

Bilasuvar 445 MW_{ac} Solar PV Project Azerbaijan

Stakeholder Engagement Plan



October 2024

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5Cs PROJECT DIRECTOR	Ken Wade

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TEMPLATE**

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LIST OF ABBREVIATIONS

ABBREVIATION	MEANING
5 Capitals	5 Capitals Environmental & Management Consultancy
AIIB	Asian Infrastructure Investment Bank
ADB	Asian Development Bank
AC	Alternating current
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ESIA	Environmental & Social Impact Assessment
ESP	Environmental Social Policy
HSE	Health Safety Environment
ESMS	Environmental Social Management System
FGD	Focus Group Discussion
DC	Direct current
GBVH	Gender Based Violence & Harassment
GRM	Grievance Redress Mechanism
GW	Gigawatts
IFC	International Finance Corporation
IPAM	Independent Project Accountability Mechanism
LRP	Livelihood Restoration Plan
MENR	Ministry of Ecology and Natural Resources
MoE	Ministry of Energy
NTS	Non-Technical Summary
NGO	Non-government Organisation
MW	Megawatts
OHTL	Overhead Transmission Lines
O&M	Operation & Maintenance
ha	Hectare
PAPs	Project Affected People/Persons
PR	Performance Requirement
PS	Performance Standard
PV	Photovoltaics
TBC	To be confirmed
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan

1 INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for the Bilasuvar 445 MW_{ac} Solar PV project (the Project) in the Bilasuvar District of Azerbaijan. This SEP summarises the stakeholder engagement conducted through the Environmental and Social Impact Assessment (ESIA) process and outlines the proposed framework methodology for stakeholder engagement throughout the lifecycle of the Project, with a specific emphasis regarding the guidelines of the international lenders and any applicable national laws.

1.1 The Project

Azerbaijan, the host country for the United Nations Climate Change Conference (COP29) in November 2024, has expressed a commitment to developing its renewable energy potential. This initiative forms a crucial part of Azerbaijan's revised Nationally Determined Contributions (NDCs), with a target of reducing emissions by 40% by 2050 compared to 1990 levels.

Renewable energy, particularly solar and wind, is integral to achieving this target. The country's Ministry of Energy has also been active in mapping the renewable energy potential, including the development of an "Atlas" for renewable energy resources. The "Law on the Use of Renewable Energy Sources in Electricity Production" (May, 2021) provides a framework for renewable energy projects, introducing measures such as guaranteed tariffs for electricity produced from renewable sources, priority in transmission, and long-term land leases for project developers. The country intends to increase renewable power capacity to 30% by 2030 and diversify its existing energy system to become a leader in green energy.

Masdar signed implementation agreements with Azerbaijan's Ministry of Energy in June 2022 to develop a renewable energy program on a bilateral basis, with a total capacity of 10 gigawatts (GW) across multiple technologies.

Subsequently, Masdar signed joint development agreements with the State Oil Company of the Republic of Azerbaijan (SOCAR) for onshore wind and solar projects, and integrated offshore wind and green hydrogen projects, with a total combined capacity of 4 GW.

The Ministry of Energy of the Republic of Azerbaijan and Masdar signed an Implementation Agreement relating to the assessment, development, and implementation of a 4 GW_{ac} pipeline of solar photovoltaic (PV) and onshore wind projects in the Republic of Azerbaijan starting with 2 GW_{ac} as the first phase.

The Bilasuvar Solar PV Plant (the Project), comprising the solar PV array, substation and access road (the Project), is one of three projects making up the first phase and it is the focus of this report. On the 26th October 2023, Masdar and the Ministry of Energy entered into an investment agreement for the Project.

5 Capitals Environmental and Management Consulting (5 Capitals) has been engaged by Masdar to undertake certain environmental and social studies during the development process of the Project, including the ESIA process and SEP (this Plan).

At this stage, it is understood that Masdar is seeking an amount of project finance from financial Institutions (together “lenders”), potentially including commercial banks that are Development Finance Institutions (DFIs), which could include:

- Asian Development Bank (ADB)
- Asian Infrastructure Investment Bank (AIIB)
- European Bank for Reconstruction and Development (EBRD)

As part of the Project’s HSSE-MS, this Stakeholder Engagement Plan SEP has been developed.

1.2 Objectives of the SEP

The objectives of the SEP include:

- To identify the key stakeholders that may be affected by the Project or may influence the outcome of the Project;
- To define processes to inform the identified stakeholders about the Project and to manage stakeholder expectations;
- To define the frequency and timeline for engagement with different stakeholder groups;
- To understand current and potential emerging issues and to capture views and concerns of the relevant stakeholders with regard to the Project;
- To provide a basis for stakeholder participation in environmental and social impact identification, prevention and mitigation including impacts and risks relating to Gender Based Violence & Harassment (GBVH) including Sexual Exploitation and Abuse (SEA);
- To propose a platform for reporting back on mechanisms to address these impacts; and
- To establish a grievance mechanism that will be implemented for the Project during the ESIA process and both the construction and operation phase.

1.3 Scope of the SEP

The scope of the SEP is to specify the methods to efficiently manage and facilitate future engagement with stakeholders during the construction, commissioning and operational phases of the Project. This document applies to the Bilasuvar Solar PV project in Bilasuvar district of Shirvan-Salyan region, Azerbaijan, approximately 140 km south of Baku.

This SEP has been prepared to align with applicable requirements of the ADB, AIB, and EBRD that establish requirements for Stakeholders Engagement and Grievance Mechanism respectively.

The SEP will remain relevant throughout the lifetime of the Project as a 'live document', it will act as a plan within the Project's construction and operational phase HSSE-MS that will require updating as Project circumstances or stakeholder dynamics evolve.

2 PROJECT OVERVIEW

2.1 Project Context

The Ministry of Energy of the Republic of Azerbaijan and Masdar signed an Implementation agreement relating to the assessment, development, and implementation of a 4 GW_{ac} pipeline of solar PV and onshore wind projects in the Republic of Azerbaijan starting with 2 GW_{ac} as the first phase. On the 26th of October 2023, Masdar and the Ministry of Energy entered into an investment agreement for the Project.

Masdar are currently developing three greenfield projects consisting of two solar PV power plants and one onshore wind power plant, with an aggregate capacity of 1,000 MW_{ac}. Details of the three projects are shown in the following table.

Table 2-1 Initial Project Details

	Bilasuvar PV	Banka PV	Gobustan South Wind Farm
Location	Bilasuvar	Banka, Neftchala Region	Gobustan South
Capacity (MW _{ac})	445	315	240
Area (ha)	1,454	973	Construction: 105 Operation: 63

The Bilasuvar Solar PV Plant is one of three projects making up the first phase and is the focus of this SEP.

2.2 Key Project Information

Table 2-2 Key Project Information

Project Title	Bilasuvar 445 MW _{ac} Solar PV Project
Project Developer	Masdar and SOCAR Green LLC
EPC Contractor	North West Electric Power Design Institute, part of China Energy Group
O&M Company	Masdar Specialised Technical Services (MSTS)
Masdar Representative	Murad Sadikhov Abu Dhabi Future Energy Company PJSC – Masdar Baku, Azerbaijan
SOCAR Representatives	Elmir Musayev and Alish Lemberanskiy SOCAR Green LLC Baku, Azerbaijan
ESIA Consultant	5 Capitals Environmental and Management Consulting (5 Capitals) PO Box 119899, Dubai, UAE Tel: +971 (0) 4 343 5955, Fax: +971 (0) 4 343 9366 www.5capitals.com

2.3 Project Location

The Project is located in Bilasuvar district of Shirvan-Salyan region, Azerbaijan, approximately 140 km south of Baku.

The administrative centre of Bilasuvar and the main residential settlements of district are located 11 km from the Project area, while the nearest settlements: Shorsulu, Dayikend and Sarvan communities are located to the north-east of the Project site at a distance of approximately 7 km. Adjacent to the Project, on its western boundary and separated by a canal, and in some locations a road, is the Lake Mahmudchala Important Bird Area.

Figure 2-1 depicts the location of the Project in Azerbaijan and Figure 2-2 depicts the regional location of the Project.

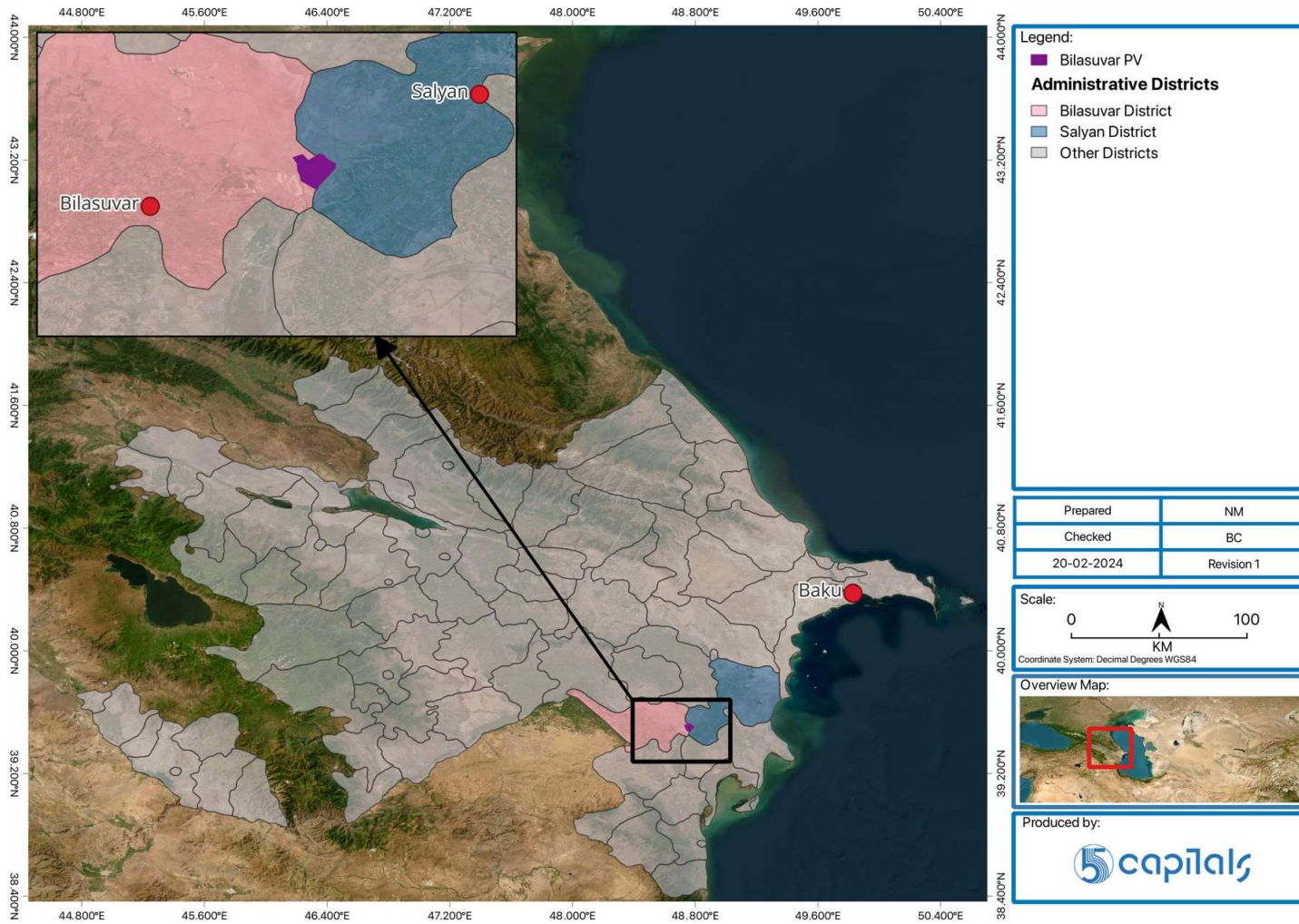


Figure 2-1 National Project Context

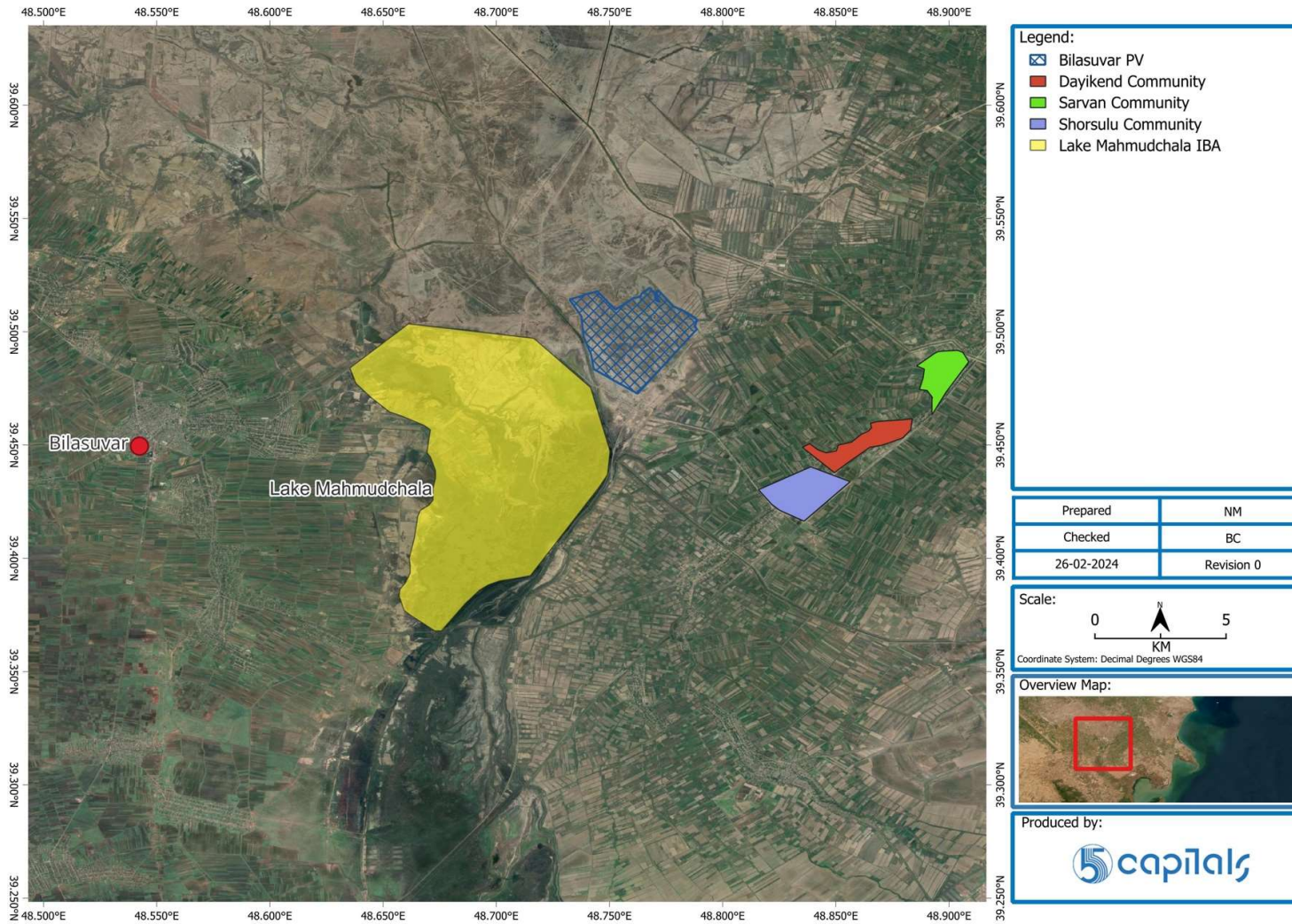


Figure 2-2 Local Project Context

2.4 Key Project Elements

Note: Please refer to ESIA Report for the detailed Project description.

The project is a 445 MW_{ac} PV Plant utilising bi-facial PV modules. The PV modules will be installed on tracking (single axis) ground mounted racks arranged to ensure the most efficient alignment for the capture of solar radiation. Mounting structures will be established within shallow foundations set into the underlying soils.

