



Stakeholder Engagement Plan

Clean Energy Asia LLC

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1 Introduction

1.1 Overview

Clean Energy Asia LLC (CEA), a special purpose vehicle company, plans to develop a 25 wind turbine generator (WTG) wind farm with up to 50MW capacity (the Project). CEA has been formed by a group of investors including Newcom LLC, a Mongolian investment company and SB Energy Corp., the renewable energy arm of Japan's Softbank Corporation. The Project is to be developed to European Bank for Reconstruction and Development (EBRD) requirements. This document is CEA's Stakeholder Engagement Plan (SEP). The objective of the SEP is to establish and define CEA's commitment and approach to constructive and meaningful engagement with stakeholders. The implementation of this SEP will support CEA in achieving compliance with national laws and international best practice, as defined by the requirements of EBRD.

1.2 Project Description

The wind farm is expected to comprise the following components:

- 25 WTGs (2MW capacity each)
- Control centre compound including permanent workers' accommodation and site office
- Access road from paved highway to the Project site
- A 34km 110kV transmission line from the sub-station at the control centre to the main substation located west of Tsogttsetsii, where the power will enter the national grid
- On-site access roads from the control centre to the WTGs and underground cables to carry electricity from the WTGs to the control centre sub-station
- Temporary construction workers' accommodation

The proposed Project site comprises approximately 7km² of remote, open desert located approximately 495km south of the of the capital city of Ulaanbaatar, 98km east of Dalanzadgad and 22km south of settlement of Tsogttsetsii (soum centre). The site lies within the Siirst bagh or Tsogttsetsii soum (district) in Umnugovi aimag (the province of Ömnögovi) in southern Mongolia (see Figure 1.1).

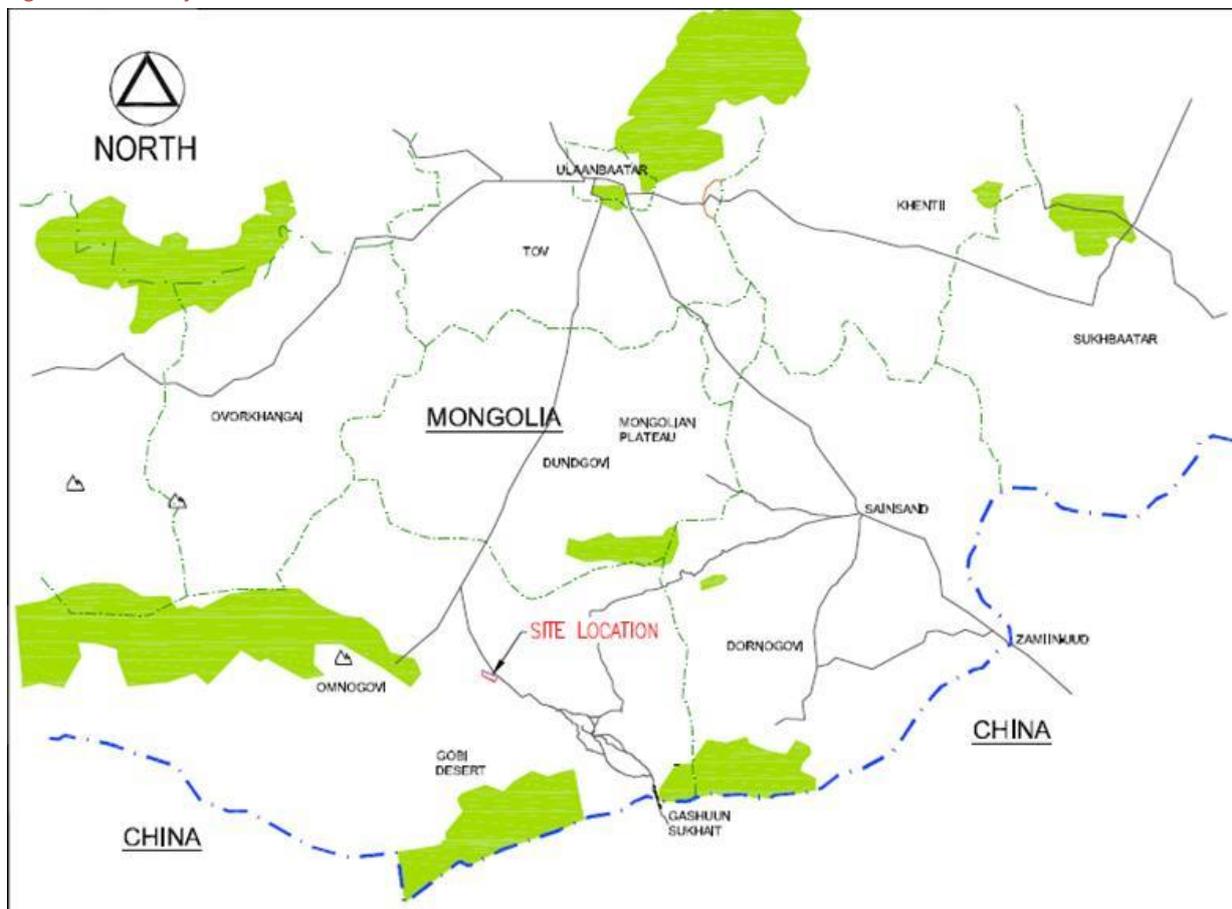
The Project is located south-east of two large open-pit coal mines at Tavan Tolgoi, owned by Erdenes Tavan Tolgoi (a government owned company), and Ukhaa Khudag, owned by Energy Resources. The site boundary is located approximately 8km from the mines at its closest point. There are other smaller mines in the vicinity, some have accommodation and maintenance compounds that are located on the periphery of the site to the north and west. Roads located immediately to the north of the site are used for exporting coal to China, its border being located approximately 200km to the south-east of the Project site. A new railway is also being constructed which, when complete, will provide an alternative for coal export.

