



Karavasta Solar Park

GRIEVANCE MECHANISM



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1 INTRODUCTION

1.1 Scope and applicability

This procedure is applicable to the design, construction and operation and maintenance activities during the **Karavasta solar project**. This Community Grievance Mechanism deals with grievances from communities and local stakeholders at site level and in neighboring areas.

- The Community Grievance Mechanism is open to grievances from individuals as well as from collective groups and stakeholders. Collective grievances shall be handled as fairly and effectively as the individuals' grievances, prioritizing processes that seek consensus and reconciliation through engagement and dialogue and which will respect local context.
- This Community Grievance Mechanism is applicable from the design phase, construction phase, operations phase and maintenance phase. It shall be fit for purpose and scaled to the impacts and the associated risk arising from Votalia operations. This mechanism can always be expanded or updated as an operation grows to consider complaint profile variation over time.

1.2 Objectives

Grievances are any complaints, concerns, or suggestions about the way a project is being implemented. They may take the form of specific complaints for damages / injury, concerns about routine Project activities, or perceived incidents or impacts. Identifying and responding to grievances addresses unforeseen impacts and manages risks, while supporting the development of positive relationships between projects and the communities, and other stakeholders they may affect. Grievance mechanisms provide a formal and ongoing avenue for stakeholders to engage with the company, whilst the monitoring of grievances provides signals of any escalating conflicts or disputes.

1.3 Principles

Participation in the grievance mechanism is voluntary and free. When required it allows for anonymous grievances.

The main principles on which the grievance mechanism is based are:

- **Proportionality:** a mechanism scaled to the potential risks and adverse impacts that the Project may impose on affected communities.
- **Cultural appropriateness:** a mechanism designed in a culturally appropriate manner.
- **Accessibility:** a clear and understandable mechanism that is accessible to all segments of the affected communities at no cost to them. Grievances may be received face-to-face, via telephone, email or post.
- **Transparency and accountability:** a mechanism that operates in a transparent way and that is accountable to all stakeholders.
- **Appropriate protection:** a mechanism that prevents retribution and does not impede access to other remedies, including public judicial or non-judicial mechanisms.

The grievance mechanism shall not impede access to the country’s judicial or administrative remedies. Complainants and affected persons are free to approach a court of law at any time, independently of the project level grievance mechanism.

1.4 Stakeholders

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

Stakeholders group include locally affected communities or individuals, national or local government authorities.

1.5 National regulations and national standards

The Karavasta Solar grievance mechanism has been developed and is implemented in compliance with the requirements of *EBRD Performance Requirement 10 : Information Disclosure and Stakeholder Engagement*, and *IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts*.

Along with international standard, the present grievance mechanism complies with the national legislation of Republic of Albania, in particular law “*Nr. 119/2014 On Public Information rights*” which specifically requires grievances to be considered within ten days from the date of receipt.

2 DEFINITIONS

| Term | Definition |
|-------------------------------|--|
| Voltage Representative | Any person working for or on behalf of Voltage and who may be subject to receive any grievance or complaint from any local stakeholder |
| Complainant | Person making a complaint or grievance against Karavasta Solar project |
| Grievance | A grievance is a concern or complaint raised by an individual or a group within communities affected by company operations. Both concerns and complaints can result from either real or perceived impacts of a company’s operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or to a complaint may be in the specific approaches and the amount of time needed to resolve it |

| Acronym | Description |
|----------------|--|
| AP | Affected People |
| EBRD | European Bank for Reconstruction and Development |
| E&S | Environmental & Social |
| FGD | Focus Group Discussion |

| | |
|------------|-----------------------------------|
| GM | Grievance Mechanism |
| IFC | International Finance Corporation |
| KII | Key Informant Interview |
| KPI | Key Performance Indicator |
| VSM | Votalia Social Manager |