The Project will have following main components:

- PV Modules
- Inverters
- Mounting Structures
- LV/MV Transformers
- PV Plant substation including Power Transformer and Switchgears
- Civil Infrastructure (Roads, Fences, drainage as required, etc.)
- Other balance of plant such as cables, protection, SCADA system etc.

2.5 Grid Connection

2.5.1 Overview, Responsibility and Status of Assessment

The connection to the grid will be via a 90 km 330 kV double circuit line to the Navahi substation. The line is considered as an associated facility to the Project. The line heads north and passes to the northwest of the Shirvan National Park.

Enhancement of the grid network, including the construction and operation of the transmission lines, construction and enhancement of substations, investments in SCADA upgrades, control systems, and battery energy storage, are being jointly financed by the World Bank and by the Government of Azerbaijan, with the entities funding different assets. The World Bank refer to the Project as Azerbaijan Scaling-Up Renewable Energy Project (AZURE) and the Appraisal Environmental and Social Summary¹ and Environmental and Social Commitment Plan² were

¹ <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099082824173027860/p50520815b0cda0961a0bb17294c1dff0e0>

² <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099082824173040751/p5052081e30efe091b02b159a8759b9abc>

published in late August 2024. The plan is for the transmission lines for Banka Solar PV and Bilasuvar Solar PV be operational by April 2026.

Although the Government of Azerbaijan is developing the transmission line which connects the Project to the Navahi substation, the commitment plan and associated mitigation measures and monitoring will be agreed with the World Bank and will be required to follow World Bank's Environmental and Social Standards. The World Bank are therefore still overseeing any gaps in the building and design of transmission line and ensuring alignment with their requirements.

Both Azerenerji and the World Bank have engaged environmental and social consultants to undertake ESIA for their respective parts of the grid enhancement. The ESIA conducted on behalf of Azerenerji, which covers the 330 kV transmission line which will connect the Project to the Navahi substation, is being prepared by Azerbaijan Scientific-Research and Design-Prospecting Energy Institute (The Scoping Report is dated August 2024).

World Bank financing will also cover energy grid strengthening and system performance improvement, as well as supporting project implementation and capacity building. Construction works financed by the Government of Azerbaijan and the World Bank will be carried out in parallel, while priority will be given to the early completion of the 330 kV transmission lines.

A meeting was conducted with Ministry of Energy, the consultants preparing the ESIA on behalf of Azerenerji, the potential lenders for the Project, and the lenders' environmental and social advisor, on the 9th August 2024. In this meeting, the consultants preparing the ESIA on behalf of Azerenerji outlined the status of the ESIA, what studies had been included as part of this ESIA, and the next steps. The ESIA was planned to be issued to the MENR in September 2024.

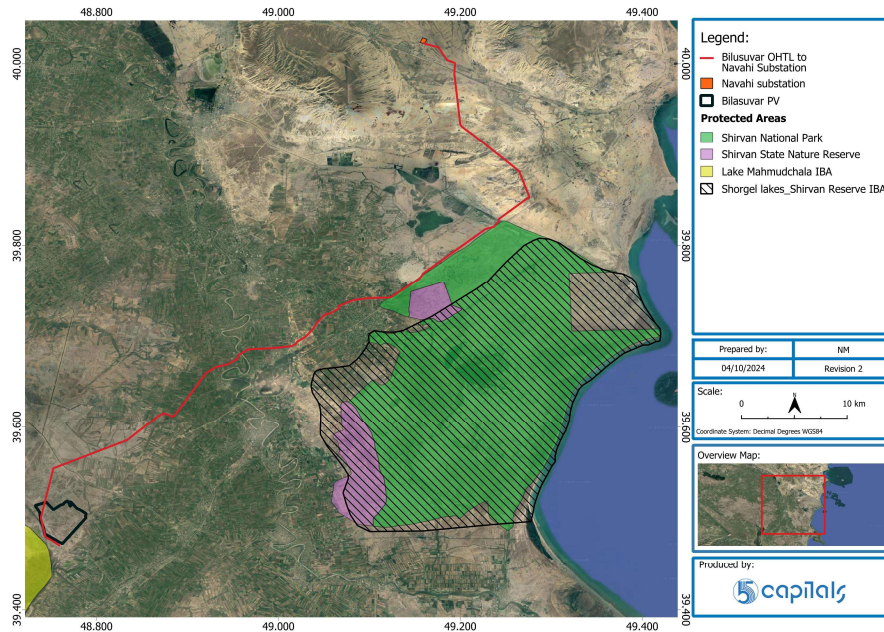


Figure 2-3 Transmission Line Connecting the Project to Navahi Substation

2.6 Construction

2.6.1 Construction Activities

Key construction activities include:

- Site preparation including fencing, clearing, levelling and grading;
- Establishment of access roads to the site;
- Installation of mechanical and electrical infrastructure for PV trackers, modules, and related equipment;
- Construction or compaction of internal roads on-site and other infrastructure including walkways & parking areas;
- Construction of storage facilities for equipment and materials, and construction of laydown area;
- Construction of general buildings, such as administrative building, sanitary rooms, workshops, electrical buildings, auxiliary buildings, and structures, etc.;
- Erection of security fencing;
- Excavation of cable trenches; and
- Construction of mechanical & electrical buildings including the SCADA building.

2.6.2 Temporary Construction Facilities

TEMPORARY LAYDOWN AREAS

Temporary laydown areas will be required in the construction phase for the storage of materials and equipment by EPC Contractor and their sub-contractors. In addition, construction offices, toilets, prayer rooms and car parking areas will be required.

All temporary construction facilities will be built within the site boundaries.

WORKERS ACCOMMODATION

Accommodation may include temporary accommodation built onsite or rental of offsite facilities. At the time of writing, the details of worker accommodation have not been finalised.

The accommodation will be required to align with IFC & EBRD Workers' Accommodation: Processes and Standards (2009).

2.6.3 Construction Workforce

As an initial estimation, and based on experience on similar projects, the typical workforce during the peak construction period is estimated to be 700 – 1,500 workers for a solar PV plant of this size. The manpower power required for the construction will be determined by the assigned EPC Contractor.

2.7 Project Operational and Maintenance Requirements

During the operational phase, maintenance will be conducted to ensure efficiency in energy production. Maintenance activities will include cleaning of panels, maintenance of electrical components and control equipment. The routine cleaning of the PV modules is to be conducted automatically by a dry-cleaning robot (i.e., brushes installed on tracks along the rows of the modules) without the use of water in order to make the cleaning process more resource efficient (i.e., avoiding water use) and economically sound.

The number of people that are to be employed during operation is expected to be up to 50. A significant percentage is expected to be comprised of Azerbaijanis.

2.8 Decommissioning

As per the PPA, the plant is to be operational for 30 years. Following the 30 years, the Ministry of Energy can decide whether to continue, upgrade or decommission the plant; this is outside the scope of this study and to be decided at that time.

Upgrading the PV power plant will entail either replacing old PV modules with new ones, augmenting the total peak power of the plant, or enhancing the plant by incorporating new elements.

In the event of decommissioning, the site will be restored close to its original condition, with a Decommissioning and Site Restoration Plan devised prior to this phase.

The components of a PV plant possess value for either reuse or recycling. Hazardous wastes will be disposed of in compliance with the environmental guidelines mandated by Azerbaijan, while non-hazardous materials such as waste metals or plastics will be transported to designated recycling facilities, if available.

2.9 Project Milestones

Table 2-3 Project Milestones

Milestone	Scheduled Date
PPA Signature	June 2024
Mobilisation	Quarter 1, 2025
Main Construction Works Commencement	Quarter 2, 2025
Commercial Operation Date	January 2027

2.10 Local Context and Sensitivities

Full details of receptors, local sensitivities, land users and site baseline to be described in the Environmental & Social Impact Assessment (ESIA) Report for the Project. A summary of this has been included below for context in this SEP.

2.10.1 Land Use and Site Conditions

LAND OWNERSHIP

The land within the project site consists of one plot of 1,454 ha of agricultural land that is owned by Bilasuvar Executive Power. The Executive Power will transfer this land to the Ministry of Energy (MoE) in Azerbaijan to allow for the development of the Project. This is in line with the Cabinet of Ministers of the Republic of Azerbaijan Decision No. 212 dated April 16, 2024, which designated the land (1,454 ha) to the Bilasuvar Solar PV project. The allocated agricultural land will be designated as 'Renewable Energy Land Category' under the possession of the MoE.

LAND USE AND SITE CONDITIONS

The land allocated for the proposed Project is a homogenous semi-desert area with low level shrub vegetation used for winter grazing purposes.

There are eight informal settlements within the project boundaries, six of which are used by the herders during their winter period on site while one is used as a permanent residence, and one is unused.

Based on the outcome of the ESIA and Resettlement Action Plan (RAP) consultations, the following type of land users have been identified on the site:

- One formal land user;
- Ten informal land users without legal lease agreements. This includes nine herders and one worker who also owns livestock.
 - Family members of these land users also support them in undertaking herding activities. It is noted that none of these family members receive a salary, and they support the grazing activities as this is their main source of household income.
- Two informal workers (one of which is also an informal land user as, instead of earning a salary, he is allowed to graze his own livestock and that of his brother. The other worker is salaried).

For further details please refer to the RAP.

The location of the structures is shown on the following figure.

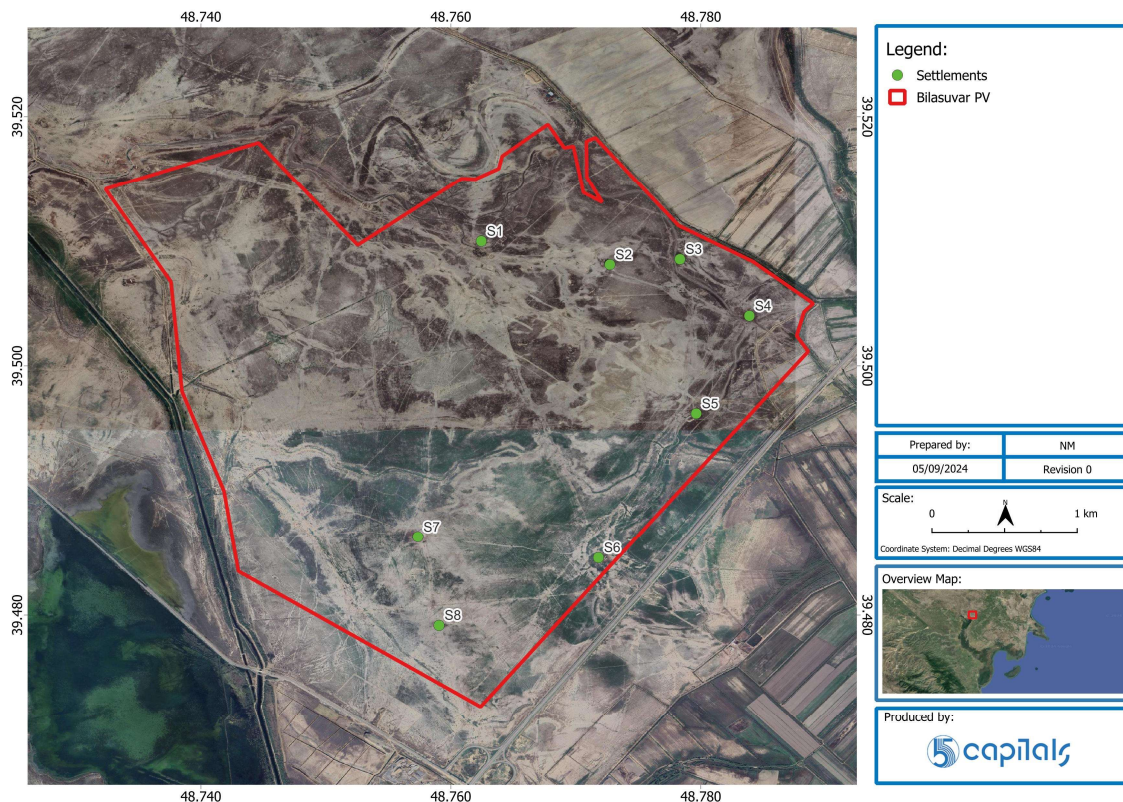


Figure 2-4 Eight Settlement Locations

Images from the site are shown in the following figures.



Figure 2-5 General Site Conditions and Existing Structures

SITE SURROUNDINGS

The surrounding areas of the Project are mainly characterised by agricultural fields. There is the Mughan Salyan canal to the north of the Project (approximately 3.2 km from the site). Immediately adjacent to the Project is the Mahmudcala nature reserve (approximately 500 m), a large lake habitat, known for its avifauna and related hunting. Ongoing construction activities (not related to the Project), including a crusher plant, were observed to the south of the Project during the August 2023 and August 2024 site visits.

Furthermore, the surrounding areas of Project site are used for grazing and leased to individuals by Bilasuvar Executive Power. There are five (5) structures are in proximity of Project boundaries (refer to Figure 2-5). Outside-structure (OS 2) on the northern site of Project belongs to herder whose 110 ha of land was allocated to the Project. Neighbouring structure (OS 5) is located within Salyan district land. The remaining three structures (OS 1, OS 3 and OS 4) outside the north-western boundary of Project are used by herders who graze livestock on adjacent land plots.

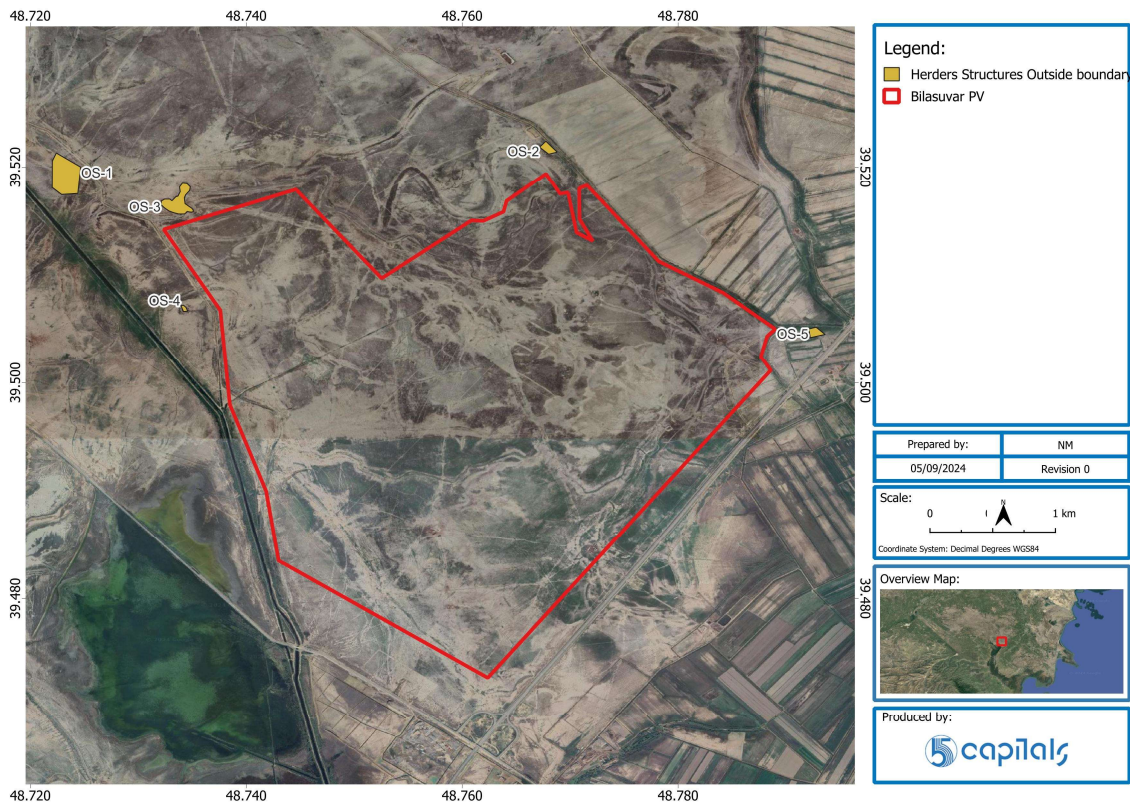


Figure 2-6 Herder Structures Outside of the Project site

Consultations with herders using structures outside the project area revealed that their leased land does not overlap with the Project boundaries. Additionally, these herders do not graze their livestock within the project area, as their leased land adequately meets their grazing needs.

