

STAKEHOLDER ENGAGEMENT PLAN (SEP)

MASDAR INFINITY POWER HOLDING 200MW WIND POWER PROJECT IN GULF OF SUEZ

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FINAL



Regional Center for Renewable Energy and Energy Efficiency
المركز الإقليمي للطاقة المتجددة وكفاءة الطاقة



INFINITY Power
A MASDAR INFINITY COMPANY

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1. INTRODUCTION

The Government of Egypt (GoE) issued the Renewable Energy Law to support the creation of a favorable economic environment for a significant increase in renewable energy investment in the country. In accordance with the Law, the Egyptian Electricity Transmission Company (EETC) invites private investors to submit their offers for solar and wind development projects, for specific capacities and the award will be made to that bidder with the lowest price. In addition, the GoE (through the New and Renewable Energy Authority (NREA)) provides the land for the investors.

In accordance with the above, Infinity Power Holding (IPH) was selected for the development of a 200-Megawatt (MW) Wind Power facility in Ras Ghareb District of the Red Sea Governorate (hereafter referred to as ‘the Project’).

This document constitutes a Stakeholder Engagement Plan (SEP) to be implemented by the Developer throughout the planning, construction, and operation phase for the Project. The SEP outlines a systematic approach to stakeholder engagement that will help the Developer build and maintain over time a constructive relationship with their stakeholders, particularly the locally affected communities. The SEP is a live document which will be updated throughout the Project construction, operation, and implementation.

The Project welcomes suggestions for improvement of this SEP. Suggestions can be submitted via the contact information for the Developer at the end of this document (Chapter ‘5’).

This SEP includes the following:

- Chapter 1 – provide a background and introduction on the Project and SEP.
- Chapter 2 – Project Description: provides a summary of the Project location, main Project components, Project schedule and job opportunities for the construction and operation phase. Finally, the Chapter also provided an overview of E&S risks and opportunities.
- Chapter 3 – Regulatory Context: highlights the main requirements that are relevant for stakeholder engagement to the Project to include Egyptian regulations and international best practice requirements.
- Chapter 4 – Identification of Stakeholders: identifies all relevant stakeholders for the construction and operation phase of the Project at all geographic levels to include national, regional, and local levels as well as communities within the area of influence of the Project.
- Chapter 5 – Summary of Past Stakeholder Engagement Activities: provides a summary of past stakeholder engagement activities undertaken for the Project during the planning and design phase of the Project.
- Chapter 6 – Stakeholder Engagement Strategy and Plan: identifies an engagement strategy for each stakeholder group to include objective for engagement, communication methods and tools, timeframe, and responsibilities. Chapter also provides contact details of the Developer for communication with all relevant stakeholders of the Project.
- Chapter 7 – Grievance Mechanism: identifies a mechanism for managing and handling any concerns or complaints related to the Project during the construction and operation phase. This includes a mechanism for stakeholder and communities and another for workers.
- Chapter 8 – Monitoring and Reporting: identifies the key monitoring and reporting requirements that are applicable for the implementation of the plan.
- Chapter 9 – Roles and Responsibilities: identifies the roles and responsibilities for the Developer and other involved entities in implementation of the plan.

1.1 Project Location

The Project site is located within the Red Sea Governorate, approximately 250km southeast of the capital city of Cairo (Figure 1). More specifically, the Project site is located within the Ras Ghareb City (or District) and therefore administratively is under the Ras Ghareb City Council.

The closest community settlement to the Project site is Ras Ghareb town (located 18km to the east) – refer to Figure 2 below. The Project has a total area of 37.5km² area that has been allocated to the Developer by NREA for the development of this Project. In addition, within the area there are key Bedouin groups that settle permanently in areas such as Ras Ghareb and Wadi Dara and other groups that are nomadic and many settle within the mountain ranges to the west of the Project area as seen in Figure 3 below.

In addition, it is important to note that the Project area is part of a 300km² Strategic Area that was initially owned by the Government of Egypt (GoE) and has been allocated to NREA for the purpose of wind farm development projects with a total capacity of 1,500MW. NREA in turn allocates the land to private developers under land use usufruct agreements. Refer to below for the location of the Strategic Area location in relation to the Project site.



Figure 1: Project Site in Relation to the Capital City of Egypt

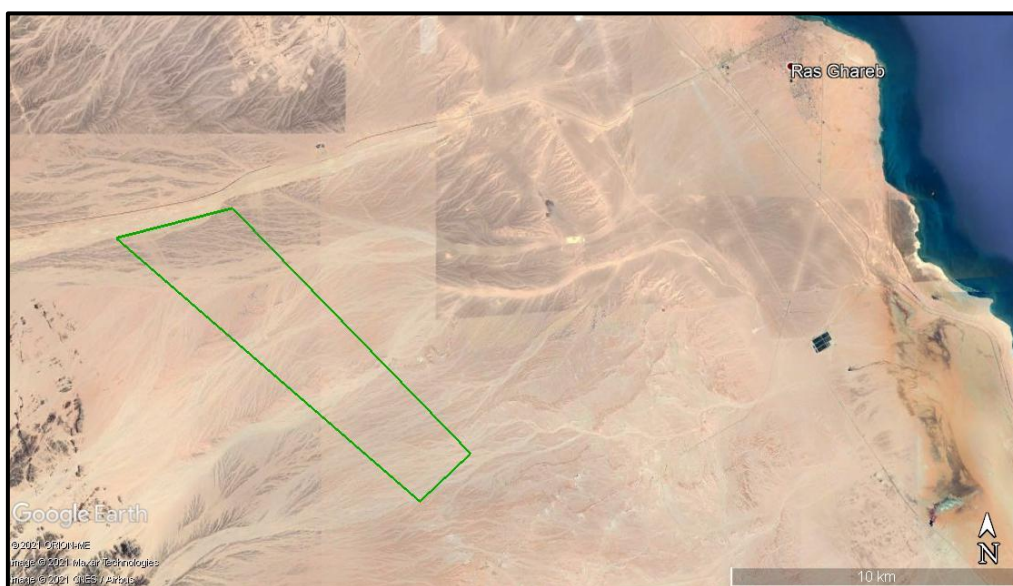


Figure 2: Project Site and Closest Villages

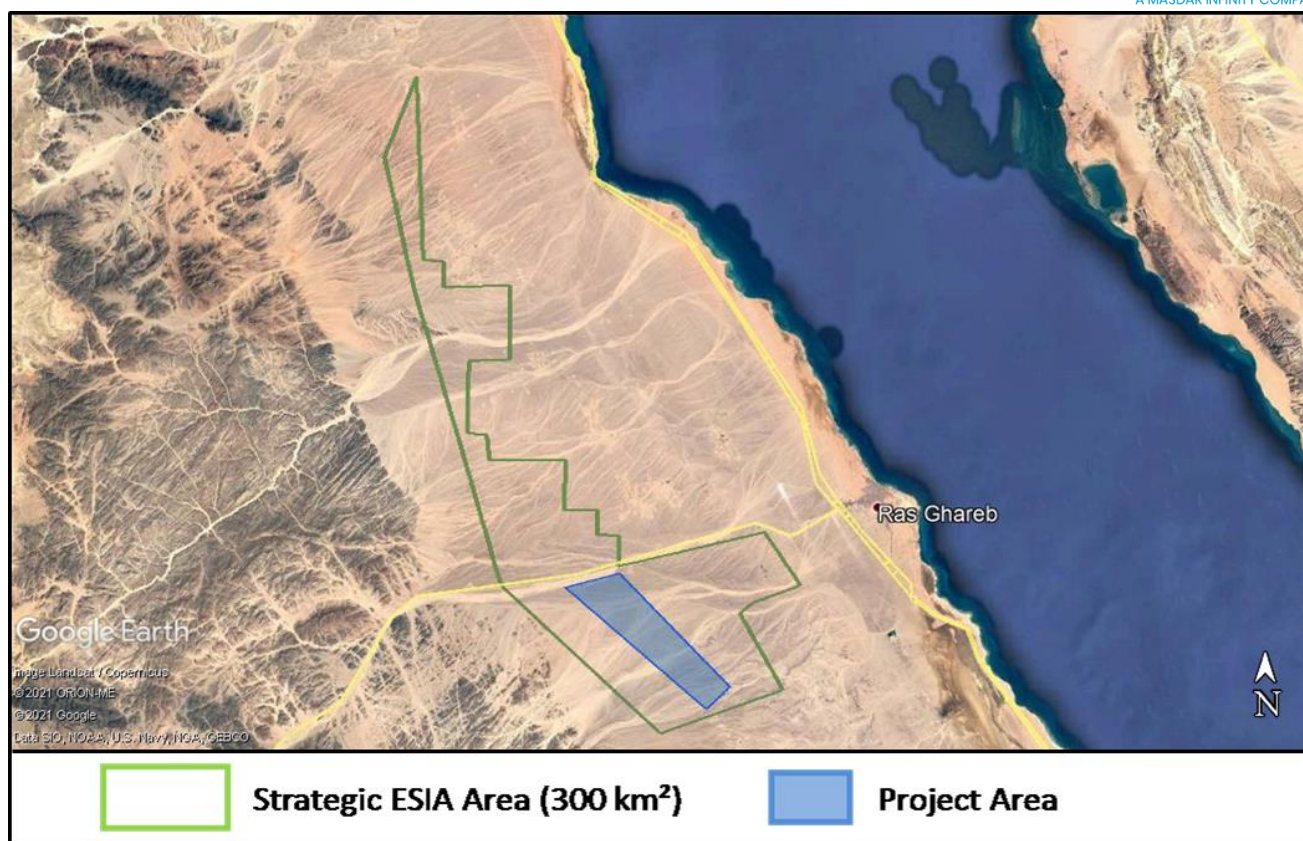


Figure 3: Project Site as Part of the 300km² Area Allocated for Wind Farm Developments

1.2 Project Components

Wind turbine technology relies on harvesting the kinetic energy in wind (i.e., movement of wind) and turning it into mechanical energy which in turn is used for electricity generation. The key components of the Project include the following:

- **Wind Turbines:** a typical wind turbine is presented in Figure 4 below. The specifications of the wind turbine are provided in the table below.

