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Abbreviations and Acronyms

Abbreviations	Meaning
AH	Affected Household
AIIB	Asian Infrastructure Investment Bank
CGM	Community Grievance Mechanism
CDO	Community Development Officer
COD	Commercial Operation Date
CPC	Commune People's Committee
CLO	Community Liaison Officer
CSR	Compensation, Support and Resettlement
DONRE	Department of Natural Resources and Environment
EDPR	EDP Renewables
EIA	Environmental Impact Assessment
EPP	Environmental Protection Plan
ERP	Emergency Response Plan
E&S	Environmental and Social
ESP	Environmental and Social Policy
ESS	Environmental and Social Standard
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMR	Environment & Social Monitoring and Reporting
ESMS	Environmental and Social Management System
FPICon	Free, Prior and Informed Consultation
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
GRU	Grievance Redress Unit
IAM	Independent Accountability Mechanism
IFC	International Finance Corporation
IP	Indigenous Peoples
JSC	Joint Stock Company
LEP	Law on Environmental Protection
LFDC	Land Fund Development Center
O&M	Operational and Maintenance

Abbreviations	Meaning
PAP	Project Affected Person
PC	People's Committee
PPA	Power Purchase Agreement
PPC	Provincial People's Committee
PPM	Project-affected People's Mechanism
PS	Performance Standard
PV	Photovoltaic
RP	Resettlement Plan
RPF	Resettlement Planning Framework
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
UN	United Nations
WTP	Water Treatment Plant

1 Introduction

1.1 Background

EDP Renewables (“EDPR”), a global leader in the renewable energy sector and one of the world's largest renewable energy producers, is operating two Xuan Thien Thuan Bac solar farms in Bac Phong Commune, Thuan Bac District, Ninh Thuan Province, Viet Nam through EDP Renewables Vietnam Co., Ltd (hereinafter referred to as “the Project Sponsor”) and two special purpose vehicle (SPV) companies. The Xuan Thien Thuan Bac project (hereinafter referred to as “the Project”) consists of two development phases, namely Xuan Thien Thuan Bac – Phase 1 and Xuan Thien Thuan Bac - Phase 2 (hereinafter referred to as “the Project Phases”), with total capacity of 200 MW_{AC}, are currently operated by two Project SPV companies, i.e., Xuan Thien Ninh Thuan Joint Stock Company and Xuan Thien Thuan Bac Joint Stock Company (JSC) (hereinafter referred to as “the Project Owners”), respectively.

SMEC Vietnam Joint Stock Company (“SMEC”) was commissioned by the Project Sponsor and the Project Owners in August 2023 to conduct an independent Environmental and Social Due Diligence (“ESDD”) assessment to review the Project environmental and social (“E&S”) performance against Asian Infrastructure Investment Bank (AIIB) Environmental and Social Policy (ESP) and the International Finance Corporation (IFC) Performance Standards (PS) on Environmental and Social Sustainability. The Service also includes the development of a Stakeholder Engagement Plan (“SEP”) for the Project.

This SEP has been prepared for the Project to outline the proposed methodology for stakeholder engagement throughout the lifecycle of the Project, with a specific emphasis on the guidelines of international best practice (i.e., as set out in the AIIB ESP and IFC PS) and Vietnamese regulations. As the SEP will remain relevant throughout the lifetime of the Project, it will serve as a reference document but will require updating as project circumstances or stakeholder dynamics evolve. The Project Owners are committed to thorough and continuous disclosure activities and continuous engagement throughout the Project lifecycle.

1.2 Project Description

The Xuan Thien Thuan Bac solar photovoltaic (PV) project was developed with a total capacity of 200 MW_{AC} to supply electricity to national grid. The Project consists of two development phases: Phase 1 with a design capacity of 125 MW_{AC} and Phase 2 with a design capacity of 75 MW_{AC}. The Project is located in My Nhon Village, Bac Phong Commune, Thuan Bac District, Ninh Thuan Province, Viet Nam, which is a rural area, located approximately 15 km from the Phan Rang – Thap Cham City.

1.2.1 Key Characteristics and Components

Xuan Thien Thuan Bac – Phase 1 (“the Project Phase 1”) comprises three land lots, in which land lot no. 1 (in the north) and land lot no. 3 (in the south) are installed with solar panels and inverters and land lot no. 2 (in the middle) is installed with common facilities (e.g., 33/220 kV substation, administration building, warehouse, workshop, guard house). Xuan Thien Thuan Bac – Phase 2 (“the Project Phase 2”) has only one land lot (adjacent to the land lot no. 1 of Thuan Bac 1) installed with solar panels and inverters. Figure 1-1 presents location of the two Project phases in Bac Phong Commune. The nearest residential area is My Nhon village, Bac Phong Commune, which is located about 3 km to the south of Project sites.

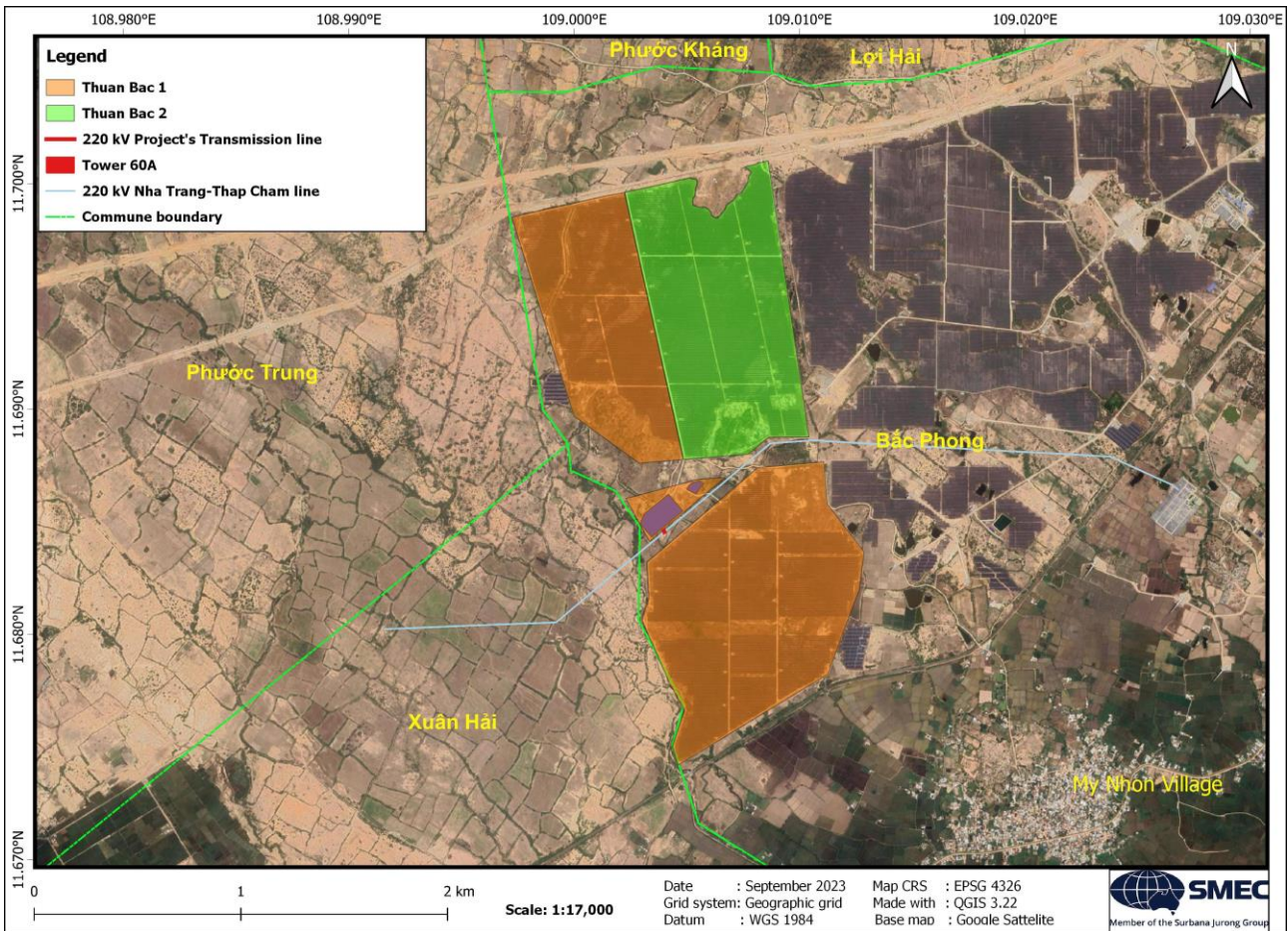


Figure 1-1: Location of the Projects

Key characteristics and components of the two Project Phases are summarized in Table 1-1 below.

Table 1-1: Key Characteristics and Components of the Two Solar PV Project Phases

Item	The Project Phase 1	The Project Phase 2
Project owner	Xuan Thien Ninh Thuan JSC.	Xuan Thien Thuan Bac JSC.
Project location	My Nhon Village, Bac Phong Commune, Thuan Bac District, Ninh Thuan Province	My Nhon Village, Bac Phong Commune, Thuan Bac District, Ninh Thuan Province
Project area	169.13 ha, including three land lots: 1) Land lot no. 1 (north): 62.84 ha; 2) Land lot no. 2 (middle): 6.12 ha; and 3) Land lot no. 3 (south): 100.17 ha.	One land lot of 85.83 ha
Project capacity	Design capacity: 125 MW _{AC}	Design capacity: 75 MW _{AC}
Project key components	Panel and inverters: 387,774 panels (monocrystalline type) with total established capacity of 158,878 kWp; <ul style="list-style-type: none"> • 154,980 panels (385 Wp); • 178,119 panels (425 Wp); • 54,675 panels (430 Wp); 27 inverter stations:	Panel and inverters: 231,282 panels (monocrystalline type) with total established capacity of 95,939 kWp; <ul style="list-style-type: none"> • 78,030 panels (385 Wp); • 153,252 panels (430 Wp); 16 inverter stations:

Item	The Project Phase 1	The Project Phase 2
	<ul style="list-style-type: none"> 24 inverter stations (each station includes three inverters (capacity of 1563 kW) and one transformer of 5070 kVA); Two inverter stations (each station includes two inverters (capacity of 1563 kW) and one transformer of 3380 kVA) One string inverter station (includes 36 string inverters (capacity of 168 kW) and one transformer of 6280 kVA) 	<ul style="list-style-type: none"> 16 inverter stations (each station includes three inverters (capacity of 1563 kW) and one transformer of 5070 kVA);
	<p>Substation: 33/220 kV with capacity of 100-150 MVA</p> <p>Transformer T1: 225±8x1.25%/33 kV-150 MVA</p> <p>Transformer T2: 225±8x1.25%/33 kV-100 MVA</p>	
	<p>Transmission line (T-line)</p> <p>220 kV transmission line (double circuit, ACSR-400/51) with the length of 50 m; connecting from Xuan Thien Thuan Bac substation 33/220 kV to new tower 60A (between tower 60 and 61) of 220 kV Nha Trang – Thap Cham transmission line.</p>	
	<p>Administration Office and Staff housing complex</p> <p>The office and staff housing complex comprise two one-storey buildings with total area of 470 m² and located within the land lot no. 2 of the Project Phase 1.</p>	
Associated facilities	There are no associated facilities which are planned and developed for the development of the two Project Phases.	

1.2.2 Project's Land Use

The two Project Phases have a total footprint of 255.51 ha for solar farms and ancillary facilities including substation, administration buildings, warehouse, and the 220 kV T-line. Table 1-2 presents the details of Project land use:

Table 1-2: Project Land Use

Item	Land Area	Land Acquisition Status
The Project Phase 1 solar farm	163.01 ha, consisting of two plots: <ul style="list-style-type: none"> Lot no. 1 (north): 62.84 ha; Lot no. 3 (south): 100.17 ha. 	<ul style="list-style-type: none"> The whole area took up a total of 254.96 ha of land, which was previously owned and managed by 160 households (HHs) and Bac Phong CPC. The overall land acquisition was a government-led process, commenced in June 2018 and completed in October 2020. Land Use Right Certificates (LURCs) for all plots were obtained on 30 March 2021 with leasing term up to April 2068.
The Project Phase 2 solar farm	85.83 ha	
Substation, administration buildings, warehouse	6.12 ha (Lot no. 2 of the the Project Phase 1)	

Item	Land Area	Land Acquisition Status
220kV T-line – Tower 60A footprint	0.55 ha	<ul style="list-style-type: none"> About 0.55 ha of land was leased by a local household to build the Tower 60A. Land lease agreement was signed on 5 September 2022 with leasing term up to October 2064.
220kV T-line – Safety corridor	N/A	<ul style="list-style-type: none"> The T-line safety corridor is located within the Project fence (Lot no. 2); hence, no additional land acquisition and land use restriction is required.

Source: LURCs of the Project Phase 1, the Project Phase 2, Land lease agreement for Tower 60A and interview with Project representatives.

It is noted that during construction and operation phases, the Project mainly use the existing Ba Thap – Suoi Le inter-commune road to access the Project sites. According to the Project Site representatives, the Project Owners have collaborated with the local authorities to expand and upgrade a part of the rural concrete road to support the transportation of the construction materials and equipment during construction phase. No additional land acquisition from local people was required for the road expansion and upgrade.

1.2.3 Project Milestone

The Project has been commenced since 2018 and put in commercial operation since April 2020. Key milestones of the two Project Phases are summarized in Table 1-3 below.