Studies conducted as part of the ESIA and RAP revealed that the project lands are not used by other seasonal or informal land users from local communities, mainly due to the site's relative isolation.

At the time of writing, the M-3 highway to the south of the Project, which connects Salyan to Bilasuvar, is being expanded from two lanes to four lanes, this is planned to be completed prior to COP29 in November.

3 REGULATIONS AND REQUIREMENTS

3.1 National Requirements

The constitution of Azerbaijan Republic confirms rights of citizens for access to information related to environmental issues as well as be compensated in case of impact/damage one's health or property as a result of violations of environmental requirements.

The regulatory body within the Cabinet of Ministers of the Republic of Azerbaijan responsible for the regulation of the activities within the country that relate to ecology, environmental protection and use of natural resources is the Ministry of Ecology and Natural Resources of the Republic of Azerbaijan (MENR).

The legal, economic and social framework for environmental protection in Azerbaijan is governed by the Environmental Protection Law of 1999 (No. 678-IQ) and its amending Laws (Law No. 1032-IVQD, 932-IVQD, 590-VQD and 553-IVQD).

The rights of people are guaranteed by the Constitution of Azerbaijan under Chapter III 'Basic Rights and Liberties of a Person and Citizen' which lists the main principles of these rights. The constitution states that *"The state guarantees equality of rights and liberties of everyone, irrespective of race, nationality, religion, language, sex, origin, financial position, occupation, political convictions, membership in political parties, trade unions and other public organizations. Rights and liberties of a person, citizen cannot be restricted due to race, nationality, religion, language, sex, origin, conviction, political and social belonging."*

Based on the revised Law on EIA (2018), public consultations in the form of hearings should be carried out during the development of EIA study in line with Law of the Republic of Azerbaijan "On Public Participation". The participants should include 'individuals living in the area of intended activity and legal entities operating in that area, as well as with the real estate owner'. The final document of public hearings conducted pursuant to article 4.10 of this Law shall be reviewed in accordance with the Law of the Republic of Azerbaijan on Citizens' Appeals'.

According to Azerbaijan's Law on Public Participation, forms of public participation can be carried out as follows:

- Public council;
- Public discussion;
- Public hearing;
- Studying public opinion;
- Public discussion of draft legal acts;

- Written consultation.
- Information Disclosure

Alongside the aforementioned legislation, Azerbaijan's legal framework encompasses specific laws governing the processes for citizens' appeals, information rights, and public engagement, as outlined below:

- The Law of the Republic of Azerbaijan No 1308-IVQ, dated September 30, 2015, delineates the procedures for addressing citizens' appeals. This law affirms that citizens have the right to contact state, municipal bodies, and entities predominantly owned by the state or municipality in both written and oral forms. It differentiates these appeals from those made to the Ombudsman or for information requests and stipulates that such appeals cannot be anonymous.
- The Law of the Republic of Azerbaijan on the right to obtain information, dated September 30, 2005, sets the legal basis for free, unrestricted, and equal access to information, as guaranteed by Article 50 of the Constitution. It entitles any individual to directly, or through a representative, request information from the owner and select the method and form for acquiring the information.
- The Law of the Republic of Azerbaijan № 816-IVQ, dated November 22, 2013, on public participation, outlines the principles and guidelines for citizen involvement in state governance, aligning with Article 49 (Freedom of assembly) of the Constitution. The law emphasizes that public participation includes: involvement in diverse sectors of state and social affairs, the formulation and execution of state policies, the creation of national and local decisions; engagement in public oversight of central and local executive authorities, local self-governing entities; and the integration of civil society institutions in state and local self-governing bodies' consultative processes and public opinion analysis (via Public Councils).

3.2 EIA/ESIA Requirements

3.2.1 National Environmental Impact Assessment (EIA) Requirements for Consultations

Based on the Azerbaijani legal updates published on October 2022, the Cabinet of Ministers issued environmental impact assessment (EIA) rules, approved by Resolution No 362 on September 21, 2022, pursuant to its mandate under the EIA Law enacted on July 17, 2018. According to the new rules, project developers are required to consult with the State Ecology Expertise Agency within the Ministry of Ecology and Natural Resources during the pre-design phase. Project developers must submit a project description and proposed assessment details to the Agency's website for public review. This submission should include the project's location,

a feasibility study, alternative proposals, and a potential environmental impact assessment, as well as a plan for public hearings regarding the assessment.

3.3 Lenders Requirements

At this stage, it is understood that Masdar is seeking a certain amount of project finance from financial institutions (collectively referred to as 'lenders'), potentially including the Asian Development Bank (ADB), the Asian Infrastructure Investment Bank (AIIB), and the European Bank for Reconstruction and Development (EBRD). The stakeholder engagement requirements according to the lenders' criteria are provided in the following sections.

3.3.1 ADB

The Asian Development Bank (ADB) have established an Operational Manual and Policy Statement that includes the need for an amount of consultation, participation and stakeholder engagement. Both documents set out the applicable requirements the banks investment projects should fulfil in the potential receipt of finance.

STAKEHOLDER ENGAGEMENT

ADB Operational Manual on “*Project Design and Preparation: Item C- Consultation and Participation*” requires meaningful consultation to be carried out with affected people and the consultation processes to be appropriately documented in the EIA, IEE, resettlement plan and/or IPP as applicable to the project.

The Operational Manual requires that vulnerable groups have sufficient opportunities to participate in consultations.

ADB Safeguard Requirement 1 on Environment: Consultation and Participation states that the client will undertake “*meaningful consultation with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation. Meaningful consultation is a process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues*”.

ADB Safeguard Requirement 2 on Involuntary Resettlement: Consultation and Participation also requires meaningful consultation to be undertaken by the client as stated above for ADB Safeguard Requirement 1 but includes consultation with host communities and the need for

the client to pay particular attention to the need of disadvantaged or vulnerable groups, especially those below the poverty line, the landless, the elderly, female headed households, women and children, Indigenous Peoples, and those without legal title to land.

ADB Safeguard Requirement 3 on Indigenous Peoples: Consultation and Participation requires *“the borrower/client will undertake meaningful consultation with affected Indigenous Peoples to ensure their informed participation in (i) designing, implementing, and monitoring measures to avoid adverse impacts on them or, when avoidance is not possible, to minimize, mitigate, and compensate for such effects; and (ii) tailoring project benefits that accrue to them in a culturally appropriate manner”*.

According to the 2009 ADB Safeguard Policy Statement, ADB requires *“borrowers/clients to engage with communities, groups, or people affected by proposed projects, and with civil society through information disclosure, consultation, and informed participation in a manner commensurate with the risks to and impacts on affected communities”*

GRIEVANCE REDRESS MECHANISM

According to the ADB Safeguard Policy Statement (2009), the bank *“requires that the borrower/client establish and maintain a grievance redress mechanism to receive and facilitate resolution of affected peoples’ concerns and grievances about the borrower’s/client’s social and environmental performance at project level. The grievance redress mechanism should be scaled to the risks and impacts of the project. It should address affected people’s concerns and complaints promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the affected people”*.

ADB Safeguard Requirement 2 and Requirement 3 specifically requires the grievance mechanism to receive and facilitate the resolution of:

- Affected persons’ concerns and grievances about physical and economic displacement and other project impacts, paying particular attention to the impacts on vulnerable groups (**ADB Safeguard Requirement 2 on Involuntary Resettlement**);
- Resolution of the affected Indigenous Peoples communities’ concerns, complaints, and grievances (**ADB Safeguard Requirement 3 on Indigenous Peoples**)

3.3.2 AIB

AIB requires clients to disclose environmental and social information in accordance with specific standards. The Bank also discloses this information early in the project assessment process and sets deadlines for disclosure, especially for high-risk projects. The Bank may defer disclosure due to legal or commercial reasons and collaborates with co-financiers on disclosure when necessary.

The AIB Environmental and Social Framework emphasizes meaningful consultation with stakeholders, especially for projects with significant adverse impacts, involuntary resettlement, or impacts on Indigenous Peoples. Clients must document these consultations.

A Project-level Grievance Redress Mechanism (GRM) must be established, tailored to the project's risks and impacts, and ensure accessibility, confidentiality, and protection for complainants. This mechanism should also address workplace concerns for project workers.

The framework also includes a Project-affected People's Mechanism for complaints about the Bank's failure to implement the framework, providing an alternative to project-level GRMs or management processes. This mechanism is also coordinated with co-financiers' accountability mechanisms if applicable.

3.3.3 EBRD

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy (2019) which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

The EBRD's ESP defines stakeholder engagement as an on-going process which involves the following elements: (i) stakeholder identification and analysis; (ii) stakeholder engagement planning; (iii) disclosure of information; (iv) meaningful consultation and participation leading to the client's incorporating into its decision-making process the views of the affected parties on matters that affect them; (v) an effective grievance procedure or mechanism, and (vi) ongoing reporting to relevant stakeholders. The process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the project life.

An essential element in the stakeholder engagement process, to ensure meaningful and effective consultation process, is the careful identification of all involved stakeholders and the examination of their concerns, expectations, and preferences. Special attention should be paid to the identification of vulnerable stakeholders. The engagement with these stakeholder groups needs to be planned and managed with special care.

Furthermore, the EBRD requires that the project developer establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints are received, handled, and resolved effectively, in a prompt and timely manner.

EBRD PR10 “recognises the importance of an open and transparent engagement between the client, its workers, local communities directly affected by the project and where appropriate, other stakeholders as an essential element of Good International Practice (GIP) and corporate citizenship. Such engagement will involve the following key elements:

- Stakeholder Identification and analysis;
- Stakeholder engagement planning;
- Disclosure of information;
- Consultation and Participation
- Grievance Mechanism and
- Ongoing reporting to relevant stakeholders.

With reference to vulnerable groups, PR10 states “The client will identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantages or vulnerable”. In addition, the client is required to “support active and inclusive engagement with project affected parties including disadvantaged or vulnerable groups”.

4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder engagement can be described as the systematic method to understand and involve stakeholders and their concerns in project activities and decision-making processes. It identifies the appropriate approach to be used for consultation and information disclosure.

The SEP for the Project has been prepared to guide on-going stakeholder engagement during the construction and operational phase. The Stakeholders included in this plan include persons or groups that may be directly or indirectly affected by the project, as well as those that may have interest in the project and/or those that may influence the projects outcome either positively or negatively. These stakeholders may change over time and as such this plan will need to be updated as and when new stakeholders are identified, or the circumstances of stakeholders evolve.

4.1 Approach to Stakeholder Identification

A systematic approach to identify affected stakeholders has been used. The stakeholders identified have been classified into three categories:

- **Affected Stakeholders (A)** – those who can be potentially affected by one or more of the potential impacts of the project;
 - The affected stakeholders are individuals or group of people that can be potentially affected by the Projects' environmental and social impacts either directly or indirectly. Potential environmental and social impacts of the Project to receptors (i.e. those outlined in Sub-section 2.8) have been assessed in the ESIA. Such impacts can directly or indirectly impact project stakeholders.
- **Interest-based Stakeholders (I)** – Stakeholders concerned with any of the procedures set by the Project, the Project's beneficiaries, national and international non-governmental organisations and the interested part of the civil society.
 - Interest-based stakeholders are groups or organisations that are not adversely affected by the Project but whose interests determine them as stakeholders. In addition, there are stakeholders outside the affected area, which can be identified through "interest-based" analysis. These are usually government authorities, NGOs and national, social and environmental public-sector agencies whose area of interest is related to the Project, or where such organisations are undertaking projects with communities in these areas.
- **Decision Making Stakeholders (D)** – those who are involved in the development of the project and its financing. In addition, this includes the regulators such as the MENR.

The following Stakeholder Engagement matrix is presented based on these categories which also include vulnerable groups (where identified at this stage).

Most lenders consider vulnerable groups to include those people or groups of people who may be more adversely affected by project impacts than other by virtue of characteristics such as gender, gender identity, religion, ethnicity, indigenous status, age (including children, youths and the elderly), physical or mental disability, literacy, political views or social status.

Vulnerable individuals and/or groups may also include, but are not limited to, people in vulnerable situations such as people living below the poverty line, the landless, single-headed households, natural resource dependent communities, migrant workers, refugees, internally displaced people, or other displaced persons who may not be protected through national legislation and/or public international law.

VULNERABLE GROUPS IN THE PROJECT

In Bilasuvar District, vulnerable groups include single parents, households that have lost a breadwinner, individuals with physical or mental disabilities, elderly individuals living alone, female-led households, and orphans. Additionally, 5,708 people receive targeted public social aid, with an average monthly amount of 115.5 AZN per person.

The largest group among them is people with physical disabilities, totaling 5,905 individuals, followed by 2,016 households led by women, and 1,767 households that have lost a breadwinner.

In addition, all PAHs are considered as vulnerable.

Table 4-1 Stakeholder Engagement Matrix

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE TO PROJECT: IMPACT-BASED (A), INTEREST-BASED (I), OR DECISION MAKER (D)
Directly Affected Stakeholders	<p>Project Land Users and their families:</p> <ul style="list-style-type: none"> - One formal land user; - Ten informal land users who are either grazing or using the settlements on site without legal lease agreements. This includes nine herders and one worker who also owns livestock. <ul style="list-style-type: none"> • Family members of these land users also support them in undertaking herding activities. It is noted that none of these family members receive a salary, and they support the grazing activities as this is their main source of household income. - Two informal workers (one of which is also an informal land user as, instead of earning a salary, he is allowed to graze his own livestock and that of his brother. The other worker is salaried). 	<p>A: The project site is used herders, specifically during the winter grazing season, there is also one permanent resident. Refer to the Resettlement Action Plan for further details.</p>
	<p>Construction Workers:</p> <ul style="list-style-type: none"> - Project's construction workforce including the EPC Contractor's subcontractors and supplier workers. 	<p>A: Direct Project related impacts during construction phase and potential labour issues.</p>
Indirectly affected stakeholders	<p>Surrounding land users;</p> <ul style="list-style-type: none"> - Herders who located at outside of the project area in five settlements. 	<p>A: The closest structures to Project boundaries that may be indirectly impacted due to the increased traffic, dust, noise and temporary restriction to the areas of construction works (safety concerns).</p>

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE TO PROJECT: IMPACT-BASED (A), INTEREST-BASED (I), OR DECISION MAKER (D)
	Surrounding Communities <ul style="list-style-type: none"> - Shorsulu Village; - Dayikend Village; - Sarvan Village. - Khirmandali Village; and - Aliabad Village 	A: The closest communities to the Project boundaries. This includes potential exposure to indirect impacts relating to socioeconomic impacts.
Vulnerable groups	Vulnerable groups in the Project area (such as veterans of war, martyr families, unemployed youth, low-income families and women, herders, female led households & persons living with disabilities, women and elderly members of the community)	A: These groups may be disproportionately impacted by the Project impacts such as those relating to mobility, availability, Gender Based Violence & Harassment (GBVH), spread of diseases, labour/economic exploitation etc. All PAHs are considered to be vulnerable.
Local governmental authorities	Bilasuvar District Executive Power (Committee) Bilasuvar District Municipality Salyan Municipality Shorsulu Municipality Dayikend Municipality Gender Commissions of the Municipalities	D: Project area lies within the jurisdiction of the Municipality
State Organisations	Ministry of Energy Ministry of Culture and Tourism of Republic of Azerbaijan	D: Responsible for Project support during its planning and development stages. I: Regulatory body overseeing cultural and archaeological sites/features issues and confirming absence of importance of Project site from cultural and archaeological perspective.

