

1. PURPOSE AND SCOPE

Regular and transparent communication between both the project and the communities and vice versa is crucial in building positive relationships between the two parties. This relationship is crucial for managing unexpected situations that might arise during the project.

Stakeholders are persons or groups of communities who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively.

The main aim is

- Identify the stakeholder engagement requirements.
- Outline a systematic approach to build and maintain a constructive relationship with the project stakeholders; and
- Set up a system to appropriately manage and respond to grievances from the local communities and other stakeholders.

2. APPLICABILITY

This procedure applies to Sterling & Wilson Projects and Operations & Maintenance

3. DESCRIPTION OF PROCEDURE:

Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, or other businesses. Stakeholder engagement involves a range of activities such as public disclosure of appropriate information, consultation with stakeholders, and mechanisms by which people can make comments and raise grievances. Communication, both internally and externally, is an important aspect of the success of a project. The Communication procedure regulates both Internal and external communication as well as possible grievances.

Stakeholder Analysis and Engagement Planning

Identify the stakeholders that may be interested in their actions and consider how external communications might facilitate a dialogue with all stakeholders. Where projects involve specifically identified physical elements, aspects and/or facilities that are likely to generate adverse environmental and social impacts to Affected Communities. This plan is developed for helping or addressing the affected communities' concerns and issues. When the stakeholder engagement process depends substantially on community representatives, S&W will make every reasonable effort

to verify that such persons represent the views of affected communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents.

Internal Communications:

Internal Stakeholders include, but are not limited to, internal project workforce, project teams, project management teams, sub-contractors workforce, and subcontractor's management teams. The internal communication includes regular meetings for the Project team to review and coordinate project progress regarding environmental and community issues. Most of the procedures as identified in this plan lay the methodology of the same will be communicated internally.

External Communications:

External Stakeholders include but are not limited to, the local public, Local Administration representatives, government authorities, media, and regulatory bodies. It is very important to note that only authorized and identified team members can communicate with external stakeholders. The communications will be documented for internal purposes.

Mechanism

To be sure the possible grievances or local complaints are received, there will be a Post-box (placed at the main entrance or site office) and contact numbers on signboards, easily viewable, in order local community to be able to contact the Project team. The following way to act shall be implemented, to be sure all the grievances are managed:

- All grievances will be logged and reviewed by the designated environmental/Social Coordinator.
- The designated Environmental/Social Coordinator will identify the mechanism to redress the grievance, will identify the party responsible for accomplishing the task and will issue the instruction to complete the action.
- The site HSE will review the adequacy of the action and approve the completion of the action.

Stakeholder Engagement and Grievance Redressal

A meaningful stakeholder engagement process during the lifetime of the project is a requirement of the project. During the Construction phase, Stakeholder Engagement involves a range of activities such as public disclosure of appropriate information, consultation with stakeholders, and mechanisms by which people can make comments and raise grievances. The Stakeholder Engagement procedure should meet the aim of:

- Identify the stakeholder engagement requirements.
- To build and maintain a constructive relationship with the project stakeholders; and
- Address and respond to grievances from the local communities and other stakeholders.

Disclosure of relevant project information helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. Affected Communities with access to relevant information on:

- The purpose, nature, and scale of the project.
- The duration of proposed construction activities.
- Any risks to and potential impacts due to construction activities to its neighbourhood and relevant mitigation measures.
- The communication & grievance mechanism.

The grievance mechanisms will be publicized as:

- Posters at the site entrance; and
- Disclosure of the environmental Data on demand.

The information provided will be made available in all the relevant local and international languages and will include the following:

- Who can raise complaints (i.e. all stakeholders)?
- Where, when, and how community members can file complaints (i.e. Location of the post box for external communication, email details of the designated E&S Coordinator etc.).
- Who is responsible for receiving and responding to complaints (i.e. contact no. & email ID of the designated E&S Coordinator)?

In addition, to ensure that the grievances are reported (e.g. all vehicles dedicated full time for the project and circulating on roads outside the project site will have a written Project name with a telephone number for any road user to report grievances when required) required measures shall be adopted. The grievance mechanism will allow for complaints to be filed, in the following ways:

- By post.
- By email and.
- Put the concern in the post box kept at the project gate or site office.

Written and verbal complaints will be received at the project's gate or site office – therefore the security personnel shall be trained to deal with the complaint appropriately.