Table 1: Summary of Turbine Specifications

Parameter	Goldwind	Envision
Model	GWH182 7.2MW	EN182 7.8MW
Rated Capacity	7200kW	7800kW
Hub Height	110m	110m
Rotor diameter	182m	182m
Maximum tip Speed	89m/s	89m/s
Number of WTGS	28	26

- **Supporting infrastructure and utility** elements for the Project which will include:
 - Cables that will connect the turbines to an onsite substation
 - Substation that converts the output from the turbines to a voltage that is appropriate for connection with National Grid
 - Onsite building infrastructure that will include an administrative building (offices) and a warehouse for storage of equipment and machinery

- Road network for ease of access of various project components throughout the site
- Associated facilities which will mainly include an Overhead Transmission Line (OHTL) that will connect from the substation onsite to the National Grid.

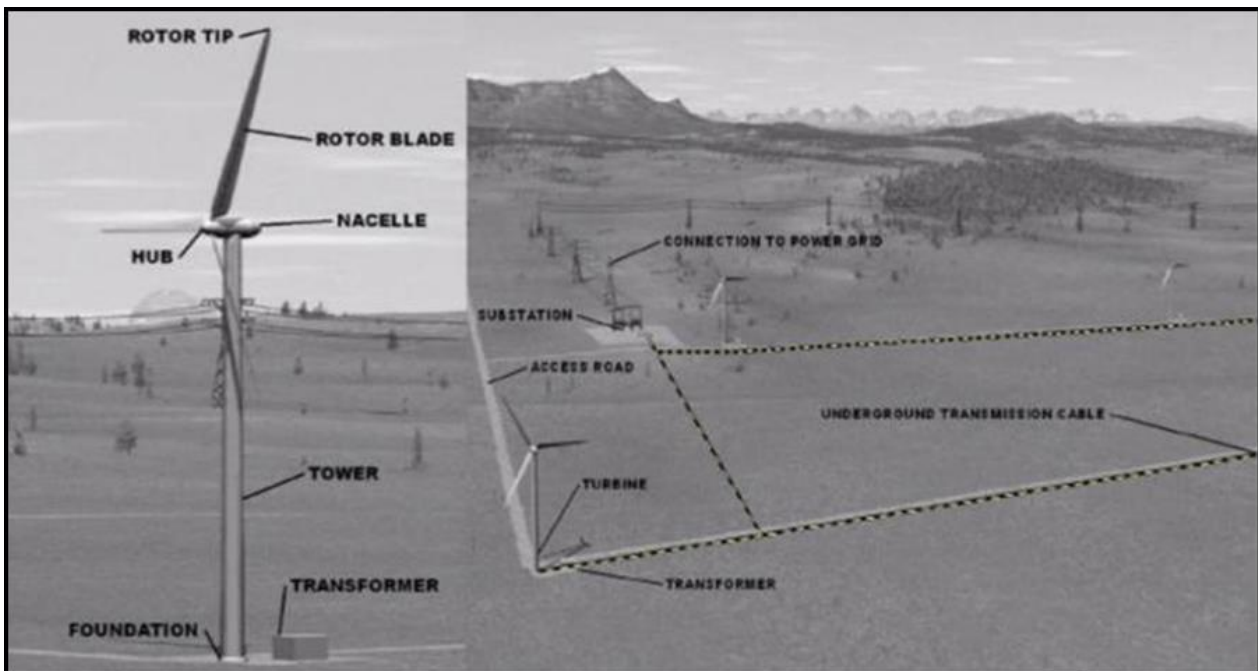


Figure 4: (a) Typical Structural Components of a Wind Turbine, (b) Typical Components of a Wind Farm (Source: EHS Guidelines for Wind Energy, IFC)

The Project will result in crucial positive environmental and economic impacts on the strategic and national level given the current challenges the energy sector in Egypt is facing. Such positive impacts underpin rationale for the Project. These include the following:

- The Project allows for more sustainable development and shows the commitment of the Government of Egypt to realizing its Energy Strategy and meeting the set targets for renewable energy sources.
- The Project will contribute to increasing energy security through reliance on an indigenous, inexhaustible, and mostly import-independent energy resource. The Project is expected to provide around 800-Gigawatt Hour (GWh) of electricity per year, which is enough to power more than 300,000 households in Egypt.
- Generating electricity through wind power is relatively pollution-free during operation. Compared with the conventional way of producing electricity in Egypt, the clean energy produced is expected to reduce consumption of fossil fuels for electricity generation and will thus help in reducing greenhouse gas emissions as well as air pollutant emissions. The Project will likely displace more than 400,000 metric tons of CO₂ annually.

1.3 Project Phases

- Planning and Construction Phase: that will include: (i) preparation of the detailed design, (ii) transportation of components to the site, (iii) site preparation activities (land clearing, excavations, etc.), and (iv) installation of components.
- Operations Phase: that will include the normal daily operation of the wind farm and the undertaking of maintenance activities as required.
- Decommissioning Phase (to be determined): that will include the dismantling of the various Project components at the end of the lifetime.

1.4 Overview of Potential E&S Risks and Opportunities

The table below provides an overview of the potential E&S risks and opportunities that are expected throughout the key project phases.

Potential Risks and Opportunities during the Construction Phase

Attribute / Issue	Likely Impact – Planning and Construction Phase
Landscape and Visual	Visual and landscape impacts due to presence of elements typical of a construction site such as equipment and machinery.
Land Use	Project could conflict the formal assigned land uses set by the various governmental entities.
Geology, Hydrology, and hydrogeology	Potential for flood risks on the Project area.
	Risk of soil and groundwater contamination during the various construction activities from improper housekeeping activities, spillage of hazardous material, random discharge of waste and wastewater.
Biodiversity	Improper management of construction activities could disturb/damage habitats and fauna within the Project site.
Archaeology	Improper management of construction activities could disturb/damage archaeological remains which could be buried in the ground (if any).
Air Quality and Noise	Construction activities will likely result in an increased level of dust, particulate matter, and pollutant emissions
	Possible noise emissions to the environment from the construction activities which will likely include the use of machinery and equipment
Infrastructure and Utilities	Road Networks – if transportation activities of the various project components to the site are not properly managed beforehand, they could entail risk of damage to the existing roads and could be of public safety concerns to other users on the road. In addition, if planning activities are not well managed it could damage/disturb existing onsite road networks.
	Water Resources – water requirements of the Project could entail constraints on the existing resources and users.
	Waste Utilities – it is important to ensure that existing utilities would be able to handle the amount of waste, wastewater and hazardous generated from the Project during the construction phase.
	Aviation, Telecommunication, and TV & Radio Links – Improper planning and site selection of the Project could impact aircraft safety and/or could potentially interfere with certain electromagnetic transmissions associated with air transport, telecommunications, and radio/television systems in the area.
Occupational Health and Safety	There will be some generic risks to workers health and safety from working on construction sites, as it increases the risk of injury or death due to accidents.
Public Health and Safety	Public access of unauthorized personnel to the various Project components (turbines, substation) could result in various public safety hazards.
	Worker influx could result in certain community health, safety, and security impacts, including competition over basic social services (water, housing, health care facilities, waste collection and disposal, etc.), risk of diseases, inappropriate conduct by workers towards locals, an increase in social vices ¹ , etc.
	Inappropriate conduct of security personnel towards local communities could result in resentment, distrust and escalation of events

¹ Social vices are deviant behaviors such as illicit sex, drug addiction, immoral behavior, and criminal tendencies.

	Road Networks – The main junction that leads to Ras Gharib (which is located just outside of the city) also leads to the Project site and this junction in specific is expected to have an increased level of traffic. If transportation activities of the various project components to the site are not properly managed beforehand, they could entail risk of public health and safety concerns to other users on the road (e.g. exceeding speed limits, in adherence to driving rules, etc.).
Socio-economic Development	The Project is expected at a minimum to provide job opportunities for local communities as well as procurement opportunities for local businesses. This, to some extent, could contribute to enhancing the living environment for its inhabitants, elevate their standards of living, and bring social and economic prosperity to local communities. Around 250 job opportunities are expected at peak during the construction phase. This will mainly include skilled job opportunities (engineers, technicians, consultants, surveyors, etc.) and unskilled job opportunities (mainly laborers but will also include a few security personnel).

Potential Risks and Opportunities during the Operation Phase

Attribute / Issue	Likely Impact – Operation Phase
Landscape and Visual	Visual impacts concern the turbines themselves (e.g., color, height, and number of turbines) relating to their interaction with the character of the surrounding landscape.
Geology, Hydrology and Hydrogeology	Risk of soil and groundwater contamination during the various operational activities from improper housekeeping activities, spillage of hazardous material, random discharge of waste and wastewater.
Avifauna (Birds)	Wind turbines are associated with impacts on birds from risks of strikes and collision on both migratory and resident soaring birds. Such impacts depend on several factors but could affect the population levels of certain species especially those with international/national critical conservation status.
Bats	The potential impacts from the Project during operation are mainly related to risk of bat strikes and collisions with rotors of the operating wind turbines.
Infrastructure and Utilities	Water Resources – water requirements of the Project could entail constraints on the existing resources and users.
	Waste Utilities – it is important to ensure that existing utilities would be able to handle the amount of waste, wastewater and hazardous generated from the Project during the construction phase.
Occupational Health and Safety	There will be some risks to workers health and safety during the operation and maintenance activities of the Project.
Public Health and Safety	Operating wind turbines will produce noise from mechanical and aerodynamic effects. This could be a source of disturbance and nuisance to the receptors and could create a disturbing indoor environment.
	Operating wind turbines will produce shadow flicker which could be a source of disturbance and nuisance to the receptors and could create a disturbing indoor environment.
	Public access of unauthorized personnel to the various Project components (turbines, substation) could result in various public safety hazards.
	Inappropriate conduct of security personnel towards local communities could result in resentment, distrust and escalation of events
	Blade or tower glint can impact sensitive receptors as the reflection of sunlight off the rotor blade may be angled toward nearby receptors.
	Failure in rotor blade can result in the ‘throwing’ of the blade. Although overall risk of such events is extremely low, it could affect the public safety of nearby receptors.

