

Grievance Management Procedure

1	Introduction.....	3
2	Policy & legislative requirements	4
2.1	Corporate Objectives	4
2.2	Omani Legislative Requirements	4
2.3	EIA Commitments.....	4
2.4	International Guidelines	5
3	Roles and Responsibilities.....	5
3.1	DRPIC Responsibilities.....	6
3.1.1	Publicising the Grievance Management Procedure.....	6
3.2	CONTRACTORS' Responsibilities.....	7
4	Grievance Procedure.....	8
4.1	Contact Details	10
4.2	Grievance Handling and Resolution.....	11
4.3	Grievance Review Committee (GRC)	13
4.4	Grievance tracking.....	13
4.5	Grievances Outside of the DRPIC Grievance Procedure	14
5	Grievance Procedure for Workers [hold pending hc review]	15
6	Consultation and Disclosure	16
7	Verification and Monitoring	16

1 INTRODUCTION

This document is the Grievance Management Procedure (GMP) for Duqm Refinery and Petrochemical Industries Company LLC ("DRPIC"), or Company, and forms part of the DRPIC's Environmental and Social Management System for the project. The GMP is designed to outline the procedure for accepting, assessing, resolving and monitoring grievances from those affected by the Project. The aim is to identify and manage grievances from individual stakeholders or stakeholder groups. Timely redress or resolution of such grievances is vital to ensure successful implementation of the Project. EPC Contractors and subcontractors will be required to develop Grievance Management procedures that are aligned with this Procedure and track and report contractor-related grievances to DRPIC.

Grievances can encompass minor concerns as well as serious or long-term issues. They might be felt and expressed by a variety of parties including individuals, groups, communities, or other parties affected or likely to be affected by the social or environmental impacts of the Project. It is essential to have a robust mechanism to systematically handle and resolve any complaints that might arise in order that they do not escalate and present a risk to operations. If well-handled, an effective grievance mechanism can help develop positive relationships and build trust with stakeholders.

DRPIC has placed a high priority on establishing a permanent dialogue and communicating with communities and stakeholders. One of our goals is to show respect for, inform and respond to people's concerns and queries on a permanent basis. This GMP provides a simple means for stakeholders to express their concerns and for DRPIC to take corrective actions as required to ensure project commitments are effectively implemented.

The specific objectives of the GMP include:

- Establishing a mechanism for responding to grievances in an understanding, transparent and culturally suitable manner.
- Developing an easy access, no cost and efficient grievance procedure for project affected peoples and other stakeholders.
- Ensuring effective dialogue and open lines of communication with the public.
- Helping to prevent unrealistic expectations and/or negative perceptions from the local population towards the Project.
- Establishing a system of investigation, response and quick grievance resolution.
- Reducing the number of grievances received over time.
- Improving social performance through the analysis of grievances and refinement of work practices.
- Ensuring that non-compliances with project environmental and social commitments are adequately corrected in a timely fashion and are subsequently monitored.

To maximise the effectiveness of the Grievance Procedure, DRPIC will apply the following factors during implementation and operation of the system:

- Commitment to fairness in both process and outcomes.
- Clear grievance management rules, and accountability.
- Validity of all complaints submitted.
- Confidentiality if requested.

The GMP is expected to help improve the Project's environmental and social performance over time as the number and nature of grievances received is an indicator of the behaviour of our employees, contractors, and the overall effectiveness of our Project execution. This GMP has been considered in parallel to the Stakeholder Engagement Plan (SEP) due to the inter-relationship between the two. It has been designed to meet the legal requirements of Oman and the requirements of the International Finance Corporation (IFC) in relation to grievance management.

2 POLICY & LEGISLATIVE REQUIREMENTS

2.1 Corporate Objectives

The corporate objectives of DRPIC are set out in the Health, Safety, Environmental and Social (HSES) Policy which states that "Duqm Refinery will consult with, listen to and respond openly to our partners, employees, contractors, regulators, customers, local communities and public interest groups. We aim to be a proud neighbour with our focus firmly fixed on sustainable development of the organisation through continuous improvement".

It also states that we will provide information about our project, products, services and operations to partners, customers, employees, government agencies, contractors and the public, as appropriate.

2.2 Omani Legislative Requirements

Grievance legislation in Oman is mainly under the umbrella of the Ministry of Manpower and labour unions.

