During the assessment, the complaints team shall gather information about the case and key issues and concerns and help determine whether and how the complaint might be resolved. The Sponsor will:

- Determine who will conduct the assessment. Typically, the CLO performs this task or directs it to an appropriate staff or department for assessment (production, procurement, environment, community relations, human resources).
- Select a company member to engage directly with the complainants to gain a first-hand understanding of the nature of the complaint.
- Clarify the parties, issues, views, and options involved:
  - Identify the parties involved.
  - Clarify issues and concerns raised by the complaint.

- Gather views of other stakeholders, including those in the company.
- Determine initial options that parties have considered and explore various approaches for settlement.
- Classify the complaint in terms of its seriousness (high, medium, or low). Seriousness includes the potential to impact both the company and the community.

Issues to consider include the gravity of the allegation, the potential impact on an individual's or a group's welfare and safety, or the public profile of the issue. A complaint's seriousness is linked to who in the company needs to know about it and whether senior management is advised.

Rather than resorting to a purely unilateral "investigate, decide, and announce" strategy, the Sponsor will engage more directly with the complainant in the assessment process, and involve the complainant in influencing the resolution process to be selected, and settlement options.

## **RESPONDING TO A GRIEVANCE**

The system for responding to the complainant should specify who communicates and how.

The Site Manager may participate in feedback, depending upon the seriousness of the complaint.

When formulating a response, the Sponsor will ensure that:

- The CLO prepares the response. The response should consider the complainants' views about the process for settlement as well as provide a specific remedy. The response may suggest an approach on how to settle the issues, or it may offer a preliminary settlement.
- To present and discuss the response to the complainant, consider holding a meeting with the CLO, relevant company manager, and the complainant. If a direct meeting is not possible, consider meeting with a neutral third party serving as facilitator. The group would also discuss appropriate next steps during this meeting. If the proposal is a settlement offer and it is accepted, the complaint is resolved successfully and there is no need to proceed to the next step of selecting a resolution approach. If the complainant is not happy with the response about a resolution process or substance, the group should try to reach an agreement that would be mutually acceptable.

All comments and complaints will be responded to either verbally or in writing, by the CLO, in accordance with preferred method of communication specified by the complainant in the Comments and Complaints Form. Comments will not be considered as complaints and may not, therefore, be responded to unless the commenter requests a response.

The Sponsor will respond to the complaint within a period of up to fifteen (15) working days with a proposed resolution to the grievance. If the proposed resolution cannot be sent to the complainant within this time for any reason, then the CLO will inform the complainant about the reason for the delay and indicate a target date as to when a proposed resolution will be submitted to them.

## **MONITORING**

Grievances need to be tracked and monitored as they proceed through the system. Effective tracking and documentation accomplish several goals:

- Document the severity of a complaint (high, medium, low) according to specific criteria. The level of severity guides requirements for alerting senior management and determines the seniority of management oversight needed.



- Provide assurance that a specific person is responsible for overseeing each grievance—from receipt and registration to implementation.
- Promote timely resolution according to the time periods specified in the SEP.
- Inform all concerned (the complainant and appropriate company personnel) about the status of the case and progress being made toward resolution.
- Document the company's response and outcome(s) to promote fairness and consistency.
- Record stakeholders' response(s) and whether additional research or consultation is needed.
- Provide a record of settlements and helps develop standards and criteria for use in the resolution of comparable issues in the future.
- Monitor the implementation of any settlement to ensure that it is timely and comprehensive.
- Provide data needed for quality control measures, to assess the effectiveness of the process and action(s) to resolve complaints.
- Identify learning from specific cases to be used later to assess the effectiveness of the mechanism or address systemic issues that may require changes in company policies or performance.

In order to ensure that grievances are tracked and documented, the Sponsor has provided for the following:

- Tracking forms and procedures for gathering information from company personnel and complainant(s).
- The CLO will routinely update the database of grievances.
- Periodically review information so as to recognize grievance patterns, identify any systemic causes of grievances, promote transparency, publicize how complaints are being handled by the company, and periodically evaluate the overall functioning of the mechanism.
- Processes for informing stakeholders about the status of a case (such as written status reports).
- Procedures for provision of regular reporting of grievances and resolutions.

### **Internal Parties / Worker Grievance Redress Mechanism**

The internal grievance mechanism will have same operational flow as External Grievance Redress Mechanism and will be made available for all construction, commissioning and operation/maintenance personnel associated with construction, commissioning and O&M activities to enable them make work related concerns. This includes all those employed by the Project Company, EPC contractor, sub-contractors, O&M contractors, any other related contractors and project site visitors. All personnel will be made aware of the grievance mechanism during their employment inductions at the project site and in employment documents.