Socio-economic Development	The Project is expected at a minimum to provide job opportunities for local communities as well as procurement opportunities for local businesses. This, to some extent, could contribute to enhancing the living environment for its inhabitants, elevate their standards of living, and bring social and economic prosperity to local communities. Around 25 job opportunities are expected during the operation phase for a duration of 20 years. This will include skilled job opportunities (such as engineers, technicians, administrative employees, etc.) and unskilled job opportunities (such as security personnel, drivers, etc.).
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2. REGULATORY CONTEXT

2.1 Egyptian Legislation Requirements

Stakeholder consultation and engagement under the Egyptian requirements, is primarily linked to the Environmental and Social Impact Assessment (ESIA) study as stipulated in the “Law of Environment No. 4 of 1994 and its amendments in Law No. 9 of 2009”. According to the last updated executive regulation and the ministerial decree No. 26 of 2016, the ESIA system classifies the projects into four categories based on different levels of ESIA requirements according to severity of possible impacts and location of the establishment and its proximity to residential settlements.

In specific, wind farm development projects in general are categorized as “Category C” (projects which require a comprehensive ESIA study) and which require consultations under two (2) phases as part of the ESIA study: (i) environmental and social scoping phase which requires targeted consultations; and (ii) disclosure phase which requires a public disclosure session for ESIA outcomes.

The scoping should include targeted stakeholder consultations with key stakeholders as relevant to the Project, while the public disclosure consultation must include the following entities:

- Representatives of the Egyptian Environmental Affairs Agency (EEAA)
- Related governmental authorities
- Representatives of the Governorate and local units where the project is located
- Affected groups including local businesses and communities
- Non-governmental Organization (NGOs) and civil society groups

The EEAA guidelines methodology identifies the following articles covering the guidelines on conducting the public consultation as part of the ESIA study are as follows:

- Paragraph 6.4.3.1 Scope of Public Consultation
- Paragraph 6.4.3.2 Methodology of Public Consultation
- Paragraph 6.4.3.3 Documentation of the Consultation Results
- Paragraph 7 Requirement and Scope of the Public Disclosure

2.2 Lender E&S Requirements

The Developer will be seeking financing for the Project from International Financial Institutions (IFIs). Therefore, the Developer wishes to design and manage the Project in accordance with good international industry practice and standards. This SEP meets international best practice requirements to include the relevant E&S requirements of IFIs.

International Finance Corporation (IFC)

The IFC Policy on Environmental and Social Sustainability, including the IFC Performance Standards (PS) have become the de facto international environmental and social performance benchmark for project financing. The IFC Policy on E&S Sustainability, the IFC Performance Standards, along with the IFC Access to Information Policy constitute the overall IFC Sustainability Framework, where “IFC Performance Standard 1 on Assessment and Management of Environmental and Social Risks and Impacts” (IFC, 2012) sets out the following recommendations for stakeholder engagement:

- Stakeholder Engagement is an on-going process that may involve, in varying degrees, the following elements: stakeholder analysis & planning, disclosure & dissemination of information, consultation & participation, grievance mechanism, and on-going reporting to Affected Communities.

- Project stakeholders are those persons or groups who:
 - are directly and/or indirectly affected by the project (or the company's operations)
 - have "interests" in the project or parent company that determine them as stakeholders
 - have the potential to influence project outcomes or company operations
- A Stakeholder Engagement Plan (SEP) that is scaled to the project risks and impacts and is developed and tailored to the characteristics and interests of the Affected Communities and will be implemented accordingly.
- Affected Communities will be provided with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.
- When Affected Communities are subject to identified risks and adverse impacts from a project, a process of consultation will be undertaken 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. 'Effective' or 'meaningful consultation' is further explained in Para 30 of PS1.
- The extent and degree of engagement should be commensurate with the project's risks and adverse impacts and concerns raised by Affected Communities.
- The consultation process will be tailored to language preferences of Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups.
- For projects with potentially significant adverse impacts, the client will conduct an Informed Consultation and Participation (ICP) process that will result in the Affected Communities' informed participation.
- A grievance mechanism will be established to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance.

Additionally, IFC provides ample guidance on the whole process in its good practice handbook on stakeholder engagement (2007).

European Bank for Reconstruction and Development (EBRD) Performance Requirements (PR)

The SEP will also follow the requirements of the EBRD in relation to the stakeholder engagement process and activities. EBRD "PR10: Information Disclosure and Stakeholder Engagement" sets out the following requirements of stakeholder engagement during project preparation:

- A Stakeholder Engagement Plan (SEP) must be developed and implemented for projects that are likely to have adverse environmental or social impacts and issues, tailored to consider the main characteristics and interests of the affected parties and other interested parties.
- The first step in successful stakeholder engagement is for the client to identify the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project ("affected parties"), or (ii) may have an interest in the project ("other interested parties"). Resources for public information and consultation should focus on affected parties, in the first instance.
- As part of the stakeholder identification process, the client will identify individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. The client will also identify how stakeholders may be affected and the extent of the potential (actual or perceived) impacts. Where impacts are perceived, additional communication may be required to provide information and reassurance of the assessed level of impacts. An adequate level of detail must be included

in the stakeholder identification and analysis to enable the Bank to determine the level of communication that is appropriate for the project under consideration. Employees are always considered stakeholders.²

- The Client will inform the EBRD how communication with the identified stakeholders will be handled throughout project preparation and implementation, including the type of grievance procedure envisaged.

² Good international practice among IFIs dictates that the entire workforce on a project - particularly during the construction phase, for example all workers employed by the EPC contractor and its subcontractors - is considered a key stakeholder group.

3. IDENTIFICATION OF STAKEHOLDERS

This chapter includes the identification of stakeholders that are relevant to the Project and provides a stakeholder mapping as well.

3.1 Stakeholder Identification

In order to design an engagement process with stakeholders, several stakeholder groups that may be interested and/or affected by the development and implementation of this Project have been identified. There are various social groups that have an interest in the Project on different levels. These may be described as:

1. People and groups who will be directly or indirectly affected by the project (such as local communities).
2. People and groups who may participate in the implementation of the project (such as investors and lenders).
3. People and groups who are not affected by the project development per se may but have a possibility to influence and make decisions on implementation of the Project (such as Ministries or regulatory agencies).

The main categories of stakeholders identified so far are listed in the table below. This document is a living document and will need to be updated and modified during Project development and as a result of its implementation with the various identified stakeholders throughout as identified below.

Vulnerable Groups

The stakeholder list also includes vulnerable groups and is defined as groups that are expected to be disproportionately affected by project impacts due to their race, color, sex, language, religion, political opinion, national or social origin, gender, ethnicity, culture, physical or mental disability, and other. Vulnerable groups are context-specific and depend on a range of issues which must be understood such as project location, socio-economic, historical, and demographic context, as well as the nature of the development and type of impacts anticipated.

The vulnerable groups within this context were identified to include:

- Women groups of the local community. Cultural norms in Egypt and within the local communities, in specific, could limit their participation in decision-making in general as well as their employment opportunities as opposed to their male counterparts. Even though such cultural norms are considered applicable within local communities, however Bedouin women in particular are considered much more vulnerable than mainstream women in Upper Egypt.
- Disabled Groups: are considered vulnerable groups mainly due to physical disability which could limit their access to information on the Project and could limit their participation in decision-making in general as well as their employment opportunities as opposed to able-bodied groups.
- Elderly Groups: are considered vulnerable groups mainly due to age limitations which could limit their access to information on the Project and could limit their participation in decision-making in general.

Given the nature and location of the Project there are no additional groups considered as vulnerable that would require special consideration throughout the consultation process.

Table 2: Identified Groups of Stakeholders

Level of Stakeholder interest in/involvement to the Project
1. Stakeholders who may be directly or indirectly affected by the Project
<p>Residents of the nearby villages of the Project to include <u>Ras Gharib Town</u> which are administratively under Red Sea Governorate and Ras Ghareb City (or District). For the above, this includes the following groups within the local communities in specific:</p> <ul style="list-style-type: none"> ▪ <u>Community Members</u>: local community members have a vested interest in the project due to mainly potential for job opportunities. In addition, local community members could be impacted by other potential negative

<p>impacts (e.g., worker influx, noise & shadow flicker, etc.). Such impacts are discussed and identified within the ESIA.</p> <ul style="list-style-type: none"> ▪ <u>Community Leaders</u>: They are socially active members and known figureheads for local community members, who may or may not hold government positions. Community leaders involved in the project are the heads of affected communities ▪ <u>Business Community (local subcontractors)</u>: such groups have a vested interest in the project due to mainly potential for procurement opportunities such as subcontracting works (e.g., civil works, provision of food and amenities, etc.)
<p><u>Women groups</u> within local communities, such groups have a vested interest in the project due to mainly potential for job opportunities. In addition, such groups could be impacted by other potential negative impacts (e.g., worker influx, Gender Based Violence and Harassment (GBVH), etc.) Such impacts are discussed and identified within the ESIA</p>
<p><u>Bedouin Groups</u>: the key Bedouin group known in the area are the Tabbna, Hamadin and Khoshman. Tabbna and Hamadin settle permanently in key cities such as Ras Ghareb, Zaafarana. The Khoshman are nomadic groups that settle within the mountain ranges located west of the area in general. All these Bedouin groups apply a type of customary ownership within the Project area lands which is known as 'Urfi Contracts' and 'Ghafra System'. Such tribes would be helpful in providing security and protection and could also have a vested interest in employment and procurement opportunities (such as security guards, provision of raw materials, provision of food supplies and water to the workers, etc.).</p>
<p>2. Stakeholders who may Participate in Implementation of the Project</p>
<p><u>Investor/Lender</u>: entities that will provide financing for the Project development. In particular, they have interest in ensuring that the Project is developed and implemented in accordance with their E&S requirements and standards and will monitor the compliance of the Project against such requirements.</p>
<p><u>Workers</u>: This includes all Project workforce to include but not limited to workers from Developer team, workers from EPC Contractor, Project Operator, and any involved subcontractor(s).</p>
<p>3. Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project</p>
<p>Central Government</p>
<p><u>The Egyptian Environmental Affairs Agency (EEAA)</u>: state body regulating environmental management. For this Project, this will include review and approval of ESIA, issuance of environmental permit, monitoring implementation of Environmental and Social Management Plan (ESMP) and compliance with other conditions, as applicable.</p>
<p><u>Egyptian Electricity Transmission Company (EETC)</u>: off-taker and entity that signed the Power Purchase Agreement (PPA) with Developer. They will also be responsible for designing, building, and operating the associated interconnection facilities (i.e., Overhead Transmission Line).</p>
<p><u>New & Renewable Energy Authority (NREA)</u>: national focal point for expanding efforts to develop renewable energy technologies to Egypt in coordination with other concerned national institutions. In addition, NREA also the entity responsible for allocation of the land for the development of the Project.</p>
<p><u>Ministry of Labor</u>: official governmental entity responsible for setting labor policies and legislations as well as ensuring protection of labor rights and working conditions. Has a vested interest in ensuring that labor rights and proper working condition are maintained for the Project in accordance with Egyptian laws and regulations.</p>
<p><u>Ministry of Civil Aviation</u>: Official governmental entity responsible for civil aviation management in Egypt and responsible for issuing permits for projects with specific height requirements.</p>
<p><u>Armed Forces Operations Authority</u>: Official governmental entity responsible for military aviation management in Egypt and responsible for issuing permits for projects with specific height requirements.</p>
<p><u>Ministry of Tourism and Archeology</u> The ministry is the entity responsible for the preservation and protection of the heritage and ancient history of Egypt, under which operates all inspector offices in the governorates.</p>