Article 105 of the Oman Labour Law, issued in accordance with the Royal Decree no. 35/2003 states that "Any employer employing fifty or more employees must put in a conspicuous place a procedures for complaints and grievances to be approved by the concerned Directorate. The aforesaid procedures must provide that the employee shall have the right to submit his complaint or grievance to the employer or the employer's representative".

2.3 EIA Commitments

The Project EIAs require that a grievance mechanism be established. Commitments included in the EIA include:

- Grievance redressal mechanism is set up by DRPIC social responsibility team at the construction site. (Duqm Refinery EIA Section 9).
- Implement a grievance redressal policy and a community engagement plan (CSC8 in Duqm Liquid Bulk Berths Project ESIA).
- The Project will develop and implement a Grievance Protocol (ESIA for Ras Markaz Crude Oil Park).
- Implement a grievance redressal policy and a community engagement plan (Raz Markaz Oil Pipeline EIA)

2.4 International Guidelines

The main international guidelines applicable to Grievance Management are the Equator Principles III and those from the International Finance Corporation (IFC, Performance Standard (PS) 1 and 2).

EP6 and IFC PS1 require that a grievance mechanism be established by the project “designed to receive and facilitate resolution of concerns and grievances about the Project’s environmental and social performance”. The procedure should be geared towards Affected Communities as its primary user and should be tailored to be culturally appropriate and without retribution to the party that raises the concern. The procedure should be disseminated to the Affected Communities through the stakeholder engagement process. The process should not impede access to any judicial or administrative remedies.

PS2, Labour and Working Condition also requires that DRPIC provides a grievance mechanism for workers (and their organisations where they exist) to raise workplace concerns. This procedure should be made available to the worker during recruitment and make it easily accessible to them, with no retribution and it should not restrict access to judicial or administrative remedies through the law, or substitute any grievance mechanism through collective agreements.

3 ROLES AND RESPONSIBILITIES

In addition to DRPIC, the Project will involve a number of third parties (e.g. EPC Contractors, government authorities, SEZAD, employment agencies, etc). CONTRACTORS will play a significant role during the construction process and, as such, will share the responsibility for using the Grievance Procedure through aligning their Procedure.

Following best practice guidelines¹, responsibility for the management and resolution of grievances ultimately rests with DRPIC, even in situations where CONTRACTOR fails to reach an acceptable resolution. For example, with respect to a community grievance related to noise or vibration generated by CONTRACTOR traffic within a residential area, the COMPANY would usually delegate resolution to the CONTRACTOR. However, should the CONTRACTOR’S attempts to resolve the complaint and fail to reach an acceptable settlement, the Project Lenders will require that DRPIC takes responsibility for the eventual grievance resolution.

The COMPANY and CONTRACTOR (including subcontractors) must specifically address grievance management, resolution and respective responsibilities.

Guidelines to CONTRACTORS for the development of their own Grievance Management procedures (and responsibilities) are included in contract documentation that defines minimum requirements and specific responsibilities.

¹ Good Practice Note Addressing Grievances from Project-Affected Communities: “Guidance for Projects and Companies on Designing Grievance Mechanisms”, IFC 2009.

3.1 DRPIC Responsibilities

COMPANY shall ensure that sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of the Grievance Procedure and its monitoring. COMPANY responsibilities in Grievance Management are :

- Final Approval of the Grievance Procedure.
- Publicising the COMPANY grievance mechanisms.
- Allocation of a dedicated budget for the management of Grievance Mechanism and addressing grievances through financial or in-kind compensation where appropriate;.
- Implementing and overseeing the Grievance Procedure and all other social plans and programs.
- Providing accurate and timely information to stakeholders about the GMP.
- Obtaining, organising and documenting feedback from the project stakeholders regarding perceptions, concerns and requests.
- Taking appropriate actions to address major Non-Conformities by the CONTRACTOR based on audit reports, performance monitoring reports and on proposed approach and actions.
- Coordinating with COMPANY Project/Construction Management team in the resolution of a complaint where applicable.
- Evaluating and transmitting feedback obtained from stakeholder's grievances to DRPIC's project management team and contractors if relevant to project decision-making.
- Centralising grievance tracking and monitoring.
- Reviewing and approving CONTRACTORS' Grievance Management Procedures.
- Overseeing the effectiveness of the CONTRACTOR'S Grievance Procedures.
- Reporting KPIs applicable to this Procedure based on information from CONTRACTORS and DRPIC.