Table 1-3: Key Project milestones

Item	The Project Phase 1	The Project Phase 2
Preparatory stage		
Approval of Investment Policy	23 April 2018	23 April 2018
Preparation of Feasibility Study	25 April 2018 – 28 May 2019	25 April 2018 – 28 May 2019
Approval of EIA/EPP	EIA approval on 28 August 2018	EPP registration on 17 September 2018
Signing of Power Purchase Agreement (PPA)	18 December 2018	18 December 2018
Pre-construction stage		
Unexploded ordnance (UXO) survey	06 September 2018 – 06 October 2018	07 October 2018 – 27 October 2018
Land acquisition	June 2018 – October 2020	June 2018 – October 2020
Appraisal of technical design	22 May 2019	22 May 2019
Construction stage		
Construction	20 November 2018 to 18 Feb 2020 (bays 371, 373, 375, 377) and 15 June 2020 (bay 379)	20 November 2018 – 17 Feb 2020
Testing and Commissioning	13 Feb 2020 to 11 April 2020 (bays 371, 373, 375, 377) and 25 June 2020 (bay 379)	14 Feb 2020 – 16 April 2020
Operation stage		
Commercial operation date (COD)	11 April 2020 (bays 371, 373, 375, 377)	11 April 2020

Item	The Project Phase 1	The Project Phase 2
	23 June 2020 (bay 379)	

1.3 Objectives of SEP

The main objectives for this SEP are as follows:

- Identify individual stakeholders and stakeholder groups that could be affected or may have an interest in the Project;
- Identify the interests, concerns and needs of stakeholders;
- Distribute accurately the Project information to stakeholders;
- Ensure that such stakeholders are appropriately engaged and are able to input on the Project operation through a process of information disclosure and meaningful consultation on environmental and social issues that could potentially affect them;
- Establish and maintain a cooperative approach with local authorities such that local regulatory processes can be followed and information regarding the Project can be disseminated in a manner that is consistent with good international industry practice (GIIP);
- Maintain a constructive relationship with stakeholders on an on-going basis through meaningful engagement during Project implementation; and
- Provide a grievance mechanism to allow communities and other stakeholders to register complaints, queries or comments and have them addressed in a timely manner by the Project.

This SEP is developed to guide the appropriate stakeholder engagement process for the Project following the best practice requirements outlined in the IFC Handbook on Stakeholder Engagement, which provides a typical benchmark for stakeholder engagement within the financial industry for project finance lenders. The development of the SEP and grievance mechanism will be gender-inclusive, taking into account the issues identified through participatory and gender-inclusive stakeholder engagement.

1.4 Scope and Applicability

The SEP is a living document and will be utilized throughout the lifecycle of the Project to guide the necessary engagement with identified stakeholders at the various project phases. In this instance, the SEP cannot be considered definitive for the lifetime of the project. As such, the SEP will need to be reviewed as the Project progresses and should be updated as necessary to reflect any changes (e.g., new requirements, new affected stakeholders, reviews of techniques, changes to engagement methods, and changes of relevant personnel).

This version of the SEP has been prepared at the Project operation. Despite previous engagement and consultation being undertaken to date (to be presented in the Section 3 of this SEP), this plan represents the first time that such methods and processes have been fully outlined in a document. Given the status of the Project, this SEP has therefore been prepared to guide the immediate stakeholder engagement at the operation phase. Engagement regarding resettlement and compensation has been provided as an overview, as this aspect of the Project is required to be undertaken by the government in Viet Nam.

1.5 Structure of this Report

This report includes the following sections:

- Section 1 – Introduction
- Section 2 – National regulation and applicable standards
- Section 3 – Stakeholder engagement completed Pre-SEP
- Section 4 – Project stakeholders
- Section 5 – Stakeholder engagement program
- Section 6 – Grievance Redress Mechanism

- Section 7 – Resource and budget
- Section 8 – Monitoring and reporting

2 National Regulations and Applicable Standards

The SEP is a component of the Environmental and Social Management Plan (ESMP) that will guide the Project's implementation through its different stages. This SEP is prepared in accordance with the national regulations and international standards including the AIIB ESP and IFC PS. It also follows the EDP Group's guidance for stakeholder engagement as specified in the EDP Group Stakeholders Relationship Policy, the EDP Group Stakeholders Management Methodology Guide and the EDP Group Local Stakeholders Engagement Policy. Vietnamese regulations require public consultation to be conducted at the regulatory Environmental Impact Assessment (EIA) stage, whilst the AIIB's ESP and IFC PS highlight the need for ongoing and appropriate communication and information disclosure between the developer and stakeholders through all stages of a project's lifecycle. The SEP will also include a grievance mechanism that provides a process for managing complaints and grievances received by external stakeholders. The grievance mechanism will be aligned with the Effectiveness Criteria for non-judicial grievance mechanisms as described in Principle 31 of the United Nations (UN) Guiding Principles on Business and Human Rights.

This Chapter sets out the regulatory requirements and standards relevant to the involvement of stakeholders and grievance redress mechanism in the Project.

2.1 Vietnamese Regulations

There are no requirements in Viet Nam that require the preparation of a specific SEP document to guide the ongoing engagement process throughout a project. Despite this, various requirements and guidelines at other project stages outline the need for engagement in some respects.

2.1.1 Information Disclosure and Consultations

According to the Project screening results, which were evaluated against the requirements of the Law on Environmental Protection (LEP) (2014) and Decree No. 18/2015/ND-CP, the Project Phase 1 must prepare a local regulatory Environmental Impact Assessment (EIA) to obtain environmental approval from Ninh Thuan Provincial People's Committee (PPC) while the Project Phase 2 must conduct registration of a local Environmental Protection Plan (EPP) to Ninh Thuan Province's Department of Natural Resources and Environment (DONRE).

Requirements for consultation during the regulatory EIA process are stipulated in Article 21 of the LEP 2014 and regulated in detail in Article 12 of Decree No. 18/2015/ND-CP dated 14 February 2015 of the Government detailing some articles of the LEP 2014. Some key regulations on the consultation process are:

Stakeholders to be consulted include:

- a) authorities and organizations directly affected by the project, and
- b) communities directly affected by the project.

Forms of consultation include:

- **With authorities and organizations directly affected by the Project:** the project owner shall send a local EIA report to the People's Committee of the Communes (CPC) where the project is located and the directly affected organizations (e.g., manufactories, co-operatives) together with a written request for opinions of the authorities and organizations. The CPCs and organization directly affected by the project shall reply in writing to the project owners within the prescribed time limit.
- **With communities directly affected by the Project:** Consultation with the directly affected communities shall be carried out in the form of a community consultation meeting co-chaired by the project owner and the People's Committee of the Commune where the project is located. All opinions of audiences attending the meeting, including representative of the Commune's Fatherland Front, political-social organizations and local communities, must be sufficiently and honestly stated in the meeting minutes. Separate community consultation meetings are sometimes conducted for different affected communes.

Contents of consultation during the EIA process include:

- Location of the investment project;
- Environmental impact of the investment project;
- Measures to minimize adverse impacts on the environment;
- Environmental monitoring and management program; plans for prevention and response to environmental incidents; and
- Other contents related to the investment project.

In principle, consultation is considered an essential step during the EIA development, which provides important inputs for the impact assessment and comes up with solutions to minimize the impacts of the investment project on the environment.

After the local EIA approval, the project owner shall undertake a public disclosure of the project's environmental management programme at the headquarter of the People's Committee of Communes where the local EIA's consultation was held in accordance with the Article 16 of Decree No. 18/2015/ND-CP.

There is no requirement for stakeholder consultation and information disclosure when a project enters the construction and operation phases.

2.1.2 Grievance Management

The national regulations relating to grievance management are listed below:

- *Law on Complaints 2011* issued by the National Assembly on 11 November 2011 and taken into effect from 01 July 2012 provides the framework for grievances and the settlement of grievances against administrative decisions or acts of state administrative agencies; or competent persons in these agencies, grievances and the settlement of grievances. These grievances related to disciplinary decisions against cadres; civil servants, reception of citizens, management, and supervision of complaint settlement work.
- *Law on Administrative Procedures 2015* issued by the National Assembly on 25 November 2015, and taken into effect on 01 July 2016, prescribes the fundamental principles in administrative procedures; tasks, powers, and responsibilities of procedure-conducting agencies and persons. It also provides the rights and obligations of procedure participants and related agencies, organizations, and individuals. Besides, it contains the order and procedures for instituting lawsuits, settling administrative cases, executing administrative judgments and settling complaints, and denunciations in administrative procedures.
- *Civil Procedure Code 2015* issued by the National Assembly and taken into effect on 01 July 2016, provides the basic principles in civil proceedings. It also contains the order and procedures for initiating lawsuits at the People's Court to settle civil cases such as marriage and family, business, trade, and labor, including grievances on environmental pollution between individuals and organizations.
- *The former Law on Environmental Protection 2014 and the current Law on Environmental Protection 2020* regulates that organizations and individuals have the right to complain about violations of the LEP by agencies, organizations, and individuals by law. Individuals have the right to denounce violations of the LEP to competent agencies or persons following the law on denunciations.
- *Land Law 2013* issued by the National Assembly on 29 November 2013 prescribes the land ownership, powers, and responsibilities of the State in representing the entire-people ownership of land and uniformly managing land, the land management and use regimes, and the rights and obligations of land users in the territory of Viet Nam. The Law also states that organizations and individuals affected by land acquisition may file lawsuits about land acquisition following the law on complaints.
- *Circular No. 07/2014/TT-TTCP* issued by the Government Inspectorate on 31 October 2014 and taken into effect on 15 December 2014 prescribes the process of receiving, categorizing, investing, and resolving community grievances.

If a person has a grievance, first they must submit it to local authorities at the commune level. If their grievance cannot be solved at that level, they are entitled to a second and third submission to higher administrative level authorities (District People's Committee (PC)/Court and Provincial PC/Court). There is no specific legal procedure designating the project owner's responsibility to collect and address grievances raised by the communities concerning the project's impacts.

2.2 AIIB Environmental and Social Policy on Stakeholder Engagement and Grievance Mechanism

The AIIB's ESP (2022) consolidates the following requirements on information disclosure, consultation and grievance redress mechanism:

Information Disclosure

The AIIB requires the Client to disclose the project's available environmental and social information in accordance with Environmental and Social Standard (ESS) 1 about the environmental and social risks and impacts in the Project area during preparation and implementation. The disclosure shall be done in a timely, accessible, gender sensitive and inclusive and culturally appropriate manner and location, and in a form and language(s) understandable to the Project-affected people, other relevant stakeholders who may have specific needs (related to disability, literacy and/or language). The objective of the disclosure is to provide these stakeholders with an opportunity to broadly identify and address the Project's environmental and social risks and impacts, including those involving Involuntary Resettlement, Indigenous Peoples and community health and safety aspects, so they can provide meaningful inputs into the design and implementation of the Project.

The project's environmental and social information to be disclosed include:

- Draft and final environmental and social documentation: draft and final environmental and social assessment reports and the documents required to complement these reports, such as the environmental and social impact assessment (ESIA), the environmental and social management plan (ESMP), the environmental and social management planning framework (ESMPF), the land acquisition and resettlement plan (LARP)/the land acquisition plan (LAP)/resettlement plan (RP), the land acquisition and resettlement planning framework (LARPF)/the land acquisition planning framework (LAPF)/resettlement planning framework (RPF), indigenous peoples plan (IPP)/indigenous people planning framework (IPPF), and/or other Bank-approved form of documentation.
- Information on project level-grievance redress mechanism (GRM) and applicable independent accountability mechanism (IAM).
- Any material changes to the disclosed environmental or social information for the Project.
- Environmental and Social Monitoring Reports required to be prepared by the Client under the above documentation.
- Bank Signage at Project Site.

Meaningful Consultation

The AIIB requires the Client to engage in meaningful consultation with Project-affected people and other stakeholders and facilitate their informed participation in the consultations during the Project's preparation and implementation. The consultation covers Project design, mitigation and monitoring measures, sharing of development benefits and opportunities on a Project-specific basis, and implementation issues. The Bank requires the Client to include a record of the consultations and list of participants in the environmental and social assessment documentation.

Meaningful consultation is an interactive process to provide information and facilitate informed decision-making that:

- a) begins early in the preparation stage of the Project to provide accurate information on the proposed Project, minimize misinformation and unsupported expectations, and obtain initial views on the Project;
- b) is carried out on an ongoing basis throughout the implementation and life cycle of the Project;
- c) is designed so that all relevant parties have a voice in consultation, including national and subnational governments, the private sector, nongovernmental organizations and people affected by the Project, including, as applicable, Indigenous Peoples;
- d) provides additional support as needed so that women, elderly, young, disabled, minorities and other vulnerable groups participate;

- e) provides timely disclosure of relevant and adequate information, including availability of the Project's GRMs and of the PPM or other Bank-approved IAM, which is understandable and readily accessible to the people affected by the Project and other relevant stakeholders;
- f) is undertaken in an atmosphere free of intimidation or coercion;
- g) is gender sensitive, inclusive, accessible, responsive and tailored to the needs of vulnerable groups; and
- h) enables the consideration of relevant views of people affected by the Project and other concerned stakeholders in decision-making.

The Client shall continue consultation with Project-affected people throughout Project implementation as necessary on issues related to environmental and social performance and implementation of the Project-level GRM.

Free, Prior and Informed Consultation with Indigenous Peoples

There is a wide spectrum of engagement levels when it comes to the different stakeholders. AIB ESS1 and ESS3 require that the Project engages in "free, prior and informed consultation (FPIC)" with and obtain the broad support of the affected Indigenous Peoples communities if activities under the Project would:

- a) have impacts on land and natural resources subject to traditional ownership or under customary occupation or use;
- b) cause relocation of Indigenous Peoples from land and/or limitations on access to natural resources subject to traditional ownership or under customary occupation or use; or
- c) have significant impacts on Indigenous Peoples' cultural resources".

ESS1 and ESS3 also recommend that the Project conducts a meaningful consultation process that results in the informed participation of the affected indigenous people (IP) communities. Meaningful consultation involves designing and implementation of consultation process that:

- Involves Indigenous Peoples' representative bodies and organizations (e.g., councils of elders, village councils or chieftains) and, where appropriate, other community members;
- Provides sufficient time for Indigenous Peoples' decision-making processes; and
- Allows for Indigenous Peoples' effective involvement in the design of Project activities or mitigation measures that may affect them either positively or adversely.

ESS3 also requires disclosure of the draft indigenous people plan (IPP), including documentation of the consultation process and the results of the social impact assessment in a timely manner in accordance with the applicable provisions of ESS 1. Adequate documented evidence of such engagement should be provided.

Project-level Grievance Redress Mechanism

The Bank require the Client to establish, in accordance with the ESP and applicable ESSs, a suitable Project-level GRM as early as feasible, to receive and facilitate resolution of the concerns of people who believe they have been adversely affected by the Project's environmental and social impacts and inform Project-affected people of its availability.

The GRM is scaled to the risks and impacts of the Project, and developed in such a manner that it does not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration or mediation procedures. The GRM may utilize existing formal or informal complaint-handling mechanisms, provided that they are properly designed and implemented, and deemed by the Bank to be suitable for the Project; these may be supplemented, as needed, with Project-specific arrangements.