<p><u>Ministry of Interior</u>: The Ministry is responsible for national and local security, as well as approving emergency response and firefighting plans for establishments/projects.</p>
<p><u>General Petroleum Company</u>: a national State-owned company engaged in exploration, production, and development of hydrocarbons, is responsible for the management of oil and gas exploration and production activities on behalf of the State. It is one of the subsidiary companies affiliated to the Ministry of Petroleum. It has the right of concession for petroleum exploration in some parts of the Project area and adjacent areas and represents the main investment activity in the Project area.</p>
<p><u>National Telecom Regulatory Authority</u>: Responsible for overall regulation and administration of the telecommunication sector in Egypt including interface with telecommunication companies and their infrastructure elements such as broadcasting towers. Given that project could impact such infrastructure elements, approvals are required.</p>
<p><u>Telecommunication Operators</u>: Could own and operate telecommunication infrastructure within the area. This includes mainly Orange, Etisalat, and Vodafone. Given that project could impact such infrastructure elements, approvals are required.</p>
<p><u>Radio and Television Union</u>: Responsible for overall regulation and administration of the radio and television sector in Egypt including infrastructure elements. Given that project could impact such infrastructure elements, approvals are required.</p>
<p><i>Local Governmental Agencies</i></p>
<p><u>Red Sea Governorate</u>: Governorate’s main role is supporting the Project in all aspects as required to include providing required permissions. The key departments of the Governorate that are related to the Project include the following:</p> <ul style="list-style-type: none"> - <u>Environmental Administration</u> that is responsible for monitoring compliance to environmental requirements along with EEAA. - <u>Labor Office</u> that is responsible for overall management of the labor force in Red Sea Governorate, monitoring recruitment by development projects within the Governorate, monitor labor grievances and other. - <u>Roads Directorate</u>: responsible for services and development of external roads in the governorate and issuing permits for any construction work on the external roads. - <u>Public Health Directorate</u>: provide the health services and facilities to the local districts and ensure overall local community health and safety.
<p><u>Ras Gharib Local City Council</u>: main role is supporting the Project in all aspects as required to include providing required permissions. In addition, the Council is also responsible for supervision and follow-up for monitoring compliance to environmental requirements along with EEAA and Red Sea Governorate, and has overall responsibility for solid waste management and disposal within their area of influence.</p>
<p><u>Directorate of Social Solidarity Ras Gharib</u>: official governmental entity that acts as the overall management, organization and registration of local community associations, foundations, and NGOs. They could have a vested interest in obtaining updates on employment and procurement opportunities provided by the Developer as well as any social responsibility programs.</p>
<p><u>Red Sea Water and Wastewater Company</u>: official entity that is responsible for water and wastewater management within the Governorate. In addition, it will be the entity that will be responsible for providing the Project’s requirements of water as well as disposal of wastewater.</p>
<p><u>Red Sea Governorate Antiquities Inspector Offices</u>: Official governmental entity representing the Ministry of Antiquities within the Red Sea Governorate. They will be responsible for protection and management of archaeology and cultural heritage resources in the area as well as implementation of chance find procedures by development projects.</p>
<p><i>Non-Governmental Organizations (NGOs) and Other Organizations</i></p>

NGOs are Organizations with direct interest in the Project, and which may have useful data or insight into local issues of relevance to the Project. These organizations can also influence the views of others regarding the Project, both nationally and international and in general NGOs are responsible for sharing information with the community. The key NGOs active within the area are summarized below.

NGOs/ CBOs	Scope
Orban El-Saharaa	Social Development
Association for the Conservation of the Environment in Red Sea (HEPCA)	Environmental protection
Red Sea Ecotourism	Social and cultural services
Environmental protection in the Red Sea	Environmental protection
Ababdeh Sons Association in Ras Ghareb	Community Development
Resala Association	Social and family services
Firdous Association	Social and family services
Egyptian Red Crescent	Community Development

Nature Conservation Egypt (NCE): this is considered one of the most important and key NGOs in Egypt that is involved in biodiversity protection and conservation. NCE is also the Egyptian partner of the Bird Life International. They have a vested interest in the impacts of the Project on biodiversity in general and avifauna in particular and they key mitigation and monitoring programs that will be implemented.

Education providers (in particular technical / vocational training institutes): Provides knowledge and skills required for various occupations, including renewables and solar power in specific that is delivered through formal, non-formal and informal learning processes. The education curriculum in undergraduate, postgraduate, or Technical and Vocational Education and Training (TVET) could be reviewed and revised to match the market and workforce requirements.

Media (Newspaper, Television, Internet): They could disclose potential information and updates about the Project.

Regional Center for Renewable Energy and Energy Efficiency (RCREEE): responsible for managing certain aspects of the overall development process on behalf of the Developer. This includes in specific the overall management of the ESIA process with the Consultant. In addition, during the operation phase, RCREEE will be responsible in particular for the implementation of the Active Turbine Management Plan (ATMP).

3.2 Stakeholder Mapping

Further to the above, a preliminary stakeholder analysis is undertaken below to clarify stakeholders' interest in the Project and their ability to influence the Project's development. Accordingly, a priority contact list is identified.

High rating for priority contact list indicates importance of continuous and regular consultation and engagement. On the other hand, medium rating for priority contact list does not reduce the importance of the entity as a stakeholder but indicates that their engagement is required at specific stages or milestones of the Project (i.e., when the involvement of these entities is triggered for a specific purpose such as obtaining a specific service).

Table 3: Preliminary Stakeholder Analysis and Priority Contact List for the Project

#	Stakeholder Group	Priority
1.	Stakeholders who may be directly or indirectly affected by the Project	
	Nearby local community from Ras Ghareb including vulnerable groups	High
	Bedouin groups in the general area where the Project is located	High
2.	Secondary Interested Parties/Stakeholders	
	IFIs and investors	High
	Workers	High
	National Government & Permitting Authorities	
	- Ministry of Environment – Egyptian Environmental Affairs Agency (EEAA)	High
	- Environmental Office within the Governorate	Medium
	- Egyptian Electricity Transmission Company (EETC)	Medium
	- New & Renewable Energy Authority (NREA)	Medium
	- Ministry of Interior	Medium
	- Ministry of Labor	Medium
	- General Petroleum Company	Low
	- Ministry of Civil Aviation	Medium
	- Armed Forces Operations Authority	Medium
	- National Telecom Regulatory Authority	Medium
	- Telecommunication Operators	Medium
	- Radio and Television Union	Medium
	- Ministry of Tourism and Archeology	Medium
	- Red Sea Governorate	Medium
	- Ras Ghareb City Council	Medium
	- Directorate of Social Solidarity Ras Gharib	Medium
	- Water and wastewater Company	Low
	- Public health directorate Red Sea Governorate	Low
	- Labor Office in Red Sea Governorate	Medium
	- Red Sea Antiquities Inspector Office	Low
	- Roads Directorate in Red Sea Governorate	Low
	- Non-governmental Organizations (NGOs) and Community Based Organizations (CBOs)	Medium
	- Education providers (in particular technical / vocational training institutes)	Low
	- Media: Newspaper, Television, Internet	Low
- Other community members at the national level	Low	
- RCREEE	High	

4. SUMMARY OF PAST STAKEHOLDER ENGAGEMENT ACTIVITIES

The table below provides a summary of all stakeholders that were previously consulted and engaged throughout the Project – mainly as part of the ESIA that is currently being undertaken for the Project. The table provides a summary of the stakeholder groups that were engaged and the main objective and outcome.

The objective of such consultations was to:

- Introduce project (rationale, objective, location, key components, etc.)
- Explain and discuss overall methodology for ESIA study
- Explain and discuss key anticipated impacts as relevant
- Identify and determine additional requirements or key issues of concern to be taken into account for the ESIA study

Throughout the consultations a handout was prepared and distributed to such stakeholder groups with key information to include but not limited to rationale for project, project location and setting, key components, and activities of the Project and other as applicable. The handout is provided in Annex 5.

The table below presents summary for the outcomes of the stakeholder consultations undertaken, while the figure that follows presents sample photos.

Public Consultation Session – ESIA

Once the Draft ESIA is completed, a public consultation session will be held in Ras Gharib City, Red Sea Governorate. The overall objective of the session is to present the outcomes and conclusions of the ESIA studies to allow interested stakeholders (including local communities) to comment on the scope of work undertaken.

As required by EEAA, the session will be an ‘open’ session for any entity/person to attend that will be announced through appropriate platforms (including newspaper advertisement) at least 2 weeks in advance of the session as well as public announcements on social media platforms that are frequently used by local people of Ras Ghareb residents and Bedouin groups. In addition, specific invitations will be issued to list of invitees that will be identified jointly in coordination between EEAA, RCREEE and the ESIA consultant and will include: (i) EEAA headquarter and regional branch; (ii) New and Renewable Energy Authority (NREA); (iii) Egyptian Electricity Transmission Company EETC; (iv) local governmental entities in Red Sea Governorate and Ras Gharib; (v) NGOs; (vi) local community representatives; and other.