The north and west of the site reflects the relatively flat, open expanse of the steppe and vegetation on the site is sparse, with very few shrubs. The south and east, also sparsely vegetated, is hilly and dominated by the Tsetsii mountain (known as Tsetsii Uul) escarpment, a protected area.

The site is used by nomadic herders who graze their animals periodically and utilise wells and winter shelters located around the Tsetsii mountain. In addition to herding, the site lies on the path of numerous informal access routes.

The construction of the Project is estimated to commence in May 2016 and to commence with operations in November 2017. Construction of the Project will be carried out under a single Engineer, Procure and Construct (EPC) Contract.

Figure 1.1: Project location



Source: SgurrEnergy (2015)

1.2.1 Environmental and Social Impact Assessment Process

A Mongolian detailed environmental impact assessment (DEIA) was completed in 2014, aimed at compliance with Mongolian legislation. This has been approved by the Mongolian Ministry of Environment and Green Development and Tourism. An Environmental and Social Impact Assessment (ESIA) has been prepared to international standards by SgurrEnergy, which has been classified as a

Category “B”¹ project by the EBRD. The ESIA assessed the impacts and benefits of the Project and identify measures by which these impacts and benefits can be managed.

¹ Projects for which potential adverse future environmental and/or social impacts are typically site-specific, and/or readily identified and addressed through mitigation measures.

2 Regulatory requirements

As part of CEA's ongoing commitment to Project stakeholders and general good corporate governance, this SEP is designed to meet international best practice, particularly the EBRD Performance Requirements (PR), as well as the laws of Mongolia. Mongolian law also aligns with good international practice as set out in the United Nations Economic Commission for Europe's (UNECE) Aarhus Convention (2001), which relates to access to information, public participation in decision-making, and public access to justice in relation to the environment.

2.1 Mongolian legislation

Relevant Mongolian laws relating to citizens' rights to information about development projects and involvement in environmental protection measures include:

- Law of Mongolia on Environmental Impact Assessment (DEIA Law) (2012), and
- Regional Development Management Law (RDM Law) (2003, amended in 2006).

The DEIA Law stipulates that public involvement in the DEIA process is required. Article 5.4 of the Law requires the opinion of local residents of the area to be addressed in undertaking and preparing a DEIA. However, there is no specific requirement under the Law to demonstrate how the opinions of local residents should be reflected in design or operational aspects.

The RDM Law primarily aims to regulate regional development and to balance social and economic objectives. Respect for the powers of local self-governing bodies in the regional development process is underwritten in the Law. According to the Law local self-governing bodies are responsible for engaging citizens in the regional development process, by responding to appropriate queries and by encouraging and directing engagement by 'citizens, enterprises and organisations'.