The GRM is designed to address promptly Project-affected people's concerns and complaints under the Project, including gender-related concerns and complaints related to GBV, using an understandable and transparent process that is gender sensitive, culturally appropriate and readily accessible to all Project-affected people.

The GRM include provisions so that the concerns of the Project-affected people are brought to the attention of the GRM, and the GRM records, responds to, and resolves or escalates these concerns in a timely manner. In addition, the GRM include provisions to:

- a) protect complainants from retaliation, grant them confidentiality and enable them to remain anonymous, if requested; and
- b) protect those who defend the rights of complainants to make such complaints. Information on the availability of the PPM is provided in an accessible and understandable manner in locally appropriate language(s), including on the Client's (or beneficiary's) Project-related website.

The GRM shall provide for the maintenance of a publicly accessible case register and reports on grievance redress and outcomes, which are disclosed in accordance with the ESS 1.

The Project-level GRM shall be operational at latest by the time implementation of the relevant Project activities commences and for the duration of the Project.

AIIB's PPM

The communities and individuals who believe that they are adversely affected by the Project may submit complaints to existing project-level grievance redress mechanism or the AIIB's Project-affected People's Mechanism (PPM). The PPM has been established by the AIIB to provide an opportunity for an independent and impartial review of submissions from Project-affected people who believe they have been or are likely to be adversely affected by AIIB's failure to implement its Environmental and Social Policy in situations when their concerns cannot be addressed satisfactorily through Project-level Grievance Redress Mechanisms or AIIB Management's processes. For information on how to make submissions to the PPM, please visit: [Policy on the Project-affected People's Mechanism - Operational Policies & Directives - AIIB](https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-people-mechanism.html) (<https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-people-mechanism.html>).

2.3 IFC Performance Standards

All of the IFC Performance Standards reference stakeholder engagement and therefore require a level of engagement when each standard is triggered by a project. In particular, Performance Standard 1 (PS1) on "Social and Environmental Assessment and Management Systems" prescribes the principles in the Project's stakeholder engagement. It states that stakeholder engagement is the *"basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure, and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities. The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project's risks and adverse impacts, and the project's phase of development."*

Stakeholder Analysis and Engagement Planning

The IFC Performance Standards require clients to identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders. Where projects involve specifically identified physical elements, aspects, and/or facilities that are likely to generate adverse environmental and social impacts on Affected Communities, the client will identify the Affected Communities and will meet the relevant requirements described below.

The Performance Standards' guidance on stakeholder consultation state that the client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage and be tailored to the characteristics and interests of the Affected Communities. Where applicable, the Stakeholder Engagement Plan will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents.

Disclosure of Information

The IFC SEP requirements include the disclosure of relevant project information, to help Affected Communities and other stakeholders understand the risks, impacts, and opportunities of the project. The developer may therefore provide Affected Communities with access to relevant information on:

- The purpose, nature, and scale of the project;
- The duration of proposed project activities;
- Any risks to and potential impacts on such communities and relevant mitigation measures;
- The envisaged stakeholder engagement process;
- The grievance mechanism.

Consultations

The IFC guidance indicates that when Affected Communities are subject to identified risks and adverse impacts from a project, the developer will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the client to consider and respond to them. The extent and degree of engagement required by the consultation process should be commensurate with the project's risks and adverse impacts and with the concerns raised by the Affected Communities. Effective consultation is a two-way process that should:

- Begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise;
- Be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful, and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities; Focus inclusive engagement on those directly affected as opposed to those not directly affected;
- Be free of external manipulation, interference, coercion, or intimidation;
- Enable meaningful participation, where applicable; and
- Be documented.

Such requirements include the need to tailor the consultation to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups. If clients have already engaged in such a process, they will provide adequate documented evidence of such engagement

Informed Consultation and Participation

IFC PS1 requires that, for projects with potentially significant adverse impacts on Affected Communities, particularly the Indigenous Peoples, the Project will conduct an Informed Consultation and Participation (ICP) process that will build upon the steps outlined above in Consultation and will result in the Affected Communities' informed participation. ICP involves a more in-depth exchange of views and information, and an organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The consultation process should (i) capture both men's and women's views, if necessary, through separate forums or engagements, and (ii) reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate. The client will document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the Affected Communities, and will inform those affected about how their concerns have been considered.

External Communications and Grievance Mechanisms

Clients will implement and maintain a procedure for external communications that includes methods to:

- Receive and register external communications from the public;
- Screen and assess the issues raised and determine how to address them;
- Provide, track, and document responses, if any; and

- Adjust the management program, as appropriate. In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability

Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate the resolution of Affected Communities' concerns and grievances about the client's environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project and have Affected Communities as primary beneficiaries. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.

Ongoing Reporting to Affected Communities

The client will provide periodic reports to the Affected Communities that describe the progress and the implementation of the project's Action Plans on issues that involve ongoing risks or impacts on Affected Communities and on issues that the consultation process or grievance mechanism has identified as a concern to those Communities. If the management program results in material changes or additions to the mitigation measures or actions described in the Action Plans on issues concerning the Affected Communities, the updated relevant mitigation measures or actions will be communicated to them. The frequency of these reports will be proportionate to the concerns of Affected Communities, but it will not be less than once a year.

In addition, the IFC Performance Standards (2012) 4, 5, 7 and 8 are also considered in the development of this SEP. Below provides specific requirements for stakeholder engagement in the respective aspects:

Table 2-1: IFC Performance Standards Requirements for Stakeholder Engagement

Performance Standards	Key Requirements
PS 4: Community Health, Safety & Security	Where project activities pose risks or adverse impacts on the health and safety of affected communities, the developer is required to make available relevant information (including the details of an Action Plan), in an appropriate form, to affected parties and government authorities so that they can fully understand the nature and extent of these risks.
PS 5: Land Acquisition and Involuntary Resettlement	In such instances, the developer will undertake extensive consultation and negotiation with affected parties. Such communication will include transparent access to project-related information in a timely fashion to enable people to plan for the future. Public participation should include the establishment of appropriate representative forums through which resettlement and compensation are discussed. Most of this consultation is part of the Social Impact Assessment (SIA) and Resettlement Action Plan but it should be recognized as a component of the Public Consultation and Disclosure Plan. A grievance mechanism should be established to be consistent with Performance Standard 1 as early as possible in the project development phase.
PS 7: Indigenous Peoples	As required by IFC PS7, if a project involves with the Affected Communities of Indigenous Peoples, Informed Consultation and Participation (ICP) and Free Prior Informed Consent (FPIC) should be followed during and after the consultation with Indigenous Peoples (IP) prior to the commencement of any the Project's development on their ancestral land or using resources.
PS 8: Cultural Heritage	Where sites of cultural heritage are potentially impacted by the project, the developer should consult with local communities as well as relevant national authorities responsible for the maintenance of such sites.

2.4 EDP Local Stakeholders Engagement Policy

Within the scope of its interactions with different Stakeholders, EDP has a Policy of Local Stakeholders Engagement, with a focus on Local Communities (first version issued on the 26th June 2023), which guarantees cross-cutting principles that align EDP with society, with the adoption of well-defined rules that are transparent to all. The Policy aims to promote a culture of transparency, strengthen the relationship with local stakeholders, promote their effective and active engagement and minimize negative impacts in local communities, seeking the appropriate interaction between EDP and these entities. The importance of Local Stakeholder engagement means that they are considered in the decision-making process in projects promoted by EDP, in accordance with the existing segmentation and the published EDP Group Stakeholders Relationship Policy. The policy provides strategic guidelines to interact, engage and collaborate with local stakeholders, ensuring that EDP's internal channels reinforce communication and gather all information needed for a more appropriate evolution of the local engagement practices. It also requires periodic monitoring will be carried out, ensuring risk prevention and greater learning, from a global perspective of Community Rights respect.

All teams representing EDP, whether employees and suppliers must acknowledge that their behaviour has to be aligned with the ESG commitments the Group has taken. All suppliers must follow the same path, in accordance with the sustainability requirements practiced transversally in procurement and contracting. It is an objective of the EDP Group that the entire supply chain should be committed to this evolution.

A Procedure for Local Stakeholders Engagement establish the rules that ensure effectiveness in the implementation of this Policy, embodies the methodology for its application on a local scale, in the best interest of Community Rights. The Procedure replicates principles of stakeholder relationship management, namely:

- Understanding, by reading the context of each location;
- Communicating, by recognizing the local voices of the stakeholders involved;
- Trusting, by getting to know the characteristics of local stakeholders; and
- Collaborating, by establishing a network that enables the action plan to be speeded up and ill-feeling to be prevented

Procedure for Local Stakeholders Engagement is summarized as follows:

- i. Establishing the governance model defines the integration of the engagement of local scale stakeholders in the formal structure of EDP and its subsidiaries, with the appropriate human and financial resources;
- ii. Identifying Project stakeholders
- iii. Establishing the appropriate communication channels with local stakeholders. Listen and understand their position and expectation in respect of the project in detail;
- iv. Characterisation of stakeholders based on the results of stakeholders listening in order to engagement approaches in line with their respective profiles;
- v. Developing a Local Stakeholders Engagement Plan that will include voluntary and mandatory measures, and which must contain clear and consistent responses to the Stakeholders' expectations and needs, promoting proximity and trustworthy communication, creating shared value through collaboration;
- vi. Monitoring and Reporting of the stakeholder engagement activities; and
- vii. Establishing a Complaint Mechanism.

Action plan for stakeholder engagement according to project phase is summarised in the Figure 2-1 below:

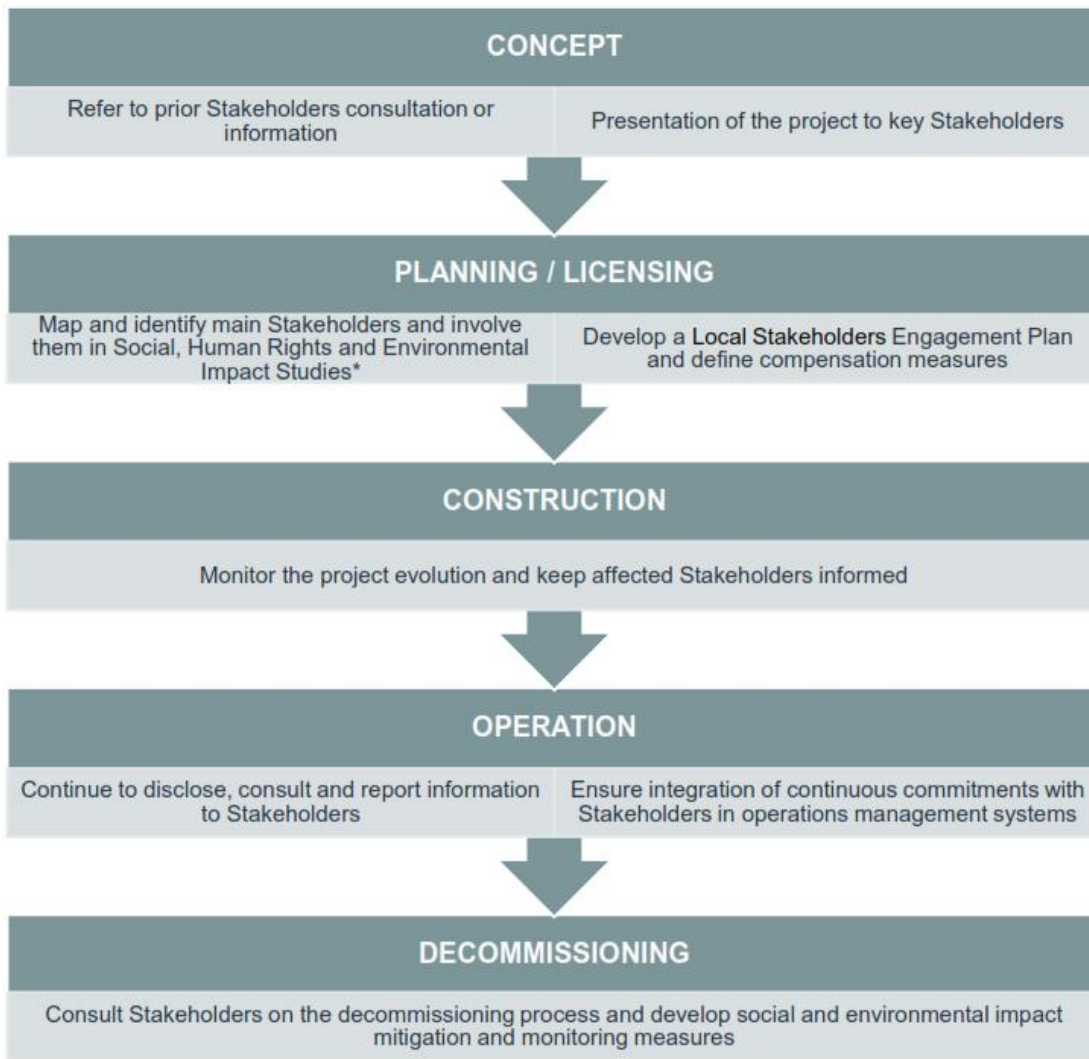


Figure 2-1: Summary of Stakeholder Engagement Approaches by Project Phases

Source: Procedure for Local Stakeholders Engagement (EDPR, 2023).

3 Stakeholder Engagement Completed Pre-SEP

This section summarises the previous engagement activities that have been undertaken prior to the development of this SEP in November 2023.

During the preparation stages, the Project has closely engaged with central and provincial relevant agencies to obtain required Project's licenses. The Project's previous engagement with local communities has been mainly done during the development of local environmental impact assessment (EIA), land acquisition and support, and direct interaction with local communities during construction phase. Such engagement has been undertaken directly or indirectly by several management functions including the government, local Compensation, Support and Resettlement (CSR) Council (for resettlement and compensation), previous project investors, and current project investors.