Annex 6 provides a list of Frequency Asked Questions (FAQ) which will be kept up to date.

Table 4: Summary of Consultations Undertaken during ESIA Process

No.	Entity	Objective	Outcomes
1	EEAA 12 May 2021	Introduction of project and location, discuss overall methodology for ESIA, key anticipated impacts, and determine any key issues of concern and/or additional requirements to be taken into account as part of the study.	<ul style="list-style-type: none"> ▪ Expressed their support to renewable energy projects ▪ Adherence to all environmental standards during construction and operation ▪ Stressed on the importance of undertaking environmental baseline studies for the site to include in particular a bird migration studies by a specialist given the importance of the area ▪ Importance of adhering to community consultation sessions with representation of the local community and project stakeholders, in accordance with the EEAA guidelines for ESIA studies. ▪ The impacts of the surrounding environment on the Project should be studied which includes in particular impacts resulting from natural factors such as floods. ▪ Impacts resulting from development activities in the area as well as assessing current and previous use of the land of the Project site and its surrounding. It was noted that there is a dumpsite near the Project site belonging to the Ras Gharib city council that will be removed to another alternative area that is currently being selected.
2	EETC 11 May 2021		<ul style="list-style-type: none"> ▪ Expressed their support to the Project ▪ ESIA study should include the Overhead Transmission Line (OHTL) of the Project. ▪ Indicated the importance of continuous consultation by the Developer with EETC during the various stages of the Project until the completion of ESIA study and up to the operational stage.
3	NREA 27 April 2021		<ul style="list-style-type: none"> ▪ Stressed the importance of studying the OHTL ▪ ESIA should consider the applicable environmental standards when constructing OHTL, as well as the Project site to include in particular impacts on bird migrating in the area. ▪ There should be communication with local communities through stakeholder engagement activities, which provide information about the project to know their expectations and concerns about wind energy projects.
4	Ministry of Electricity and Energy 11 May 2021		<ul style="list-style-type: none"> ▪ Explained that the Egyptian government is currently moving towards produce clean energy projects, in a way that does not affect the environment or natural resources. ▪ Stressed on importance of ESIA study including consideration of the potential risks to bird migration. ▪ Discussed on importance of consulting with stakeholders after preparing the ESIA draft for discussion.
5	Ministry of Communication 23 May 2021		Same as above but with focus on telecommunication and radio/TV infrastructure and broadcasting towers in the area and potential impacts from Project on such facilities.

			<ul style="list-style-type: none"> The ESIA Consultant is currently following up with NTRA to identify the official procedures to be followed to obtain approval from these entities and/or identify key requirements to be taken into account.
6	Ras Ghareb Radio and TV Unit 17 MAY 2021		<ul style="list-style-type: none"> The radio and television towers connection that are close to the Project site extend from Zafarana to Ras Ghareb to Hurghada, in addition to other towers in the direction of Sheikh Fadl Road. The distance between each tower is about 60 km, depending on the terrain of the area The existing radio and television towers are used for receiving and transmitting the microwave signal, and for radio waves FM, In addition to TV In addition to TV waves, VHF waves, They explained that to determine the impacts on radio and television towers; the Radio and Television Union in Cairo should be contacted. A memorandum was prepared to arrange for a meeting with the entity, but no response has been provided to date.
7	Ministry of Tourism and Archeology 23 MAY 2021	Same as 1 above but with focus on archeology and cultural heritage methodology and impacts for the ESIA and any issues of concern related to that.	<ul style="list-style-type: none"> Explained that there are no archaeological discoveries sites close to the Project site. However, a field survey for the Project site should be conducted to ensure that there are no archaeological sites. The archaeological sites closest to the Project site can be identified through the database of the Geographic Information Systems Department at the Ministry of Tourism and Antiquities, as well as through the archaeology departments closest to the project site (the closest antiquities directorate to the project site is in Safaga City).
8	Key national and local E&S NGOs 18 May 2021	Same as 1 above but with focus on biodiversity, birds and bats methodology and impacts for the ESIA and any issues of concern related to that.	<ul style="list-style-type: none"> Explained that positioning the turbines could have a negative effect on birds and therefore there needs to be a balance between risks and benefits and minimize any adverse environmental impacts. This must be taken into account in the design phase of the Project. Discussed the existence of a dumpsite near the Project site and which is considered an attraction area for birds. This should be taken into account in choosing an alternative site for the dumpsite. Coordination should be made with the Nature Protection Sector in the Red Sea Governorate to follow up on choosing a suitable site for the dumpsite that takes into account the potential risks to birds in the area. Stressed on the importance of having corridors for migratory birds between the turbines as part of the design of the Project. Stated that wind farms projects are in general environmentally friendly. The establishment of the Project does not conflict with protecting the environment in Red Sea Governorate, as it is definitely better than establishing coal-fired power plant. Pointed out that investment projects in the area should communicate with local communities to support the local development projects in Ras Gharib city (through CSR activities) and should also give priority to youth from the local community for job opportunities.
9			
10	Ras Ghareb Local Council 17 May 2021	Same as 1 above but with focus on land use, infrastructure and utilities and socio-economic methodology and impacts and any issues of concern related to that.	<ul style="list-style-type: none"> Officials welcomed the Project and explained that wind energy projects are the best investment in Ras Ghareb City Council officials confirmed that the dumpsite is located near the Project site and will be relocated to another alternative site that is currently being studied. Officials at the Urban Planning Department confirmed that the Project area does not include any future urban planning, and was not part of any previous urban planning. The area is mainly allocated within exploratory sites belonging to the General Petroleum Company.

			<ul style="list-style-type: none"> Clarified that the dumpsite near the Project site is the only dump area in Ras Ghareb. It is leased to a contractor whom employs 6 workers to sort and collect garbage; they are the contractor's workers, not the city council workers.
11	Red Sea Governorate 19 May 2021		<ul style="list-style-type: none"> Officials made it clear that the project area does not fall within the scope of residential projects or any residential or industrial activities, as it is intended for energy projects only, in addition to the areas allocated for the exploration of the General Petroleum Corporation. The importance of the ESIA studying migratory birds and identifying proper mitigation and monitoring requirements. The issue of relocating the dumpsite to another alternative site was discussed where he mentioned that engineering studies are currently being conducted to choose a suitable site for the new landfill.
12	Red Sea Water and Wastewater Company 19 May 2021	Same as above but with focus on water supply and wastewater management for the Project area. and any issues of concern related to that.	<ul style="list-style-type: none"> Explained that the current Project site does not conflict with any existing facilities (water / sanitation). Explained that Ras Ghareb Water Company is able to provide the Project's needs for water and sanitation services, but through contractors; because the company does not have trucks to transport water or sanitary waste.
13	Petroleum Facilities and companies in the area 18 May 2021	Same as above but with focus on land use issues and their key activities undertaken within the area.	<ul style="list-style-type: none"> Indicated that there are exploratory wells in the Project land and nearby sites. Exploration wells are currently closed, in order to access more information about the number of exploration wells, and the possibility of re-exploring them again; It will require coordination through the head office in Cairo. The consultant sent an official letter to Chairman of the Board of the General Petroleum Company to arrange for an interview with no response to date.
14	Ras Ghareb citizens 16 May 2021	Same as above but with focus on land use and socio-economic methodology and impacts. Key local community representatives will be identified through the Ras Ghareb City Administration and key local NGOs in Ras Ghareb.	<p>The Consultant conducted Focus Group Discussion (FGD) and meetings with representatives of the local community in Ras Ghareb. Key local community representatives will be identified through the Ras Ghareb City Administration and key local NGOs in Ras Ghareb. Community members explained that Ras Ghareb is a small city that lacks many services, in addition to limited job opportunities. They hoped that investment projects as this one would help provide job opportunities for all including in particular youth which would have a direct impact on the local community. No specific concerns were raised by the local community members on the Project development. On the contrary, they made it clear that the Project site is a great distance from the city center, and they do not foresee any direct negative impact on the local community, whether in the construction or operation stage. Other issues raised include</p> <ul style="list-style-type: none"> They do not feel a direct economic benefit from investment projects in the field of wind energy to date as they believe Developers in general do not depend on the city of Ras Gharib for supplies and contracting work despite the availability of construction contractors and supplies. They stated that the City Council has lists of officially registered companies, local contractors and supply companies They suggested that job opportunities can be announced through the city council as well and indicated that the city's labor office also has the available workforce according to different specializations.
15	Bedouins residing near the project area 16 May 2021	Same as above but with focus on land use and socio-economic methodology and impacts. Consultations will be	<p>Meetings were held with heads of tribal leaders of Bedouin families. The results indicated the following:</p> <ul style="list-style-type: none"> There are no stable Bedouin communities in or near the Project site. The only settled villages in the desert for Bedouin families are in Zaafarana and Wadi Dara Which is at least 50 km away from the Project site,

		undertaken with head of tribal leader.	<ul style="list-style-type: none">▪ The Project site or the surrounding areas does not have any key land use activities for them such as grazing or farming activities. However, the area in general is subject to their Ghafra System that is divided between two families, the Tabbna and the Hamadin families.
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5. FUTURE STAKEHOLDER ENGAGEMENT STRATEGY, PLAN, AND RESPONSIBILITIES

The table below identifies the stakeholder engagement strategy and plan to include stakeholders relevant to the Project (Table 5), the objectives of the consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations.

A Project Stakeholder Register³ will be updated monthly for the Project which serves as a log for all consultation and engagement undertaken for the Project. This shall be reviewed and updated regularly by the assigned Community Liaison Officer (CLO) s. A template is provided in Annex 4 – Project Stakeholder Register Form which will be used wither in Microsoft Word or Excel format.

³ Register will be developed using Microsoft Excel software.