2.2 EBRD Requirements

All projects funded by International Financial Institutions such as the EBRD are required to meet international best practice and specifically the requirements for stakeholder engagement and public consultation as set out in the EBRD's PR in particular PR 1: Environmental and Social Appraisal and Management and PR 10: Information Disclosure and Stakeholder Engagement.

In summary, the EBRD require effective community engagement through disclosure of project-related information and consultation with local communities and other interested stakeholders on matters that directly affect or interest them, to be started at the earliest stage of the environmental and social assessment process and to be continued throughout the life of the project.

As per EBRD requirements, disclosure of information means providing stakeholders with access to relevant information on:

- The purpose, nature and scale of the project
- The duration of proposed project activities
- Any risks to and potential impacts on such communities and relevant mitigation measures
- The envisaged stakeholder engagement process, and
- A procedure or policy by which people can make comments or complaints, (a grievance mechanism)

When affected communities are subject to identified risks and adverse impacts from a project, the client is required to undertake a process of consultation in a manner that provides the affected communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them. Effective consultation is a two-way process that should:

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

2.3 Aarhus Convention

The Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (the Aarhus Convention) was adopted by the UNECE in 1998. On 5 July 2011, the Meeting of the Parties to the Convention adopted a decision encouraging the accession by states outside the UNECE region and a simplified procedure for doing so.

Article 6 relates to provision for reasonable timeframes for participation, opportunities for early participation (while options are still open) and the obligation to ensure that "due account" is taken of the outcome of the participation are to be applied in respect of such any projects, plans or programmes. Article 7 requires Parties to make "appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment".

The Mongolian Government is not currently a signatory but has stated an interest in acceding to the convention, through a letter to the UNECE during the Meeting of the Parties in July 2011, mentioned above. In principle, Mongolian Law already aligns with Aarhus Convention requirements, but the letter of intent demonstrates its further commitment to ensuring public participation in environmental and human rights issues. For further information, see: www.unece.org/env/pp/introduction.html.

3 Summary of previous stakeholder engagement activities

To date, three scoping meetings have been held with local communities (see Table 3.1). The primary goals of these meetings were to:

- Describe the Project and the ESIA process
- Discuss and identify potential Project impacts and benefits associated with the construction and operation of the Project, including the transmission line, roads and other on-site facilities
- Understand local land use, activities and populations living and working within or near the Project site
- Identify the most effective ways of information dissemination in the future
- Develop a list of stakeholders groups and local people most likely to be affected by the Project

Table 3.1: ESIA consultation activities

| Date | Attendees | Location | Key Discussions |
|----------------|---|--|--|
| 3 April 2014 | Newcom, LLC representatives and the representatives of the community forums | Tsogttseii soum, Umnugobi | An introduction and information on the construction of the Project was provided. Detailed discussion regarding advantages of the wind farm, the fact that it is environmentally friendly technology, improvement of the road and infrastructure and to provide electricity to the local communities including local mining companies. |
| 7 June 2014 | Clean Energy Asia, SunnyTrade, LLC, Tsogtsetsii sum Siirst Bag | Tsogttseii soum, Umnugobi | Detail was provided on the environmental assessment workload and to provide detailed presentation on the work performances. Detail was provided on how wind energy is used to produce electricity using WTGs and how this Project will be Mongolia's second wind farm. Environmental issues and restoration measures were also discussed. |
| September 2014 | 18 herders | Salkhit Wind Farm | Community visit to the operational Salkhit Wind Farm. |
| 1 October 2014 | Clean Energy Asia, SgurrEnergy Representatives of Tsogtsetsii sum Siirst Bag. Local herders | Tsogtsetsii sum Siirst Bag (local government) office | CEA introduced the Project and SgurrEnergy. SgurrEnergy introduced the ESIA role, highlighted areas where there may be concern e.g. noise, visual, economic, and queries whether there were any concerns from the local community. SgurrEnergy advised that the wind farm would be designed to minimise impacts. CEA provided details of potential community benefits associated with the Project. |

Source: SgurrEnergy (2015)

The meetings answered stakeholder queries regarding how the wind farm would look, whether there would be benefits to the local community, such as local employment and education, and concerns regarding impact on Tsetsii mountain. CEA provided information on proposed community benefits, for example through provision of some limited local employment opportunities and supporting education for local students. SgurrEnergy provided copies of wireframe views² of the Project to show how the wind farm would look from the settlement of Tsogtsetsii. SgurrEnergy emphasised that the wind farm would be designed to minimise impacts, with CEA confirming that WTGs would not be installed near the mountain.