3.1 Stakeholder Engagement during local EIA development

As required by the national regulations, during the local EIA development stage for the Project Phase 1, in May 2018, the Project Owner (i.e., Xuan Thien Ninh Thuan JSC.) organized multiple public consultation sessions for the draft local EIA report at the affected communes. Specifically, the following approaches were utilized:

- The Project Owner sent a copy of draft local EIA report to Bac Phong Commune People's Committee and the Fatherland Front Vietnam of Bac Phong Commune on 21 May 2018 to obtain their opinions on the Project. The Bac Phong CPC provided their comments to the Project Owner on the local EIA report on 23 May 2018.
- The Project Owner, in collaboration with Bac Phong CPC, carried out a public consultation meeting with stakeholders from affected communities on 24 May 2018 to obtain their opinions on the Project development, its impacts and proposed mitigation measures. The participants in the public consultation meeting included 15 representatives of Commune People's Committee (CPC), Commune People's Council, Fatherland Front Vietnam, Women Union, Farmer Association, Veterans Association and Youth Union of Bac Phong Commune, headers of My Nhon Village, and 63 affected households' representatives.

Detailed comments of local community and authorities together with feedback from the Project Owner are provided in Table 3-1 below:

Table 3-1: Stakeholders' comments during EIA public consultation meeting and Project Owner's responses

Stakeholders	Comments	Project Owner's responses
Bac Phong CPC	The local authority and local communities strongly support the Project development. However, the Investor must commit to and fully implement the national environmental regulations during construction and operation to avoid impacting residents' health and living conditions.	The Project Owner and its contractor acknowledged the comments that were received during the consultation meeting and committed to performing the following measures: <ul style="list-style-type: none"> • Comply with the provisions of the applicable law on environmental protection in construction work of the Project; • Strictly apply measures to minimize negative environmental impacts during the construction and operation phases of the Project; • Create job opportunities and prioritize local employment; and
Bac Phong Commune's Fatherland Front	We agree with the Project's development in the local area, which can help to improve the land use efficiency. Currently, agricultural cultivation in the Project land is difficult and unproductive. However, the Project needs to pay sufficient land compensation in accordance with state regulations.	
Affected households	Though we don't fully understand the Project, we reckon it is a clean energy project and hence, totally support its development. We condition our support on the Investor ensuring that construction	

Stakeholders	Comments	Project Owner's responses
	and operation will not harm people's health or the living environment.	<ul style="list-style-type: none"> Collaborate with Bac Phong CPC to invest in the community development.

Source: MoM of the EIA public consultation meeting on 24 May 2018.

3.2 Stakeholder Engagement during Land Acquisition

Information disclosure and consultation during the land acquisition process were conducted following Government's requirements. The Ninh Thuan Land Fund Development Center (LFDC), local authorities of Bac Phong Commune played a key role in the activities. Information about the land acquisition, compensation, and resettlement was disclosed to the Project Affected Persons (PAPs) mainly through village meetings. Consultations were also organized to seek PAPs' opinions on land compensation price, land use origin, and addressing feedbacks and grievances from PAPs regarding the Detailed CSR Plans. However, no documentation of such activities was available for review at the time of the ESDD reporting. Only payment documents were kept for tracking records of the expenses.

3.3 Stakeholder Engagement during Project Construction and Operation

During construction and the first three years of operation, the Project engaged directly with local communities to address grievances. Local grievances were lodged through traditional channels established by local authorities or through calls with a Project employee. The leaders of the Bac Phong Commune People's Committee reported that local authorities often contacted the Site Manager if there were any concerns about the Project.

As of July 2023, there are no record or information on stakeholder engagement of the Project for its construction phase and the first three years of operation phase.

3.4 Stakeholder Engagement during the ESDD Site Visit

During the SMEC site visit from 22 to 23 August 2023, SMEC consultant, along with the Project's representatives, conducted several semi-structured meetings with local authorities at Bac Phong Commune, village leaders and for random affected households. Details of the meeting participants are presented in Table 3-2:

Table 3-2: Summary of Stakeholder Engagement during the ESDD Site Visit in August 2023

Activities	Purposes	Participants/ Interviewees
Random interviews with the employees of Projects' contractors and subcontractors	- Collect associated information about the Projects' E&S management and practices, particularly relating to the labour management	<ul style="list-style-type: none"> Mr. Nguyen Quang Son – Shift leader – full-time employee of Ingeteam (O&M contractor) Mr. Hang Ngoc Thien Buu – Shift leader – full-time employee of Ingeteam (O&M contractor) Mr. Bui Nhu Hanh – Day labourer – seasonal worker of Vina S E&C JSC. (electric cable subcontractor) Mr. Thien Xanh Khang – Technical supervisor – full-time employee of Vina S E&C JSC. (electric cable contractor) Mr. Tran Thanh Tuan – Security guard – full-time employee of Long Son (security contractor)

Activities	Purposes	Participants/ Interviewees
Meeting with the representatives of Bac Phong Commune People's Committee (CPC) and leaders of affected village	<ul style="list-style-type: none"> - Gain an insight into Projects' risk and impacts to local communities; - Identify any pending community grievances relating to the Project activities; and - Obtain stakeholders' perceptions towards the Project activities. 	<ul style="list-style-type: none"> - Mr. Pham Thai Son – CPC Chairman of Bac Phong Commune - Mr. Ha Quoc Minh – Cadastral officer of Bac Phong Commune - Mr. Tran Dinh Lang – My Nhon village head - Mr. Le Hong Tuan – Father land front of My Nhon village - Ms. Huynh Vo Bao Trang – Women Union of Bac Phong Commune - Ms. Nguyen Thi Nhu Hong – Father land front of Bac Phong Commune
Meeting with Ninh Thuan Land Fund Development Center	<ul style="list-style-type: none"> - Collect information about the land acquisition process, and - Identify any pending grievances relating to the Projects' land acquisition 	<ul style="list-style-type: none"> - Ms. Dang Thi Huong – official in charge of the land acquisition for the Projects
Random interviews with affected households	<ul style="list-style-type: none"> - Identify any pending community grievances relating to the Project activities; and - Obtain stakeholders' perceptions towards the Project activities. 	<ul style="list-style-type: none"> - Mrs. Nguyen Thi Nhut – displaced household - Mr. Nguyen Loc – displaced household - Mrs. Bui Thi Luu – resident of My Nhon village - Ms. Huynh Vo Bao Trang – displaced household

Community concerns relating to the Project development are summarized in the below:

- Major concern about the Project-related land acquisition was about the compensation price for land, which was considered low and inappropriate.
- Affected households were also dissatisfied with the compensation policy that applied agriculture land allocation quota. Specifically, land compensation was paid for total acquired land area, but not exceeding the land allocation quota of 2 ha in the local area. Any displaced land area over the allocation quota was only compensated with half price.
- Interviews with local authorities in Bac Phong commune recorded a concern relating to the more frequent flooding in North Canal (My Nhon village) at the south of the Project site. They believed that it was the consequence of the solar panel construction (including both Xuan Thien and Trung Nam solar farms).
- Local authorities in Bac Phong Commune expressed concerns about the livelihood impacts from land acquisition, particularly the loss of large grazing land. According to them, the AHs did not have proper plans to use the compensation money, hence, a few households quickly used up the money and potentially returning to poverty.

4 Project Stakeholders

IFC PS 1 requires clients to identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders. A stakeholder identification, mapping, and analysis process will be undertaken to better design the external communication approaches and to build relationships with affected communities.

Figure 4-1 below outlines the process to identify and prioritize key stakeholder groups. The exercise will be carried out regularly to review and update the results as the interest and influence of the respective stakeholder groups will change over time.

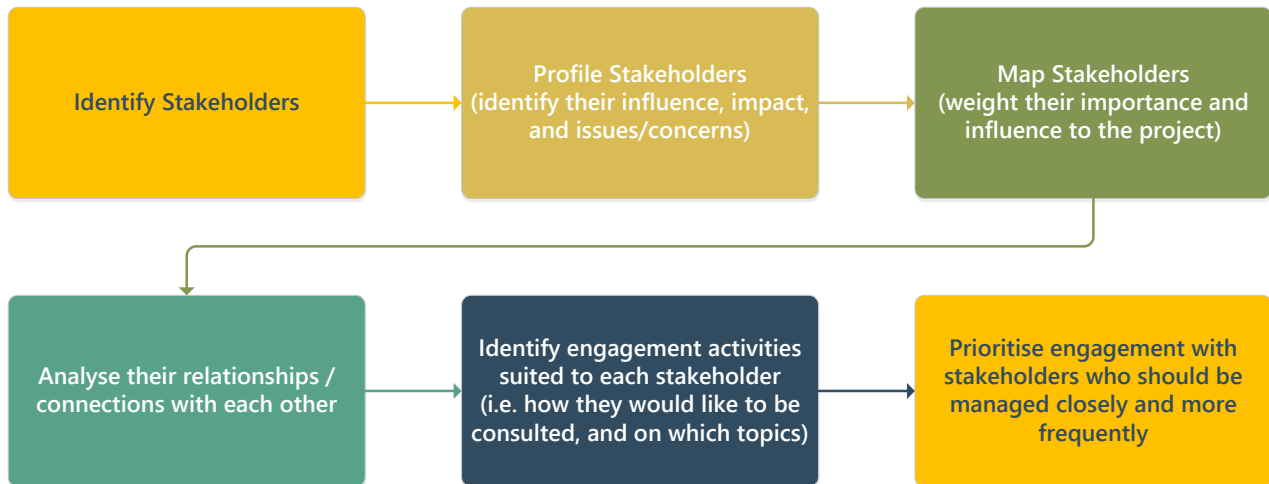


Figure 4-1: Stakeholder analysis process

4.1 Stakeholder Identification and Profiling

Stakeholders are individuals or groups who are affected, likely to be affected and who have an interest in the project. The stakeholder identification process takes into account the following consideration:

- Potential Project's impacts during its life cycle;
- Type of stakeholder engagement mandated by laws and applicable standards;
- Individuals, groups, local communities, and other stakeholders that may be affected by the Project;
- Broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the Affected Communities or their political influence; and
- Vulnerable groups required special engagement efforts.

At the time of this SEP development, we have initially identified the following stakeholder groups:

- Affected Communities, who are, directly and indirectly, negatively and positively affected by the Project activities. These might include:
 - Affected Households (AHs) who own and use land acquired by the Project;
 - Bac Phong Commune (Thuan Bac District), and surrounding communes such as Loi Hai Commune (Thuan Bac District), Xuan Hai Commune (Ninh Hai District) and Phuoc Trung Commune (Bac Ai District);
- Government Agencies and Local Authorities related to the Project's input, approval, and review. Those might include:
 - National level: Ministry of Industry and Trade;
 - Provincial level: Ninh Thuan Province People's Committee, Department of Natural Resources and Environment, Department of Police, and Department of Labour, Invalids and Social Affairs;
 - District level: Thuan Bac District People's Committee, Thuan Bac District's Division of Natural Resources and Environment, Thuan Bac District's Land Fund Development Center; and

- Commune level: People’s Committee and Fatherland Front Vietnam of Bac Phong Commune, Loi Hai Commune, Xuan Hai Commune and Phuoc Trung Commune.
- Interested parties, such as:
 - Lenders;
 - Business partners;
 - EPC contractors, sub-contractors, and workers’ representatives;
 - Potential suppliers and service providers;
 - Non-governmental organizations (NGOs)/ Civil society organizations (CSOs);
 - Neighbour private sector bodies;
 - Academic groups might participate in project review in the project development; and
 - Media.

After stakeholders had been identified and grouped, the stakeholders were profiled based on their relevance/ concerns/expectations/ interests in the Project development activities. The results of the preliminary stakeholder identification and profiling to date (as of November 2023) are presented in Table 4-1. As emphasized above, the stakeholder identification and profiling are an ongoing process, requiring regular review and updating of the stakeholder database as the Project proceeds; therefore, the database will need to be periodically updated by the Project Owner throughout the Project lifetime.

4.2 Stakeholder Mapping

In the next step, a stakeholder mapping exercise was undertaken to identify and prioritize the Project stakeholders as well as identify issues likely to be of concern to each of the different stakeholders. Figure 4-2 illustrates the stakeholder mapping matrix, which maps out the stakeholders based on their respective levels of interest and influence and assists in the determination of appropriate engagement strategies for different stakeholder groups.

- Influence: refers to the power stakeholders have over a project, including the ability to affect or influence decisions and facilitate their implementation.
- Interest: refers to the priority given by the company to considering and accommodating the stakeholder’s needs and interests.

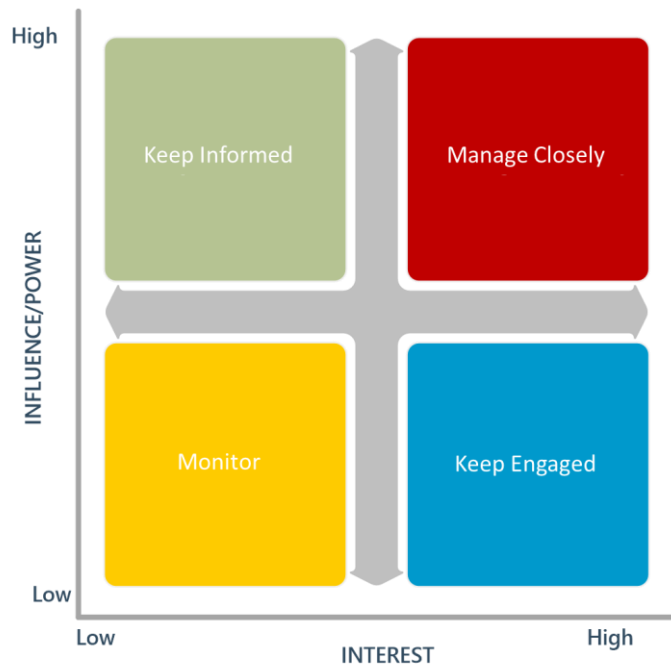


Figure 4-2. Stakeholder mapping matrix

The mapping exercise categorizes stakeholders into four groups as follows:

- **Manage Closely:** including the stakeholders that appear in the top right quadrant, who identified as having *high influence and high interest* in the Project. This group of stakeholders is often the most important to the Project as they can influence Project outcomes and also have a high level of interest in aspects of impact assessment. Stakeholders in this group should be managed closely through proactive engagement regularly.
- **Keep Engaged:** referring to the stakeholders in the bottom right quadrant who have *low influence and high interest*. This group is also important and includes those groups or organizations that are not adversely affected, but whose interests determine them as stakeholders. As such, this group should be kept engaged and the Project should maintain an open channel of communication with this group throughout Project phases. Typically, this group would include local communities not directly affected by the Project and authorities who have limited influence on the Project.
- **Keep Informed:** referring to the stakeholders in the top left quadrant who have *high influence and low interest*. From an impact assessment perspective, these are stakeholders that have the potential to influence Project outcomes but may not have a specific interest in impact assessment-related issues. Stakeholders in this group should be kept informed on the progress of the Project development and usually include statutory consultees.
- **Monitor:** referring to the stakeholders in the bottom left quadrant who have *low influence and low interest*. Typically, this group includes those who have limited interest and influence on the Project including the media and non-governmental organizations (NGOs).