2.1 Responsibilities

| ROLE | ACCOUNTABILITY |
|---|--|
| PROJECT MANAGER | <p>Ensure the guidelines provided by this procedure are adhered to</p> <p>Provide the resources necessary for the effective implementation of this procedure</p> <p>Is available for any consultation by the Environmental and Social Manager whenever necessary</p> <p>Ensures contents of this procedure are made available to the community and all affected groups</p> |
| ENVIRONMENTAL AND SOCIAL MANAGER | <p>Ensure all project personnel, including contractors, are trained on the contents of this procedure</p> <p>Ensure the community and project-affected stakeholders are made fully aware of the contents of this procedure, including the process for submitting a grievance</p> <p>Prepare and file all grievance forms</p> <p>Mediate in all grievances received by the site through proper channels</p> <p>Provide all information necessary according to this procedure whenever there is a grievance</p> <p>Ensure easy, fast and conclusive resolution of grievances</p> |
| EHS MANAGER | <p>Provide support to the E&S Manager for the implementation of this procedure</p> <p>Whenever a grievance is raised, be part of the resolution team</p> <p>During induction of new workers ensure the contents of this procedure are made clear to all</p> |
| CONTRACTORS | <p>Adhere to the steps provided by this procedure</p> |

| | |
|--|---|
| | Create a conducive environment for community to be able to raise grievances without fear or prejudice |
|--|---|

3 GRIEVANCE MECHANISM PROCESS

3.1 Process overview

The Affected People (APs), Administrative Unit (AU), and Municipality will have the opportunity to file complaints and queries on any aspect of Project activity and land acquisition. The Company will be responsible for establishment of this Grievance Mechanism (GM) and act as the GM secretary to make sure that the GM is operational to effectively handle environmental and social concerns of project affected persons. The GM is presented during all public consultations and published online. The Company will ensure that grievances and complaints on any aspect or issues that may arise, are addressed in a timely and satisfactory manner.

All possible avenues are made available to the APs to resolve their grievances at the project level. Under the proposed project level grievance mechanism, affected households may appeal any decision, practice or activity connected with the resolution of a grievance. APs will be made aware of the procedures they can follow to seek redress, including, if necessary, resort to administrative or judicial procedures as well as Lenders’ grievance mechanisms. The project GM will be disseminated to APs through the consultation meetings, FGDs, and KIIs as well as published on the Project’s website.