² A wire-frame model is a visual presentation of a three-dimensional (3D) or physical object used in 3D computer graphics

4 Identification of stakeholders and communication methods

An analysis of Project stakeholders is presented in Table 4.1 below. Means of communication with different stakeholder groups and audiences will be attuned to their comfort levels with different locations, languages, media and disclosure materials. The most vulnerable groups (affected by the Project) include nomadic herders who seasonally inhabit the Project area and who may not be informed about or able to attend key meetings and will therefore have limited access to information.

This SEP and the table below will be updated on an on-going basis as new stakeholders are identified throughout the Project life cycle.

Table 4.1: Stakeholder identification and communication

| Stakeholders | Communication details | Communication media | Responsibility | Timing | |
|--|---|---|--|---|--|
| Internal stakeholders | | | | | |
| CEA workforce | Communications will be undertaken on site by CEA | <ul style="list-style-type: none"> Bulletin board in break room or corridor at CEA (visible location to be identified) Newsletter to be inserted into payslip Worker grievance procedure | <ul style="list-style-type: none"> Human Resource Manager or Site Manager | <ul style="list-style-type: none"> Monthly Quarterly As per grievance procedure | |
| Construction workers, subcontractors (several hundred workers during construction phase) | Communications will be undertaken on site by CEA | <ul style="list-style-type: none"> Information in contract Bulletin board at CEA offices (multiple languages for international migrant workers – Mongolian, English and any others to be identified) Training and tool box talks Worker grievance procedure | <ul style="list-style-type: none"> Human Resource Manager or Site Manager | <ul style="list-style-type: none"> Prior to construction At least monthly during construction At least monthly during construction At least monthly during construction As per grievance procedure | |
| External stakeholders | | | | | |
| Settlements within Tsogttsetsii Soum, Siirst Bagh | <ul style="list-style-type: none"> Soum centre residents (circa 6100 people) Bagh residents (circa 1300 people) Herding households seasonally residing in gers or using pastures near or on site | <ul style="list-style-type: none"> Soum Governor Bagh Governors Pasture user group or other herder representatives Individual herders | <ul style="list-style-type: none"> Public bulletin board on construction site and announcements on posters in Tsogttsetsii soum center | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> Prior to construction with monthly updates |
| | | | <ul style="list-style-type: none"> Public consultation meeting at key Project stages from disclosure of draft ESIA, construction to decommissioning at soum centre | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> Prior to construction throughout Project lifetime at key stages |
| | | | <ul style="list-style-type: none"> Leaflets, brochures and fact sheets distributed through soum and bagh Governors | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> During draft ESIA disclosure, prior to construction and annually throughout project lifetime |
| | | | <ul style="list-style-type: none"> Newspaper adverts in publications such as: Tsetsii info" (a local newsletter published by the governor's office of Tsetsii soum), "Daily News", "Today" "Altan nutgiin News" which is prepared and published in Ulaanbaatar by the citizens of Tsetsii | <ul style="list-style-type: none"> Community Liaison Officer / Human Resource Manager / Site Manager | <ul style="list-style-type: none"> As required for Project updates, vacancy announcements |