The results of stakeholder identification, profiling, and mapping are summarized in Table 4-1. The stakeholder list as well as stakeholder analysis and mapping will continue to be revised according to the ongoing receipt of comments and input from stakeholders directed to the Project.

4.3 Engagement Strategy

The outcome of the stakeholder mapping exercise helps to determine the level of engagement and tools that will be used to consult with different stakeholders/stakeholder groups.

Keep Informed	Manage Closely
<ul style="list-style-type: none"> • Keep informed and consulted regularly; • Seek to obtain their support and technical guidance; • The Project aims to be proactive in its communications, providing information and seeking views at regular intervals; and. • Fluid ongoing two-way information flow 	<ul style="list-style-type: none"> • Inform and consult in interest areas through formal communications such as meetings or letters, writing documents; • Involve in governance and decision-making; and • Keep ongoing engagement and collaborative working in areas of mutual interest
Monitor	Keep Engaged
<ul style="list-style-type: none"> • Inform via public communications (for example through the Project website and press communications); • The Project will be responsive to direct requests for further information and engagement if the stakeholders ask to be consulted; and • Monitor for their feedback 	<ul style="list-style-type: none"> • Make use of interest by informing in the low-risk area; • Keep engaged and consulted in interest area; and • The Project will be responsive to direct requests for further information

Table 4-1: Stakeholder Analysis and Engagement Strategies

Groups	Stakeholders	Expectations/Concerns/Interests	Level of Influence	Level of Interest	Engagement Strategy
Affected Communities	Economically displaced households who own and use the land acquired by the Project	Being directly impacted by the Project's land acquisition. Concern about the adequate and fair compensation payment. Concerns on potential community health and safety impacts caused by the Project.	High	High	Manage Closely
	Communities located adjacent to the Project site (in Bac Phong Commune, Loi Hai Commune, Xuan Hai Commune, Phuoc Trung Commune)	Concerns on potential community health and safety impacts caused by the construction and operation of the solar farms.	High	High	Manage Closely
Government Agencies and Local Authorities	<u>National level:</u>				
	Ministry of Industry and Trade	Responsible for approval of the Project in national electricity master plan, the Project design, and the Project's electrical license.	High	Low	Keep Informed
	<u>Provincial level:</u>				
	Ninh Thuan Province People's Committee	Responsible for approval of the Project investment principle and the Project land leasing; Responsible for approval of local EIA which is appraised by DONRE; Interests in economic and social development, job places, tax revenues.	High	Low	Keep Informed
	Department of Natural Resources and Environment	Responsible for appraising local EIA and monitoring the Project's compliance with national legal environmental requirements. Responsible for land use right certificate issuance. Concerns about environmental and social impacts and mitigation measures.	High	High	Manage Closely

Groups	Stakeholders	Expectations/Concerns/Interests	Level of Influence	Level of Interest	Engagement Strategy	
	Department of Police	Responsible for approval of the firefighting design, examination of fire safety system and certificate issuance	High	High	Manage Closely	
		Responsible for approval of firefighting plan and rescue plan				
		Responsible for monitoring the Project's compliance with laws and regulations on environmental protection, firefighting and prevention				
	Department of Labour, Invalids and Social Affairs	Acceptance for the registration of internal labour regulation	Low	High	Keep Engaged	
	Ninh Thuan Province Land Fund Development Center	Playing a key role in the Project's land acquisition and compensation process	High	High	Manage Closely	
	<u>District level:</u>					
	Thuan Bac District People's Committee	Interests in economic and social development, job places, tax revenues. Playing a key role in the Project's land acquisition and compensation process.	High	High	Manage Closely	
	Thuan Bac District's Division of Natural Resources and Environment	Responsible for monitoring the Project's compliance with national legal environmental requirements. Concerns about environmental, and social impacts and mitigation measures.	High	High	Manage Closely	
<u>Commune level:</u>						
CPC and Commune Fatherland Front Committee of Bac Phong Commune and Loi Hai Commune	Playing a key role in the Project's land acquisition and compensation process (Bac Phong Commune).	High	High	Manage Closely		
	Playing a key role in communication with affected communities, including the ethnic minority groups (Loi Hai Commune).					
	Being the first-hand receiver of community grievances.					

Groups	Stakeholders	Expectations/Concerns/Interests	Level of Influence	Level of Interest	Engagement Strategy
		Concerns on potential community health, safety, and security issues caused by the Project.			
	CPC and Commune Fatherland Front Committee of the surrounding communes including Xuan Hai and Phuoc Trung	Playing a key role in communication with affected communities. Being the first-hand receiver of community grievances. Concerns on potential community health, safety, and security issues caused by the Project.	High	High	Manage Closely
Interested parties	Lenders / Investors (such as AIIB)	Concern about E&S risks related to investment	High	High	Manage Closely
	Business partners: Vietnam Electricity Group (EVN)	Receive electricity produced from the Project	Low	High	Keep Engaged
	Business partners: Ninh Hai Irrigation Station	Provide water for operation of the Project	Low	High	Keep Engaged
	Potential contractors and suppliers	Interest in procurement opportunities.	High	High	Manage Closely
	Project employees	Direct benefits from employment. Concerns about the salary, working conditions. Possibly being the first to see warning signs of social problems or community unrest	High	High	Manage Closely
	NGOs/ CSOs	Interest in the project development and its potential E&S impacts	Low	Low	Monitor
	Neighboring business (such as Trung Nam solar farms)	Concern about potential cumulative E&S impacts and their responsibilities to implement the required mitigation measures Interest in the clean water supply service for the new residential areas	Low	High	Keep Engaged
	Academic groups	might participate in project review in the project development	Low	Low	Monitor

Project Stakeholders

Groups	Stakeholders	Expectations/Concerns/Interests	Level of Influence	Level of Interest	Engagement Strategy
	Media	Interest in the project development and its potential impacts on the environment, society, and economics.	Low	Low	Monitor

5 Stakeholder Engagement Program

This Chapter describes the main stakeholder engagement activities that will be undertaken on an on-going basis throughout the life of the Project. The engagement activities will be carried out for the Project based on principles related to informed consultation and participation as detailed within IFC PS1, including the gender consideration for the consultations. This Chapter will also discuss the documentation requirements for the stakeholder engagement activities.

5.1 Stakeholder Engagement Principles

5.1.1 Basic Principles for Consultations

There is no one right way of undertaking consultation. Given its nature, the process will always be context-specific. This means that techniques, methods, approaches, and timetables will need to be tailored for the local situation and the various types of stakeholders being consulted. Ideally, a good consultation process will be:

- Targeted at those most likely to be affected by the Project;
- Early enough to scope key issues and have an effect on the Project decisions to which they relate;
- Informed as a result of relevant information being disseminated in advance;
- Meaningful to those consulted because the content is presented in a readily understandable format and the techniques used are culturally appropriate;
- Two-way so that both sides have the opportunity to exchange views and information, to listen, and to have their issues addressed;
- Gender-inclusive through awareness that men and women often have differing views and needs;
- Localized to reflect appropriate timeframes, context, and local languages;
- Free from manipulation or coercion;
- Documented to keep track of who has been consulted and the key issues raised;
- Reported back in a timely way to those consulted, with clarification of next steps; and
- Ongoing as required during the life of the Project.

5.1.2 Gender Considerations in Consultation

The Project is likely to affect men and women differently. In general, men and women play different roles within the private and public spheres. With these different and complex roles come differential access to resources and finances, to contacts and relationships, to personal skills development, and to opportunity and power. Consulting primarily with men provides only half of the story. Partial information can lead to both risks and missed opportunities. In some circumstances, failing to consult adequately with women is not deliberate, rather it happens because engaging women in the consultation process usually requires awareness and concerted effort.

The following considerations will be incorporated into the Project's stakeholder engagement activities and Community Needs Assessment to further integrate women's perspectives into the consultation process.

- Getting the full picture of how men and women may have different needs, views, and impacts related to the Project, since men and women may also view the same resource differently.
- During the any consultation process, collecting gender-disaggregated data to better understand how men and women are affected differently by the Project. Female-headed households are also an important group to target, since single mothers and widows are likely to represent some of the most vulnerable households in the community;
- Paying attention to team composition and emphasis and ensuring that the staff and consultants are gender-aware and can communicate effectively with women. Sometimes, women are more comfortable talking to other women, hence, community liaison staff should have female members who can conduct discussions and interviews or receive grievances from women where needed.

Getting more women in the room by making meetings more accessible and convenient for women by providing childcare, choosing a convenient time and location, and providing transportation.

- Using active facilitation techniques to encourage women's participation and expression in public meetings or workshops.
- Holding separate meetings with women or reaching out to them through different networks and groups to create a safe and comfortable space for them to raise their own issues and concerns.
- Raising priority issues for women and giving them equal weight in the discussion and decision-making process.

5.1.3 Consideration of Indigenous Peoples (IP) in Consultation

5.1.3.1 Identification of Indigenous Peoples in the Project

The Project-related land acquisition resulted in economic displacement for 160 AHs in both phases. Among whom, about 40 HHs belonged to the Cham and Raglai ethnic minority groups. Desk-based reviews and stakeholder engagement during SMEC site visit acknowledged that the Cham and Raglai ethnic minority groups have different characteristics from the mainstream ethnicity in Vietnam (Kinh group), and fulfill the four characteristics of Indigenous Peoples (IPs) as defined by AIIB's ESS 3 and IFC PS 7¹. However, according to the interviews with Bac Phong CPC and My Nhon village leaders, the Project land area was not homeland to the Cham and Raglai ethnic group communities. Several ethnic minority individuals, who were residing scattered in the neighbouring communes, reclaimed land in the Project area and were later recognized as landowners. As such, it is assessed that the Project affected individuals, rather than groups or communities of the indigenous peoples.

In addition, based on the document review and consultations with local authorities during the SMEC's ESDD site visit (August 2023), it is confirmed that except for Cham and Raglai households affected by the Projects' land acquisition, there are no other ethnic minority groups residing within the Project area. Local communities that are residing within the Project area of influence and impacted by the Project activities, are composed of King group only.

Since there was no impact on lands under collective/ancestral attachment due to land acquisition, the Free, Prior, and Informed Consent (FPIC) is not applicable for the Project. However, there are adverse impacts on livelihood of individual Cham and Raglai households. As such, as per the AIIB ESS 1 and IFC PS 1 requirements, it is necessary for the Project Owners to adopt specific engagement approaches in order to establish and maintain an ongoing relationship based on Informed Consultation and Participation (ICP) with the affected ethnic minority peoples throughout the project's life-cycle. The approach is specified in the Section 5.1.3.2 below.

5.1.3.2 Informed Consultation and Participation (ICP)

ICP is a more intensive and active form of consultation. It involves in-depth exchange of information, and joint analysis and decision making. This leads to the inclusion of the affected communities' views into the Project decision-making related to proposed mitigation measures, sharing of development benefits and opportunities, and implementation issues. The process of ICP builds upon the following principles:

- begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise;

¹ IFC PS7 indicates the four following characteristics to confirm a distinct social and cultural group as Indigenous Peoples:

- Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the nature resources in these habitats and territories;
- Customary cultural, economic, social and political institutions that are separate from those of the mainstream society or culture; and
- A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

- be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to the affected communities;
- focus inclusive engagement on those directly affected as opposed to those not directly affected, such as men, women (gender consideration), elderly, youth, displaced persons, indigenous people, vulnerable and disadvantaged persons or groups.
- be free of external manipulation, interference, coercion, or intimidation;
- enable meaningful participation where applicable; and
- be documented- who has been consulted.

Future engagement and consultation with local communities of the Project (see Section 5.2) requires the compliance of the principles as described above. In addition, to ensure informed and meaningful participation among the ethnic minority communities, the Project Owner should ensure that:

- Engagements with local communities involves participants from diverse backgrounds and viewpoints;
- Involving Indigenous Peoples' representative bodies and organisations (e.g., councils of elders or village councils), as well as members of the Affected Communities of Indigenous Peoples;
- Communication channels and consultation methods should be further clarified and justified, to ensure they are culturally appropriate and reach all relevant stakeholders, including vulnerable groups;
- Organising the face-to-face interactions/meetings and using indigenous languages where appropriate and/or a translator; and
- Providing sufficient time to fully consider and address Indigenous Peoples' concerns and suggestions for Indigenous Peoples' decision-making processes.

5.2 Future Engagement Activities

Stakeholder engagement is a dynamic process starting early in project preparation and continuing throughout project implementation in both design, construction, and operational phases. Stakeholder engagement should continue to be used as a tool to manage social risk and address key community issues throughout the Project life cycle. This will be achieved by maintaining and strengthening relationships with stakeholders through an ongoing process of information disclosure, consultation, dialogue, and grievance management.

As the Project enters the operation phase, stakeholders should be kept updated on the following:

- Project impacts during the operation phase;
- Management of the impacts including results of monitoring;
- Changes to the Project;
- Activities about to commence in their area of interest;
- Employment and economic opportunities; and
- Future stages of development – preparation for this and what it will involve.

This section presents the future stakeholder engagement program during the Project operation phase. The activities will be carried out based on basic principles for disclosure and consultation, including the consideration about gender and indigenous peoples as detailed in the Section 5.1. Table 5-1 details the information disclosure and consultation requirements, frequency, and methods that will be used to disseminate the information and consult with each of the stakeholder groups identified in the previous section.

This list of key activities is by no means definitive and will be adapted by the Project Owners to further reflect local conditions and concerns as they arise. Activities and associated budgets will be prepared each year to ensure continuous improvement in adaptive management. The SEP will be updated upon major project changes to reflect engagement activities that may be required during the life of the Project.

In addition, ongoing and future engagement will include any further Project-related grievances that may be raised by the displaced parties via the Community Grievance Mechanism established by the Project Owners as set out in Section 6.