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE TO PROJECT: IMPACT-BASED (A), INTEREST-BASED (I), OR DECISION MAKER (D)
	Azerbaijan Academy of Sciences, Institute of Archaeology and Ethnography (AAS IAE)	I: According to national requirements, Ministry of Culture requires Academy approval/advice before granting permits for the excavation of archaeological and heritage sites
	Ministry of Ecology and Natural Resources (MENR)	D: Regulatory body overseeing protected areas, ecologically sensitive and environmental issues. Provide the approval of the ESIA Report for the Project.
	Ministry of Transport, Communications and High Technologies of the Republic of Azerbaijan	I: Regulatory body overseeing transport in Azerbaijan. Will be consulted for approving transportation routes.
	Azerenergi JSC	D: Off-taker and responsible for development of OHTL required for the Project. <u>Note:</u> The development of the transmission line is not within the project scope, nor does it fall under the definition of an associated facility, and has not been assessed within this SEP.
	Bilasuvur Women Resource Centre (established by the State Committee for Family, Women and Children Affairs)	I: Interested with regards to impacts and opportunities for local women.
Limited Liability Companies	Aztelekom LLC	I: Should be consulted if any communication lines will be identified.
Financial institutions	Lenders (ADB, AIIB, and EBRD)	D: Key interest in the project development and project success. Interest includes potential environmental and social risks related to project financing.
NGOs	NGOs Public Council at MENR	I: Will be interested in the execution of the Project and its environmental impacts and mitigation measures.
	Public Unions (Members of Public Council of NGOs, Azerbaijan Ornithological Society, Environmental Education and Monitoring PU, Support for innovative education of women and children PU, Social and political research PU, Support for Sustainable Tourism Development PU, Youth Tourism Public Union)	I: Potentially interested in project impacts to the environment.

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE TO PROJECT: IMPACT-BASED (A), INTEREST-BASED (I), OR DECISION MAKER (D)
	Bird Life International Bankwatch Coalition for Human Rights in Development Local NGOs (Public Association for Assistance to Free Economy, Publish What You Pay, The Centre for International Private Enterprise, Crude Accountability, Centre for Economic and Social Development)	I: Potentially interested in project impacts related to avifauna. I: Potentially interested in project's environmental and social impacts.
Media	Regional and local mass media	I: Will potentially be involved in reporting on and disseminating information about the Project.
Workers and workers organisations	Project workers and employees	A: Potential project related impacts during both construction and operation phase.

5 PREVIOUS STAKEHOLDER ENGAGEMENT

Stakeholder identification and consultations for the Bilasuvar Solar PV Project were conducted during the Scoping and ESIA Stage. The stakeholder identification process identified impact based, interest based and decision-making stakeholders. Full details of the consultations are provided in Volume 2 of the ESIA.

5.1 Measures Undertaken Prior to Consultations

The following measures were taken into account during all consultation and engagement process:

- Confidentiality of information and consent to take part in the consultations;
- At the start of the meetings members of the communities were encouraged to express their opinions without fear of retaliation. It should be noted that there were no tensions between the local community and the different stakeholders engaged during the ESIA process. This was not noticed or raised in any of the consultations undertaken with the local community;
- Participants were informed of purpose of consultation and on how such information will be used and were given the option of not having their names disclosed; and
- All Participants and Stakeholders were informed of the grievance mechanism established for the project to report any complaints, grievances and any misconducts during the ESIA and consultation process.

5.2 Stakeholder Consultations during the E&S Scoping & ESIA Stage

The methods used for the on-going stakeholder engagement process include bilateral meetings, emails, telephone calls and letters with national, regional and local authorities. Public consultations and meetings undertaken for the Project site is as summarised below.

5.2.1 Scoping Stage Consultations

During the Scoping stage and site observations, consultations were conducted, including engagements with local authorities. Notably, discussions were held with the Executive Power of Bilasuvar District, as well as with herders. These consultations aimed to gather insights, collect feedback, understand previous land use and ensure alignment with local regulations and interests as part of the project development process.

A summary of the conducted consultations is provided in the following table.

Table 5-1 Summary of Scoping Stage Conducted Consultations

Stakeholder group	Stakeholder	Relevance category	Consultation agenda	Mode of engagement	Inputs to date
Local Governmental Authorities	Bilasuar Executive Power/Committee	D: The Project area lies within the jurisdiction of the Executive Power. This organisation will give a decision on land allocation to the Project as well as any resettlement or provision of alternative lands and removal of existing assets within the Project footprint if required.	<p>Discussion of Executive Power role in Project implementation;</p> <p>Discussion of previous land use situation;</p> <p>Discussion of land use by local communities;</p> <p>Discussion of availability of alternative land;</p> <p>Collecting feedback from Executive Power;</p> <p>Establishment of the Project's external Grievance Redress Mechanism (GRM).</p>	<p>Face to face meetings/site observations</p> <p>Date of meeting: February 20, 2024</p> <p>Venue: Office of Bilasuar Executive Power</p>	<p>Executive Power provided information on:</p> <ul style="list-style-type: none"> • Previous land use; • Role and responsibility of Executive Power has been provided; • Executive Power agreed to support all E&S baseline surveys and access to Project site; • Executive Power provided information on previous land use as well as confirmed availability of alternative land for herder whose 110 ha of land is going to be impacted by Project; • Executive Power confirmed to provide statistic data related to socio-economic state of nearby communities. • Executive Power confirmed that they can remove all existing assets at the Project site as per local legislation; • Executive Power agreed to support 5Cs with all surveys associated with RAP.
Directly Affected Stakeholders	One affected herder (met at the Project site)	A: The project site is used herders, specifically during the winter grazing season, there is also one permanent resident.	<ul style="list-style-type: none"> - Sharing information about Project; - Discussion of herder's land use conditions; - Discussion of relocation of herder's settlement; - Providing Project leaflet and GRM details. 	<p>Face to face meetings/site observations</p> <p>Date of meeting: February 20, 2024</p>	<p>The Herder provided following information:</p> <ul style="list-style-type: none"> • Herder has formal land lease agreement for land plot which is outside of Project boundaries. • Herder confirmed that he has been informed by Bilasuar Executive Power on Solar PV project and he is fine with relocating his settlement to the land that

Stakeholder group	Stakeholder	Relevance category	Consultation agenda	Mode of engagement	Inputs to date
				Venue: At the Project site	is formally under his land lease agreement; <ul style="list-style-type: none"> No comments or concerns were raised during consultation.
Indirectly affected stakeholders	Herders outside the Project site	A: The closest structures to Project boundaries that may be indirectly impacted due to the increased traffic, dust, noise.	<ul style="list-style-type: none"> - Sharing information about Project; - Discussion of herders' grazing activities - Providing Project leaflet and GRM details. 	Face to face meetings/site observations Date of meeting: February 20, 2024 Venue: At the Project site	Two herders whose settlements are located outside the Project boundaries were consulted and following information has been obtained: <ul style="list-style-type: none"> Both herders have formal land lease agreements, which do not overlap with Project boundaries; Both herders graze livestock during October – April; Both herders stated that they bring family members (including children) during the grazing period; Both herders stated that they were previously informed about Project by Executive Power. No comments or concerns were raised during consultation

5.3 ESIA Stage Consultations

The consultations conducted during the ESIA phase followed a stakeholder matrix specifically developed for the Project, ensuring a thorough assessment of the impacts on various groups affected by the Project's construction and operation. Face-to-face consultations were held with Bilasuvar Executive Committee as well as with PAHS. Additionally, neighboring districts, Salyan Executive Committee as well as communities nearby were consulted to provide information on planned Project. These consultations aimed to gather secondary data, obtain necessary confirmations or approvals, and facilitate meetings with PAPs and nearby residents.

A summary of the consultations is provided in the table below.

Table 5-2 Summary of ESIA Stage Conducted Consultations

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
Local Governmental Authorities	Bilasuvar District Executive Committee	D: The Project area lies within the jurisdiction of the Executive Power and Municipality. These organisations will give a decision on land allocation to the Project as well as any resettlement or provision of alternative lands and removal of existing assets within the Project footprint if required.	<ul style="list-style-type: none"> Providing access to the Project site and identification of existing assets within Project boundaries; Assisting in identification of potential PAPs who are using Project site for grazing purposes and utilizing assets; Providing secondary data related to socio-economic state of project district; and Discussion of allocation of alternative land for herder whose partial plot of leased land was affected by project. 	<p>Face to face meetings/site observations/phone calls;</p> <p><u>Date of meeting:</u> continuously during April-June 2024</p> <p><u>Venue:</u> Office of Bilasuvar Executive Committee/Project site</p> <p>An additional meeting was conducted on the 30th August 2024, with the Executive Power, Ministry of Energy, Project Sponsors and PAPs</p>	<p>Executive Power committed to providing information on:</p> <ul style="list-style-type: none"> Number and type of existing assets at the project site; A map describing the location of the settlements with the Project area; A list of potential PAPs who are utilizing these existing assets and grazing livestock; Statistics data on the current socio-economic state of Bilasuvar district <p>The District Executive Committee also provided information on the usage of surrounding settlements.</p>	<p>On 30th August 2024, a discussion with regards to livelihood restoration as part of the RAP was conducted at the Bilasuvar EP Office Building. Participants included the Ministry of Energy, Masdar, SOCAR Green, Bilasuvar Executive Power, PAHs and 5 Capitals.</p> <p>Several options for alternative livelihood restoration based on project impacts were discussed during the meeting.</p>

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
	<p>Salyan District Executive Power</p> <p>Shorsulu Municipality</p> <p>Sarvan Municipality (includes Sarvan and Dayikend villages)</p>	<p>A: The closest communities to the Project boundaries. This includes potential exposure to indirect impacts relating to visual impacts, increased traffic, dust and noise at construction stage (safety concerns).</p>	<ul style="list-style-type: none"> • Providing Project information, sharing Project leaflet as well as GRM contact details • Obtaining information on use of highway E 119 • Obtaining information on current socio-economic status of village and the list of land owners adjacent to project area (E-119/M-3 motorway). 	<p>Face to face meetings/Project Brochures</p> <p><u>Date of meeting:</u> 13 March 2024</p> <p><u>Venue:</u> Salyan District Executive Power Office</p>	<p>Meeting Discussion Points:</p> <ul style="list-style-type: none"> • The Executive Committee stated that they have no feedback or concerns associated with the Project. • It was agreed that information related to the nearest communities' socio-economic state will be provided by local municipalities. • It was stated that local highway E 119 is constantly used by local residents for daily purposes. • The socio-economic profile table for Shorsulu and Sarvan villages was shared with village authorities for them to complete and return. • A KMZ map was sent to village authorities to identify landowners/users 	<p>The Project team outlined an overview of the Project, gave updates regarding the Project process, the anticipated project impacts, the timelines for implementation and to outline the GRM in case of any queries, concerns or grievances.</p> <p>The received information was used to prepare project documentation including ESIA, SEP and RAP.</p>

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
					<p>adjacent to the project area and provide their list.</p> <ul style="list-style-type: none"> Once the list of landowners/users is received, consultations were to be conducted to discuss project details, environmental impacts, and transportation. The E119/M-3 motorway separates Bilasuvar and Salyan districts, with areas adjacent to the motorway fenced off and having no direct access to it. 	

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
State organisations	Ministry of Culture of Republic of Azerbaijan	I: Regulatory body overseeing cultural and archaeological sites/features issues and confirming absence of importance of Project site from cultural and archaeological perspective.	<ul style="list-style-type: none"> Project information, confirmation of proximity of nearby features of archaeological or cultural interest, details of requirements during construction phase. 	Business correspondence	The State Service for Cultural Heritage Protection, Development and Restoration under the Ministry of Culture, conducted a site visit and inspection alongside Masdar representatives and following the inspection issued a letter on the 20th August 2024 to Masdar in which the Ministry of Culture confirm that the absence of archaeological and cultural heritage items within the site. The letter also outlines the requirements to be followed in the event of a chance find.	The information was included within this ESIA Report.
	Ministry of Ecology and Natural Resources (MENR)	D: Regulatory body overseeing protected areas, ecologically sensitive and environmental issues. Provide	<ul style="list-style-type: none"> Submission of Scoping reports for review Submission of ESIA reports for review and obtaining approval for Project construction 	1) The Scoping Report was issued on May 17, 2024, to request feedback from MENR on the proposed methodology of the ESIA.	At Scoping Stage Meeting followings key issues were discussed: <ul style="list-style-type: none"> Impact on Birds: The potential impact of solar panels on bird populations in the ornithologically sensitive Banka 	5 Capitals, Masdar and SOCAR Green presented an overview of the Project, the team members involved, the plan for environmental and social surveys, the potential impacts,

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
		the approval of the ESIA Report for the Project.		<p>2) <u>Scoping stage meeting:</u> Date: 29.05.2024 Venue: Office of MENR</p> <p>3) MENR shared a response letter with MASDAR on June 12, 2024, regarding the scoping report review.</p>	<p>(Neffchala) area was discussed. It was noted that there are no major impacts expected on bird life due to existing anthropogenic activities. Field surveys will be conducted to monitor the seasonal movements of birds in the area.</p> <p>The response letter from MENR emphasizes the need for a detailed assessment of the project's impact on bird populations due to the project's proximity to important ornithological areas. Additionally, it highlights the requirement for a public hearing to be conducted, with the results included in the Environmental Impact Assessment (EIA) report.</p>	<p>timeline and deliverables. The team answered specific questions with regards to potential impacts on microclimate and avifauna.</p>

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
					<p>The letter also covers various other environmental considerations such as:</p> <ul style="list-style-type: none"> • The current state of project areas, including air, water, and soil quality. • Biodiversity, hydrological and geological conditions, and climate. • The technical aspects of the project, resource requirements, and potential environmental impacts. • Waste management, emergency and risk assessment, and environmental protection measures throughout the project's phases. • Preparation of environmental management and monitoring plans, as 	

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
					<p>well as rehabilitation plans after project completion.</p> <p>Furthermore, it is noted that no specific comments were made regarding the scoping report itself.</p>	
Directly Affected Stakeholders	Affected herders and workers	<p>A: Land use change as a result of the Project will change the land use and result in access restrictions. In addition, existing structures will be required to be removed prior to construction start.</p>	<ul style="list-style-type: none"> • Discussion of previous and current land use situation • Conducting inventory survey to assess impacted structures • Conducting socio-economic surveys to assess the impact to herders' households 	<ol style="list-style-type: none"> 1) Phone call consultations with affected PAPs 2) Socio-economic surveys of PAPs households 3) Inventory and valuation surveys of affected assets 4) Further consultations have been conducted with the PAPs in August 2024, refer to the RAP for further details. 	<ul style="list-style-type: none"> • Herders were informed about Project in 2023 by Bilasuvar Executive Committee; • During the April 2024, initial meetings with PAPs have been carried out to prepare preliminary list of PAPs and determine categories of PAPs; • On May 8th the general meeting with PAPs has been arranged at Bilasuvar Executive Committee to provide detailed information about Project and explain the nature of surveys that should be 	<p>Information obtained has been used to prepare the project documentation, including the RAP.</p> <p>The Project team have been in frequent communications with the PAPs/PAHs regarding the Project process, the timelines for implementation and to outline the GRM in case of any queries, concerns or grievances.</p>

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
					<p>conducted in a framework of Resettlement Action Plan;</p> <ul style="list-style-type: none"> • On May 10th inventory surveys with participation of PAPs were carried out by independent valuator; and • Socio-economic surveys for PAPs households were conducted between May 8-31st. • Further consultation has been conducted with the PAPs and household members to collect additional information including alternative livelihood restoration and provide information on the grievance mechanism. 	