Grievances of personnel will be made in writing to the Contractor / O&M operator or other relevant hiring party via a specific grievance form. The grievance form will be made available at key locations on-site (e.g. administration block, canteen area, and office locations) as well as at any staff accommodation area. The grievance form will be available in Kazakh, Russian, English, Chinese and any other languages of Project staff. Where the complainant is illiterate, the complaint can be made verbally in confidence to a manager, so that the manager will complete the grievance form on behalf of the grievant.

Grievance forms will include contact details of the complainant; however, a grievance can be raised anonymously if desired. Grievance forms will be posted in a sealed and locked 'post box', located at all key locations where grievance forms are available. The grievance box will be checked on a regular schedule several times a week. If a verbal grievance is preferred this can be specified by the complainant at the time of raising the grievance and the responsible staff will also record the grievance received and register it via the formal process.

Responses to grievances will be transparent and free of retribution. Follow-up to grievances will be completed on a grievance follow up form and signed off by the Project Company's and Contractor's grievance control representative. The follow up form will state all actions taken to resolve the grievance and any further dialogue that had ensued, as well as any future monitoring of the situation or other planned actions. The completed and signed off forms will be kept in a dedicated grievance mechanism folder on site, which will be made available for review to the external independent environmental and social auditors during the periodic environmental and social audits required during the construction and commissioning phase.

### **Management of Sexual Exploitation and Abuse/Sexual Harassment Issues**

The grievance mechanism will include handling Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints. The GRM that will be in place for the project workers will also be used for addressing SEA/SH related issues and will have in place mechanisms for confidential reporting, with safe and ethical documentation of SEA/SH issues.

The GRM will include a channel to receive and address confidential complaints related to SEA/SH, with special measures in place. If an employee faces SEA/SH issue s/he can either apply to a higher level superior or go directly to the national referral system of the country for dealing such cases. The content and procedures of the project's GRM will also have a reporting line on such cases in regard to SEA/SH issues and will be handled under full confidentiality and with the consent of the survivor. Project Company or Contractor shall not investigate any SEA/SH cases without survivor's informed consent. If the Project Company or Contractor will receive a SEA/SH related grievance, the severity of the grievance will be evaluated. The following potential sanctions will be applied depending on the severity of the grievance:

- Informal or formal warning;
- Additional training;
- Loss of up to one week's salary;
- Suspension of employment (either administrative leave as above or without payment of salary) for a minimum period of one month up to a maximum of six months;
- Termination of employment;
- Referral to the police or other authorities as warranted (with survivor's informed consent).

All details of GBV and SEA/SH survivors will be kept strictly confidential in the Grievance Register Database; and

- The GRM Officer will not ask for, or record, information on more than the following related to the GBV and SEA/SH allegation;

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of the survivor's knowledge, the perpetrator was associated with the project; and if possible, the age and sex of the survivor.

### **GRM: Legal System**

In accordance with RoK legislation, if a resolution cannot be reached following discussion and assistance from the Project site and central GRC, the case shall be referred to the court for resolution. Nonetheless, it should be emphasized that GRC management does not restrict a complainant's initial right to refer the case to court as part of the grievance redress procedure.

## 8 MONITORING AND REPORTING

Stakeholder engagement during operations will relate to the ongoing operational and maintenance activities.

Where any significant works are required during operations, this may necessitate additional stakeholder consultation prior to the works commencing.