Table 5: Stakeholder Engagement Strategy and Plan in Relation to the Project

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Stakeholders who may be directly or indirectly affected by the project				
Nearby local communities and residents to include Ras Ghareb. This also includes vulnerable groups.	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.	1. Hardcopy of SEP in Arabic to be available at Red Sea Governorate and Ras Ghareb Local Governmental Unit.	Once before construction (to be updated when required)	Developer (CLO)
		2. Summary advertisement in Arabic of grievance mechanism to be posted at key local community platforms to include CBO's (including women) and through the distribution of flyers in both Arabic and English. Refer to Chapter 7 for additional details.	Once before construction (to be checked regularly to ensure advertisement in place)	Developer (CLO)
	Updates on the Project including environmental and social issues and CSR activities undertaken	1. Prepare leaflet in Arabic with updates on Project including environmental and social issues. This could include updates on the Project development, number of employment opportunities allocated for local communities, CSR activities, the bidding process for Project components, construction plans, etc. Leaflet to be disclosed at key local community platforms to include Red Sea Governorate and Ras Ghareb Local Governmental Unit. In addition, it will also be updated on company website and social media platforms.	Quarterly during construction Annually during operation	Developer (CLO)

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Bedouin Groups	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.	1. Individual targeted meetings with tribal leaders of such groups to explain SEP and grievance mechanism	Annually during construction and operation	Developer (CLO)
	Updates on the Project including environmental and social issues and CSR activities undertaken	1. Prepare and distribute leaflet in Arabic with updates on Project including environmental and social issues. This could include updates on the Project development, number of employment opportunities allocated for local communities, the bidding process for Project components, construction plans, updates on CSR programs implemented, etc.	Quarterly during construction Annually during operation	Developer (CLO)
Stakeholders who may participate in implementation of the Project				
Lender	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.)	1. Individual/Internal Meetings (if required)	TBD	Developer team as applicable
		2. Submission of environmental and social report.	Annually during operation – 1 st quarter of each year Monthly during construction	Developer team as applicable
Workers	Provide updates on contract requirements on employment to include duration, salary, leaves, etc.	1. Individual/Internal Meetings	Upon employment	Developer Team as applicable / EPC Team as applicable
	Provide explanation on worker grievance mechanism	1. As part of Induction Training 2. As part of Toolbox Talks	Upon employment / continuous	

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
	Provide general/specialized training requirements as applicable to include but not limited to induction, Toolbox Talks (TBT), occupational health and safety, waste management, etc.	3. As per training plan to be developed	Upon employment / continuous	
Stakeholders who may have a possibility to influence and make decisions on implementation of the Project and/or may have an interest in the Project				
Central Government				
1. EEAA 2. EETC 3. NREA 4. Ministry of Interior 5. Ministry of Labor 6. Ministry of Health	Some governmental stakeholders might require to undertake certain inspections or auditing exercises and/or might require certain updates/information on the implementation of the Project.	1. Individual/Internal Meetings (if required)	Upon occurrence	Developer team as applicable
		2. Correspondence and official letters (if required)	Upon occurrence	Developer team as applicable
	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, CSR programs implemented, etc.)	1. Email notification. Annual environmental and social report to be disclosed on company website.	Annually – 1 st quarter of each year	Developer (CLO)
Ministry of Transportation / Roads and Bridges Directorate, Red Sea Governorate	Submission of traffic and transport management plan in relation to turbine transportation	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction	Developer team as applicable / EPC Contractor
Ministry of Civil Aviation	Submit application to obtain their approval for Project development	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once during planning phase	Developer NREA RCREEE

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Armed Forces Operations Authority	Submit application to obtain their approval for Project development	<ol style="list-style-type: none"> 1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters 	Once during planning phase	Developer NREA RCREEE
National Telecom Regulatory Authority Telecommunication Operators Radio and Television Union	Submit application to obtain their approval for Project development	<ol style="list-style-type: none"> 1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters 	Once during planning phase	Developer NREA RCREEE
General Petroleum Company	<ul style="list-style-type: none"> - Identify officially location of all petroleum facilities onsite (above and underground) and any requirements to be considered as part of the detailed design; - Discuss the requirements that affect the design as included within the “Work Coordination Agreement” and identify if such requirements are still considered applicable and identify/discuss any additional issues to be considered and taken into account; and 	<ol style="list-style-type: none"> 1. Individual/Internal Meetings (if required) 3. Correspondence and Official Letters 	<p>Once during planning phase</p> <p>Continuously throughout construction and operation as applicable</p>	Developer NREA RCREEE

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
	<ul style="list-style-type: none"> - Identify requirements for coordination of work throughout the construction and operation phase 	<ol style="list-style-type: none"> 1. Individual/Internal Meetings (if required) 4. Correspondence and Official Letters 	Continuously throughout construction and operation as applicable	Developer NREA
Local Government				
Ras Ghareb Local Unit	Coordination for the collection of solid waste from the site to the municipal approved landfill	<ol style="list-style-type: none"> 1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters 	Once before construction Once before operation	EPC Contractor/ Project Operator
	Coordination for list of private contractors approved for collection of hazardous waste from the site to the Swaqa Hazardous Waste Treatment Facility.	<ol style="list-style-type: none"> 1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters 	Once before construction Once before operation	EPC Contractor/ Project Operator
Ras Ghareb Water Company	Coordination for list of private contractors approved for collection of wastewater from Project site.	<ol style="list-style-type: none"> 1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters 	Once before construction Once before operation	EPC Contractor/ Project Operator
	Coordination to secure the water requirements of the Project (if required)	<ol style="list-style-type: none"> 1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters 	Once before construction Once before operation	EPC Contractor/ Project Operator

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Ministry of Antiquities – Red Sea Antiquities Inspection Office	Notify to check if they will provide any observers to oversee excavation process	<ol style="list-style-type: none"> Individual/Internal Meetings (if required) Correspondence and Official Letters 	Once before construction	EPC Contractor
	Reporting and communication in case archeologically remains are found through construction of Project along with chance find procedures implemented.	<ol style="list-style-type: none"> Individual/Internal Meetings (if required) Correspondence and Official Letters 	Upon occurrence	EPC Contractor
Non-Governmental Organizations (NGOs)				
As per list provided earlier	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, CSR programs implemented, etc.)	<ol style="list-style-type: none"> Email notification. Annual environmental and social report to be disclosed on company website. 	Annually – 1 st quarter of each year	Developer (CLO)

ESIA and Supporting Documents Information Disclosure

It is of utmost importance to ensure that stakeholders are kept well informed about the Project throughout its life cycle, thus information will be accessible to the public, key stakeholders, and local communities through dissemination of related documents.

The disclosure package will include the following key documents that are available publicly in the Arabic and English languages.

- Environmental and Social Impact Assessment (ESIA) for the IPH Wind Farm that will also include the associated Overhead Transmission Line (OHTL)
- Non-Technical Summary (NTS)
- Stakeholder Engagement Plan (SEP)⁴

The above documents are available at the following avenues:

- Developer’s Website. The documentation above will remain on the website for the life of the project.
- Hard copies are available at Red Sea Governorate and Ras Ghareb Local Governmental Unit

Red Sea Governorate

October 6, Hurghada,
Red Sea Governorate, Egypt
Tel: 065354627/06535546337

Ras Ghareb Local Governmental Unit

Location: Al-Mina Street City: 11432
Ras Ghareb – Red Sea
Tel: 01001318480 – 0120195877

- Soft copies can also be made available to stakeholders via email to (info@weareiph.com). In addition, any inquiries or comments with the Developer can be directed to this email address as well.

Finally, it is important to note that all stakeholders can raise concerns or comments via the grievance mechanism provided in “Chapter 6” below.

⁴ The most recent, updated version.

6. GRIEVANCE MECHANISM

6.1 Stakeholder Grievance Mechanism

IPH understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for a project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities, and other stakeholders. Monitoring of grievances will signal any recurrent issues, or escalating conflicts and disputes.

IPH will implement a Grievance Mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. IPH will accept all comments and complaints associated with the Project and individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Egypt.

IPH will monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below. IPH will also report regularly to the public on the grievance mechanism implementation, protecting the privacy of individuals.

The figure below presents a process diagram for the stakeholder grievance procedure which is further explained throughout the section below.