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
Indirectly affected stakeholders	Herders and their structures outside of Project boundaries	A: The closest structures to Project boundaries that may be indirectly impacted due to the increased traffic, dust, noise and temporary restriction to the areas of construction works (safety concerns).	<ul style="list-style-type: none"> - Providing Project leaflet and GRM details. - Boundaries/land plots of herders for grazing livestock - Usage of Project area, if any 	Face to face meetings and phone call <u>Date of meeting:</u> February 20 th , and May 10 th 2024 <u>Venue:</u> At the Project site & call	There are 5 settlements located within proximity to the Project boundaries. 1 out of 5 settlements belong to herder whose land plot is going to be impacted by Project. 1 settlement is located at land plot belonging to neighbouring Salyan District. Herders who own these structures confirmed that their leased land plots are not affected by Project area. In addition, all herders confirmed that they are not herding outside of leased land plot boundaries.	The Project team have been in communications with the herders regarding the Project process, the potential project impacts, the timelines for implementation and to outline the GRM in case of any queries, concerns or grievances.

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
NGOs / CSOs	Public Unions ("Support to the Social Development of Women in Bilasuvar" Public Union" "Young Leaders" Education-Training and Development Public Union, Azerbaijan Social Work Association)	I: Potentially interested in the Project's environmental and social impacts / benefits.	Overview of project details, activities, timeline, impacts, and grievance mechanism.	Online meeting	<p>Online meetings were conducted on 30th July 2024.</p> <p>During the meeting with "Young Leaders" Education-Training and Development Public Union, the importance of training and education to the young and vulnerable groups was highlighted.</p> <p>During the meeting with Azerbaijan Social Work Association, the topic of education was also mentioned as well as involving young people and people originally from Neftchala and Bilasuvar so that they can return from Baku and work on projects in their region. Unemployment in the region was also highlighted as a key difficulty.</p> <p>During the meeting with "Support to the</p>	The Project team provided an overview of the Project, the anticipated project impacts, the status to date and the upcoming milestones and construction/operation timelines. An overview of potential for employment in the project was discussed as were initiatives with local communities and the NGOs/CSOs.

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
					Social Development of Women in Bilasuvar" Public Union, suggestions for arranging transportation for women workforce to the Project area were raised, as well as other opportunities for women such as tailoring. Unemployment and water scarcity were highlighted as issues for the region.	
	Bankwatch		Information exchange and feedback request	Letter from 5 Capitals on the 13 th September 2024.	A letter was sent to Bankwatch to provide brief project information, introduce the survey team, and provide information. It was requested that, if possible, they provide any relevant information that could contribute to the impact assessment and any queries.	No response received to date.
	Birdlife			Letter from 5 Capitals on the 13 th September 2024.	A letter was sent to Birdlife to provide brief project information,	No response received to date.

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE / USE OF INFORMATION
					<p>introduce the survey team, and outline the key focus of the baseline survey, which is to determine the ecological separation between the project sites and nearby IBAs. It was requested that, if possible, they provide any relevant information that could contribute to the ongoing impact assessment.</p>	

5.4 Public Consultation Meeting

As part of the ESIA process, a public consultation meeting was planned. To determine the venue and date, a letter was sent to the officials of the Bilasuvar District Executive Power/Committee. The venue and date were decided based on the preferences of the Bilasuvar Executive Power and the community. The Bilasuvar Executive Power also notified the community and invited the public to the meeting to provide project information, introduce the grievance mechanism established for the project, and hear any feedback or concerns.

The public consultation meeting was held with local community members at the Bilasuvar Executive Power Office in Bilasuvar District on July 11th, 2024, with 25 attendees (3 women and 22 men).

The meeting was conducted in Azerbaijani, starting with an introductory presentation session and ending with a question-and-answer session.

Key subjects discussed during the meeting are summarised below. Further details are provided in the SEP:

- All attendees agreed to the recording of the meeting to ensure a full understanding of the content and transparency.
- Introduction of Masdar, the E&S Consultant Team, and attendees from relevant stakeholder groups.
- Key project information provided, including the construction start in Q4 2024, project area size, and land ownership.
- Project rationale and potential contributions to the country's energy sources.
- Discussion of the project location, baseline surveys, and socioeconomic information gathered from ExCom and Municipalities.
- Stakeholder consultations, potential positive impacts (local employment), and negative impacts (temporary dust generation), along with planned mitigation measures.
- Explanation of the established grievance mechanism and the contact person for grievances or queries.
- Distribution of project brochures to community members.
- Employment opportunities and requirements strategy explained:
 - Job positions will be announced at the Executive Power and Municipalities.
 - Employment requirements subject to job skills and relevant certifications.
 - Emphasis on vulnerable groups and gender equality in job opportunities.

- Explanation of the grievance process, including anonymous submissions.
- Masdar's plans for implementing social projects.
- In the Q/A session, below discussions are noted:
 - Question 1: Enquiry about job opportunities for unskilled workers and average salary.
 - Answer 1: Unskilled workers can apply, employment depends on job requirements. Average wage details based on previous projects were provided.
 - Question 2: Concern about vacating settlement and the need for an alternative area.
 - Answer 2: Masdar and stakeholders addressed concerns by discussing state land ownership, alternative solutions, and support measures such as fodder provision and relocation assistance.
 - Question 3: Enquiry about relocation assistance for structures within the project area.
 - Answer 3: Masdar confirmed support for dismantling and relocation, aiming for agreements with all PAPs to ensure a smooth resettlement process.

5.5 ESIA Disclosure Meetings

In line with the consultation and disclosure requirements set by the lenders, project information was disclosed to stakeholders and affected communities during the ESIA disclosure meetings held on September 21, 23-27, 2024.

The engagement process ensured equitable participation from all relevant parties. Separate meetings were organized for men and women to allow focused discussions, and vulnerable groups were engaged through door-to-door meetings. This approach addressed the needs of women-headed households, elderly household heads, and those with disabilities or chronic illnesses. All meetings were conducted in the local language for full comprehension.

Stakeholders involved in the ESIA disclosure meetings included:

- Bilasuvar Executive Power, along with relevant municipality chairs, territorial executive representatives, and the Department of Socio-Economic Analysis and Forecasting.
- Khirmandali Village LGAs and community.
- Aliabad Village LGAs and community.
- Meetings with two herders located near the project area.

-
- Meetings with Project-Affected Persons (PAPs).

Placement of Non-Technical Summary Documents: Hard copies of non-technical summary documents were placed in Bilasuvar Executive Power Office and the offices of Khirmandali and Aliabad villages. Additionally, Salyan Executive Power approved the distribution of non-technical summary documents to Shorsulu, Salyan, and Dayikend villages.

Project leaflets were distributed to LGAs, communities, and PAPs during the ESIA disclosure meetings.

Non-technical summary documents in Azerbaijani have been placed in six locations, including Bilasuvar Executive Power, Shorsulu Village, Salyan Village, Dayikend Village, Khirmandali Village, and Aliabad Village.

The key discussions of these meetings are summarized in the following table.

Table 5-3 Summary of ESIA Disclosure Meetings

#	STAKEHOLDERS	LOCATION	DATE	ATTENDANCE
1	Bilasuvar Executive Power, Municipality representatives from Khirmandali, Neftchala, and various villages	Bilasuvar Executive Power Office	25 September 2024	Women: 1 Men: 57 Total: 58
	Key Discussions	<p>The meeting began with an introduction from the Deputy of Bilasuvar Executive Power, who emphasized the project's importance for the Republic of Azerbaijan, particularly for job creation and local economic development.</p> <p>The ESIA disclosure presentation covered the project's construction and operational phases, the anticipated workforce needs, and the commitment to hire certified welders.</p> <p>During the presentation, key aspects such as planned access roads, transmission lines, and the undertaken studies were discussed. The ESIA team provided updates on stakeholder consultations and identified both positive (e.g., job creation, local sourcing) and negative impacts (e.g., temporary dust, noise, and worker influx). Mitigation measures were outlined, including appointing a social manager, and details of the grievance mechanism were further outlined.</p> <p><u>Q&A Highlights:</u></p> <ol style="list-style-type: none"> 1. A question was raised about whether the energy produced would be for local use or distributed nationally. It was clarified that the energy would be connected to the national grid and not limited to the Bilasuvar region. 2. A representative shared positive feedback, noting that the project's environmental impact is minimal compared to other projects and that it would greatly benefit the community through job creation. 3. There was a question about expected salaries, to which it was responded that wages would meet or exceed the market rate. <p>The importance of cooperation with local government and addressing grievances through a transparent process was emphasized. The ESIA report would be made available online for further review.</p>		
2	Herders around the project boundary	Around the project boundary	23 & 27 September 2024	2 male herders
	Key Discussions	<p>ESIA project disclosure was provided to two of the herders who have structures near the project boundary. Electronic project leaflets were distributed. Information with regards to project timeline, access road,</p>		

#	STAKEHOLDERS	LOCATION	DATE	ATTENDANCE
		<p>transmission line, next steps, potential positive and negative impacts, access restrictions and the grievance mechanism were discussed.</p> <p>Other herders were not able to be reached as they were not at site and neither Bilasuvar Executive Committee nor the neighbouring herders had contact details for them.</p>		
3	Project Affected People	At PAPs houses	21 and 24-26 September 2024	All PAPs, and household members (26 in total, 10 of whom are women)
	Key Discussions	<p>ESIA disclosure sessions were conducted at a similar time to RAP disclosure meetings. Information with regards to project timeline, access road, the associated transmission line, positive and negative impacts and the undertaken studies. Project leaflets were distributed to PAPs and details of the grievance mechanism were refreshed.</p>		
4	Aliabad Village	<p>Session 1: Aliabad Village Middle School</p> <p>Session 2: Vulnerable groups have been visited at their houses.</p>	25 September 2024	<p>Women: 1</p> <p>Men: 57</p> <p>Total: 58</p>
	Key Discussions	<p>The ESIA disclosure meeting with the community members from Aliabad Village included a presentation by 5 Capitals, covering key project information such as construction and operation phases, access roads, the transmission line connection, and undertaken studies. Both positive impacts (like job creation and prioritization of local employment) and negative impacts (such as dust, noise, and worker influx) were discussed. Mitigation measures and the appointment of a social manager were also outlined. Attendees were informed where project information would be available and further informed about how grievances could be submitted. During the Q&A session, participants asked about project details, labour rights, and potential social benefits for the village, including healthcare facilities. Requests were noted to be forwarded to the project company.</p>		
5	Khirmandali Village	<p>Session 1: Village Tea House</p> <p>Session 2: Folklore house (culture house)</p>	25 September 2024	<p>Women: 12</p> <p>Men: 32</p> <p>Total: 44</p>

#	STAKEHOLDERS	LOCATION	DATE	ATTENDANCE
		Session 3: Vulnerable groups have been visited at their houses.		
	Key Discussions	<p>Separate sessions were held for men, women, and vulnerable groups.</p> <p><u>Session 1: Men's Group</u> The presentation covered key project details, including construction and operation phases, access roads, transmission line connection, and stakeholder consultations. Positive impacts, such as job creation and demand for local materials, were highlighted, as well as negative impacts like dust and noise. Mitigation measures were discussed, and the appointment of a social manager was announced. Attendees were informed where project information would be available, and how they could submit grievances.</p> <p><u>Q&A Summary:</u> Questions were raised about employment contracts, salaries, local hiring, project benefits for Bilasuvar, and the need for drivers. Responses confirmed that contracts would comply with labor laws, local jobs would be created, and various roles, including drivers, would be needed.</p> <p><u>Session 2: Women's Group</u> The same presentation was delivered, discussing project phases, timeline, an overview of project details, positive and negative impacts, and mitigation measures. The session emphasized local employment opportunities, particularly for women. Attendees were informed about access to project information and grievance submission procedures.</p> <p><u>Q&A Summary:</u> Questions focused on shift work, job opportunities for women, and the registration of local workers in the labor book. Responses confirmed there would be two shifts, and that there will be employment opportunities for women. Employment contracts would be registered in labor books based on the type of contract.</p> <p><u>Session 3: Vulnerable Group</u> Three vulnerable households were visited, and ESIA disclosure information was provided during door-to-door meetings.</p>		

5.6 Scoping and ESIA Stage - Grievance Mechanism

The following approach was planned to be used in the establishment of the Project specific grievance mechanism.

- Applications/complaints from local individuals or groups are accepted both in written and verbal forms after conducting the meeting with affected community.
- ESIA Consultant 5 Capitals as well as local consultants planned to review and, within their authority be responsible for resolving submitted grievances (in co-ordination with the Project developer, Masdar, who are ultimately responsible for managing grievances).

The following details were provided to the stakeholders in order for the stakeholders to be able to submit their grievances or comments regarding the proposed Project.

Table 5-4 Scoping Phase & ESIA Stage Grievance Mechanism Contact Details

Contact person/s	Company	Contact details
Sardar Huseynov	5 Capitals	Email: sardarhuseyn@gmail.com Mob: +994 55 566 04 20
Yashar Gojayevev	Masdar	Email: ygojayevev@masdar.ae Mob: +994 50 273 04 21

As of the date of submission of this report, no grievances have been received regarding the project.

5.7 Media Coverage of the Project

The development of the Bilasuvar Solar PV Project has received both national and international coverage in various media outlets. The most notable press coverage is as provided below:

LOCAL MEDIA COVERAGE

- The Ministry of Energy Republic of the Republic of Azerbaijan: This official government publication presented the project in a positive light, emphasizing its alignment with Azerbaijan's renewable energy goals.
 - <https://minenergy.gov.az/en/xeberler-arxivi/00082>
- Haqqin News: The project was portrayed positively, highlighting its potential impact on Azerbaijan's green energy transition.
 - <https://haqqin.az/news/318423>
- Banker News: The article covered the project's launch event, presenting it as a critical step toward expanding the country's renewable energy capacity.

- <https://banker.az/prezident-v%c9%99-bee-naziri-neftcala-bil%c9%99suvar-gun%c9%99s-elektrik-stansiyalarinin-v%c9%99-abseron-garadag-kul%c9%99k-elektrik-stansiyasinin-t%c9%99m%c9%99lini-qoyublar/>
- APA News: This article covered the foundation-laying ceremony, presenting the project as a key collaboration between Azerbaijan and the UAE, promoting sustainable energy development.
 - <https://en.apa.az/official-news/azerbajani-president-and-uae-minister-laid-foundations-of-neftchala-bilasuvlar-solar-power-plants-and-absheron-garadagh-wind-power-plant-439093>

INTERNATIONAL MEDIA COVERAGE

- Masdar's Website: Masdar's own publication emphasized the significance of this project as part of their broader renewable energy portfolio, showcasing the positive impact on regional sustainability efforts.
 - <https://masdar.ae/en/news/newsroom/president-of-azerbajian-breaks-ground-on-masdar-1gw-solar-and-wind-projects>
- Financial Times: The Financial Times presented the project positively, focusing on Azerbaijan's strategic move toward achieving ambitious green energy targets with international collaboration.
 - <https://www.ft.com/content/36a2f00d-eb7a-4057-bc31-6be6c4f01d16>
- Arabian Gulf Business Insight (AGBI): The article highlighted Masdar's leadership in the project, portraying it as a forward-looking initiative in support of Azerbaijan's green energy aspirations.
 - https://www.agbi.com/energy/2022/08/masdar-takes-lead-as-azerbajian-sets-ambitious-green-targets/?gad_source=1&qclid=CjwKCAjw65-zBhBkEiwAjrqRMIEjBtKG-vmcVf67ldXI2lpnldGRmM2FyYIPLxo14Y-R17qabQ3BoCXNYQAvD_BwE

6 FUTURE STAKEHOLDER ENGAGEMENT PROGRAMME

Stakeholder engagement is an on-going process that will be undertaken during the construction, commissioning and operational phases of the Project. The processes used will be transparent, free of intimidation, interference and coercion. The aim of this section is to describe what information will be disclosed, in what formats, the types of methods that will be used to communicate information and the consultation methods to be used with each of the stakeholder groups identified in the previous sections.

6.1 Engagement Methods

The following methods and tools will be used for stakeholder engagement and consultations. The contents and messages will be reviewed and approved by Masdar prior to dissemination.

- **Project Brochures/Leaflets** – These will be distributed to vulnerable groups and will be available to those who cannot attend ESIA disclosure sessions. They will include a summary of the negative and positive impacts of the project and information regarding the grievance mechanism.