Table 5-1: Proposed Key Stakeholder Engagement Activities during Operation Phase

No	Actions	Target Stakeholders	Forms of Engagement	Timing and Frequency
1	Disclose the E&S documentation (e.g., SEP, Livelihood Restoration Plan (LRP), Community Development Plan (CDP), Community Grievance Mechanism (CGM))	<ul style="list-style-type: none"> All Stakeholders 	<ul style="list-style-type: none"> The Project’s E&S documentation will be disclosed on the Project Owner’s and AIBB website. 	<ul style="list-style-type: none"> When the SEP is confirmed as final;
2	Disclose the AIBB’s Project-affected People’s Mechanism (PPM)	<ul style="list-style-type: none"> Affected Communities, Province-level, district-level, and commune-level authorities 	<ul style="list-style-type: none"> The AIBB’s Project-affected People’s Mechanism (PPM) will be disclosed on the Project Owner’s website, AIBB’s website and during the Project’s stakeholder engagement activities, together with the disclosure of E&S documentation (e.g., SEP, LRP, CDP, CGM). 	<ul style="list-style-type: none"> When the E&S documentation is disclosed
3	Disclose information relating to the Project operation such as project updates, local employment opportunities, and any public safety hazards etc.	<ul style="list-style-type: none"> Affected Communities, Province-level, district-level, and commune-level authorities 	<ul style="list-style-type: none"> Official letters to the relevant government authorities; Provision of information to be disclosed at commune office for display; Attending or organizing regular or ad-hoc meetings with the affected communities to share information 	<ul style="list-style-type: none"> As needed when there are any changes/ updates
4	Consultation and disclosure of stakeholder-related environmental and social management plans (ESMPs) that will be developed and implemented in future (e.g., Emergency Response Plan, Internal Labour Regulation, LAA, LRP, and CDP)	<ul style="list-style-type: none"> Province-level, district-level, and commune-level authorities Affected Communities, Project employees Contractors and suppliers 	<p>Depending on requirements of each management plan, the consultation could be different. For example:</p> <p>Emergency Response Plan (ERP) shall be disclosed to and sought for approval of the relevant authorities of some relevant elements (e.g., fire-fighting and prevention). After obtaining the approval, the ERP will be publicly disclosed to the local authorities and local communities</p>	<ul style="list-style-type: none"> Consultation: During the development of the management plans Disclosure: When the management plans are confirmed as final.
5	Communication of Community Grievance Mechanism (CGM)	<ul style="list-style-type: none"> Any potentially affected parties 	<ul style="list-style-type: none"> Attendance in regular or ad-hoc meetings with the affected communities to disclose GRM Leaflets outlining the GRM to be delivered to affected residents; 	<ul style="list-style-type: none"> Develop the CGM as soon as possible

No	Actions	Target Stakeholders	Forms of Engagement	Timing and Frequency
			<ul style="list-style-type: none"> Display of CGM (key messages, hotline/contact number) at the site's main entrance, community centers (such as CPC offices, communal houses, and/or any easily accessible locations) 	<ul style="list-style-type: none"> Maintained throughout the operation
6	Communication of ESMS and E&S Policies	<ul style="list-style-type: none"> Project Employees 	<ul style="list-style-type: none"> Presentation to all employees on the ESMS and E&S Policies. Presentation to the new employees during their induction to the Project. 	<ul style="list-style-type: none"> When the ESMS and E&S Policies are available; At employee inductions
7	Communication of Code of Conduct, Internal labor regulations	<ul style="list-style-type: none"> Project Employees 	<ul style="list-style-type: none"> Presentation to all employees on the Code of Conduct (COC) and Internal Labor Regulations. Presentation to the new employees during their induction to the Project. 	<ul style="list-style-type: none"> When the COC and Internal Labor Regulations are available; At employee inductions
8	Communication of Employee Grievance Mechanism	<ul style="list-style-type: none"> Project Employees 	<ul style="list-style-type: none"> Presentation to the new employees during their induction to the Project. Inclusion of the mechanism in the HR Manual 	<ul style="list-style-type: none"> At employee inductions
9	Environment & Social Monitoring and Reporting (ESMR)	<ul style="list-style-type: none"> Government agencies in Vietnam (i.e. DONRE) Project Lenders 	<ul style="list-style-type: none"> Periodical monitoring reports to the Government agencies as required by the national regulations ESMR reports to Lenders, presenting the Project's E&S performance in compliance with national laws and regulations, AIIB ESP and IFC PSs 	<ul style="list-style-type: none"> Frequency of the local regulatory reporting is subject to local laws and regulations Annual ESMR reports to Lenders throughout the loan period.
10	Periodic reporting to affected communities	<ul style="list-style-type: none"> Local communities Commune-level authorities 	<ul style="list-style-type: none"> A non-technical summary of ESMR presenting the Project's general progress and implementation of E&S activities to be displayed at commune offices 	<ul style="list-style-type: none"> Annual basis throughout operations
11	Ongoing consultation with stakeholders	<ul style="list-style-type: none"> All potentially affected parties 	<ul style="list-style-type: none"> The constant presence of the Project's Community Development Officer (CDO) to provide information, answer questions, and receive community grievances. The availability and contact details of the CDO should be publicized to the communities. 	<ul style="list-style-type: none"> Maintain throughout the operations

No	Actions	Target Stakeholders	Forms of Engagement	Timing and Frequency
12	Ad-hoc consultation with stakeholders	<ul style="list-style-type: none"> All potentially affected parties 	<ul style="list-style-type: none"> As appropriate or where multiple grievances are received on a certain topic, public meetings will be arranged to outline project progress and discuss specific solutions to the topics. 	<ul style="list-style-type: none"> As appropriate during operations

5.3 Documentation

Documenting consultation activities and their outcomes is critical to effectively managing the stakeholder engagement process. The Project will develop a stakeholder log (refer to Appendix B), recording all activities and consultation responses, and tracking each of these to the point they are “closed out”. The Stakeholder Log can be a useful tool in demonstrating that the views of affected people and influential stakeholders have been incorporated into the project’s environmental and social mitigation strategies. Such documentation also provides the basis for reporting back to stakeholders on how their views have been addressed.

The Stakeholder Log will record the following information for each entry:

- When and where the engagement activities took place;
- List of attendees with contact details;
- The topic of discussion;
- Issues and concerns raised;
- Actions for follow-up;
- Responsibility and deadline; and
- Confirmation of close-out.

Collection and documentation of gender-disaggregated data will be employed to better understand how men and women are affected differently by the Project.

The Project is responsible for maintaining the Stakeholder Log during the Project development phases. Therefore, it is recommended that it identifies a person in charge of the log and its maintenance and update.

The SEP will be a “living” document, continually updated and evolving throughout the Project as new stakeholders emerge and consultation activities are undertaken.

It is noted that once engagement occurs, the local community and other interested parties may also want to receive feedback from the Project to know how their concerns will be addressed. Therefore, the results of the periodic monitoring of the implementation of the SEP shall be disclosed and considered as feedback to local communities.

In addition, it is necessary to report back periodically to communities and other stakeholder groups on how the Project has been responding to the grievances received. Grievance monitoring is considered a good approach to providing such information to stakeholders. In particular, the report should contain the name of the individual or organization; the date and nature of the complaint or concern; any follow-up actions are taken; the final result; and how and when this decision was communicated to the grievant.

6 Grievance Redress Mechanism

An effective stakeholder engagement process can help to prevent grievances. However, projects with a high potential for environmental and social impacts to occur, often result in grievances from stakeholders. This section provides a framework for the Grievance Redress Mechanism (GRM) that will be used to identify, track, and manage grievances raised by external Project stakeholders. The GRM applies to all community grievances relating to the Project activities, particularly during the operation phase. A separate grievance mechanism will be developed to address internal grievances relating to employment matters. The GRM will be refined during SEP development and be maintained throughout the Project lifecycle, to ensure that grievances are promptly heard, analysed, and, to the extent possible, resolved.

6.1 Objectives

The main objective of the grievance mechanism is:

- To address grievances promptly and effectively, in a transparent manner resulting in fair, effective, and lasting outcomes;
- To provide a grievance management process that is culturally appropriate and readily accessible to all Project affected parties;
- To enable systematic identification of emerging issues facilitating correcting actions and pre-emptive engagement; and
- To build trust as an integral component of the Project community relations activities.

6.2 General Requirements

The objective of GRM is to ensure there is a robust and transparent process available for addressing complaints. To meet the objectives, below are the key requirements for the GRM:

- All grievances shall be managed following the Project's Grievance Procedure.
- All grievances must be handled discreetly and objectively.
- The Project Owner should appropriately recruit and allocate human resources to manage the procedure. Ideally, a Project Grievance Redress Unit (GRU) should be set up during the Project operation. The GRU should comprise the Project Director and members of departments within the EDPR Vietnam such as Stakeholder Engagement Department, Health, Safety and Environment (HSE) Department, Corporate Social Responsibility (CSR) Department, Compliance Department, and the Operation and Maintenance (O&M) Company (e.g., Ingeteam Vietnam). The contact information of the GRU members who are assigned as contact points to receive grievances in each department should be disclosed to all Project stakeholders in an ongoing manner. Particularly, at the affected communities, the GRU should assign a primary contact, preferably the Community Development Officer (CDO) who is stationed at the Project site, to receive and address all Project-related community grievances. Sometimes, women are more comfortable talking to other women, hence, the GRU should have female members who can conduct discussions and interviews or receive grievances from women where needed.
- All grievances should be recorded in a Grievance Register as a means of maintaining transparency throughout any action taken relating to a grievance. The Grievance Register should provide complaint details, a summary of the grievance, the resolution or agreement on proposed actions (between the Project and the complainant), and monitoring actions taken in response to the grievance. All correspondence related to the grievance must be documented in the Grievance Register for monitoring, reporting, and learning.
- Grievances for highly sensitive cases, and as requested by complainants, will be filed anonymously, which is essential for capturing any grievances that may arise concerning gender-based violence (GBV) and sexual exploitation and abuse (SEA).

- Community grievances can be submitted to the Project through different lines of communication such as a written grievance form sent to the Project’s office, verbal communication via a telephone hotline of the Project; or directly submitted to a person in charge in the GRU.
- A community grievance procedure is generally designed for different levels of redress, corresponding to the scale and seriousness of the complaint. If the grievance cannot be resolved at Project levels, the PAPs can appeal to the local authorities' grievance system.

6.3 Grievance Procedure Proposed for the Project

Figure 6-1 depicts and overview of the grievance procedure. Details of each step in a community grievance procedure are described in the following text.

COMMUNITY GRIEVANCE PROCEDURE

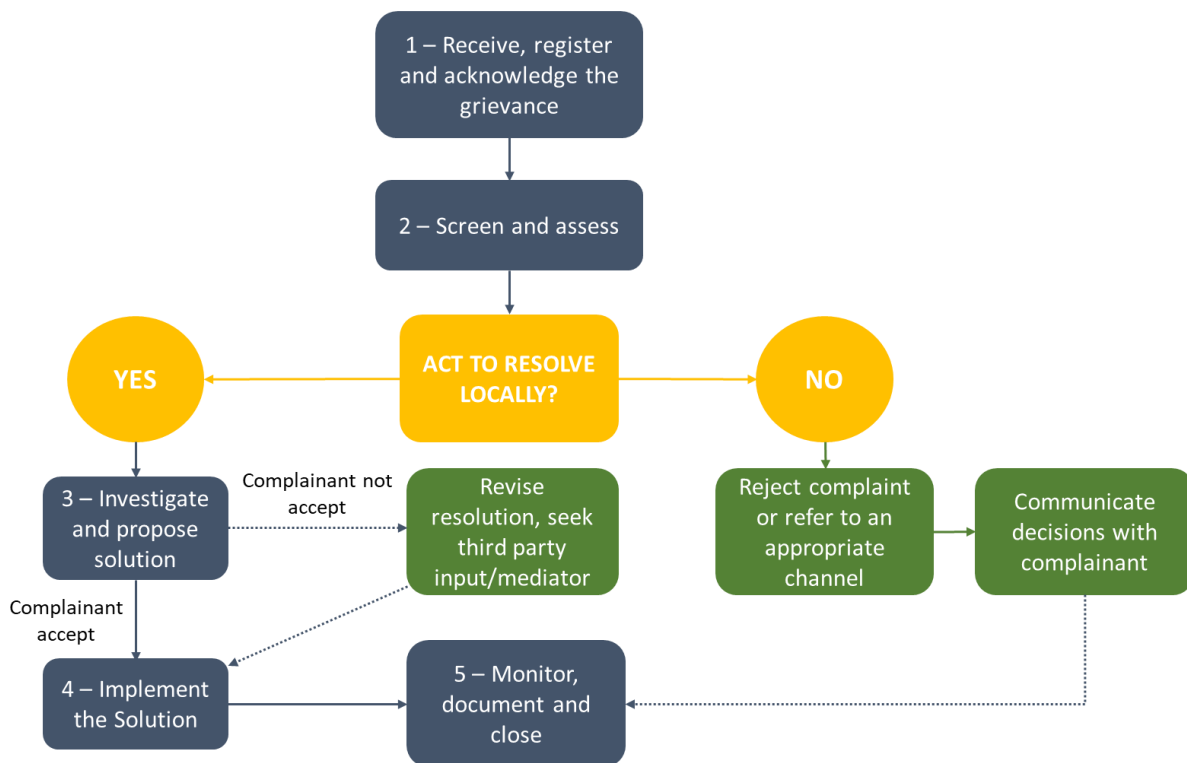


Figure 6-1: Community Grievance Procedure

Step 1: Receive, Register and Acknowledge Grievance

A variety of methods will be available through which stakeholders can lodge grievances. This will include:

- Written communication by filling out the Grievance Form (refer to Appendix C) which will be made available on the Project website/ site office/ village committee’s office. For those who have difficulty reading or writing or are inexperienced with the complaint process, the GRU members will assist them in filling out the complaint form;
- Verbal communication with the Project staff who are stationed in the local communities. In this case, the Project staff should immediately inform the GRU about the grievance for further proceeding; or
- Verbal or written communication via phone calls, emails and other platforms with the GRU members (see Table 6-1 for contact detail of the GRU members).

In addition, recognizing the tendency of community members to seek redress through local authorities, especially the CPCs, for project-related concerns, it is recommended that the GRU maintain regular communication with local

authorities to identify and address any potential grievances. To facilitate this process, the GRU should establish a designated liaison with local authorities, preferably the CDO, to receive and manage grievances lodged through this channel.