The grievance management process is illustrated **Figure 1**

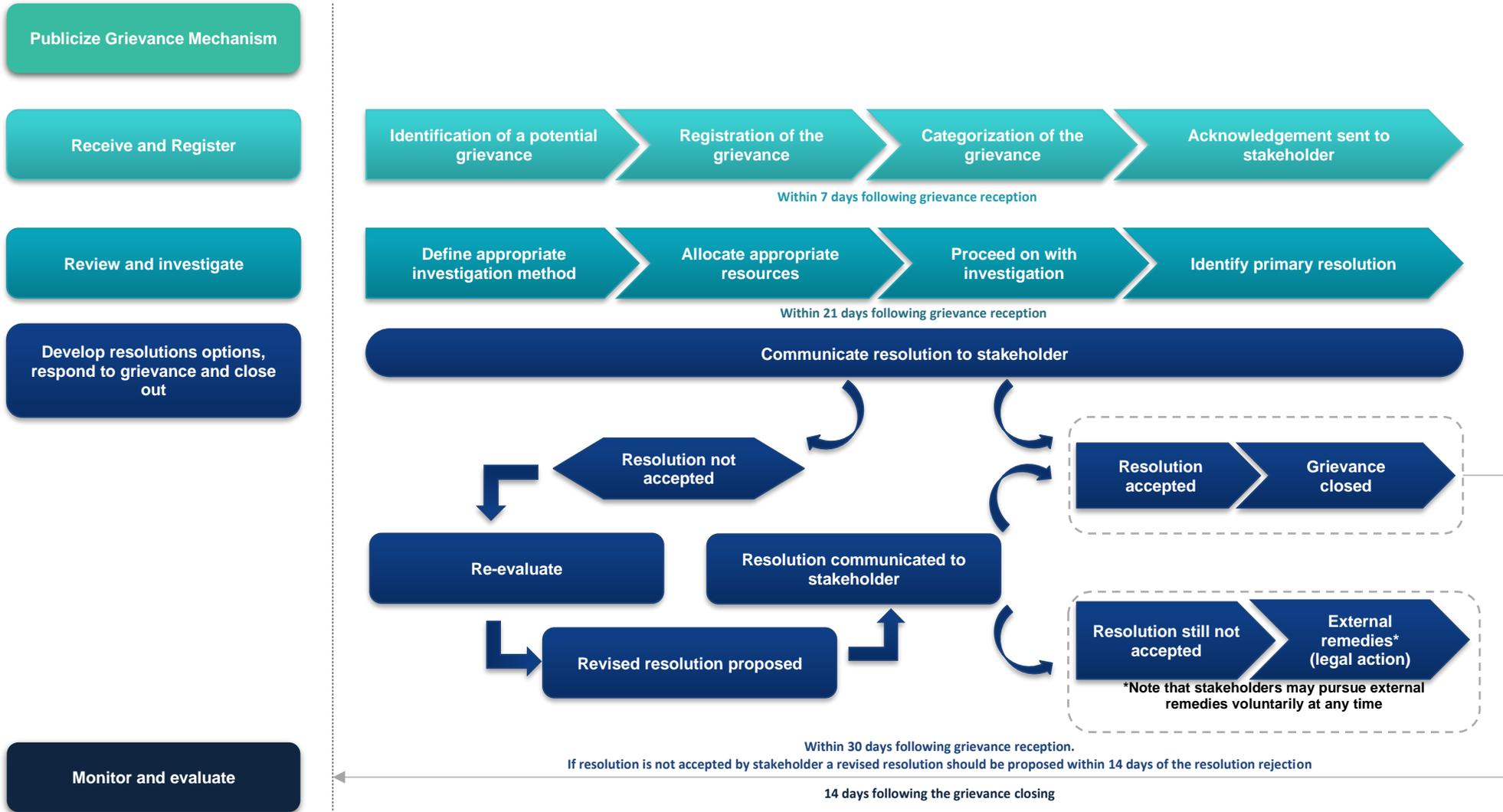


Figure 1 - Grievance Management Process

3.2 Publicize the Grievance Mechanism

For a grievance mechanism to be effective, all project stakeholders need to understand and support its purpose. Affected communities must be aware of and understand the grievance mechanism's benefits to them. Other stakeholder groups need to understand why the grievance mechanism is not open to them or their issues and concerns (such as commercial or political disputes) - and be informed of the available methods for them to raise their complaints.

Grievance forms shall be available for use and located at all the Voltalia site offices, including those of the -contractor, and at all the entry points of the site. Location of Grievance Forms will be communicated to all communities as part of the induction talk and displayed at the information boards located at the entry points of the site. Also, anyone can use the email address to send their complaint or issue.

The Project communicate this procedure to its external stakeholders during consultations and key activities (e.g. baseline surveys) and inform them on how they can express their grievances, including indications of the channels to be used.

Information shared with the -stakeholders includes the following:

- General principles of the Grievance Mechanism.
- What benefits complainants can receive from the Grievance Mechanism.
- When, where, and how Project stakeholders can file complaints.
- Who is responsible for receiving and responding to complaints;
- Nature of response Project stakeholders can expect including timing.

The grievance mechanism has been presented to the Project's stakeholders during the ESIA process carried out in 2020/2021 and during preliminary field assessments as part of Livelihood Restoration Plan (LRP) development. The GM will be published on the Karavasta Solar website (www.karavastasolar.com) and on public displays at the entrance door of the construction site when it will be set up. The GM will also be presented during every stakeholder engagement meeting, as well as to every directly-impacted household during the socio-economic and asset surveys.

3.3 Grievance Reception and Registration

Any person or stakeholder group may send comments, complaints and/or requests for information using the channels described below. The GM is designed to allow every stakeholder to raise grievances irrespective of their literacy level or access to infrastructure. Stakeholders can raise grievances in Albanian or English, and anonymously. Stakeholder with lower literacy level are encouraged to raise complaints verbally.

3.3.1 Grievance reception

Complaints will be received through the following channels:

- Face to face communication with Voltalia site management or contractors.
- Email addresses for Voltalia grievance management staff will be outlined on the information boards: karavasta@voltalia.com
- Phone number; 00355 684027034
- Complaint boxes that will be placed at all entry points to the Karavasta project site

Upon receiving a complaint/grievance, the receptor will explain to the complainant the process and timelines for the remaining steps in the procedure, and inform on how the complaint will be handled. The receptor will ensure confidentiality of the complainant from the lodging of a grievance onwards. Only those directly involved in the examination process will be provided with the grievance's details. Sensitive information will only be disclosed upon users' knowledge and approval. In case of any emergency, the person who is in the site (employee of the company or contractor) should call the person in charge for GM.