Note: Prior to the stakeholder engagement conducted in February 2024 with government bodies, community members, and other stakeholders, a draft brochure in Azerbaijani language was developed and shared during the consultations. The brochures used during the consultation are provided in Appendix C.

- **Letters, Phone calls and email** – Suitable to engage interest-based stakeholders and to notify them of the engagement and disclosure mechanisms;
- **Bilateral meetings** – Suitable to engage impacted and interest-based stakeholders as identified, to allow these stakeholders provide their views and opinions and to notify them of the engagement and disclosure mechanisms.
- **Community Dialogues/Door-to-Door Consultations** – Open community dialogues introducing key concepts and offering explanations regarding the Project.
- **Social Media** – This may include use of messaging platforms such as WhatsApp, Telegram, Google Meetings, Zoom etc. to communicate general information about the Project. Data privacy must be ensured and protected if a stakeholder database is established.
- **Meetings with community leaders** – These can be informal meetings held with community leaders so as to maintain good relations with the community and address any concerns the community might have.

- **Online** – Useful for Interest-based Stakeholders. The engagement and disclosure mechanisms for the ESIA package during the construction and operational phases of the project will be advertised on Masdar’s website with a contact point provided for comment. The same will be available on the lending institution respective websites.
- **Trainings** – Dedicated trainings related to occupational health and safety and Project grievance mechanism, gender-based violence etc.

6.2 Disclosure of E&S Documents

The Project’s ESIA and related E&S documents will be disclosed on the Masdar’s website where they will be accessible to the Project stakeholders. The ESIA Non-Technical Summary, LRP and SEP (including Grievance Mechanism) will be disclosed to the different stakeholders (impacted and interest-based stakeholders as applicable) (refer to Section 5.5).

The table below provides the ESIA public disclosure timetable.

Table 6-1 ESIA Public Disclosure Timetable

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY	RESPONSIBLE PARTIES FOR IMPLEMENTATION
Disclosure of E&S documents	All identified stakeholder (impacted and interest-based including vulnerable groups).	Once agreed with the lenders, the ESIA study, Non-Technical Summary (NTS), SEP and LRP will be fully disclosed online. The documents will be available on the website of Masdar prior to financial close. Where appropriate, stakeholders have the opportunity to comment or request additional information during this disclosure period. These documents will also be disclosed on lenders’ websites and will include the NTS, this SEP and the LRP in Azerbaijani and English.	Dependent upon lender requirements	Masdar Project Lenders

At the end of the lender’s disclosure period, a public consultation and disclosure report will be developed based on additional consultation and feedback undertaken during the disclosure period. This feedback report will then be disclosed on Masdar’s website together with the final ESIA package explaining the disclosure activities that have been undertaken, feedback received and whether/how these are addressed in the final ESIA and management plans.

6.3 Measures to Avoid Reprisal

Stakeholders must be able to provide their feedback, opinions and raise concerns without fear of retaliation (e.g., threats, intimidation, harassment or violence) to ensure meaningful engagement during the lifecycle of the project. The following will be implemented by Project Company, EPC and O&M company and all subcontractors and subconsultants involved in the project:

- Adopt a zero-tolerance policy to reprisals which will be reflected in the Code of Conduct and company policies. This will be communicated to stakeholders during all engagements;
- If risks of retaliation become an issue (e.g., when stakeholder raise or signal concerns to their safety for expressing their opinions,) the stakeholder engagement process may need to be adapted to ensure safety of the participants (e.g. not disclosing venue or date of consultation etc.).
- Participants will be informed on the purpose of engagement/consultation and obtain consent to signing attendance sheet. Participants will be informed about how this information will be used and to be given the option not to have their names disclosed
- Raise awareness among staff to ensure implementation company's code of conduct and train employees on expectation of their behaviours when communicating with local community and project PAPs;
- Allegations of reprisals will be addressed and responded to. Responses will be taken in consultation with those at risk and measures on responding to reprisal and implementation will be agreed with victims. Personal information will not be disclosed.

6.4 Stakeholder Engagement During Construction and Commissioning

Stakeholders most likely to be affected by construction and commissioning activities will be engaged leading up to and during the physical construction and commissioning of the Project. Stakeholder engagement during construction and commissioning will allow stakeholders to assess whether measures are working as intended, if grievances are being responded to and identifying alternatives where there are failings. Effective management of stakeholder engagement during the construction and commissioning phase is important as it can set the tone for the remainder of the project (ref. IFC, Handbook for Stakeholder Engagement and Multilateral Financing Institution's Working Group, Meaningful Stakeholder Engagement Good Practice document).

Construction and commissioning related engagement processes are set out below and will be the responsibility of the EPC Contractor, although support from the Project Company is expected (to provide a local cultural context).

Table 6-2 Construction Phase SEP Timetable

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
Compensation and livelihood restoration activities in line with RAP	PAPs identified in RAP	In accordance with RAP	Prior to construction and start of early works	Masdar and SOCAR Green LLC
Notify stakeholders of construction and commissioning activities including the timelines.	Directly and Indirectly Impacted Stakeholders (See Stakeholder Engagement Matrix)	<p>Official notices will be posted at the site entrance points and at strategic locations in the project site to advise of construction and commissioning commencement.</p> <p>Bilateral meetings will also be undertaken with directly impacted stakeholders to inform them of the construction commencement and any changes in project construction schedule</p>	<p>Prior to the start of construction and commissioning phases. This will be updated as necessary within the construction and commissioning phases if there are changes to the planned activities or processes.</p> <p>Meetings to be undertaken throughout construction phase of the</p>	Project Company with the coordination of the EPC Contractor

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
	Government Bodies/organisations and Local Government/agencies, NGOs	Official emails or letters in coordination with applicable local authorities will be sent to provide information on construction and commissioning activities and timelines.	project and/or if there are any significant changes to construction activities or processes.	
Communication of emergency preparedness and action plan	Project workers, residents in communities near the Project site and commercial entities	Bilateral meetings will be held with local authorities and community leaders to inform them of the emergency plan and to optimise with any concerns from their side. Based on the outcome of these meetings, it will be decided in coordination with local government whether bilateral meetings with the communities are necessary.	Prior to the start of construction and commissioning and updated if key changes to the plan occur.	Project Company with the coordination of the EPC Contractor
	Government Bodies, State Committees/Agencies Local Government, NGOs, Industrial and Business Organisations Project Lenders	Official emails or letters informing the applicable agencies about the emergency response procedures in place and any required co-ordination for specific events.		

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
		Bilateral meetings will be held where necessary.		
Communication of GBV and SEA/SH Prevention and Response	Women, youth, young girls and boys within the communities near the Project site.	<p>Focus group discussions will be held with women and the youth to educate them on gender-based violence and to encourage them to report any cases of GBVH, SEA and SH.</p> <p>Meetings with young girls and boys will be held under the permission of their guardians and parents. In addition, a female and male representative will be present during the meetings.</p> <p>This will be conducted in a culturally appropriate manner.</p>	On a quarterly basis throughout construction phase of the project	Project Company with the coordination of the EPC Contractor
Independent Environmental & Social Monitoring & Reporting (to include GBV – SEA/SH prevention and response activities, number of grievances handled, SEA/SH awareness creation trainings provided for	Project Lenders	Environmental and Social auditing to evaluate Projects compliance with Azerbaijan standards, lender requirements and loan covenants.	On a quarterly basis throughout construction and commissioning phase of the Project.	<p>Independent Environmental & Social to be appointed by the lenders.</p> <p>Project Company to issue the report to lenders.</p>

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
project staff, etc.)				
Implementation of grievance mechanism	All identified stakeholders	As described in the grievance mechanism section of this SEP (see Section 7).	Established at the start of construction and commissioning phases and updated throughout to facilitate rapid and effective response.	Project Company

6.5 Stakeholder Engagement During Operation

Stakeholder engagement during the operational phase of the Project will be the responsibility of the O&M Company, although it is expected that the Project Company will provide key support in order to ensure local cultural context during engagement activities.

It will be important for the Project Company and O&M Company to ensure a smooth transition between stakeholder engagements from construction and commissioning phase to operational phase of the Project by understating the techniques that have been most effective during construction and commissioning phases. It will be important to continue these techniques to avoid decrease in the frequency of stakeholder engagements, as the stakeholders are already familiar with the typical processes for engagement.

Table 6-3 Operational Phase SEP Timetable

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
RAP Activities	PAPs identified in RAP	In accordance with RAP	During operational phase	Masdar and SOCAR Green LLC
Notify stakeholders of the transition from construction/commissioning to operations	Directly and Indirectly Impacted Stakeholders (See Stakeholder Engagement Matrix)	Official notices will be posted at the site entrance to advise of commencement of the operational phase of the Project.	At least 2 months prior to commencement of operations.	Project Company

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
	Government Bodies/organisations, Local Government/agencies and NGOs	Official emails or letters in coordination with applicable government agencies will be sent to provide information on operational phase activities and timelines.		
Upon development of and any updates related to the emergency preparedness and action plan, or other HSE related matters that may affect local external parties.	Residents in communities near the Project site and nearby herders.	Bilateral meetings will be held with local authorities and community leaders to inform them of the emergency plan and to optimise with any concerns from their side. Based on the outcome of these meetings, it will be decided in coordination with local government whether bilateral meetings with the communities are necessary.	2 months prior to the commencement of operations and updated if there are key changes to the plan occur.	Project Company
	Government Bodies, State Committees/Agencies Local Government, NGOs, Industrial and Business Organisations Project Lenders	Official emails or letters informing the applicable government agencies/authorities about the emergency response procedures in place and any required co-ordination for specific events. Bilateral meetings will be held where necessary.		

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
<p>Communication of GBV and SEA/SH Prevention and Response</p>	<p>Women, youth, young girls and boys within the communities near the Project site.</p>	<p>Focus group discussions will be held with women and the youth to educate them on gender-based violence and to encourage them to report any cases of GBVH, SEA and SH.</p> <p>Meetings with young girls and boys will be held under the permission of their guardians and parents. In addition, a female and male representative will be present during the meetings.</p> <p>This will be conducted in a culturally appropriate manner.</p>	<p>On an annual basis throughout operational phase of the project.</p>	<p>Project Company</p>
<p>Independent Environmental & Social Monitoring & Reporting (to include GBV – SEA/SH prevention and response activities, number of grievances handled, SEA/SH awareness creation trainings provided for project staff, etc).</p>	<p>Project Lenders and other interested stakeholders</p>	<p>Environmental and social auditing to evaluate projects compliance with Azerbaijan standards, lender requirements and loan covenants.</p>	<p>On an annual basis throughout operational phase of the project.</p>	<p>Independent Environmental & Social to be appointed by the Project lenders.</p> <p>Project Company to issue the report to lenders.</p>

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
Implementation of grievance mechanism	All identified stakeholders—including project workforce	As described in the grievance mechanism section of this SEP (Section 7).	Established at the start of operations and managed throughout the entirety of the operational phase to facilitate rapid and effective response.	Project Company

7 PROJECT SPECIFIC - GRIEVANCE MECHANISM

The Projects activities (during construction, commissioning and operation) may result in potential nuisances for stakeholders, or environmental and social impacts and as such it is required to establish a grievance mechanism to address potential complaints from affected parties. The aim of the grievance mechanism is establishing a system to receive and facilitate resolution of the stakeholder's concerns and grievances about the Project's environmental and social performance.

According to lenders requirements, the grievance mechanism will comply with the key principles:

- Inform the affected PAPs (and other stakeholders) of the grievance mechanism, purpose and how to access it during the engagement process;
- The process will be scaled to the risks and impacts of the Project;
- The grievance mechanism will be made clear, understandable and easily accessible by providing information in the local language and orally where PAPs (and communities) cannot read;
- Ensure transparency, discretion and accountability to all stakeholders by putting it into writing, publicising it and explaining it to relevant stakeholders;
- Providing responses to complaints, concerns and/or request for Project information in a timely manner;
- Provision of the mechanism at no costs, retribution or retribution associated with lodging a grievance;
- Precautionary measures such as clear non-retaliation policy, confidentiality measures and safeguarding of personal data collected in relation to a complaint, as well as an option to submit grievances anonymously will be in place;
- Consideration of when to engage third-parties as mediators (such as community leaders) to resolve grievances between the Project and PAPs;
- The grievance mechanism will not impede access to judicial or administrative remedies; and
- Monitoring and analysis of trends that the grievance mechanism has established are of concern to PAPs and other stakeholders

The grievance mechanism is an important part of stakeholder engagement and will be in place from the E&S disclosure process, throughout construction and operations through the end of the Project life. The grievance mechanism will use an understandable and transparent process that is culturally appropriate and readily accessible at no cost; so, all stakeholders/affected parties will have the opportunity to raise a complaint.

The overall responsibility and accountability for the grievance mechanism will be held by the Project Company. However, implementation may be delegated and fall under separate parties depending on whether the grievance is related to the construction, commissioning or the operational phases, i.e., EPC Contractor during construction and commissioning and O&M Company during operations.

7.1 Key Principles of Grievance Mechanism

The grievance mechanism for the Project will comply with the following principles:

- The purpose of the grievance mechanism procedure will be clarified at the outset;
- The process will be scaled to the risks and impacts of the Project;
- The process will be transparent and accountable to all stakeholders by putting it into writing, publicising it and explaining it to relevant stakeholders;
- The grievance mechanism will be made clear, understandable and easily accessible by providing information in the local language and orally where communities cannot read;
- Complaints or concerns will be rapidly resolved;
- The mechanism will not involve any costs nor retribution associated with lodging a grievance; and
- Precautionary measures such as clear non-retaliation policy, confidentiality measures and safeguarding of personal data collected in relation to a complaint, as well as an option to submit grievances anonymously will be in place.

7.2 Scope of Grievance Mechanism

The scope of the grievance mechanism is to evaluate and address stakeholders' problems and concerns regarding project activities, the implementation of mitigation and compensation measures as per the ESIA and environmental and social performance of the Project.

All relevant claims from affected stakeholders will be accepted and no judgment made prior to investigation, even if complaints are minor. This includes complaints in relation to gender-based violence, sexual exploitation and abuse, sexual harassment, conflict between project employees and community members etc.

However, according to good practice, the following claims will be directed outside of Project-level mechanisms:

- Complaints clearly not related to the project based on assessment of its legitimacy;

- Issues related to governmental policy and government institutions;
- Complaints constituting criminal activity and violence, which will be referred to the justice system; and
- Commercial disputes: Commercial matters will be stipulated for in contractual agreements and issues will be resolved through a variety of commercial resolution mechanisms or civil courts.

In the event that any of the grievances are rejected at the screening stage, the complainant will be informed of this decision including a justification why.

7.3 Steps in Managing Grievance Mechanism

7.3.1 Publicising Grievance Management Procedures

The grievance mechanism of this Project will be publicised using the means outlined and as linked to the disclosure processes. In addition, notices will also be provided at the Project entrance in regard of how to lodge a grievance and the process related to follow up. The information provided will be available in both English and Azerbaijani and will include the following:

- What Project-level mechanisms are capable of delivering and what benefits complainants can receive from using the company's grievance mechanism, as opposed to other resolution mechanisms;
- Who can raise complaints (i.e., all stakeholders);
- Where, when, and how community members can file complaints;
- Who is responsible for receiving and responding to complaints;
- What sort of response complainants can expect from the company, including timing of response; and
- What other rights and protection are guaranteed.

7.3.2 Submitting a Grievance

Upon raising awareness and publicising the mechanism, grievances may be submitted by:

- Direct delivery to a sealed grievance box at the project site entrance;
- Submission by post or email; and
- Directly received by project personnel such as CLOs and/or E&S Manager. Where security personnel at the Project's entry points and site office(s) have received any grievances, they will immediately inform the CLOs and/or E&S Manager. Security personnel will be aware and trained to deal with any grievances appropriately, in needed.

Information will be provided at the Project entrance, at the location of grievance boxes to inform people about the process and timeline to follow up their grievances.