Implementation of the DRPIC Project Grievance Mechanism will be the ultimate responsibility of the COMPANY, Government and Community Relations' team leader within the Sustainability Department, supported by the wider DRPIC Project team when required.

DRPIC Management will:

- Ensure that this Grievance Management procedure is applied through all DRPIC departments and levels that are undertaking activities related to the DRPIC project. The Management will apply necessary controls to minimise risks that could result in stakeholder grievances.
- Contribute to the resolution and sign off of any grievances which have international repercussions.

3.1.1 Publicising the Grievance Management Procedure

Prior to the start of the construction works, the DRPIC Government and Community Relations Team Leader within the Sustainability Department will proactively publicise the grievance mechanisms and inform local communities and the wider stakeholder group of the details of the Grievance Management Procedure. This will include information about where people can go and who they can talk to if they have a grievance. This information shall be widely and

regularly publicised (both by COMPANY and CONTRACTORS), throughout the duration of the Project.

3.2 CONTRACTORS' Responsibilities

CONTRACTOR and Subcontractors

DRPIC Government and Community Relations' team leader within the Sustainability Department and the CONTRACTOR personnel responsible for the Grievance Procedure implementation will liaise regularly to discuss the status of construction activities and any critical grievance issues. If the received grievance was caused by the activities of the CONTRACTOR, the DRPIC Government and Community Relations team leader will discuss it with the CONTRACTOR about appropriate solutions so that both sides agree as to how the corrective action will be carried out. The CONTRACTOR then will report formally to COMPANY on the resolution of the grievance and what else might need to be done for the grievance to be closed.

CONTRACTORS will also need to provide sufficient and qualified resources allocated on an ongoing basis to achieve effective implementation of their Grievance Procedures. CONTRACTORS also need to provide relevant monitoring data/reports to COMPANY as indicated in their contracts and also in Section 4.4 of this procedure.

CONTRACTORS' specific responsibilities for grievance management include:

- Following all COMPANY policies and plans, including this procedure.
- Developing and executing their own grievance mechanism which will be in accordance and aligned with the COMPANY'S Grievance Management Procedure.
- Receiving grievances directly from the individuals or groups concerned, including community members, employees and workers (see below), or through subcontractors.
- Handling grievances resolution through their own Community Liaison (CL) teams but in close coordination with the DRPIC's Government and Community Relations team.
- Reporting to DRPIC's Government and Community Relations teams regarding grievances tracking (received, registered, in process and resolved) on a daily and weekly basis.
- Resolving a grievance immediately in the field when practicable.
- Informing DRPIC's Government and Community Relations team in writing about any grievance, including those immediately resolved in the field.
- Proposing alternative approaches to activities which may result in an impact of concern to stakeholders, in order to avoid and to reduce the number of grievances received.
- Attending all coordination meetings requested by DRPIC's Government and Community Relations team leader on a daily and weekly basis, and as needed.
- Reporting to DRPIC's Government and Community Relations team on a daily and weekly basis and as needed to manage social incidents and other community relations issues.

4 GRIEVANCE PROCEDURE

This Grievance Management Procedure is designed to facilitate the lodging, acceptance and closure of grievances coming primarily from Affected Communities, but also from other interested stakeholders and project workers.

Grievances may arise from local hiring, unplanned impacts and infrastructure damage as they relate to the Project's environmental and social commitments. The GMP is available to any party that wishes to communicate a grievance to DRPIC whether it be an individual, non-governmental organisation, community based organisation, other community group, local or national employee. A grievance will be considered genuine and evaluated if a party considers itself genuinely impacted due poor environmental and social performance.

The GMP is available on a voluntary and non-excluding basis. It does not affect anyone's rights to use the Omani judiciary system in any way, nor does it replace the public mechanisms of grievance and conflict resolution. However, DRPIC believes most grievances can be quickly resolved by discussing the issues and agreeing mutually acceptable solutions in a less official setting.