In case of a verbal complaint, the security personnel shall inform the designated E&S Coordinator that a stakeholder wants to submit a grievance. On receiving the information, he/she shall reach the gate to receive the grievance.

A register for External Communication Shall be kept at the security gate to note down the grievance. After reviewing & investigating the Grievance, an adequate response shall be communicated to the person who made the grievance with measures to be taken and with the timeline to resolve the issue. Meetings with complainants and site visits for grievance investigation will be undertaken, as appropriate. For complex grievances, an investigation team will be formed based on potential conflicts of interest, qualifications, gender composition, and budget. The grievance investigation team will provide a proposal to resolve the complaint.

If all parties accept the proposed solution, the agreed actions will be implemented in the established timeframe. In the case that the complainant does not accept the proposed resolution, it should be re-assessed for a situation and make sure that all alternatives within the grievance mechanism are explored. Close-up monitoring of a complaint will be undertaken, if possible, by collecting evidence that the necessary actions have taken place. For example:

- If the issue was resolved to the satisfaction of the complainants, get a confirmation and file it along with the case documentation.
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how these were resolved.

To monitor Grievance management, the following parameters shall be reviewed periodically:

- Number of grievances closed out.
- Number of grievances still opened.
- Topics raised in grievances and trends.

The documental evidence is kept as records which are to be updated (as required) to address the issues if any. The table below suggests the mechanism that will be adopted on-site for communication with various stakeholders:

Table - Communication Matrix

What to Communicate	Target Group/Who to communication	When to Communicate	How to communicate	Responsibility
Internal Stakeholders				
HSE Policy and Mandatory Rules	All on Site	Commencement to Work	Display at prominent location thru Safety mascot-WILSON and security gate	Site HSE
HSE hazards-Risks / Aspects-impacts	All workforce, supervisors, engineers, Visitors	Commencement and execution. Change in work methodology/new equipment	Induction training. Toolbox talks/ Posters/ Signage Safety Suggestion Hazard observation	All workforce, supervisors, engineers, Visitors
Communication on HSE Performance	All	During the project duration/tenure	Through display sign boards	PM/Site HSE
HSE Objectives and Program	All on Site	Commencement to Work	Induction training, Committee meetings	Site HSE / PM
Legal Requirements including half-yearly returns	All workforce, supervisors, engineers	After site mobilization	Online HSE portal, Induction training, HSE committee meetings	Site HSE / PM
Emergency Procedure and First Aid facilities	All	On site entry	Site induction Job specific training	Site HSE / Site Security

What to Communicate	Target Group/ Who to communication	When to Communicate	How to communicate	Responsibility
Incident Information and Learnings from Incidents & Near Miss	Workforce, Supervisors, Engineers, Management	On the occurrence and after completion of the investigation report followed by the lesson learnt report	Toolbox talks Reporting to clients thru email Reporting to SW Management thru Email/ Online HSE Portal	Site HSE / PM
Audit findings	Engineers, In charge, PM, Client	Immediate thru the online portal	Portal and Email	Site HSE / PM
Changes in execution methodology/ machinery / Drawing/ Design	Engineers/workers / sub-contractors	Within 1 day of any change in the risk, the equation is anticipated due to changes in execution methods/equipment	Team Meetings and MOMs Change in HIRA-AIA	Site HSE/ PM
Grievances received from external bodies	Grievance redressal team (HSE manager, Project manager, admin manager, project director, client reps)	As and when received	Team Meetings and MOMs	PM/ Team
External Stakeholders				
HSE Policy/ Any cautions regarding site work	Local Public Client Supplier/Vendor Authorities	Throughout the project work	HSE Policy on the SW website Safety Mascot - Wilson	Corp Com/ HSE/PM

What to Communicate	Target Group/Who to communication	When to Communicate	How to communicate	Responsibility
			Display Signages Warning signs	
Communication on HSE Performance	All	During the project duration/tenure	Through display sign boards	PM/Site HSE
Any major HSE incidents	Client/Government Authorities	As and when occurred	Incident Reports	Project and Client
Project related update	Media	In consultation with the Client, the Management will identify the representative Corporate Communication team for SW related Media interaction		
Receiving Stakeholder Grievances	From Local Public/ Govt Authorities/ media	To be captured thru the communication register at the security gate, Emails, and post box at the entry gate. Display of Site HSE/PM contact person at the Security gate.		

1. FORMATS APPLICABLE

S. No.	Format No.	Title
1	SW/HSE/F461	Communication Matrix