| Stakeholders | Communication details | Communication media | Responsibility | Timing | |
|-------------------------------|--|---|--|--|--|
| | | soum living in Ulaanbaatar. | | | |
| | | <ul style="list-style-type: none"> Television such as "DDISH TV", "Orchlon" and "Malchin" web based content (limited use) | <ul style="list-style-type: none"> Community Liaison Officer / Site Manager | <ul style="list-style-type: none"> As required | |
| | | <ul style="list-style-type: none"> Email (limited use) | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> As required | |
| Nearest town | Tsogttsetsii (roughly 6108 inhabitants in 2013) | Tsogttsetsii soum Governor | <ul style="list-style-type: none"> Public consultation meeting at relevant Project phases | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> Prior to construction Prior to operations Prior to decommissioning |
| | | | <ul style="list-style-type: none"> Newspaper adverts | | <ul style="list-style-type: none"> Prior to construction |
| | | | <ul style="list-style-type: none"> Public bulletin board at the construction site | | <ul style="list-style-type: none"> Prior to construction |
| Herders and other land users | Herders pass through the Project site but no permanent residents on site | Via Pasture User Groups or similar herders' representatives | <ul style="list-style-type: none"> Public consultation meetings | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> During disclosure of draft ESIA As per grievance mechanism |
| | | | <ul style="list-style-type: none"> Grievance mechanism | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> As per grievance mechanism |
| | | | <ul style="list-style-type: none"> Project leaflet | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> During disclosure of draft ESIA |
| Aimag (provincial) government | <ul style="list-style-type: none"> Department of Waters Department of Physical Planning Department for Municipal Affairs National Power Transmission Grid Company (NPTG) National Data Center (NDC) | Heads of Departments | <ul style="list-style-type: none"> Email correspondence to Heads of Departments | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> Prior to construction As required |
| | | | <ul style="list-style-type: none"> Formal and informal meetings / as and when necessary | | <ul style="list-style-type: none"> As required |
| Government of Mongolia | <ul style="list-style-type: none"> Ministry of Environment and Green Development, and Tourism Ministry of Finance | Email official contact points | <ul style="list-style-type: none"> Formal and informal communication as required by Project permit(s) | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> As required |
| | | | <ul style="list-style-type: none"> Formal and informal meetings as and when necessary | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> As required |
| NGOs | <ul style="list-style-type: none"> Mongolian Wind Energy Association | <ul style="list-style-type: none"> e.myagmardorj@gmail.com | <ul style="list-style-type: none"> Email copy of NTS Notifications prior to start of | <ul style="list-style-type: none"> Community Liaison Officer Community Liaison Officer | <ul style="list-style-type: none"> Prior to start of construction Prior to start of construction, key |

| Stakeholders | Communication details | Communication media | Responsibility | Timing |
|---|---|---|--|--|
| <ul style="list-style-type: none"> Centre for Human Rights and Development, Mongolia Gobi Soil, Khanbogd, Mongolia OT Watch, Mongolia Tsetsii Nutag / homeland Steps Without Borders | <ul style="list-style-type: none"> Urantsooj Gombosuren, gurantsooj@rocketmail.com Battsengel Lhamnorov, tsengel_5595@yahoo.com Sukhgerel Dugersuren, otwatch@gmail.com Contact details to be confirmed Ms N. Bayarsaikhan (contactable at OT Watch, Mongolia) | <ul style="list-style-type: none"> construction and at key points in construction process via email Annual reports / company website disclosure (web address to be confirmed at a later stage) Public consultation meetings at relevant Project stages | <ul style="list-style-type: none"> Community Liaison Officer Community Liaison Officer | <ul style="list-style-type: none"> points during construction Annually Prior to construction, prior to operations |
| Small business stakeholders | <ul style="list-style-type: none"> Potential suppliers for CEA in Umnugobi aimag Shops and services in Tsogttsetsii soum centre | <ul style="list-style-type: none"> Public consultation meeting Email notices at key points during the construction process (if requested) | <ul style="list-style-type: none"> Community Liaison Officer | <ul style="list-style-type: none"> Prior to and during construction Annually during operations As required |
| Other interested parties | International NGOs, concerned parties, students, and any others | <ul style="list-style-type: none"> Email if named parties Web based communication Public consultation meetings Newspaper adverts | <ul style="list-style-type: none"> Community Liaison Officer Community Liaison Officer Community Liaison Officer Community Liaison Officer | <ul style="list-style-type: none"> As required As required As required As required |

5 Consultation and disclosure programme

Engagement phases specific to the Project can be classified as below:

- Consultation completed by CEA in the Project development stage, including:
 - DEIA consultation with local stakeholders and permitting authorities, prior to obtaining an environmental permit for the Project; and
 - Discussions around the lease of government owned land for the transmission line route and right of way for the construction and maintenance of the transmission line.
- Consultation and engagement as part of the ESIA process. A single round of ESIA related consultation meetings has been completed to date. For details of this and planned future activities, see Table 5.1:
 - Scoping;
 - ESIA consultation; and
 - Disclosure.

The following section and Table 5.1 outlines the planned engagement modules to be carried out by CEA and their Engineering Procurement and Construction (EPC) contractors over the Project life cycle.

5.1 Resources and responsibilities

It is recognized that stakeholder engagement is an important element of the strategic planning and management of the Project as well as its day to day running. CEA will invest the appropriate resources in this process over the life of the Project, from planning and construction, to decommissioning and closure.