DRPIC will assure the implementation of the Engineering, Procurement and Construction Contractors' own Grievance Procedures, which are aligned with the DRPIC Grievance Procedures and are fully enforced. This is done by reviewing and approving their Grievance Procedures, ensuring their Community Liaison Officers understand their responsibilities, and by ensuring that grievances are being logged, followed-up and closed-out in a timely manner. DRPIC retains the right to intervene if a Contractor has not closed-out any genuine grievances after the second attempt or within a reasonable period of time.

Specific grievances in relation to labour or procurement contracts and In Country Value are beyond the scope of the Grievance Procedure and should be followed up through the DRPIC or Contractor Procurement or Human Resource Departments, as applicable.

Grievances will be handled through the Government and Community Relations team within the Sustainability Department. These specialists will be trained prior to the start of EPC and shall receive, centralise and process all grievances for their area of responsibility. They will deliver grievances to the appropriate departments in DRPIC or Contractor organisations, implement systems to organise, track and document all responses and deliver summary reports to management.

The Government and Community Relations team will propose means to resolve grievances, monitor the Procedure, and hold regular meetings to collect grievances in the field and provide feedback to communities. Grievances may also be raised during formal stakeholder meetings which will be handled through this procedure.

DRPIC will inform the local communities, its workers and sub-contractors' workers about the Grievance Mechanism and provide (on posters) contact details how people can launch a complaint via:

- The Government and Community Relations team within the Sustainability Department - verbally;
- Telephone;
- Email;
- Letter; or
- Website.

All contact details and means of submitting a complaint will be widely and regularly publicised, throughout the duration of the project, through posters at key locations (e.g. outside a local market, etc), advertisements in local papers/radio and verbally by DRPIC employees.

4.1 Contact Details

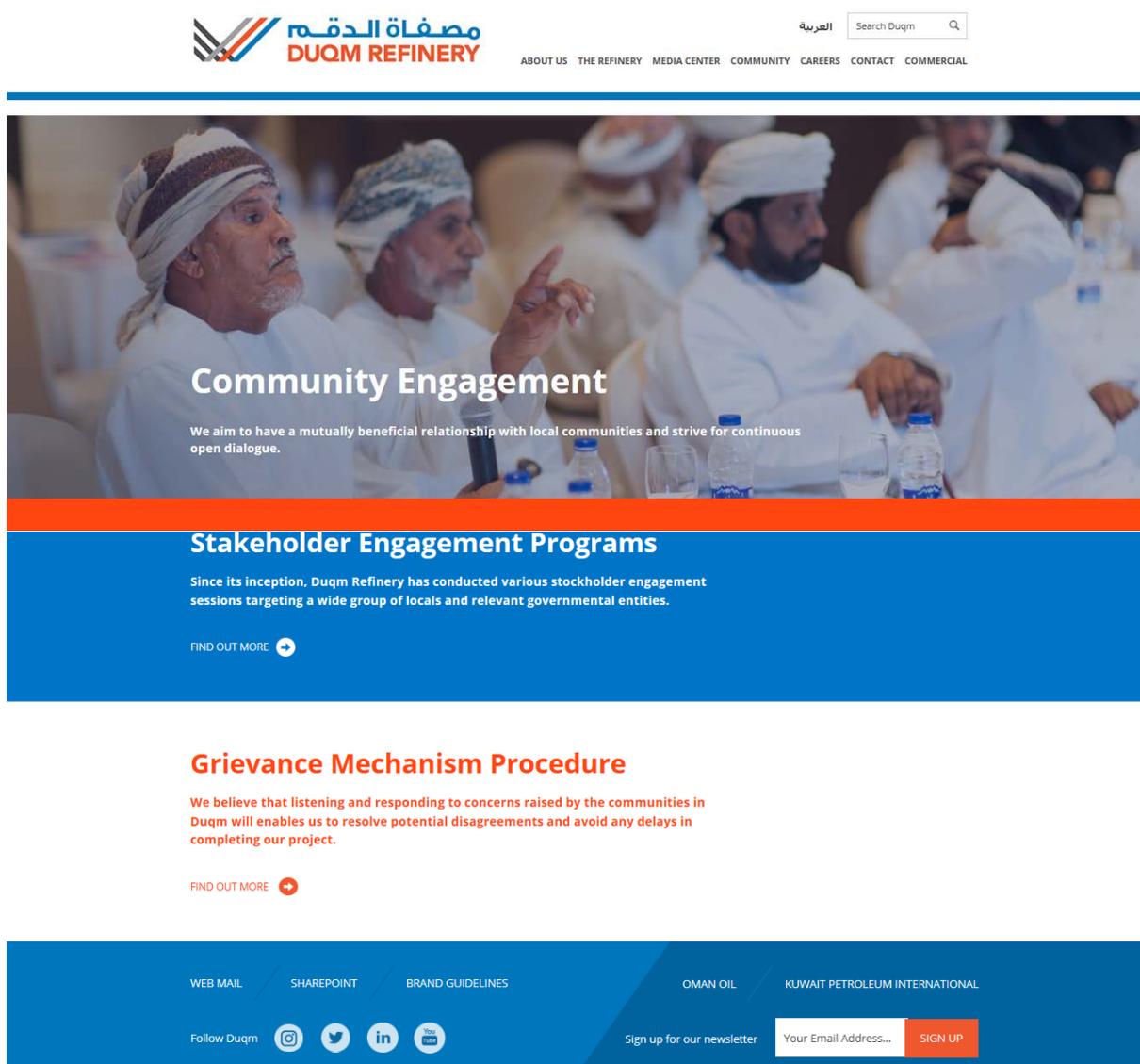
All stakeholders with internet access are able to contact DRPIC with a grievance or feedback through the following mechanisms:

corporate website: <http://www.duqmrefinery.om/pillar/community-engagement/>

email address: comms@duqmrefinery.om

Telephone: +968 2206 2700

Address: Muscat ExpressWay,
Al Rawaq Building 3rd Floor,
P.O. Box 144,
PC 102 Muscate Sultanate of Oman



The screenshot shows the website's navigation bar with the logo and menu items: ABOUT US, THE REFINERY, MEDIA CENTER, COMMUNITY, CAREERS, CONTACT, COMMERCIAL. A search bar is also present. The main content area features a large image of men in traditional Omani attire, with the heading "Community Engagement" and a sub-heading "Stakeholder Engagement Programs". Below this, there is a "Grievance Mechanism Procedure" section. The footer contains links for WEB MAIL, SHAREPOINT, BRAND GUIDELINES, OMAN OIL, and KUWAIT PETROLEUM INTERNATIONAL, along with social media icons and a newsletter sign-up form.

Figure 1: A screen of DRPIC Corporate Contact Website

During EPC, an office will be established where individuals may lodge a grievance verbally, or in writing using the form in Appendix A.

Valid anonymous responses will be posted on bulletin boards located in the office as appropriate. Anonymous grievances are not expected to be common due to the community structure in the area.

Workforce grievances or feedback to be handled through anonymous locked drop boxes in worker accommodation and canteens, or through a system designed by the EPC contractor in accordance with their welfare plans. Bulletin boards will be used to post responses to anonymous complaints as appropriate.

All forms will be in Arabic and English. For EPC Contractors, forms should be in the language understood by its workforce as well as Arabic and English. The Government and Community Relations team will speak both Arabic and English. The DRPIC website can be viewed in both languages.

4.2 Grievance Handling and Resolution

Grievances should be handled according to the following steps:

1. The Government and Community Relations team will learn as much as possible about the case, including:
 - Who?
 - What?
 - Where?
 - When?
 - Why?
2. DRPIC shall acknowledge receipt of any grievance as soon as possible, but up to seven days from the date it was submitted and shall inform the complainant about the timeframe in which a response can be expected. For reasons of confidentiality and to protect the safety and security of DRPIC personnel, the contact details of individual staff members will not be released to external parties/complainants.
3. The findings of the all investigations will be entered into the grievance file and used to determine eligibility (see above Grievances to be Directed Outside of the DRPIC Grievance Procedure). If the Grievance is considered to be ineligible the Government and Community Relations team will contact the complainant within 3 working days and explain that the complaint was not recognised as eligible.
4. For all types of Grievances, the Government and Community Relations team will listen attentively to the person while he/she expresses his/her grievance. In many cases, simply listening with empathy helps to calm the situation.
5. During this first meeting if the grievance is resolved, the case is considered closed and it is registered as such.
6. If a grievance is more complex, DRPIC and/or the contractor conduct an investigation to verify whether the grievance is genuine as related to project commitments. This is

done in the presence of the person or the representatives of the local community lodging the grievance. DRPIC will investigate fully all grievances submitted, and will involve other departments, contractors and senior management as required in the process in order to fully understand the circumstances that led to the grievance being raised. This should be performed in a timely manner to avoid delaying the resolution of a grievance. DRPIC will aim to resolve any grievances within 30 days from the date that it was received. This timeframe can be extended to 60 days for more complex grievances, if required.