The receptor will inform the complainant that the grievance can also be lodged anonymously should the complainant prefer it. However, in the case of an anonymous grievance, no follow up or resolution will be provided to the complainant.

3.3.2 Grievance registration

Following reception, the grievance will be registered in the Grievance register **within 1 working day**.

The Grievance Register log is a Microsoft Excel which is used for logging, tracking and managing the complaints. This will assist in tracking overall trends and patterns in concerns, allowing emerging issues to be flagged and understood at an early stage. As a minimum, the following information will be recorded:

- Date
- Details of complaint
- History of other complaints/queries/questions
- Prioritization using a common scale to assist with timelines for resolution.
- Resolutions agreed with the party(ies) in question, and actions implemented.

All registered issues will be discussed with the responsible board, to provide fast and efficient solutions.

3.3.3 Grievance acknowledgement

All incoming grievances will be acknowledged within **7 days** of grievance reception. On reception of the grievance by Voltage an acknowledgement letter will be issued to the complainant. Complainant should also be provided with contact information of the person responsible for the resolution of their grievance and the estimated time for completion. If it is decided that a grievance is not valid or doesn't fall under the company's jurisdiction, the person responsible for the grievance resolution will notify the complainant **within 14 days** from receipt of the grievance, and where possible direct them to the responsible third parties.

The acknowledgement form includes:

- Formal confirmation, date and a complaint number;
- Name of the complainant;
- Name of the person who received the complaint;
- Signature of the complainant whenever possible;
- Contact details including phone number in case the complainant has any question;
- Expected timeline for response.

When grievances are submitted in person, the acknowledgement form will be provided to the complainant immediately using the form presented in Annex 1.

3.4 Review and investigation

3.4.1 Grievance Categorization

After reception and registration, the complaint will be assessed and classified by Votalia as follows:

- G0: Request for information not directly related to the Project
- G1: Questions / concerns
- G2: Requests / Petitions
- G3: Complaints

All grievances will then be given a priority level defined according to the following criteria:

| Category | Description |
|----------|---|
| Low | Concern, claim or grievance regarding lack of information or unclear information provided. |
| Medium | Concern, claim or grievance from stakeholders (individual or as a group) that could impact the project reputation or compromise its development at medium term. |
| High | Concern, claim or grievance involving stakeholders of high priority, and: <ul style="list-style-type: none"> • Reports a breach to human rights • Relates to a legal non-compliance Pose a short term risk to the project continuity. |

The initial review, classification and validation of grievances received will be performed by Votalia Environmental and Social Manager within 7 days of having received the grievance. The timeframe will be communicated to the complainant in the acknowledgement of grievance delivery (refer to previous step), in written form, and verbally if needed.

3.4.2 Investigation

Depending on the priority level of the issue raised, the actions and accountability of managing every grievance will be different. Votalia E&S Specialist will perform this process within the timeframe below.

Examination of grievances is undertaken in order to verify the validity of the complaint, determine its causes and develop corrective actions to minimize or avoid recurrence of the causes. If the grievance requires a more thorough investigation, the complainants will be notified by Votalia Environmental and Social Manager of the process to be followed and who will be the people in charge of investigating.

| Grievance Level | Action | Accountable | Investigation Time |
|-----------------|--|-------------------------|-----------------------|
| High | <ul style="list-style-type: none"> • Seek advice internally from Votalia Company Management • If necessary, form an investigation team to collect evidence on the grievance and come up with a status report. • In instances when impartiality is important or complex technical matter are involved, | Votalia Project Manager | 7 days from reception |

| Grievance Level | Action | Accountable | Investigation Time |
|-----------------|---|---|------------------------|
| | <p>designate third-party experts to investigate complaint before circumstances change or conflict escalates.</p> <ul style="list-style-type: none"> Conduct meetings with complainants and visit the site before proceeding to response and/or resolution. | | |
| Medium | <ul style="list-style-type: none"> Seek advice internally before proceeding to response and/or resolution. | Voltalia Environmental and Social Manager | 14 days from reception |
| Low | <ul style="list-style-type: none"> Review information to be provided before proceeding to response and/or resolution. | E&S Specialist /Project Manager | 7 days from reception |