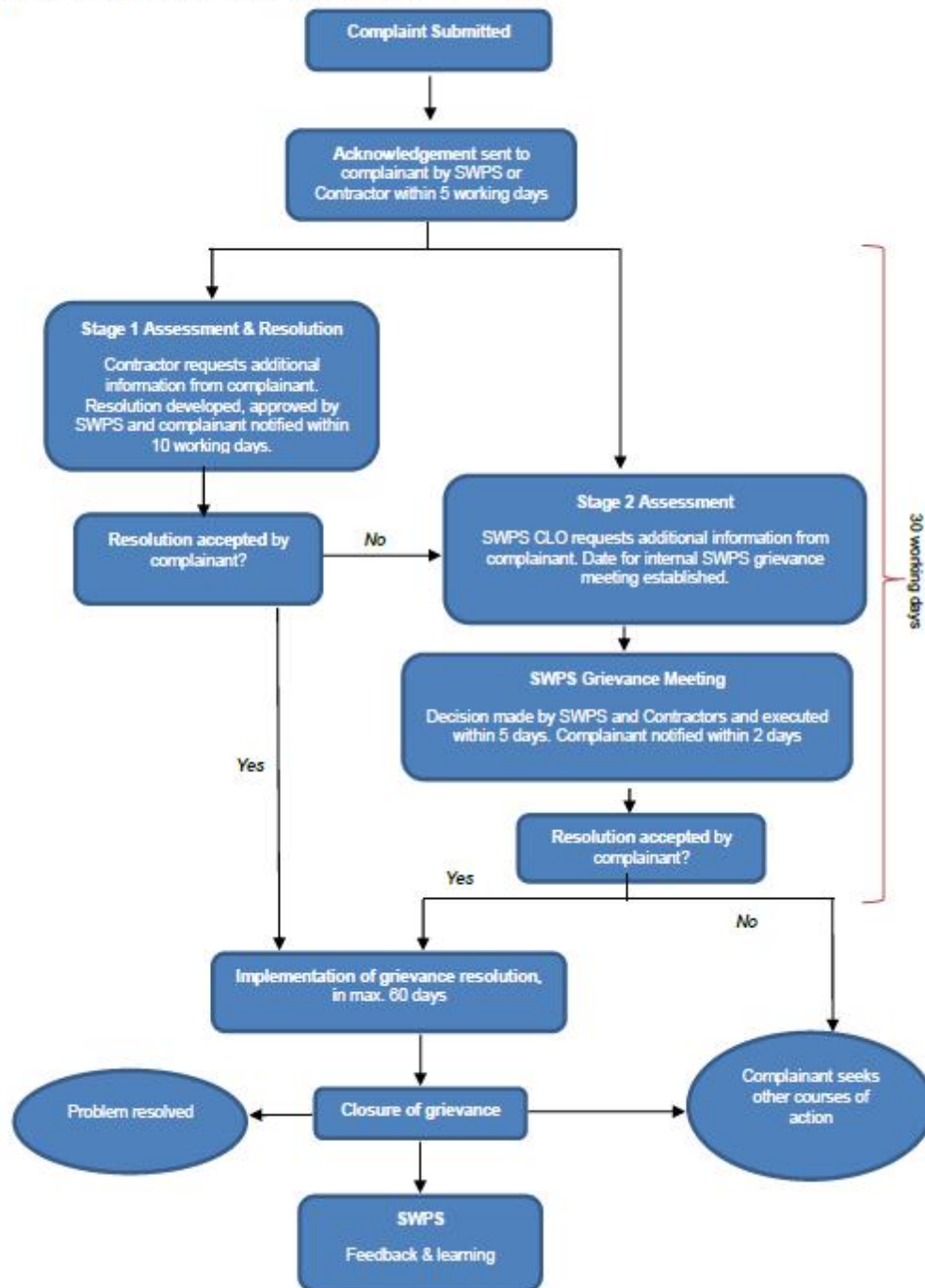
Engagement with stakeholders during operations is primarily about involving stakeholders in assessing whether previously identified mitigation measures are working as intended, being responsive to grievances and identifying alternatives where there are failings.

The monitoring KPIs that shall be used are set out below.

Topic Area	Monitoring KPIs
Provision of Project information	Number of public announcements made to provide accurate information on the current status of the Project, using social and other types of traditional media.
Community Meetings (every 12 months)	<p>Number community meetings held as planned, per year in both Bulaksay and Saryoba villages.</p> <p>Number of people attending each monthly public consultation meeting, broken down by gender.</p> <p>Number of high/medium-priority and repeat actions for the Sponsor outstanding each month.</p>
Annual Environmental and Social updates for Village Councillors	Provided annual environmental and social updates to stakeholders via the Village Councillors
Grievance redress mechanism	<p>Number and type of grievances raised per month and their status: open/processed/closed.</p> <p>Number of grievances resolved to the satisfaction of the grievant.</p> <p>Number of grievances resolved within the agreed timeline.</p>
General	The CLO will keep track of complaints and requests to identify if there are repeat complaints/requests, related to certain topic areas/stakeholder groups. This will allow for analysis of key positive or negative trends.

Please adjust and adopt these samples below

### Appendix I.1 Grievance Resolution Process Chart



## Appendix I.2 Grievance Form

Reference No:	
Full Name	
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).	By Post: Please provide mailing address: _____ _____ _____  By Telephone: _____  By E-mail: _____
Language  Please mark your preferred language for communication	Kazakh  Russian  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	
	One time incident/grievance (date _____)  Happened more than once (how many times? )  On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Please return this form to:

**Name:** NAME, NAME, Social and GRM specialist

Address:

Phone:

Fax:

Email:

# Appendix A

## **STAKEHOLDER ENGAGEMENT LOG TEMPLATE**

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# Appendix B

## **GRIEVANCE LOG TEMPLATE**

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# Appendix C

## **GRIEVANCE SUBMISSION FORM TEMPLATE**

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# **APPENDIX TITLE**