7. The local authorities and/or representatives may be invited to attend the investigation if the grievance warrants their involvement.
8. The Government and Community Relations team will communicate and explain the grievance to the appropriate person in DRPIC or in the Contractor organisation.
 - Example, if the grievance involves one of the workers, they will contact the head of human resources of his/her company, and also his/her direct supervisor, as well as the worker himself/herself. If the complaint is environmental in nature it will be reviewed by an environmental professional within the team and so on.
9. The Government and Community Relations team will consult other departments to determine the practical corrective action(s) or mitigation of the grievance.
 - nature of the corrective action;
 - time in which it must be implemented;
 - person responsible for implementation; and,
 - log information in the Grievance Registry.
10. Contractors responsible for constructing the DRPIC facilities and ensuring compliance with construction related environmental and social commitments:
 - consider proposed solutions with their construction team for agreement and execution;
 - notify and discuss proposed corrective actions with DRPIC Government and Community Relations team and Construction Management and the party that raised the grievance within 7 days and agree an implementation schedule;
 - obtain written authorisation to proceed with the corrective actions, as needed, e.g. repair third party infrastructure etc; and,
 - execute corrective actions under supervision of DRPIC the Government and Community Relations team.
11. DRPIC and/or the contractor implement this solution.
12. If the complainant accepts the corrective actions, they sign a letter of acceptance and the grievance is closed subject to a 15 days monitoring period.
13. If the proposed solution or executed solution is not accepted by the complainant, the grievance is elevated to a Grievance Review Committee (Section 4.3).
14. DRPIC and/or the Contractor Government and Community Relations team will consider if refinements to procedures or practices could reduce the probability of recurrence. DRPIC coordinates any changes to plans, procedures and methods with the Contractors within contractual restrictions.

4.3 Grievance Review Committee (GRC)

The GRC will be set up by DRPIC to address complaints as a result of the project implementation. The GRC will include the Government and Community Relations team leader, representatives from DRPIC, local wilayat, EPC Contractors and at least two representatives from local communities. A coordination of resolutions within the GRC will be the Government and Community Relations team's responsibility.

All grievances shall be dealt with on a case by case basis. However, all will require further discussions with complainants and community members to mitigate perceptions that resolutions unfairly benefit DRPIC.

If attempts to resolve a grievance through the steps in Section 4.2 above do not result in an acceptable grievance resolution, the grievance may be elevated by the Government and Community Relations team to a specially-formed grievance committee. The committee may include local representation from the Wali and / or authorities (e.g. SEZAD), with a defined chair.

Documentation pertaining to an unresolved grievance will be given to the Chair of the Committee, who will seek and give opinion about how to resolve the case and who will attempt to resolve the case through conciliation.

As a last resort, aggrieved parties have a right to take legal action. This is a more formal rights based approach that shall only be taken if all other approaches have failed or when there are serious conflicts about facts and data. The final decision will be taken by the arbitrator or courts based on compliance with laws, policies, standards, rules, regulations, procedures, past agreements or common practice.

4.4 Grievance tracking

Once a verbal or written grievance is received, it will be screened for validity (e.g. to ensure that nothing is blatantly false) and logged into a central grievance mechanism database within 3 business days. An extract of the database can be found in Appendix B. Grievances shall be assigned a case number and records of communication/consultation shall all be attached with the relevant entry and filed. The database shall be monitored regularly for recurring grievances so that appropriate mitigation can be developed.

Grievances will be categorised into the aspect it relates to such as the type of activity, geographical area (e.g. Ras Markaz, Pipeline, Camps, Refinery, Liquid Terminal), which EPC contract it covers (EPC1, EPC2 or EPC3 where applicable), HSES Management System Element, or overall Project Environmental and Social Performance.