Upon receipt of the written/verbal grievance, the GRU will assign a unique number to each grievance for easy tracking. Grievances for highly sensitive cases, and as requested by complainants, will be filed anonymously, which is essential for capturing any grievances that may arise concerning gender-based violence (GBV) and sexual exploitation and abuse (SEA).

The GRU will provide the complainant with a **verbal acknowledgment** of the receipt of the complaint (phone call, text message, or a meeting) and a **written acknowledgment within five working days** (email, letter). The acknowledgment will include the grievance number so that the complainant can use it as a reference to track the status of their complaint. If the grievance is not well understood or if additional information is required, clarification should be sought from the complainant during this step.

Step 2: Screen and Assess Grievance

A grievance is screened and assessed within three (3) working days of receipt by the GRU as follows:

If it is decided that a grievance is not valid, the grievance will be dismissed and advice of the decision and the reasons for dismissal will be provided to the complainant in writing (and in person if required). Where applicable, the Project will refer the complainant to a government department, organization, or judicial committee within the local government.

If the grievance is valid, it will be classified into one of the following categories

- Level 1 Complaint: A complaint where potential impacts and/or consequences are low that can be resolved quickly (e.g., a Project vehicle damaging another's property)
- Level 2 Complaint: A complaint that is widespread and repeated (e.g., dust from Project vehicles)
- Level 3 Complaint: A complaint that could potentially result in a serious breach of national laws and regulations, or affect Government and Project image and performance (e.g., inadequate waste management).

Management will be notified of all grievances and the Project Director is notified of all Level 3 grievances.

GRU will initiate resolution for Level 1 complaints where potential impacts and consequences are relatively low.

Management will initiate the resolution of all complaints at Levels 2 and 3, and Level 1 complaints that can have significant implications for the business image or performance.

For any grievance that requires the involvement of a third party (e.g., technical expert, authority), the GRU is responsible for contacting the relevant third party for their advice or resolution.

Step 3: Investigate and Propose Resolution

The GRU will **investigate** the grievance and propose a resolution as soon as possible but **no later than 30 days** after screening and assessing the grievance. The responsible team member shall seek input from Village Committee and relevant district officials, as well as Project personnel and contractors, as necessary.

The GRU member will discuss the outcomes of the investigation and proposed resolution with the complainant. The response can be communicated in several ways depending on the complainant's preference (e.g., face-to-face, email, letter, phone call, etc.). They will ask the complainant for written acceptance of the resolution (or verbal if the complainant has difficulty reading/writing).

- For the Level 1 Complaint: GRU will contact the complainant directly to develop solutions with oversight from the Manager of relevant departments.
- For Level 2 Complaint: The relevant Department Managers will be responsible for identifying a coordinated management solution and response. This should involve other senior managers and sign-off from the Project Director.

- For Level 3 Complaint: immediate intervention of related parties such as senior managers, contractor/s, and/or local authorities to seek their advice on potential resolutions.

The response is signed off by the Project Director for Level 3 complaints and the relevant Department Manager for Level 2 and Level 1 complaints.

If the Complainant does not accept the proposed resolution:

- The GRU shall conduct consultation with the Complainant to obtain further detailed clarification on the issues and to negotiate a mutual solution. Minutes of consultation sessions shall be kept in the Grievance Log (refer to Appendix D). If a mutual solution cannot be obtained through consultation, third parties could be asked to be involved. The third party can provide advice or facilitation in a way that is acceptable to all parties.
- Where mediation is desired, academic or other local institutions may be sought out to play an “honest broker” role in mediating between the Project and stakeholder groups.

Step 4: Implement the Resolution

If the Complainant accepts the proposed resolution:

- For relatively simple, short-term actions that can resolve the grievance, the objective will be for the solution to be implemented within 30 days after assessing the grievance.
- For solutions that take longer to address, or for which the complainants are not satisfied, or additional corrective actions are required, the GRU will inform the complainants of the progress regularly until the solution is completely implemented.

The GRU member shall inform the complainant once the resolution or corrective actions are implemented and confirm that the complainant is satisfied with the resolution.

Step 5: Grievance Close Out and Documentation

Monitor, and document the grievance resolution process and close the grievance with a sign-off from the relevant Department Manager, or with the Project Director's approval to close out Level 3 grievances. If further attention is required, the GRU should return to Step 2 to re-assess the grievance.

All correspondence related to the grievance must be documented in the Grievance Log for monitoring, reporting, and learning. The GRU is responsible for maintaining all records in the Grievance Log.

Contact details of GRU

The contact details of GRU members are presented in Table 6-1.

Table 6-1: Contact details of the GRU contact points

No	Name	Position	Phone number/ Email
Representatives of EDPR Vietnam			
1	Mr. Nguyen Ta Tuan	Plant Manager	0987991889
2	Ms. Luong Thi Thu	HSE Manager	0914083650
3	Ms. Tran Thi Thu Lap	Environmental Officer	0971371200
4	Ms. Ha Thi Nga	Community Development Officer	0939744161
5	Mr. Truong Thanh Kien	Stakeholder Engagement Department	0988229898
6	Compliance Department		Compliance@edp.pt
Representatives from Ingeteam (O&M Company)			
7	Mr. Dang Tran Thuc Nguyen	O&M Manager	0961414305

No	Name	Position	Phone number/ Email
Representatives from Long Son Security Company			
8	Mr. Nguyen Duc Vuong	Long Son Security	02583873161

6.4 AIIB's Project-affected People's Mechanism

Project-affected people may raise their concerns regarding the environmental and social aspects of an AIIB-financed Project with the Client and AIIB during the preparation and implementation of the Project.

The Project-affected People's Mechanism (PPM) was established by AIIB to provide an opportunity for an independent and impartial review of submissions from Project-affected people who believe they have been or are likely to be adversely affected by AIIB's failure to implement its Environmental and Social Policy (ESP) when their concerns cannot be addressed satisfactorily through Project-level grievance redress mechanisms or AIIB Management's processes. The PPM entered into effect on March 31, 2019. The PPM is guided by the Policy on the PPM (PPM Policy) and Rules of Procedure of the PPM (PPM Rules of Procedure).

For information on how to make submissions to the PPM, please visit: [Policy on the Project-affected People's Mechanism - Operational Policies & Directives - AIIB](https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html) (https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html).

7 Resources and Budget

7.1 Resources

The implementation of the SEP is led strategically by the Project Director with support from the members who directly implement the activities of the SEP. The roles and responsibilities of such positions are proposed as outlined in Table 7-1.

Generally, the Project's Community Development Officer (CDO) and Operational and Maintenance (O&M) Company will be undertaking the key roles for stakeholder engagement and the implementation of the SEP during operations at the local communities, while the Project Director and managers of the relevant Departments will oversee the progress and report to the relevant stakeholders. It is noted that the team establishment should be gender-aware. Having female staff of the Project present during consultations targeted at women can also be helpful and create a channel for communication and relationship-building between local women and the company. However, it is not just about women or hiring women, but about having a team that is gender-aware and can facilitate situations in a way that allows both men and women to express their views.

Table 7-1: Roles and Responsibilities for SEP Implementation

Roles	Responsibilities
Project Director	<ul style="list-style-type: none"> Plan and allocate human and financial resources for the implementation of environmental and social (E&S) management activities; Assign tasks for relevant departments and appoint members in charge of each department for ongoing oversight of the implementation of the SEP; Review and approve the stakeholder engagement plan for the Project; and Oversee the resolution of grievances.
Managers of the relevant Departments (such as Stakeholder Engagement, HSE, CSR, Compliance) and the O&M Company	<ul style="list-style-type: none"> Report the implementation of engagement activities of the department including grievance procedure to the Project Director; Report to the Lenders on the department's engagement activities and grievance resolution implementation progress on the frequency agreed with the Lenders; Monitor the compliance of the contractor and subcontractors' performance on stakeholder engagement and grievance redress; Participate in the Project Grievance Redress Unit (GRU); Ensure engagement activities and grievance resolution will be implemented in compliance with the approved SEP by supervising the implementation of engagement activities and grievance resolution process and leading the monitoring and reporting to the Project Director and other relevant parties as required; Proactively assess the need for other necessary engagement activities and update the SEP accordingly; and Review the updated SEP before sending it to the Project Director for his/her review and approval.
GRU members stationed at the site (such as Environmental Officer, Community Development Officer)	<ul style="list-style-type: none"> Implement engagement activities in compliance with the SEP; Conduct the SEP reporting as required; Report to the relevant Department Managers about the implementation plan and results of engagement activities, including grievance management, monthly during construction and quarterly during operation; Receive, log, acknowledge, and classify grievances; Participate in solving the grievances; Ensure grievances are documented properly and that the database of grievances is updated regularly including details of any grievance resolutions; and

Roles		Responsibilities
Contractors/ contractors	Sub-	<ul style="list-style-type: none"> Communicate relevant environmental, social, safety, and health policies and management plans to subcontractors including this grievance mechanism; Involve in construction-related grievance resolutions when needed; and It is noted that Contractor may allocate personnel to be in charge of the above-mentioned responsibilities
O&M Company		<ul style="list-style-type: none"> The O&M Company will mainly be involved in stakeholder engagement during the operation phase. The O&M company will allocate a member of staff for stakeholder engagement. This member of staff will also be responsible for following up on grievances and will need to arrange all necessary community liaisons as appropriate.

7.2 Budget

The budget for the implementation of engagement activities will be included in the financial plan of the Project. The budget is intended to be allocated annually based on the specific engagement activities planned to be conducted in the year.

Annual stakeholder engagement budgeting during operation will likely include the following elements:

- Staff (contract and permanent);
- Communication material development and production (i.e., printing);
- Updates to the Lender's and Project Owner's websites;
- Meeting costs (refreshments, transport);
- Event costs (meeting fees, refreshments, venue hire, transport); and
- Surveys (e.g., monitoring and perception surveys).

8 Monitoring and Reporting

Through various communication channels such as surveys, town hall meetings, and periodic one-on-one meetings, the Project will monitor and collect feedback from stakeholders. Separate reports shall be compiled for stakeholder engagement activities and grievances. The results of the stakeholder engagement process will be included in an Environmental and Social Monitoring Report (ESMR). The frequency of the disclosure of the ESMR is defined in Table 8-1. The Project should include the following information on the stakeholder engagement activities in the ESMR:

- place and time of public consultative meetings (including other types of engagement activities);
- information on the participants;
- issues and concerns raised during the consultative meetings;
- list of the number and types of grievances raised in the reporting period and the number of resolved and/or outstanding grievances; and
- information on how the issues raised during the meetings were taken into consideration by the organization in charge of the Project implementation.

The Reports will also include a summary of implemented corrective measures intended to address any grievances.

Table 8-1 provides frequencies of the internal monitoring and reporting on stakeholder engagement activities, including grievance management.

Table 8-1: Frequency of Internal Monitoring and Reporting of SEP

Phase	Monitoring	Reporting	Updating the SEP
Operation phase	Continuous	Annually	Annually or when new “leverage” and “engage” stakeholders are identified, or when new engagement activities are required, whichever comes first

Appendix A Records of consultations – Minutes of meeting during the ESDD site visit

Meeting with representatives of EDPR Vietnam, Xuan Thien Thuan Bac phase 1 & 2 solar Projects

GENERAL INFORMATION

Project	ESDD for EDPR Solar Farms
Subject	Interviews with representatives of EDPR Vietnam, Xuan Thien Thuan Bac phase 1 & 2 solar Projects
Date	22 and 23 August 2023
Location	EDPR Vietnam's meeting room at Xuan Thien Thuan Bac phase 1&2 solar plants
Attendees	<p>SMEC</p> <ul style="list-style-type: none"> - Ms. Pham Tra Giang (Environmental Specialist) - Ms. Vu Thi Ha Ngan (Social Specialist) <p>EDPR Vietnam</p> <ul style="list-style-type: none"> - Ms. Luong Thi Thu – HSE Manager of EDPR Vietnam; <p>Representatives of Xuan Thien Solar Plants:</p> <ul style="list-style-type: none"> - Mr. Nguyen Ta Tuan – Plant Manager; - Mr. Phan Hoang Long- O&M Manager; <p>Contractors:</p> <ul style="list-style-type: none"> - Mr. Dang Tran Thuc Nguyen – O&M Manager (Ingeteam Vietnam); - Mr. Le Cong Lam – HSE team leader (Ingeteam Vietnam); - Mr. Nguyen Khanh Bang – HSE team member (Ingeteam Vietnam); - Mr. Nguyen Kim Vinh – QA/QC Manager (VinaS E&C JSC.); - Mr. Nguyen Van Thao – HSE Manager (Jobtest – A hired company to support EDPR Vietnam supervising HSE compliance of the contractors working on the Projects, i.e., VinaS E&C JSC at that time).

DISCUSSION POINTS

1. General Information

- EDPR Vietnam has acquired Xuan Thien Thuan Bac Phase 1 & Xuan Thien Thuan Bac Phase 2 solar power plants (hereinafter referred as “**Thuan Bac 1**” and “**Thuan Bac 2**”) since September 2022.
- Currently EDPR Vietnam is managing Thuan Bac 1 and Thuan Bac 2 including E&S Management, however EDPR Vietnam has no employees. Their human resources are provided from Sunseap Commercial & Industrial Assets (Vietnam) Co., Ltd. (“SCIAVN”).
- EDP Renováveis directly holds a 100% stake in the share capital of EDP Renewables Vietnam Co., Ltd. (the Project Sponsor, a Vietnamese company) and Sunseap Group Pte. Ltd. (a Singaporean company). EDP Renováveis, through its wholly owned subsidiaries, SCIAVN, and Sunseap Delta Holdings Pte. Ltd. (a Singaporean company), holds a 100% stake of Xuan Thien Ninh Thuan JSC. and Xuan Thien Thuan Bac

JSC., each of one operating Xuan Thien Thuan Bac-Phase 1 Project and Xuan Thien Thuan Bac-Phase 2 Project, respectively.