For illiterate complainants or those that prefer to submit their grievances verbally, they will have the possibility to meet with the relevant site E&S/HSE/HSSE Manager who will take notes on the details of the complainant and read them out loud to the complainant to confirm that the key elements of the complaint have been captured. Where the respective manager is not available, security staff will take the grievances and ensure these are registered via the formal grievance process.

If an anonymous grievance (e.g. letter or email without details about the complainant) or the grievant requests to remain anonymous is submitted, the grievance will also be accepted and processed.

7.3.3 Keeping Track of Grievances

Upon receiving grievances submitted by any means mentioned above, the steps below will be followed to ensure all grievances are adequately investigated in order to avoid leaving any issues or concerns raised open.

- The grievance will be recorded in a form of register. The register will contain:
 - Details of the grievance;
 - The personnel/division(s) responsible for resolving the grievance;
 - Process tracking fields (receipt dates, status, result dates);
 - Response provided to the complainant;
 - Corrective and preventive actions taken to prevent reoccurrence of such complaint; and
 - The grievances will be acknowledged as soon as possible (no later than a week from reception) by sending a formal confirmation with a complaint number and a timeline for response to the complainant to assure the complainant that the organization is responding properly.
- In cases of sensitive grievances, such as those involving multiple interests and a large number of affected people or those relating to sexual abuse and harassment or gender-based violence, where a more complex investigation is required, the complainant will receive an update within two weeks of the grievance being received, explaining the actions required to resolve the complaint, and the likely timeframe; and
- The Project Company will explain in the first letter of acknowledgment, which claims are clearly outside the scope of the mechanism and what alternative mechanisms communities can use to address these potential issues.
- mechanisms communities can use to address these potential issues.

7.3.4 Reviewing and Investigating Grievances

Depending on the circumstances of complaints made, various departments may need to be involved in resolving the complaints. The person(s) responsible for handling grievance will organize the process to validate the complaints legitimacy and arrange for investigation of details.

When grievances are complex and cannot be resolved quickly, an extensive investigation may be required to prevent escalation of the issue. The responsible and accountable party remains the Project Company, although the investigation and review may be delegated to the EPC Contractor or O&M Company respectively. The grievance mechanism must conform to the principle of 'no cost'. If the investigation team is formed internally, issues that will be taken into consideration include potential conflicts of interest, qualifications, gender composition, and budget. Meetings with complainants and site visits will be undertaken, as appropriate.

All grievances will be investigated by the responsible Project party within 2 weeks of submittal. Where grievances require a longer duration for investigation, the grievant will be informed of this delay and advised of the expected timeline for a response.

In cases of sensitive grievances - such as those involving multiple interests or those relating to sexual abuse and harassment or gender-based violence or community related conflict- it may help to engage outside organizations in a joint investigation, or allow for participation of local or national authorities only if the complainants agree to this approach.

7.3.5 Grievance Resolution Options and Response

The approach used in resolving various types of grievances will be different depending on the nature of the issue, frequency of occurrence and the number of grievances. Rather than prescribing a specific procedure for each particular type of complaint, the flexibility of the grievance mechanism allows for resolution options appropriate for different types of grievances to be provided. For example, these options may include altering or halting harmful activities or restricting their timing and scope (e.g. for construction dust, or access road noise), providing an apology and revising the stakeholder engagement strategy.

Resolution to the grievance will be communicated to the grievant either in written format or verbally depending on what format the grievant has selected as preferred, but in all cases a written record will be kept by the Company. In cases where the grievance/claim is rejected or where the company does not require action, the company representative will be diplomatic when informing the grievant about the outcome of the eligibility review process so as to prevent conflict from escalating.

Where the claim is accepted, a proposed solution will be provided and communicated to the grievant within a stipulated period. If the grievant does not accept the proposed resolution, the company would re-assess the situation, discuss and clarify the finding with the grievant and make sure that all alternatives within the grievance mechanism are explored. If the grievant is still not satisfied with the proposed resolution, the grievant can take the dispute resolution mechanism outside of the company grievance mechanism (external mechanism).

Where a proposed solution is accepted or agreed upon by all parties involved, the case will be closed out and evidence that necessary actions have taken place will be collected. Such evidence includes:

- Conducting a meeting with the complainant to reach a collective agreement or get a confirmation and file it along with the case documentation to close out the claim; and
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how they were resolved.

Where the grievant is not satisfied with the outcome of the proposed resolution, actions concerning further discussion and re-assessment shall be completed and advised within 2-weeks of notification of dissatisfaction by the grievant.

7.4 Grievance Mechanism in Construction and Commissioning Phase

The construction and commissioning phase will require two separate grievance mechanisms to be implemented for the following parties:

- **Internal parties;** Construction and commissioning personnel, workers, project staff, (including sub-contractors' staff and visitors); and
- **External parties.**

Although the Project Company will remain responsible and accountable, the EPC Contractor will manage internal and external grievance mechanisms. A member of staff will be assigned the responsibility to receive and follow up on all grievances. They will also be required to train related staff (as outlined below). Grievances will be investigated by the EPC Contractor and may require co-ordination with the project company or other sub-contractors. All received grievances will be acknowledged within a week of receipt, or quicker depending on the urgency of the grievance.

Adequate resources will be allocated to the assigned staff member responsible for managing stakeholder engagement. This designated staff member will also be responsible for following up and managing grievances. An additional team or part of an existing team may support the member of staff; however, the staff will be experienced in engagement processes and will be familiar with the lender requirement for stakeholder engagement.

7.4.1 Internal Grievance Mechanism

The internal grievance mechanism will be made available for all construction and commissioning personnel associated with construction and commissioning activities to enable them make work related concerns. This includes all those employed by the Project Company, EPC contractor, sub-contractors, any other related contractors and project site visitors. All construction and commissioning personnel will be made aware of the grievance mechanism during their employment inductions at the project site and in employment documents. There will also be information on how to access the grievance mechanism posted at key locations on-site (e.g. noticeboards) and at dedicated worker accommodation.

Grievances of construction and commissioning personnel will be made in writing to the EPC Contractor via a specific grievance form (see example grievance form in Appendix A). 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 Azerbaijani, English and any other languages of Project staff. The complaint can also be made verbally by all complainant 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 anomalously 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 EPC Contractors 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.

Note: Personal data and records will be protected and only used for the purpose of grievance resolution or analysis. No personal data will be disclosed or reported publicly.

7.4.2 Third-Party Grievance Mechanism

External grievance forms will be made available in Azerbaijani and English at the site entrance gate. Sealed and locked 'grievance boxes' will be made available at the Project site entrance

for grievance form submission. The contact details of the E&S Manager will be advertised at the notice board at the site's main entrance gate, once the individual has been appointed. The process for recording, reviewing, following up and responding to will be the same as detailed in sub-section 7.3.

Where external complaints are received by telephone, letters or email these will also be formally recorded and followed up appropriately by the designated representative. The solution to the grievance will be communicated to the grievant depending on the format the grievant has selected as preferred. In cases where the grievance/complaint is rejected, the company representative will be diplomatic when informing the grievant about the outcome of the resolution process so as to prevent conflict from escalating.

The company would re-assess the situation, organise a meeting with the complainant and local community members responsible for arbitration during conflicts or mediating of conflicting groups to discuss and clarify the findings and make sure that all alternatives within the grievance mechanism are explored.

Formal records of the grievance submission, investigation, determination of root cause (if any), corrective and preventative actions and any follow up (including monitoring) will be recorded in a grievance follow up form and maintained as documented information, with all other associated evidence of follow-up or corrective/close-out actions.

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, which will be made available for review to applicable external parties such as independent environmental and social auditors.

Note: Personal data and records will be protected and only used for the purpose of grievance resolution or analysis. No personal data will be disclosed or reported publicly.

7.4.3 Monitoring

The process of monitoring grievance and complaints by the EPC will be under the scrutiny of Project Company who will discuss this in weekly and monthly EHS Meetings and through the site audit programme. In addition, there will be quarterly third-party independent audits by an E&S Consultant that will verify the suitability of the process and the method for documenting complaints and responding to them. The findings will be reported to the lenders and to the Board of the Project Company.

7.5 Grievance Mechanism during the Operational Phase

The grievance mechanism in the operational phase of the Project will be similar to that of the construction and commissioning phase. The grievance mechanism will be available for both workers and third-parties.

A member of staff will be assigned and responsible for managing worker and third-party grievances received (recording, reviewing, investigating and responding) appropriately. Grievance forms will be made available in Azeri & English through CLO assigned for operation stage. The process for recording, reviewing, following up and responding to will be the same as detailed above. All grievances received during operations (including all follow up documentation) will be maintained for a minimum of 5 years, with records being available on site.

Where third-party grievances are received by letters or email, these will also be formally recorded and followed up appropriately by the designated representative. The contact details of the applicable manager will be advertised at the project information disclosure locations and notice boards at the site's main entrance/office locations.

There will be worker representatives selected by workers at sites who will be involved in grievance management and in coordination with representatives from trade unions.

7.6 Grievance Procedures for Women and Vulnerable and Disadvantaged Groups

The following procedures will be implemented to ensure GBVH cases are reported:

- A Project specific GBVH Policy detailing the list of unacceptable behaviour among workers, provisions for reporting, sanctions for perpetrators and available resources & support systems for the victims will be prepared and implemented in accordance with lenders and Azerbaijan requirements including Masdar's Environmental & Social Management System;
- Workers will be provided with information regarding worker code of conduct in local languages as part of their employment contract which will include provisions for reporting, investigations, termination and disciplinary action against those who perpetrate gender violence and harassment;
- The EPC Contractor and O&M Company will conduct mandatory regular training and awareness raising for the workforce on gender-based violence and harassment towards local community members and their colleagues especially women and the availability of a grievance mechanism to report any GBVH cases;
- The workers will be made aware of the laws and regulations that make sexual harassment and gender-based violence a punishable offence which is prosecuted;

- Ensure inclusion of a balanced representation of women on the HSE team and CLO who will be easily relatable and approachable to female workers;
- Develop tools for anonymous sexual harassment complaints by workers and host community members and protect the confidentiality of the complainants;
- EPC will train female GBVH focal point to address any GBVH cases between workers & community members;
- The EPC Contractor and O&M Company will work in close coordination with the local authorities in investigating any complaints relating to gender violence and harassment in the host communities where it relates to Project workers;
- The EPC Contractor will provide targeted training (including in life skills such as leadership and decision-making) and awareness raising to vulnerable workers such as women; and
- Develop a monitoring system to monitor GBV activities to assess the effectiveness of the controls.

7.6.1 Reporting of Gender Based Violence and Harassment (GBVH)

Channels and tools for anonymous reporting of GBVH will be developed. The reporting channels will ensure safety and confidentiality to encourage reporting of such incidents. The reporting channels will include any of the following:

- **Community members:** Channels may include complaint/feedback boxes, a toll-free telephone number, a designated community organisation (e.g. NGOs, etc.), service-user group or local women's organisation. Reporting channels will include anonymous and child-friendly options to encourage children and young people to come forward.
- **Workers:** Channels may include complaint/feedback boxes at site/office, online reporting on company website or email.

Sensitive grievances, particularly those relating to GBVH (Gender-Based Violence and Harassment), will be recorded and stored in a separate, confidential grievance logbook. Access to this logbook will be restricted to designated individuals who are specifically trained to manage such sensitive cases. These individuals will ensure the grievances are handled with the utmost confidentiality and discretion.

In severe cases, such as those involving criminal activities or where the safety and well-being of individuals are at risk, the grievance will be referred to the relevant authorities or service providers, including local law enforcement, health services, or specialized support organizations. The referral process will follow legal and regulatory requirements to ensure that the complainant receives appropriate support and protection.

All sensitive grievances will be managed in compliance with local legal frameworks and the project's non-retaliation and confidentiality policies to safeguard the rights and dignity of those affected.

Process for handling and logging of sensitive grievances will be provided in workers grievance mechanism procedure to be developed by EPC Contractor.

7.7 Grievance Mechanism Contact Details

The following details will be provided to the stakeholders in order to be able to submit their grievances or comments regarding the proposed Project.

Table 7-1 Construction, Commissioning and Operation Phase - Grievance Mechanism Contact Details

Company	Contact person/s	Phases	Contact details
Representative from Masdar	Yashar Gojayevev	Construction, Commissioning and Operation Phases	Email: ygojayevev@masdar.ae Mob: +994 50 273 04 21
EPC Contractor	<i>To be determined</i>	Construction and Commissioning Phases	<i>To be determined</i>
O&M Company	<i>To be determined</i>	Operation Phase	<i>To be determined</i>

The Project Company, EPC Contractor and O&M Company's contact details will be confirmed before the commencement of the construction and operational phases as applicable.

7.8 Process Flow and Timeline

Table 7-2 Grievance Process and Timeline

STAGE	TIMELINE
Grievance Received/Submitted	-
Grievance logged and acknowledged	Within 1 week of grievance being submitted
Grievance investigated	Within 2 to 3 weeks of grievance being submitted*
Proposed resolution conveyed to grievant	Within 30 days of grievance being submitted
If applicable following dissatisfaction of resolution by Grievant	
Actions to re-assess grievance/propose new solution/inform Grievant of final decision	Within 2 weeks of notification of dissatisfaction by Grievant
In the event that a grievance cannot be resolved between the two parties a mediator will be involved i.e. local leaders who understand the culture and practices within the Project site.	Within 2 weeks of notification of dissatisfaction by the Grievant.

STAGE	TIMELINE
Grievances that are not resolved at the project level - a grievance committee involving senior management from Masdar, municipality and any other relevant authorities (if required).	Within 30 days of notification of dissatisfaction by the Grievant.

Note: Where complex grievances, or other factors are extending the investigation time, the Grievant will be informed of this delay and advised of an updated expected timeline for response.

7.9 Project Information Disclosure Locations

The table below provides the proposed locations where project documents can be disclosed in the project area so that local community members can physically access project documents.

Table 7-3 Project Information Disclosure Locations

Municipality/Village	Location
Bilasuvar and Salyan Executive Power Committee	Committee Office
Shorsulu Village	Shorulu Municipality Office
Salyan Village	Salyan Municipality Office
Dayikend Village	Dayikend Municipality Office
Kirmandalı Village	Khirmandali territorial Executive Representative Office
Aliabad Village	Aliabad Territorial Executive Representative Office
Bilasuvar Solar PV Project Construction Area	Construction Admin Office and/or Security Gate

The EPC Contractor and O&M Company will be required to undertake further consultation with community leaders and elders to determine the suitability of the proposed locations. If necessary, the locations proposed in the table above will be updated.

In addition to the availability of project information and documents at the proposed locations, grievances will also be received at these offices/centres. All grievances received will be processed in a timely manner as outlined in Section 7.8 herein.

7.10 Training

- It will be the responsible of Project management to endorse the grievance mechanism and ensure that they are aware of the availability of this process. It is

also necessary for Project management to ensure that personnel are allocated to manage the grievance mechanism;

- These personnel shall be made fully aware of the outlined grievance mechanism and have access to this document to ensure that they can undertake the necessary duties for effective implementation; and
- As grievances can be submitted/taken at the Project entrance, it will be necessary to ensure that security staff are trained in regard to this process and have access to this document and any applicable forms, contact details of responsible project parties etc.
- All staff will be advised of the availability of the grievance mechanism in the Project induction, including its key features such as how to submit gender-based violence & harassment incidences, processes and where to access it.

8 CORPORATE LEVEL - GRIEVANCE MECHANISM

Given the complexity and scale of the Project, which includes three subprojects with an aggregate capacity of 1000 MW_{ac}, a two-tier Grievance Redress Mechanism (GRM) is proposed. While each subproject will operate its own project-specific grievance mechanism (as detailed in the Section 7: Project-Specific Grievance Mechanism), the corporate-level GRM will serve as an overarching platform to handle grievances that transcend individual subprojects or are related to broader corporate-level concerns.

This mechanism will ensure that complaints which cannot be resolved at the subproject level, or those that involve multiple subprojects, are addressed efficiently and transparently. It also provides a higher-level option for stakeholders to voice their concerns regarding the overall implementation of the Mega Project.