DRPIC anticipates that the following direct impact grievances could be categorised as follows:

- Possible impacts on marine life
- Possible impacts on fish and fisheries catch
- Job issues
- Third party injuries or conflicts
- Damages to infrastructure
- Loss of livestock (goats, camels)

- Damage and temporary interruption of access roads
- Road congestion
- Nuisance caused by noise or dust
- Unplanned use of land
- Environmental issues (soil and water contamination, erosion, damage to wildlife or vegetation, hunting and fishing, improper right of way restoration etc)
- Behaviour of personnel
- Community health and safety
- Cultural issues.

Categorising grievances will allow DRPIC to establish trends and adapt its own, and Contractor's management system where needed to improve environmental and social performance and reduce the overall number of grievances resolved.

If a grievance is the result of a non-compliance to project environmental and social project commitments and could result in harm to people or serious environmental impact, the Government and Community Relations team will consult directly with the Construction Management Team and CSR Manager and may recommend a temporary suspension of an activity. Any member of staff or contractor has the right to refuse or stop work that is unsafe.

Should DRPIC receive a grievance that is not related to DRPIC-executed projects but within the larger SEZAD area, it will be forwarded to SEZAD for them to coordinate a response with the appropriate third party. The complainant will be informed accordingly. These grievances will not be tracked.

In addition to categorising a grievance, the following information will also be collected in a standards format:

- Name, address, contact number, place or community of residence.
- When and where the grievance was received.
- Name of the Government and Community Relations team members who received the grievance.
- Basic information about the party making the grievance for providing feedback.
- Corrective actions and dates when they were initiated and completed;
- Dates when the required notifications and feedback were given to the affected party
- Date when all parties agreed the grievance was closed-out.

It is voluntary for the individual making the grievance to provide personal information.

4.5 Grievances Outside of the DRPIC Grievance Procedure

Following best practice, all grievances and claims from local communities should be accepted and no judgment made prior to investigation, even if complaints are minor. However, several types of grievances deserve special consideration and possible redirection to other grievance resolutions channels, such as:

- **Complaints clearly not related to the Project:** It is sometimes difficult to determine which issues are related to the project and which are not. If in doubt, employees designated to receive grievances should accept the complaint and assess its

legitimacy. Making upfront agreements with communities as to which types of claims are and are not project-related will help avoid misunderstandings in individual cases.

- **Complaints constituting criminal activity and violence:** In these cases, complainants should be referred to the formal justice system.
- **Commercial disputes (i.e. CONTRACTOR not paying to third parties):** Commercial matters should be stipulated for in contractual agreements and issues should be resolved through a variety of commercial dispute resolution mechanisms or civil courts.
- **Issues related to Governmental policy and Government institutions:** It is not uncommon for communities to use company grievance mechanisms to bring complaints related to aspects of project implementation that are a responsibility of, and implemented by, public institutions and their officials—for example, issues related to the resettlement process handled by local governments for the project needs. The private sector is not obliged to address such complaints. Communicating clearly to local communities about the role, responsibilities, and limitations of the DRPIC Grievance Mechanism is a must, but it may not suffice in practice. Governments may not have enough capacity (either resources or processes) to handle grievances, or they may be inaccessible to affected communities. At a minimum, such grievances can be captured through the DRPIC system, and then COMPANY may choose to pass the grievances to authorities and let the communities know how to follow up.

5 GRIEVANCE PROCEDURE FOR WORKERS [HOLD PENDING HC REVIEW]

In parallel to the Grievance Mechanism for external individuals and communities, COMPANY will ensure that a mechanism is in place to manage the grievances raised by the project workers (including, but not limited to, reporting of HSE issues to the DRPIC management) that is in line with both Omani legislation as well as IFC Performance Standard 2, Labour and Working Conditions.

Grievances from the COMPANY-employed workers working on all Project construction sites will be managed directly by DRPIC in coordination between the Government and Community Relations team and HSE Department (for HSES issues) and the Human Capital Department (for labour and working or accommodation issues).

At the same time, grievances from workers employed directly or indirectly by CONTRACTORS and subcontractors will be managed by each responsible party, the overall performance of which will be reported to DRPIC Management on a regular basis.

The principles underlying the Grievance Mechanism for (CONTRACTOR-employed) workers are the same as the ones for external parties/stakeholders. In addition, workers will be guaranteed that the use of the grievance mechanism will not affect in any way their retribution or working rights.