Key roles and responsibilities for stakeholder engagement have not currently been assigned but a Community Liaison Officer (CLO) will be appointed to implement the SEP. The CLO will carry out day to day liaison with all stakeholders, communities and interest groups. The CLO will be responsible for collecting up to date information about local communities and other stakeholders, as well as anticipating and reporting any issues. The CLO will carry out regular community visits, including meeting with herders at their camps. The CLO will report to the Site or Project Manager.

The CLO will also be responsible for monitoring and reporting on SEP implementation and grievances periodically to CEA management and also externally. The SEP will be reviewed on an annual basis and updated if necessary.

Table 5.1: ESIA disclosure and consultation

| Information to be disclosed / issue to be discussed | Timeframe | Communication / media tool | Location | Opportunity for stakeholder comment |
|---|--|---|---|--|
| Scoping | | | | |
| Project description, seeking initial opinions | ESIA Scoping stage - completed | Meetings with community forum representatives, Tsogttsetsii soum, Siirst Bagh representatives, local herders | Tsogttseii soum, Umnugobi Tsogttsetsii soum, Siirst Bagh office | At meetings |
| Disclosure | | | | |
| ESIA package disclosure: DEIA, ESIA, Non-technical summary (NTS), this SEP, Environmental and Social Action Plan (ESAP) | March – May 2016 public review period | Advertisements and leaflets stating that the ESIA package is available for public review and comment, to be posted in local and national newspapers (Today and Daily News), and on the Project parent companies websites (www.newcom.mn and www.sbenergy.co.jp) in English and Mongolian, and EBRD website in English Email documents upon request | Electronic copies at (web address to be determined at a later stage) Paper copies available for review at: <ul style="list-style-type: none"> • Soum Governors' offices • CEA offices • Lenders' websites | Stakeholders will be able to submit comments at any time before finalisation using the contact details in Section 7 of this report |
| ESIA consultation | | | | |
| Notification of ESIA public consultation events | At least 30 days before the first consultation event | Public notice in physical locations in Tsogttsetsii town, in newspapers (Today and Daily News) and on Project parent companies websites (www.newcom.mn and www.sbenergy.co.jp) in English and Mongolian | Public notice in suitable national and regional newspapers Placement of notices in public areas | Through stakeholder comment form and at consultation events |
| ESIA findings, ESMP | At least 30 days after the above notification is published | Public consultation event to be facilitated in English and Mongolian, to be staffed by an ESIA team member along with CEA staff member. The NTS will be used to explain the Project, the ESIA process and key findings in English and Mongolian. Regional government leaders and NGOs should be invited to this event | A public location in Tsogttsetsii soum centre, easily accessible to all residents of the soum and to herders. | At the event Public grievance mechanism |
| ESIA findings, ESMP | At least 30 days after ESIA package Disclosure | Meeting with key high level stakeholders including relevant government departments | CEA office or Government office in Tsogttsetsii and/or Ulaanbaatar, as deemed suitable by the consultees | At the meetings |

Table 5.2: Engagement modules to be carried out by CEA and EPC contractors during construction and operation

| Information to be disclosed / issue to be discussed | Timeframe | Communication / media tool | Location | Opportunity for stakeholder comment |
|---|----------------------------|---|-----------------------------------|-------------------------------------|
| Public grievance mechanism (see | Alongside ESIA development | • Website: (currently www.newcom.mn and | Soum Governors' offices and other | Once the grievance mechanism is |