8.1 Scope and Purpose

The corporate-level GRM will:

- Manage grievances that affect more than one subproject or are corporate in nature.
- Address unresolved complaints from the subproject-level GRMs.
- Ensure transparency and accountability for the management of grievances that arise at the corporate or cross-subproject level.
- Provide a pathway for higher-level complaints that require the involvement of senior management or broader stakeholder groups.

8.2 Operating Principles

The corporate-level GRM will adhere to the same fundamental principles outlined in the Project-Specific Grievance Mechanism section, including:

- Accessibility for all stakeholders, ensuring that grievances can be submitted via multiple channels.
- Transparent processes for logging, investigating, and responding to grievances.
- Clear communication of grievance procedures in local languages, ensuring accessibility for all PAPs and communities.
- Safeguarding measures such as non-retaliation policies and confidentiality protections.

Additionally, the corporate-level GRM will be structured to:

- Handle complex grievances that involve multiple subprojects or require resolution at a corporate level.
- Facilitate the coordination between subproject grievance mechanisms when necessary.
- Allow for the engagement of third-party mediators or experts, particularly in cases where disputes involve corporate policies or impact multiple subproject areas.

8.3 Submission and Processing of Grievances

Grievances can be submitted to the corporate-level GRM through the following channels:

- Direct submission via email, phone, or a dedicated online platform.
- Referrals from the project-specific grievance mechanisms, particularly for unresolved or cross-cutting issues.
- Anonymous submissions through a dedicated grievance box at corporate offices, if stakeholders prefer not to disclose their identity.

Once received, grievances will follow a structured process:

- **Acknowledgment:** The corporate team will acknowledge receipt of the grievance within 5 working days.
- **Investigation:** The grievance will be logged and assigned to the relevant corporate or subproject team for investigation. In complex cases, a dedicated cross-subproject investigation team may be assembled.
- **Resolution:** The team will work with relevant stakeholders to find an appropriate resolution, ensuring compliance with both project-specific and corporate-level policies. Resolutions will be communicated to the complainant in a timely manner.
- **Monitoring:** Outcomes of grievances, including corrective actions, will be tracked to ensure follow-through and to prevent recurrence.

8.4 Monitoring and Reporting

The corporate GRM will produce quarterly reports summarizing the types of grievances received, their status, and resolutions achieved. These reports will be shared with key stakeholders, including lenders, government authorities if needed, and the Project's senior management.

8.5 Contact Information

The corporate GRM will have its own dedicated contact points, distinct from the project-level mechanisms.

The following details will be provided to the stakeholders in order to be able to submit their grievances or comments regarding the proposed Project.

Table 8-1 Construction, Commissioning and Operation Phase - Grievance Mechanism Contact Details

Company	Contact person/s	Phases	Contact details
Representative from MASDAR (Corporate level)	To be confirmed	Construction, Commissioning and Operation Phases	Email: To be confirmed Mob: To be confirmed
Representative from SOCAR (Corporate level)	To be confirmed	Construction, Commissioning and Operation Phases	Email: To be confirmed Mob: To be confirmed

The Project Company, EPC Contractor and O&M Company's contact details will be confirmed before the commencement of the construction and operational phases as applicable.

9 IMPLEMENTATION PLAN

In order for this Stakeholder Engagement Plan to function effectively, it is important to determine a management structure and assign suitable personnel(s) to implement and manage this Stakeholder Engagement Plan.

9.1 Roles and Responsibilities (Project Company)

Note: The roles below will need to be revised upon finalisation of Project staff and responsibilities on-site. The responsibilities of the HSE/HSSE Manager, Environmental and Social Manager and Community Liaison Officer are to be outlined below once confirmed by the Project parties.

9.1.1 HSE/HSSE Manager

NAME	To be confirmed
CONTACT DETAILS	To be confirmed

The HSE/HSSE Manager is responsible for:

- Ensuring stakeholders are recognised as partners in the development and delivery of strategic goals;
- Assisting the stakeholder management unit to effectively consult and engage stakeholders;
- Advising Senior Management of issues and/or risks to stakeholder relationship as soon as they arise so risk can be managed effectively;
- Supporting the implementation and management of the SEP;
- Getting involved in stakeholder engagement activities that relate directly to HSE concerns or emergency planning; and
- Engaging with any external stakeholders with respect to emergency planning, drills, and instances of emergency as appropriate.

9.1.2 Environmental and Social Manager

NAME	To be confirmed
CONTACT DETAILS	To be confirmed

The EPC Contractor will employ/nominate the Environmental and Social Manager during the construction and commissioning phase and the O&M Company during the operation phase. The Project Company HSE/HSSE Manager will oversee the Environmental and Social Manager. The Environmental and Social Manager is responsible for:

- Implementation of all aspects of the SEP ensuring that the Project is compliant with lenders requirements;
- Identifying stakeholder issues and acting appropriately to address those issues.
- Ensuring that the SEP and the available engagement methods are publicised by the Community Liaison Officer;
- Ensuring that Project personnel are well briefed in regard to the SEP and grievance mechanism (including security personnel), and that the required resources (e.g. vehicles, company phones, office materials) are provided;
- Ensuring stakeholder meeting and disclosure of information are managed properly.
- Supervising the processing and resolution of all grievances; and
- Supervising the independent periodic monitoring and disclosure of the non-technical summary of the audit reports and of the full reports if required.

9.1.3 Community Liaison Officer (Grievance Manager)

NAME	Yashar Gojayev (Representative of Project Company (MASDAR & SOCAR))
CONTACT DETAILS	ygojayev@masdar.ae

In order to maintain regular communication with affected stakeholders, a Community Liaison Officer (CLO) will be employed/nominated (this role may be shared by the nominated E&S Manager). The CLO will be knowledgeable about the project region and will be able to speak local language. The responsibilities of the CLO include:

- Identifying, informing and recording public views, opinions & grievances and or relaying them to the necessary personnel for follow up;
- Setting up a grievance complaint tracker system to keep track of the type of complaints filed, the complainant and status of each complaint;
- Publicising & Distributing information to applicable stakeholders and translation of the material into applicable languages;
- Handling minor, straightforward issues such as those related to a complainants request for information;
- Obtaining clarification from other members of management in regard to dealing with specific grievances, such as a need to notify the Project Company (or other Project parties) in regard to the content or response to specific grievances;
- Ensuring all received external grievances are properly recorded, addressed and managed within the specified timelines as detailed in this procedure; and
- Keeping up to date with any changes in compliance obligations with respect to stakeholder engagement and grievances.

9.2 Monitoring and Reporting

The following Key Performance Indicators (KPIs) should be considered to evaluate the progress or successful implementation of the SEP. KPIs should be accounted on a monthly basis.

- Number (per type) of grievances related to local community health, safety and security (injuries, damage, diseases, etc.);
- Number of incidents causing injuries/damage to community member(s);
- Number of incidents off-site that could have caused injuries or loss of life/property to community member(s);
- Number of project training/inductions provided to workers on a monthly basis, number of attendees and number of new employees;
- Number of women employed;
- Number of education and awareness training on reproductive health, and HIV/AIDS provided to women & adolescent girls residing in the project's area of influence;
- Number of awareness training provided to all project workers in regards to SEA/SH risks;
- Number of mandatory regular training and awareness provided to workforce about gender-based violence and harassment towards local community members (including women) and their colleagues especially women; and
- Number of grievances received and resolved in regards to SEA, SH and GBV etc.

All engagement activities will be tracked and reported by Project Company.

10 REVIEW

As stated herein, the SEP is a living document that will be utilised in the ESMS throughout the project's lifecycle as a reference document. As such, there is a need to update the SEP as necessary to include any relevant changes such as changes in projects circumstances, new requirements, new affected stakeholders, reviews of techniques, changes to engagement methods, changes of relevant personnel, changes to grievance mechanism, etc. There may also be a need to update the SEP and Grievance Mechanism as part of corrective actions linked to audit, or other findings.

As a minimum, the SEP will be reviewed on an annual basis, with the aim of achieving continual improvement.

APPENDIX A – EXAMPLE TEMPLATE RELATED TO GRIEVANCE MANAGEMENT

PUBLIC GRIEVANCE FORM	
Reference No.	
Full Name:	
Contact Information Please mark how you wish to be contacted and add contact details	<input type="checkbox"/> By Post: <input type="checkbox"/> By Telephone: <input type="checkbox"/> By E-mail: <input type="checkbox"/> Other (please specify)
Description of Concern, Incident or Grievance	What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of concern, incident, or grievance	
<input type="checkbox"/> One-time incident/grievance (date) <input type="checkbox"/> Happened more than once (how many times?) <input type="checkbox"/> On-going (currently experiencing problem)	
What would you like to see happen to resolve the problem?	
Signature:	
Date:	
Please insert this form in one of the grievance boxes	

GRIEVANCE RESOLUTION FORM	
How was grievance received	<input type="checkbox"/> Grievance Box (specify which box) <input type="checkbox"/> Directly contact with CLO
Reference No:	
Description of Concern, Incident or Grievance: <i>What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>	
Date of Grievance	
Has the Grievance been Resolved?	<input type="checkbox"/> Yes <input type="checkbox"/> No; <i>if not provide a justification below</i>
<u>Fill Out Either Section 1 OR Section 2 below</u>	
Section 1	
Summary of Actions Undertaken to Resolve Grievance	
Date of Implementation	
Section 2	
Summary of Proposed Actions to be Implemented to Resolve Grievance	
Timeline for Implementation	
CLO Signature: Date:	E&S Manager Signature: Date:

GRIEVANCE CLOSE-OUT FORM	
Reference No:	
Full Name	
Description of Concern, Incident or Grievance:	
Description of Actions Taken to Resolve the Grievance	
Date of Submission of Grievance	
Date of Communication of Solution to Grievance	
Has the grievance been resolved (Yes/No)	
<p>CLO</p> <p>Name:</p> <p>Date:</p> <p>Signature:</p>	<p>Complainant</p> <p>Name:</p> <p>Date:</p> <p>Signature</p>

APPENDIX B – GRIEVANCE REGISTER & STAKEHOLDER ENGAGEMENT REGISTER TEMPLATE

GRIEVANCE REGISTER FORM									
Ref No.	How Was grievance received (i.e. grievance channel)	Date of Submission of Grievance	Name and Contact Information	Description of Grievance	Department/Person Responsible for Resolution	Actions Taken to Resolve the Grievance	Date of Communication of Solution	Has grievance been resolved (Y/N) if not explain why	Has grievance been repeated (Y/N)

STAKEHOLDER ENGAGEMENT REGISTER							
Date	Staff member	Stakeholder name	Contact details	Organization	Engagement activity summary and issues raised	Follow-up actions	Action status
<Insert>	<Insert>	<Insert>	<Insert>	<Insert>	<Insert>	<Insert>	<Insert>

APPENDIX C – PROJECT BROCHURE

BİLƏSUVAR 445 MW_{AC} GÜNƏŞ FOTOELEKTRİK (PV) STANSİYASI

LAYİHƏ BARƏDƏ MƏLUMAT

Azərbaycan Respublikasının Energetika Nazirliyi və Masdar şirkəti arasında birinci fazası 2 GW_{ac}-dan başlamaqla Azərbaycan Respublikasında günəş və külək enerjisi layihələrinin 4 GW_{ac} gücündə xəttinin qiymətləndirilməsi, hazırlanması və həyata keçirilməsi ilə bağlı İcra Sazişi imzalanıb. Masdar hazırda ümumi gücü 1052 MW_{ac} olan iki günəş və bir külək elektrik stansiyasından ibarət üç yaşıl sahə layihələrini hazırlayır etdirir.

Biləsuvar Günəş PV stansiyası birinci fazaya daxil olan üç layihədən biridir.

5 Capitals Ətraf Mühit və İdarəetmə üzrə Məsləhətçi (5 Capitals) şirkəti layihənin Ətraf mühit və sosial təsirin qiymətləndirilməsi (ƏMSTQ) paketinin hazırlanması prosesi zamanı ətraf mühit və sosial araşdırmaları aparmaq üçün Masdar tərəfindən layihəyə cəlb olunmuşdur.

Layihənin məqsədi nədir?

Layihənin məqsədi bərpa olunan enerji mənbələri yaratmaqla Azərbaycanın elektrik enerjisi təchizatını artırmaq, bununla da istixana qazlarının (İQ) azaldılması və təbii resurslara qənaət edilməsidir.

Günəş paneli nədir?

Günəş paneli bir sıra fotoelektrik hissəciklərdən yaranan fotoelektrik sistemdən ibarətdir. Bu hissəciklər günəş işığı udməqlə onu elektrik enerjisinə çevirmək üçün nəzərdə tutulub. Təklif olunan layihə PV panelləri istifadə edəcək və istehsal olunan elektrik enerjisi milli şəbəkəyə ötürüləcək.

Tikinti fəaliyyətləri

Tikinti fəaliyyətlərinə aşağıdakılar daxil olacaq:

- Sahənin təmizlənməsi, hamarlanması, konstruksiyalar üçün sahələrdə kipləşdirmə elementləri və s.;

- Lazım gələrsə, az miqdarda betonla yerində quraşdırılan PV dayaq/izləyicilər üçün bünövrələrin qazılması (dəriniyi 2,5 m-ə qədər olması gözlənilir);
- PV izləyiciləri, modulları və avadanlıqları üçün mexaniki və elektrik avadanlıqlarının quraşdırılması;
- Sahədə daxili yolların və digər infrastrukturların, o cümlədən piyada yollarının və dayanacaq yerlərinin tikintisi və ya sıxlaşdırılması;
- Avadanlıq və materialların saxlanması üçün anbarların və saxlanma meydançalarının tikintisi;
- İnzibati bina, sanitariya otaqları, emalatxanalar, elektrik binaları, yardımçı binalar və tikililər və s. kimi ümumi binaların tikintisi;
- Pf kabel xəndəklərinin qazılması;
- SCADA (proseslərə nəzarət və monitorinq sistemi) üçün də daxil olmaqla mexaniki və elektrik binalarının tikilməsi

Əməliyyat fəzası fəaliyyətləri

Layihə milli şəbəkəyə qoşulacaq 445 MW_{ac} gücündə enerji istehsal edəcək. İlk əsas vaxt qrafiki və tarixlər aşağıdakı cədvəldə verilmişdir.

Layihənin əsas mərhələləri və tarixləri (ilkin)

MƏRHƏLƏ	TARİX
Enerji alqı-satqısı müqaviləsinin imzalanması	İyun 2024
Mobilizasiya	2025-ci ilin 1-ci rübü
Əsas Tikinti İşlərinin Başlanması	2025-ci ilin 2-ci rübü
Ticarət Əməliyyatlarının Tarixi	Yanvar 2027

Şikayətlər və rəylər

İcmalarla davamlı dialoq və şikayət mexanizminin qurulması təmin olunacaq. Bu, Maraqlı Tərəflərin İştirakı Planında öz əksini tapacaq.

- Şikayət mexanizmi tikintidən əvvəl (ƏMSTQ fəzası), tikinti və istismar fəzası boyunca mövcud olacaq və bu ödənişsiz, şəffaf və ondan istifadə edənlər üçün təhlükəsiz olacaq.
- Layihələrdə icmalarla və müxtəlif maraqlı tərəflərlə müxtəlif məsələlərlə bağlı, o cümlədən onların şikayətlərinin həlli ilə bağlı əlaqə saxlayan İcma Əlaqələri üzrə Mütəxəssis var.

Layihə ilə bağlı hər hansı şərhiniz, şikayətiniz, və ya əlavə məlumat ehtiyacınız varsa, zəhmət olmasa aşağıda göstərilən məlumatlar vasitəsilə layihə əməkdaşları ilə əlaqə saxlayın.

ŞİRKƏT	ƏLAQƏ
Masdar Yaşar Qocayev – İcma əlaqələri üzrə mütəxəssis	E-mail: ygojayev@masdar.ae Mob: +994 50 273 04 21
5 Capitals Sərdar Hüseynov – Sosial Mütəxəssis	E-mail : sardarhuseyn@gmail.com Mob: +994 55 566 04 20