The grievance mechanism for workers will follow the same steps, as outlined in this Grievance Management Procedure in accordance with Omani Labour Law and will be the responsibility of CONTRACTOR' Human Resources Departments, including:

- Disclosure of the Grievance Procedure for workers.
- Receiving and recording worker-related grievances.
- Assessment and investigation of such grievances.
- Developing Resolution and Response to the complainant.
- Regular reporting to COMPANY.
- Close out of the complaint.

Worker grievances should be kept as confidential as possible, particularly in cases of alleged bullying, harassment or whistleblowing.

Workers raising a grievance in good faith shall not be subject to any form of retaliation. Examples of such possible grievances or concerns include possible violations of policies, rules, or legal requirements relating to HSSE&S issues, and responsible operations.

6 CONSULTATION AND DISCLOSURE

The disclosure of this procedure is done through the corporate website. A simplified summary procedure will be documented in the Project Offices and the Government and Community Relations team will be well versed and trained in the Grievance Procedure. Contractors should train their personnel on how the DRPIC grievance procedure must be followed. The procedure and forms should also be easily accessible and the same forms will be used by all EPC Contractors to ensure consistency of collecting and analysing received grievances.

During Stakeholder Engagement sessions and community engagement meetings, the grievance process will also be explained.

7 VERIFICATION AND MONITORING

DRPIC will carry out monitoring to ensure that Contractor and subcontractors are adhering to the requirements and commitments contained in the DRPIC's Management Plans and Contractor Implementation Plans. All monitoring requirements shall be established within the Contractor Plans with details of resources, monitoring, and assurance methods included within the Contractor's ESMS.

This entails good record keeping of complaints raised throughout the life of the construction and operation of the Project. On receipt of grievances, electronic notification to management must be distributed. Grievance records must be made available to management at all times.

Monthly internal reports will be compiled by the Government and Community Relations Team leader, supported by CLOs as required and distributed to the management team. These grievance reports will include:

- The number of grievances logged in the proceeding period by level and type (with further details of the location of the incident/issue).
- The number of stakeholders that have come back after 15 days of monitoring period stating they are not satisfied with the resolution.
- The number of grievances unresolved – by type - after 30 days for relatively straightforward grievances and 60 days for complicated cases.
- The number of grievances resolved after 30 days, without accessing legal or third party mediators, by level and type

- The number of grievances of the same or similar issue
- DRPICs' responses to the concerns raised by the various stakeholders.
- The measures taken to incorporate these responses into project implementation.

These reports and other records will be made available for external review if required.
EPC Contractors shall also submit monthly reports aligned to the DRPIC reports.

An appropriate grievance report should be part of DRPIC's annual reporting. Annual reports will be made available to the public (through the DRPIC website).

APPENDIX A – Grievance Form - Sample

GRIEVANCE ACTION FORM			
PART A	LOCATION:	COMPLAINT NUMBER (to be taken from the Consultation Tracking Database)	DATE RECEIVED:
Name:		Method of Response Verbal (in person) <input type="checkbox"/> Verbal (telephone) <input type="checkbox"/> Written (personally handed) <input type="checkbox"/> Written (Emailed / Mailed) <input type="checkbox"/> Written (notice board / Wali / SEZAD) <input type="checkbox"/>	
Address			
Contact Method / #:			
PART B COMPLAINT¹			
Name:..... Signature:..... Date:.....			
PART C RESPONSE FROM DRPIC²			
Name:..... Signature:..... Position:..... Date:.....			
PART D VERIFICATION OF RESPONSE AND CORRECTIVE ACTION (IF REQUIRED)			
Follow-up Details: Closed Out:..... Signature:..... (Date)			
PART E ACKNOWLEDGE RECEIPT OF RESPONSE¹			
Name:..... Signature:..... Date:.....			

APPENDIX B- Grievance Database Template

No.	Case	Date	Name	Organization	Contact	Description	Method	Action / Main Outcome	Responsible	Result / Follow Up Action	Target Completion Date (DD Month YYYY)	Actual Completion Date	Status	ISSR Report	Phase	Year	Case Completion (Y/N)	Remark	
1																			
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			
10																			
11																			
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