- The two projects were completed construction and have started operation since April 2020; No major construction is occurring at the sites during the ESDD site visit.
- At EDPR Vietnam (country level):
 - o HSE Management: Ms Luong Thi Thu;
 - o Social Management (Community Development Officer): Ms.
- There are six people, who are employees of SCIAVN, working in the plants:
 - o One Plant Manager;
 - o One O&M Manager;
 - o Three Shift supervisors;
 - o One admin.
- Currently, there are several contractors working on the Projects such as:
 - o Long term contractors:
 - Ingeteam Vietnam (acting as O&M contractor of the two plants): 20 people (three working shifts);
 - Long Son Security Services JSC. (Security contractor): 30 people (three working shifts);
 - EVN Power Transmission Company No. 3 (PTC 3) (O&M contractor of 220 kV TL).
 - o Short-term contractors:
 - VinaS E&C JSC. ("**VinaS**") (the contractor is replacing electric cables of the two plants). Their contract duration is from Mar to Sep 2023. At the time of ESDD site visit, they are still there.
 - Tuan Hung Company: the vendor provides solar panel cleaning service.
 - Jobtest: HSE supervisor They will demobilize from the project sites after VinaS finishes their work.

2. ESIA, E&S Policy, ESMS and ESMPs

- EDPR Vietnam's representative confirmed that they are currently adopting the E&S relevant policies, management plans and procedures/guides from group and region level to country level. They have not yet developed any site-specific E&S policy, ESMS or ESMPs for Thuan Bac 1 and Thuan Bac 2.
- EDPR Vietnam has ERP and HSE plan (at country level) available, not yet adopted (in documentation) for the Projects;
- There is no grievance redress mechanism (GRM) or stakeholder management plan (SEP) available at the Projects either. They are applying group-level GRM (online channel);
- Ingeteam Vietnam has their own E&S policy, and HSE management plans/procedures applying for all their projects in Vietnam including Thuan Bac 1 and Thuan Bac 2;
- EDPR Vietnam is currently reviewing the HSE management plans/procedures of Ingeteam Vietnam and requested the updates (when applicable) to be in line with EDPR's policy and relevant plans/procedures, for example: waste management plan, etc.
- No ESIA report has been conducted for the Projects, only local EIA for Thuan Bac 1 and local EPP for Thuan Bac 2. EIA and EPP have been approved by Ninh Thuan's Department of Natural Resources and Environment in 2018;
- No additional biodiversity assessment conducted for the Projects to date, except the very limited biodiversity assessment provided in the EIA and EPP.
- At Project level, environmental monitoring reports are conducting as per the approved local EIA and EPP.

3. Health and Safety

- HSE compliance activities are managed on a daily basis via tool box meeting at every morning (before work deployment);
- HSE inspection site walks and abnormal records (if any) on a weekly basis.

- HSE meetings are in every Tuesday among the representatives of EDPR Vietnam (HSE management), plant management and the contractors;
- PPE is required and fully equipped for employees of the projects including employees of the contractors.
- Emergency Responses Plan (ERP) with a focus on fire explosion emergency plan are prepared for the company's properties.
- HSE Manager of EDPR Vietnam conducts HSE site walk to inspect HSE compliance activities at the projects on a monthly basis. She also receives monthly HSE reports from the contractors, and then report to HSE management at regional level of EDPR

4. Training

- There is no documented E&S Training Plan available at the project level. Currently, the E&S related trainings are on call demand and based on group-level training matrix.
- HSE training has been provided to the project personnel (including contractors' employees) by EDPR Vietnam.
- Ingeteam frequently conducts HSE training for their workers, through HSE meetings, on a monthly basis;
- All personnel working in the solar farms have been through the basic trainings on health, and safety, basic first aid, fire-fighting, and emergency response.
- Fire-fighting response, search and rescue drills are implemented every year.

5. Waste Management at the sites

- The waste management at the sites is controlled by Xuan Thien Thuan Bac JSC. and Xuan Thien Ninh Thuan JSC. with support from EDPR Vietnam. Ingeteam Vietnam is taking responsibility for waste generated from O&M activities, including broken solar panels and other hazardous waste such as waste oil.
- The waste generated from the activities of other contractors working in the plants is the contractors' scope. After completing the work, they must clean up and return the premises to the solar farms. That is also a contracted term.
- Waste is classified as domestic waste, non-hazardous waste and hazardous waste;
 - o Domestic waste is collected by a licensed unit (i.e., Nam Thanh Ninh Thuan Company Limited) on every Weds;
 - o Hazardous waste (HW) is collected and transferred by a lincased HW treatment unit (i.e., Moc An Chau Company), frequency once per year;

Additional contracts and records will be updated to SMEC for review.

- Waste management plan developed by Ingeteam Vietnam is currently under review by EDPR Vietnam and then subject to revise following waste management plan/procedure issued by EDP Group.
- Neither an environmental license nor a HW registration is available at the Projects.

6. Land acquisition, involuntary resettlement and Indigenous People

- The land acquisition has been completed at the time of ESDD site visit.

7. Internal and External Grievance mechanism

- The Projects have not yet developed an SOP for Internal and External Grievance mechanism. As reported in the meeting, whenever there is a complaint or feedback from an employee, he or she can report it directly or via email to their line manager. They can also submit their complaints online (via EDPR's Speak Up Channel). This channel is accessible to all employees, customers, suppliers and other stakeholders that may be adversely impacted by the Corporate or, irrespective of this, that wish to complain, denounce, clarify or expose any situation of ethical nature.
- No internal complaints/ grievances have been reported so far.
- No complaints have been received from nearby residential areas.

8. Labour and Human Resources

- Majority of the project personnel are local people (i.e. Ninh Thuan's citizen).
- Working regimes and benefits for employees comply with Labour Code.
- No child labor and forced labor are allowed.

9. Supply Chain Management

- At group level, EDP has several policies and plans/procedures to manage supply chain of contractors and/or suppliers, for example: Sustainability in the Supply Chain- Protocol of Procedures, EDP Supplier Code of Conduct, etc.
- For new contractors and suppliers, they apply HSE in supply chain procedure and contractor management procedure from tendering process (through RfP) through the operation of the winner, for new contractors and suppliers;
- However, as confirmed by EDPR Vietnam’s representative, since the equipment supplier of the Projects (i.e., Shanghai JA Solar Technology co., Ltd.) had been selected before the Projects was acquired by EDPR S.A. (September 2022). After that, EDPR also conducts an examination of the supplier to ensure if they have any issues on forced labor based on their internal policies and procedures.
- No site-specific supply chain management procedure is available at the time of ESDD.

10. Random interview at site (22 August 2023)

Name of interviewees	Topics	Answer
Han Ngoc Thien Buu (Shift Leader)- full-time employee of Ingeteam Vietnam Nguyen Quang Son (Shift Leader)- full-time employee of Ingeteam Vietnam;	1. PPE; 2. Labour requirements. 3. OHSE implementation. 4. Waste classification awareness. 5. Worker grievance mechanism. 6. Training on EHS, safety and related records. 7. Other related issues.	1. PPE has been provided every year and on demand. 2.They were introduced about labour requirements, workplace rules and also their benefits while working in the plants; They have not had any complaints, or unpleasant comments so far; 3. They are trained OHSE by Ingeteam Vietnam and also by EDPR Vietnam; OHSE implementation has been followed and monitored by a HSE team of Ingeteam Vietnam; 4. Waste classification has been included in the HSE induction training; 5. Worker grievance mechanism: they are following their reporting line. No documented WGM provided to them. 6. They have been qualified and certified as electric operators, by EVN. In addition, they also were provided a several trainings including HSE, safety, basic first aid, fire-fighting before working for the plants; 7. They have been checked up periodically. The last health check-up was in June 2023. The next one will be end of this year.

Meeting with local authorities in Bac Phong Commune People's Committee

GENERAL INFORMATION

Project	ESDD for EDPR Solar Farms
Subject	Meeting with the local authorities in Bac Phong Commune People's Committee (CPC)
Date	22 August 2023
Location	Bac Phong CPC office, Thuan Bac District, Ninh Thuan Province
Attendees	<p>SMEC</p> <ul style="list-style-type: none"> - Ms. Ngan Vu (Social Specialist) <p>Bac Phong CPC:</p> <ul style="list-style-type: none"> - Mr. Pham Thai Son – CPC Chairman of Bac Phong Commune - Mr. Ha Quoc Minh – Cadastral officer of Bac Phong Commune - Mr. Tran Dinh Lang – My Nhon village head - Mr. Le Hong Tuan – Father land front of My Nhon village - Ms. Huynh Vo Bao Trang – Women Union of Bac Phong Commune - Ms. Nguyen Thi Nhu Hong – Father land front of Bac Phong Commune).

DISCUSSION POINTS

1. General Information

- Bac Phong commune has about 1,800 households and a population of 6,800 people. Including 3 villages of My Nhon, Ba Thap, Suoi Le. Among them, My Nhon village is the village directly affected by the project, with about 950 households and a population of about 3,500 people.
- 99% of the commune's population is Kinh ethnic group. There are a small number of ethnic minorities who have immigrated from other places to do business or build families in the commune. In the list of households whose land was recovered, there are a number of people from other ethnic groups. These are people who came to reclaim or buy land from people in the commune many years ago.

2. Land acquisition process

The project's land acquisition process complies with state regulations. There is no livelihood restoration program, only career change support according to state policy. There is no special support for poor households and policy families whose land is recovered.

Some of the main complaints related to land acquisition are:

- Internal family disputes
- During the construction process, the construction unit built on the land of some households that have not received enough compensation.
- Complaints about land prices being too low
- Some households (it is unclear whether the land is being recovered for the Xuan Thien or Trung Nam project) complained that the project fenced their land and the households could not access it to continue farming.
- The agricultural land allocation norm of Ninh Thuan province is 2 hectares. Therefore, even though some households have an area of over 5 hectares, they are only compensated for 2 hectares. The household complained about this.

3. Land acquisition impacts

- At the time of land acquisition for the Project, the main land types were rice land, perennial crop land and other agricultural land.

- Agricultural land in the project area was previously very arid, had no water source for irrigation and was completely dependent on the weather, only cultivable during the rainy season. Therefore, people hardly cultivate but only graze cows and goats. When land is recovered, it does not affect income from farming, but affects income from grazing cows and goats.

4. Community Health and safety

- The Xuan Thien project has built a fence around the site to prevent people and livestock from accessing it, thus eliminating safety concerns.
- Since the project's development, flooding in the North Canal (My Nhon village) south of the project site has become more frequent. Residents believe that this is due to the construction of solar panels (including both the Xuan Thien and Trung Nam solar farms).

5. Difficulty for women:

- Since the land acquisition, the remaining land is almost unusable due to a loss of access roads, which has decreased its value. Additionally, the grazing area has shrunk significantly, reducing income from cattle and goat grazing.
- Most people do not know how to use compensation money effectively, and it quickly runs out.
- There were no reports of harassment during the construction phase.

6. Recommendations for the project:

- The company should provide additional support for social welfare, especially for the poor and children. This support should be given directly to communes, rather than to higher levels such as districts and provinces.
- The company should collaborate with local authorities to address problems with canals, roads, and water drainage systems in My Nhon village. This will improve the living conditions of the people in the village.

7. Other discussions

- Bac Phong commune has many other projects besides the Xuan Thien solar power project, such as the Hanbaram wind power project, the Nai Dam project, and the Trung Nam wind and solar power complex.
- The Du Long Industrial Park in the commune has a garment factory that employs nearly 3,000 workers, mainly women. Many women in the commune work at this factory for a monthly salary of 5-6 million dong, not including benefits. People in the commune also work as seasonal unskilled laborers for solar and wind power projects in the area.
- The commune coordinates with the district and provincial people's committees to organize rural vocational training programs every year, but these programs have low attendance due to their low effectiveness.

Meeting with representatives of Ninh Thuan LFDC

GENERAL INFORMATION

Project	ESDD for EDPR Solar Farms
Subject	Meeting with the representative of Ninh Thuan LFDC
Date	22 August 2023
Location	Ninh Thuan LFDC office, Ninh Thuan Province
Attendees	SMEC: Ms. Ngan Vu (Social Specialist) Ninh Thuan LFDC: Ms. Dang Thi Huong – official in charge of the land acquisition for the Projects.

DISCUSSION POINTS

1. Role of the Ninh Thuan LFDC in the Project's land acquisition process:

With approval from the Ninh Thuan Provincial People's Committee (PPC) for land acquisition, the Compensation, Support and Resettlement (CSR) process for the Projects was undertaken by the Government. Thuan Bac District People's Committee (DPC) made decision on the land acquisition, and Ninh Thuan Land Fund Development Center (LFDC) was the public land service organization contracted by the Project Owners to implement the CSR process and report to Thuan Bac DPC.

2. Land acquisition process

The project's land acquisition process complies with state regulations. Key steps of the process include:

- Land acquisition notification: around June 2018
- Detailed Measurement Survey (DMS) for AHs: from June to August 2018
- Development of Detailed CSR Plans for AHs: from August 2018 to September 2020
- Consultation of Detailed CSR Plans with AHs: from August 2018 to September 2020
- Appraisal and Approval of the Detailed CSR Plans: from November 2018 to September 2020
- Compensation and Support Payment: Complete in around October 2020

All the displaced household had handed over their land. The Ninh Thuan PPC also officially handed over the land area to Project Owners through issuance of the LURCs for both Thuan Bac 1 and 2 projects on December 30th, 2021.

3. Other discussions:

- There were several land users who encroached public land to do farming at time of the land acquisition. Those were eligible for the compensation for crops and did not receive compensation for land and job transition.
- Some households rent land from others for cultivation. If these households have land lease contracts, they will be compensated according to regulations when the land is acquired. However, there are almost no cases of land leasing in the project area because the land is dry and farming is not very effective.

4. Grievances

Main complaints related to land acquisition include:

- Complaints about low compensation prices
- Complaints related to personal disputes

However, to date, all complaints have been resolved and there are no outstanding complaints related to land recovery.

Appendix B Stakeholder Engagement Log Template

Date	Venue	PIC	Form of Communication	Participants/ Stakeholders	Purpose	Points of Discussion	Follow-up Actions	MoM	Photo/ Notes

Appendix C Grievance Registration Form

GRIEVANCE FORM		
Reference Number		
Date of Receipt		
Name of Complainant		
ID Number		
Contact Information	Address	
	Phone	
Content of Grievance or complaint		
Signature of complainant		
Received by	Name	
	Signature	
Status of grievance	Investigation	
	Resolution	
	Complainant feedback	
	Close out reporting	

Appendix D Grievance Log Template

No.	Date of Receipt	Recipient	Form of Grievance	Name of Complainant	Address/ Phone	Summary of Grievance	Grievance Accepted?	Reason for Reject	Person in charge	Summary of Grievance Resolution Process	Status	Date of Grievance Closed	Further Action	Notes

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