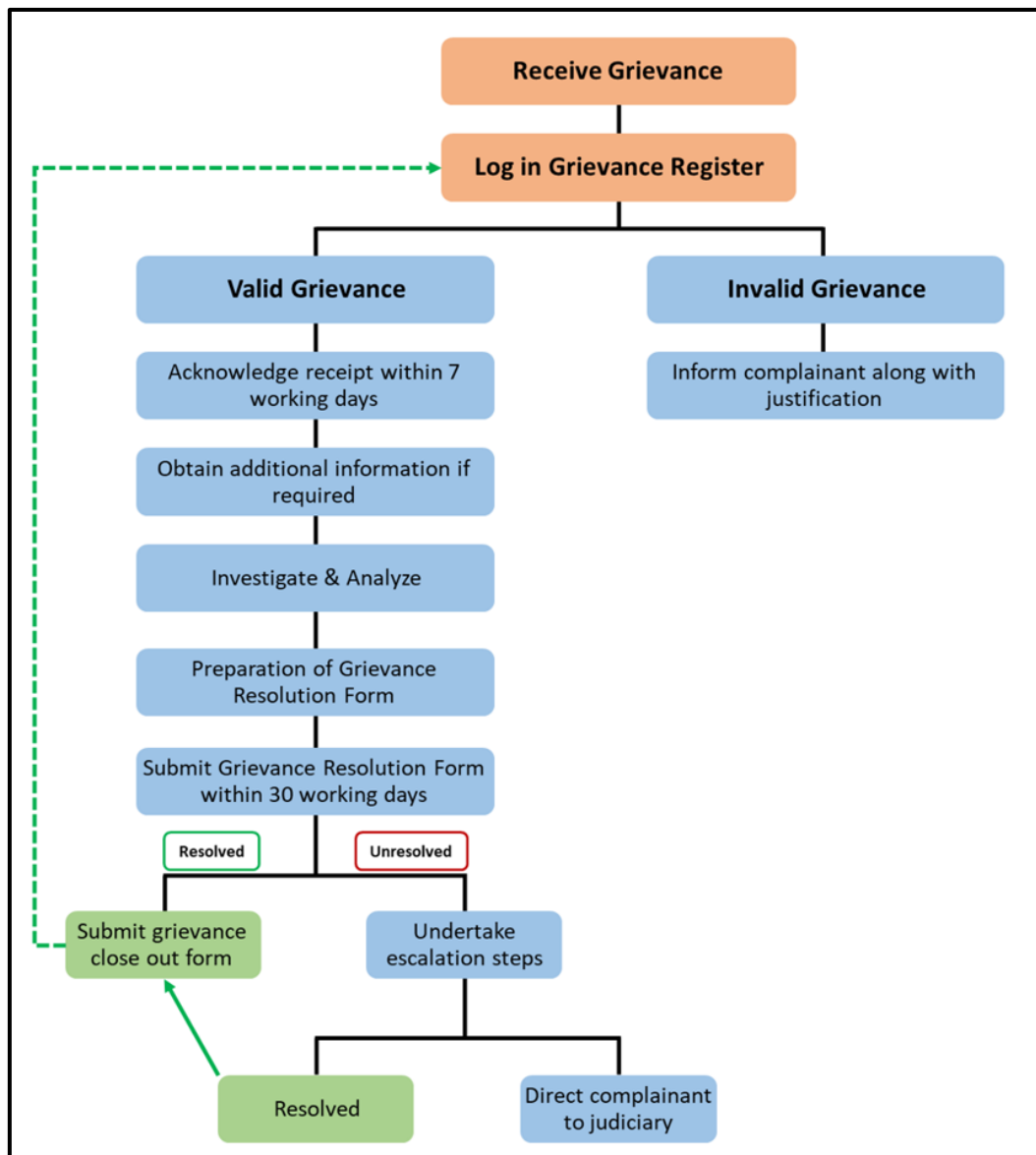


Figure 5: Stakeholder Grievance Process Diagram

Stakeholder Grievance Procedure

1. A Grievance Disclosure Sheet will be disclosed at key locations. The Grievance Disclosure Sheet will inform the local communities on how and where to lodge a grievance in accordance with step 2 below.
 - a. Red Sea Governorate
 - b. Ras Ghareb Local Governmental Unit
 - c. Selected key NGOs and CBOs to include Women
 - d. Entrance Office of the Project
 - e. Provided directly to tribal leaders of Bedouin groups
 - f. Other identified suitable local community platforms
2. Stakeholders willing to lodge a grievance should be able to use the following avenues:

a. Grievance Sheets (Annex 1) with grievance boxes will be made available at the following locations:

- **Ras Ghareb Local Governmental Unit**

Location: Al-Mina Street City: 11432

Ras Ghareb – Red Sea

Tel: 01001318480 – 0120195877

- **Project Office**

Location: 57 Nile Corniche St., El Maadi 11431, Cairo, Egypt

Tel: +3 12 0522 2555

b. Direct Contact through the following:

CLO

Address: 57 Nile Corniche St., El Maadi 11431, Cairo, Egypt (*please check the project's webpage on our website for updated details*)

Telephone: +3 12 0522 2555 (*please check the project's webpage on our website for updated details*)

E-mail: info@weareiph.com (*please check the project's webpage on our website for updated details*)

c. Company Website at the following www.weareiph.com

3. All grievances (whether submitted through a grievance form, e-mail, telephone, etc.) will be recorded on a grievance log sheet by the CLO (Annex 2).
4. It is possible that for some grievances, women might feel uncomfortable discussing a grievance with a person of the opposite sex, therefore the grievance mechanism also includes a female CLO that will be available.
5. This mechanism is applicable for any project related stakeholder group to raise a grievance. This includes but not limited to national / regional governmental entities, local communities, Non-Governmental Organizations (NGOs), media, research, and academic institutions, and other. This mechanism addresses grievances related to the following:
 - Any grievance related to project activities to include but not limited to: (i) damage to public / private assets; (ii) degradation / deterioration of local infrastructure (e.g. roads); (iii) disturbance from noise, dust, traffic accidents, pollution, excessive speed of project's vehicles; (iv) degradation of the environment and disturbance of wildlife; (v) disturbance to land uses, (vi) other similar issues.
 - Any grievance against involved person/entity in the project to include but not limited to the Developer, EPC Contractor, subcontractors, and suppliers. This could include but not limited to: (i) negative behavior of construction workforce towards local communities; (ii) misconduct of security service providers; (iii) inappropriate behavior of workers in terms of managing employment and procurement opportunities, (iv) other similar issues.

However, the following grievances will not be addressed in the case they are submitted. In this case, the applicant will be informed that the grievance will not be addressed along with a justification. This includes the following in particular:

- Grievances that are not related to the project or its activities
- Grievances against an entity / person / worker that is/was not involved in the project in any way directly or indirectly

- A complaint that is currently being reviewed by the judiciary system and/or for which a final and definitive court ruling has been issued
6. Grievance procedure starts with formal acknowledgment in accordance with the preferred method of communication specified by the complainant within 7 working days of submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.
 7. In coordination with the relevant personnel, the CLO will analyze the root cause of the grievance, investigate if the grievance is correct or not, and identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable). For other more complex grievances, third parties could be involved in the investigation as applicable. Specific examples on this includes the following:
 - Grievances that entail safety concerns such as personal threats. Such grievances might require the involvement of local Police
 - Grievances that entail damage to property which have been verified might require an assessment of the damaged asset with the support of an external specialist in agreement with the complainant.
 8. The CLO will prepare a grievance resolution form (see Annex 3) which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance along with the timeline for their completion. Grievance resolution form will be submitted within (30) days of receiving the grievance.
 9. The grievance resolution form, including necessary budget to resolve the grievance, must be approved and signed-off by the Project Manager.
 10. The outcomes of the grievance resolution form will be communicated to the complainant by the CLO in accordance with the preferred method of communication specified.
 11. In case the grievance resolution form identifies proposed actions to be implemented, the CLO will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form. The CLO will contact the complainant once such actions are completed in accordance with the preferred method of communication specified.
 12. The CLO will ensure that the grievance forms, grievance log sheet, and grievance resolution form are always updated and maintained onsite.
 13. The grievance mechanism will be implemented promptly and at no cost and without retribution to the party that originated the issue or concern.
 14. The use of grievance mechanism shall not impede access to judiciary means.
 15. The grievance mechanism allows submission of anonymous complaints by community members.
 16. In the case the complainant does not accept the proposed resolution the following steps will be undertaken:
 - The CLO will raise the issue to the Project Manager for discussion and adoption of new resolutions for the grievance.
 - In the case the complainant does not accept the new resolution, the Project Manager will raise the issue to the E&S Department at headquarters for discussion and adoption of new resolutions for the grievance.
 17. In the case the complainant does not accept the new resolution proposes, the compliant will be asked to access judiciary means to resolve his/her grievance.

Stakeholder Grievance Mechanism for Gender Based Violence, Sexual Harassment and Sexual Exploitation and Abuse

The requirements set below are considered applicable for handling grievances related to the following and in accordance with the requirements set within the “Good Practice Note Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works” (2018, World Bank).

- Violence Against Women and Girls (VAWG): defined violence against women and girls as any act of gender-based violence that results in, or is likely to result in, physical, sexual, or mental harm or suffering to women, including threats of such acts, coercion, or arbitrary deprivation of liberty, whether occurring in public or in private life
- Gender-based Violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. Women and girls are disproportionately affected by GBV across the globe.
- Sexual Exploitation and Abuse (SEA): any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Sexual abuse is further defined as “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” Women, girls, boys, and men can experience SEA. In the context of World Bank supported projects, project beneficiaries or members of project-affected communities may experience SEA.

For the above complaints, there are risks of stigmatization, rejection, and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. Therefore, the following steps should be considered for any grievances related to the above.

- Both the male and female CLO will receive appropriate training from an authorized GBV Service Provider (National Council for Women) on how to collect GBV cases confidentially and empathetically (with no judgement). It is essential to respond appropriately to a survivor’s complaint by respecting the survivor’s choices. This means that the survivor’s rights, needs, and wishes are prioritized in every decision related to the incident. The survivor who has the courage to come forward must always be treated with dignity and respect. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor’s informed consent. These steps serve to minimize the potential for re-traumatization and further violence against the survivor.
- Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.
- No identifiable information on the survivor should be stored including in particular the grievance log register. In addition, if a grievance is submitted through a grievance form it will be kept confidential.
- Should the grievance be received by the CLO through a grievance form, telephone, email or other, the CLO should not ask for, or record, information on more than three aspects related to the incident and which include the following:
 - Nature of the complaint (what the complainant says in her/his own words without direct questioning)
 - If, to the best of their knowledge, the perpetrator was associated with the project; and,
 - If possible, the age and sex of the survivor.
- The CLO should assist the survivor by referring them to the GBV Services Provider for support immediately after receiving a complaint directly from a survivor. It is up to the survivor, and only the survivor, whether to take up the referral. The list of services providers is included below:

[Insert contact details of GBV Service Provider]

- The GBV Services Provider provides the necessary support to the survivor until it is no longer needed. Survivors may need access to police, justice, health, psychosocial, safe shelter and livelihood services to begin healing from their experience of violence. This will be arranged by the GBV Services Provider on their behalf in accordance with the survivor’s wishes.
- The CLO will immediately notify the Project Manager (if the consent of the survivor is obtained). The survivor must give consent to data sharing and know what data will be shared, with whom and for what purposes.
- The CLO, Project Manager and GBV Services Provider will meet immediately to agree on a plan for resolution as well as the appropriate remedy for the perpetrator in accordance with the below. Note: The survivor must give the service provider representative consent to participate in the resolution mechanism on her/his behalf.
 - Reviews the case and collectively agree upon the appropriate actions to be taken and sanctions, if any.
 - Refers the case to the police as appropriate (see note below).
 - Assigns the appropriate ‘Focal Point’ to implement the actions—with the assistance of the GBV Services Provider.
 - Upon resolution, the Focal Point and GBV Services Provider advise that it has been resolved, who in turn advise the CLO.
 - The CLO notes the resolution and closes the cases and submits a close-out report to the Project Manager whom in turn reviews and approves the report.
- All entities involved above in case resolution, need to understand their legal obligations when it comes to reporting cases to the police. Reporting should be done in accordance with the law, especially in cases that require mandatory reporting of certain types of incidents, such as sexual abuse of a minor. When there is no legal obligation to report the case according to the local law, survivors hold the decision of whether to report cases for resolution and other service providers and reporting of a case to anyone can only be made with the consent of the survivor.
- If a case is first received by the GBV Services Provider, a report should be sent to the CLO to ensure it is recorded in the system. If any follow up is required by the CLO, it will be provided immediately with the consent of the survivor as applicable.
- If the survivor does not wish to place an official complaint through the grievance mechanism, the complaint is considered closed.
- If the alleged perpetrator is an employee of the Developer, EPC Contractor, or subcontractor, to protect the safety of the survivor, and the workplace in general, the worker, in consultation with the survivor—and with the support of the GBV Services Provider—should assess the risk of ongoing abuse to the survivor. Reasonable adjustments should be made to the alleged perpetrator’s work schedule and work environment—preferably by moving the perpetrator rather than the survivor—as deemed necessary.