3.5 Resolution and Grievance Response

Resolution process will adapt to the type of complaint and to the complainant as well. Grievance resolution processes are defined here below:

| Approach | Description |
|-----------------------|--|
| Unilateral | Voltalia E&S Manager him/herself addresses the source of the problem in liaison with the relevant project team (e.g. stopping noise or dust) |
| Bilaterally | <p>Voltalia E&S Manager refers to Voltalia E&S Corporate Manager and the complainant, reaching a resolution through discussion or negotiation.</p> <p>As during the evaluation process, Voltalia E&S Manager and Project Manager are committed to considering all the evidence and meeting with all the relevant parties, in an effort to give complainants every opportunity to present their views.</p> |
| Through a third party | <p>Informally or through mediation. Voltalia E&S Manager refers to the Voltalia E&S Corporate Manager who, in order to ensure impartiality, will select and agree with the person or company filing the grievance as a third party “mediator”.</p> <p>For this purpose, whenever possible, Voltalia E&S manager should identify a list of potential mediators (e.g. member of the church, imam, leaders of the community, etc.).</p> |

Voltalia Environmental and Social Manager will perform this resolution process and inform the complainant about progresses in written form and verbally if required. Grievances resolution status can be:

- Preliminary:** resolution aims at informing the complainants about the assessment and/or status of their claim; or
- Conclusive:** resolution aims at communicating a decision (including rationale) and ask for complainant’s agreement to close out the claim (refer to Appendix 3)

3) **Non-conclusive:**

- 3.1. If complainants are not likely to be satisfied with the outcome of the preliminary resolutions, the Votalia Environmental and Social Manager shall invite the complainant to collect additional evidence, obtain additional arguments, conduct further investigations and clarify the company's position. Votalia E&S Manager could get direct support from Votalia Country Manager, Votalia E&S Corporate Officer, Votalia Head of Projects and/or the Director.
- 3.2. If complainants are not satisfied with the outcome of a conclusive resolution, Votalia will appeal to external dispute-resolution mechanism (extra-legal party).

Preliminary and conclusive responses to grievances are to be provided in written form and verbally if needed. The resolution timeframe will be communicated to the complainant in written form and verbally if needed.

Should no solution be reached through the approaches mentioned above, complainants will have an option to pursue other avenues for seeking redress. This appeal mechanism will involve a further extra-legal yet credible third party. The company will always be cooperative to find the best solution for the project and for the person filing the complaint. In any case, the right solution will be sought. If for many reasons this does not go well the company will be open to follow other legal avenues.

The response should be preferably in writing, although a verbal response may also be provided where appropriate. When corrective actions are agreed upon by Votalia and the complainant, the responsible manager will be responsible for ensuring corrective actions are implemented. The Social project manager shall inform the complainant on the progress of implemented corrective actions. If no further attention is required, then the E&S manager can close the grievance and record this in the Grievance Register log.

Resolution and response timing depending on the grievance level is summarized in the table below:

| Grievance Level | Registration time | Acknowledgment time | Resolution Time | Close out time |
|-----------------|-------------------|-----------------------|------------------------|------------------------|
| High | 1 working day | 7 days from reception | 21 days from reception | 30 days from reception |
| Medium | 1 working day | 7 days from reception | 21 days from reception | 30 days from reception |
| Low | 1 working day | 7 days from reception | 14 days from reception | 21 days from reception |

3.6 Grievance Close Out

Votalia Social project manager will communicate the outcome of the investigation to the complainant and request feedback on the resolution. This initial response will include a summary of what is planned and when it is likely to be implemented, or an explanatory note clarifying why action is not required.

Any further response from the complainant is recorded to help assess whether the grievance is closed or whether further action is required. The Grievance Manager will use appropriate communication channels to confirm whether the complainant has understood and is satisfied with the response. This communication will also be recorded in the grievance register. Based on the complainant response (resolution accepted or resolution rejected with no further review), the Environmental and Social manager can close the grievance.

3.7 Resolution evaluation

The Environmental and Social manager will evaluate the resolution efficiency following its implementation based on the complainant satisfaction, the non-recurrence of the aspect that prompted the grievance in the first place, and the absence of recourse to external remediation process by the complainant.

4 REVIEWING AND MONITORING THE GRIEVANCE MECHANISM

In an effort to measure the effectiveness of the grievance mechanism and the efficient use of its resources, the grievance mechanism will be regularly monitored and evaluated by the Environmental and Social Manager and E&S Corporate Manager.

Reviewing and monitoring the grievance mechanism will help identifying common or recurrent grievances that may require structural solutions or a policy changes and enabling Voltage to capture improvement opportunities and any “lesson learned” while assessing grievances.

The grievance mechanism efficiency will be assessed based on the following KPIs.

| Performance Indicator | Limits / Objective to achieve |
|------------------------------------|--|
| Number of grievances communicated | No high grievances reported |
| Proposed resolution rate | A resolution was proposed to all complainants |
| Timing for grievance resolution | All grievances receive a resolution proposition within the defined timeframe |
| Resolution acceptance rate | Proportion of resolution accepted and considered satisfactory by the complainant following the resolution evaluation process |
| Recourse to external remedy system | Number of complaints not solved though the GM going to administrative, judicial or third-party remedy systems. |

ANNEX 1 GRIEVANCE REGISTRATION FORM

LOCAL GRIEVANCE/CONCERN FORM

GRIEVANCE REGISTRATION FORM AND ACKNOWLEDGMENT

| | | | |
|--|--|--------------------------|--|
| Project name | | Region | |
| Grievance reference | | Date (dd/mm/year) | |
| Complainant name | | | |
| Complainant phone number | | | |
| Complainant address | | | |
| Complainant e-mail | | | |
| Complaint/Concern detail | <i>Attach relevant documents and supporting evidence</i> | | |
| Complainant expectations for Grievance resolution | | | |
| Complainant signature | | Date | |
| Voltalia representative signature | | Date | |

Please detach the section here above and give the original to the complainant

FEEDBACK ACKNOWLEDGEMENT RECEIPT

| | | | |
|----------------------------|--|-------------------------------------|--|
| Project | | Region | |
| Grievance reference | | Date | |
| Complainant name | | Voltalia representative name | |

This receipt is to certify that your complaint has been registered and will now be examined by Voltalia.

The project team commits to contacting you within 21 days of this acknowledgement. Questions can be shared with Voltalia using the following contacts:

- Environmental and Social manager contact details: Vilma Terpollari, karavasta@voltalia.com, tél : 0684027034

ANNEX 2 GRIEVANCE INVESTIGATION AND RESOLUTION FORM

LOCAL GRIEVANCE FORM

INVESTIGATION AND RESOLUTION FORM

| | | | |
|---|--|--------------------------|--|
| Project name | | Region | |
| Grievance reference | | Date (dd/mm/year) | |
| Complainant name | | Examiner name | |
| Meeting notes | | | |
| Investigation findings | | | |
| Proposed resolution | | | |
| Examiner signature | | | |
| For internal use only | | | |
| Amendments | | | |
| Environmental and Social manager signature | | Date | |
| Project director signature | | Date | |

ANNEX 3 GRIEVANCE CLOSE OUT FORM

LOCAL GRIEVANCE FORM

GRIEVANCE CLOSE OUT FORM

| | | | |
|--|-------------------------|---|-------------------------|
| Project name | | Region | |
| Grievance reference | | Date (dd/mm/year) | |
| Complainant name | | Examiner name | |
| Voltalia response | | | |
| Actions resolution for | Action(s) | Deadline for implementation | |
| | | | |
| This section is completed upon completion of all agreed actions. | | | |
| Action implementation date | | | |
| Action satisfactory to the complainant | Yes No | Outcome satisfactory to the complainant | Yes No |
| Complainant signature | | Examiner signature | |
| Additional observations | | | |
| Complainant signature on complaint closing date | | Examiner signature on complaint closing date | |

ANNEX 3 POSTER



SOLAR • WIND • HYDRO • BIOMASS • STORAGE

PRJEKTI PËR NDËRTIMIN E PARKUT FOTOVOLTAIK “KARAVASTA 140 MW”

Kompania është e gatshme të japi informacion për çdokënd që është i
interesuar dhe preket nga zhvillimi i projektit

Kompania: “Karavasta Solar” Sh.p.k.

Themeluar nga “Voltalia” Ltd

MEKANIZMI I ANKESAVE

Kontakt:

Tel: 0684027034

E-mail: karavasta@voltalia.com