7. MONITORING AND REPORTING

7.1 Monitoring Requirements

The following monitoring requirements will be undertaken by the CLO with regards to the implementation of the SEP:

- Weekly inspections will be undertaken at stakeholder grievance boxes and worker grievance boxes to collect any grievance forms.
- Twice per month inspections will be undertaken to ensure: (i) SEP is disclosed in hard copy at the Red Sea Governorate and Ras Gharib Local Administration; (ii) summary advertisements of grievance mechanism are available at local community platforms.
- Submission of minutes of meetings with tribal leaders of Bedouin groups
- Quarterly inspections will be undertaken to: (i) ensure project update leaflets are available at local community platforms; (ii) stakeholder grievance boxes and forms are available at designated locations; (iii) worker grievance boxes and forms are available at designated locations.
- Monitoring requirements are to be updated once available for implementation of the local employment and procurement procedure as well as the social responsibility program. This could include for example submission of employment and procurement databases, proof of announcement advertisements, etc.
- Undertake monthly inspections on EPC Contractor and involved subcontractors on implementation of worker grievance mechanism. Inspections will include:
 - Visual observation to ensure EPC Contractor/subcontractor(s) provide grievance boxes.
 - Discussion with sample of workers to ensure they are familiar with the process.
 - Collection and review of grievance forms, grievance closeout forms and grievance log sheet.

7.2 Reporting Requirements

The following reporting requirements will be prepared by the CLO with regards to the implementation of the SEP:

- On a monthly basis the stakeholder register form will be submitted as provided in Annex 4.
- On a monthly basis the stakeholder grievance form will be submitted as provided in Annex 2.
- On a monthly basis the worker grievance form will be submitted as provided in Annex 8.
- The SEP will be updated and resubmitted on a semiannual basis during the construction phase and on an annual basis during the operation phase.
- The following Key Performance Indicators (KPI) will be reported monthly:

No.	KPI	Measurement Action
1	Number of stakeholder engagement activities undertaken	All communication to be reported in stakeholder register
2	Number of stakeholders involved	All communication to be reported in stakeholder register

3	Number of vulnerable groups engaged (including women groups)	All communication to be reported in stakeholder register
4	Number of requests for information via websites, CLOs and local information centers	All communication to be reported in stakeholder register
5	Number of stakeholder / worker valid grievances submitted (and number rejected as outside of scope)	All grievances to be reported in grievance register
6	Number of resolved stakeholder / worker grievances	All grievances to be reported in grievance register
7	Number of stakeholder / worker grievances related to GBV	All grievances to be reported in grievance register
8	Average time for resolution of stakeholder / worker complaints	All grievances to be reported in grievance register
9	Type of stakeholder / worker grievances submitted	All grievances to be reported in grievance register
10	Alert on stakeholder and worker 'Red Flags,' if applicable.	Analysis of all stakeholder and worker engagement activities in combination with the data of both grievance mechanisms.

8. ROLES AND RESPONSIBILITIES

This chapter identifies the roles and responsibilities related to implementation of the SEP.

Project Manager – IPH

- Ensure resources required (budgetary, human, and logistical resources) are available for the implementation of this Stakeholder Engagement Plan
- Oversee the overall implementation of this Stakeholder Engagement Plan, including frequent interfacing with CLOs.
- Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.

Community Liaison Officer (CLO) – IPH (Male and Female)

- Update the SEP as required during the project's lifetime, to include planning, construction, operation, and decommissioning.
- Overall responsibility for implementing the requirements of the stakeholder engagement plan as identified under 'Chapter 5.5'

- Overall responsibility for implementing the requirements of the stakeholder grievance mechanism to include distribution of grievance disclosure sheets, collection of grievance forms, updating grievance log sheet, filling grievance resolution forms and grievance close-out forms.
- Overall responsibility for implementing the worker grievance mechanism for their staff. This includes distribution of grievance disclosure sheets, collection of grievance forms, updating grievance log sheets, filling resolution form and grievance close-out forms.
- Coordinate with the EPC Contractor's team / oversee the implementation of the EPC Contractor and its subcontractors of all requirements related to SEP and worker grievance mechanism.

EPC Contractor / Project Operator

EPC Contractor will be required to assign a qualified Community Liaison Officer (CLO) that will have the following roles and responsibilities:

- Implementing the requirements of the stakeholder engagement plan as applicable and as identified under '5.' As noted in Table 5, the EPC Contractor CLO will have no role in consultation and engagement activities with local communities or Bedouin groups. EPC Contractor CLO engagement activities are limited to those requirements for the project that are mainly with governmental entities such as securing water requirements from the Water Company, assigning authorized waste collectors from City Council, etc.
- Submission of proof of completion of required engagements to the Project Developer's CLOs.

Note: The EPC Contractor and its subcontractors(s) will have no role in the implementation of the stakeholder grievance mechanism. Any complaints received directly or indirectly by any EPC or subcontractor staff shall be redirected to the IPH CLOs.

9. ANNEXES

9.1 Annex 1 – Grievance Disclosure Sheet

PUBLIC GRIEVANCE FORM

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

9.3 Annex 3 – Grievance Resolution Form

GRIEVANCE RESOLUTION FORM

How was grievance received	
Reference No:	
Description of Concern, Incident or Grievance: <i>What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>	
Date of Grievance	
Has the Grievance been Resolved?	<input type="checkbox"/> Yes <input type="checkbox"/> No; <i><u>If not provide a justification below</u></i>
Fill Out Either Section 1 OR Section 2 below	
Section 1	
Summary of Actions Undertaken to Resolve Grievance	
Date of Implementation	
Section 2	
Summary of Proposed Actions to be Implemented to Resolve Grievance	
Timeline for Implementation	

CLO:

Signature:

Date:

9.5 Annex 5 – Project Handout

9.6 Annex 6: Frequently Asked Questions (FAQ)

1. Will the Project provide electricity to local communities?

Based on agreement with the Government of Egypt (GoE), the project will be connecting to the National Grid that supplies electricity for all end-users. Project will not be providing electricity specifically for a local community area but rather all end-users across Egypt.

2. What are the job opportunities that the Project will provide?

Project will require the following workforce throughout the construction and operation phase:

- Around 250 job opportunities at peak during the construction phase for a duration of approximately 24 months. This will mainly include around skilled job opportunities (to include engineers, technicians, consultants, surveyors, etc.) and unskilled job opportunities (mainly laborers but will also include a number of security personnel).
- Around 24 job opportunities during the operation phase for a duration of 20 years. This will include skilled job opportunities (such as engineers, technicians, administrative employees, etc.) and unskilled job opportunities (such as security personnel, drivers, etc.).

3. How will job opportunities be managed? And how can one apply?

A Local Recruitment Procedure will be prepared and announced at a later stage. The procedure will identify the number of job opportunities targeted for local communities to include skilled and unskilled workers. Such job opportunities shall also take into account employment of local communities in the area around the Project to include fresh graduate engineers, technicians, laborers, etc.

In addition, the procedure will include details on how job opportunities will be announced as well as a selection process that is fair and transparent and provides equal opportunities for all including females.

The Procedure should be developed in coordination with local authorities such as the Local Labor Office and will investigate the potential for implementation through a joint collaboration between the Developer/EPC Contractor and the other wind farm developers in the area.

4. How will procurement opportunities be managed? and how can one apply?

A Local Procurement Procedure will be prepared and announced at a later stage. The procedure will identify procurement opportunities targeted for local communities to include for example local subcontractors, local supplies and services, cleaning services, etc.

In addition, the procedure will include details on how procurement opportunities will be announced as well as a selection process that is fair and transparent and provides equal opportunities for all.

The Procedure should be developed in coordination with local authorities such as the Local Labor Office and will investigate the potential for implementation through a joint collaboration between the Developer/EPC Contractor and the other wind farm developers in the area.

5. Will the project implement a Social Responsibility Program? How can one benefit from this?

A social responsibility program will be considered by the Developer which will aim to benefit the local communities to the greatest extent possible. A structured approach to this will be developed which will identify priority development projects which could benefit local communities (e.g. based on a needs assessment if available).

Based on that the social responsibility program can prioritize projects for local communities based on available budget, vision, timeline for implementation and other factors.

Social responsibility program will be developed and announced at a later stage.

6. *How can anyone submit a project related grievance?*

d. Grievance Sheets (Annex 1) with grievance boxes will be made available at the following locations:

- **Ras Ghareb Local Governmental Unit**

Location: Al-Mina Street City: 11432

Ras Ghareb – Red Sea

Tel: 01001318480 – 0120195877

- **Project Office**

Location: 57 Nile Corniche St., El Maadi 11431, Cairo, Egypt

Tel: +3 12 0522 2555

e. Direct Contact through the following:

CLO

Address: 57 Nile Corniche St., El Maadi 11431, Cairo, Egypt (*please check the project's webpage on our website for updated details*)

Telephone: +3 12 0522 2555 (*please check the project's webpage on our website for updated details*)

E-mail: info@weareiph.com (*please check the project's webpage on our website for updated details*)

f. Company Website at the following www.weareiph.com