| Information to be disclosed / issue to be discussed | Timeframe | Communication / media tool | Location | Opportunity for stakeholder comment |
|--|---|---|---|---|
| section 6) | | <p>www.sbenergy.co.jp)</p> <ul style="list-style-type: none"> Contact details in Section 7 of this SEP Public meeting focusing on grievance mechanism deployment | locations to be determined | deployed, the public can lodge grievances at any time throughout the lifecycle of the Project |
| Project schedules | <p>One month prior to:</p> <ul style="list-style-type: none"> Start of construction Other major work phases Re-issued if there are any significant changes | <ul style="list-style-type: none"> Signposts at the entrance to Project construction site and at soum Governor offices Email to interested parties upon request Website: (web address to be determined at a later stage) | <ul style="list-style-type: none"> The entrance to the Project construction sites and at key locations close to the site Community buildings, such as mosques, schools, town halls, libraries and police stations | During the construction and implementation phases through public grievance mechanism, available |
| Regular Project updates | Monthly / bi-monthly events during construction | <ul style="list-style-type: none"> Leaflets³ and meeting notices Email to interested parties upon request Website: (currently www.newcom.mn and www.sbenergy.co.jp) | To be determined | <p>In the meetings</p> <p>Public grievance mechanism</p> |
| Open Days | Annually during operations | Guided tour of Project site and facilities for interested members of the public | Project site | During Open Days |
| Workers' grievance mechanism | Construction and Operation | Bulletin board in break room, tool box talks when new groups of workers commence work on the Project | Project construction site | Workers (including non-employees) can lodge grievances at any time through the workers' grievance mechanism |
| Employment terms and conditions | | Included in contracts. | N/A | Through workers' grievance mechanism |
| Human resources and Environment, Health and Safety (EHS) policies and procedures | | Included in contracts | N/A | Through workers' grievance mechanism |

³ Covering Project milestones, latest news, environmental and social monitoring information, resolution of grievances (to be done outside update sessions), construction news and recruitment.

6 Grievance mechanism

The resolution of public grievances is the ultimate responsibility of the senior managerial staff at CEA, but will be coordinated by the CLO. CEA and the Contractor(s) will receive and consider all comments and complaints associated with the Project. Any person or organisation may send comments and/or complaints in person, by phone, post or email using the contact information provided at the end of the document.

All comments and complaints will be responded to either verbally or in writing, as indicated by the complainant on the Grievance Form, if contact details of the complainant are provided.

Grievance information will be recorded in a grievance log by the CLO. This information will include basic details such as:

- Stakeholder name and contact details
- Details of the nature of the grievance
- Date received and responded to
- Date closed out, and
- How it was submitted, acknowledged, responded to and closed out

Individuals do not have to give their name and can request their name be kept confidential. However, CEA cannot directly communicate responses to anonymous grievances.

The main function of the grievance log will be to prioritise grievances for action, based on their gravity and legitimacy. A typical categorisation is given in Table 6.1, where a ‘category 1’ grievance is the most urgent type of grievance and ‘category 3’ is the least urgent. It is envisaged that this categorisation will be updated and refined over the life of the Project.

Table 6.1: Categorisation of grievances

| Grievance category | Description | Response timeframe | Type of response |
|--------------------|---|--|--|
| 1 | A grievance regarding Project effects on livelihood (including any land acquisition issue), health and safety, personal or community assets, or effects on any other human right. Grievances can also be categorised as ‘1’ if a vulnerable individual or group ⁴ is believed to be affected. Nuisance or inconvenience to a large number of people (above 50) should be categorised as ‘1’. | Grievance resolved within one week, or explanation provided as to why resolution will take longer. | An Investigation Team will be organised for prompt investigation and resolution. Work may be stopped in the affected area. CLO will send immediate acknowledgement of receipt of grievance. |

⁴ The DEIA identifies the most vulnerable group to the project as nomadic herders who seasonally inhabit the area and who may not attend key meetings and have limited access to information.

| Grievance category | Description | Response timeframe | Type of response |
|--------------------|---|---|--|
| 2 | A grievance relating to nuisance or inconvenience to a small number of people due to Project activities should be categorised as '2'. | Grievance resolved within three weeks or explanation provided as above. | CLO and an appropriate investigation team will conduct investigation. The Site Manager or Occupational Health and Safety Manager may decide to stop work during the investigation to allow the corrective preventive actions to be determined. CLO will send acknowledgement of receipt of grievance within a week. |
| 3 | A suggestion for improvement, or any other type of grievance, would be categorised as '3'. | Suggestion considered within six to eight weeks. | CLO will coordinate internal consideration of suggestion. CLO will provide response to originator of suggestion acknowledge receipt followed by response outlining key actions. |

Dedicated grievance boxes will be provided at a number of convenient locations, in order to collect grievances from community members. Proposed grievance box locations are:

- One grievance box at the soum Governor's offices in Tsogttsetsii
- CEA main entrance
- One location convenient for herders in Tsogttsetsii soum, and
- Three locations along the proposed OHTL route

The grievance boxes will be weather proof and locked, and will be checked once a week initially, and then depending on usage levels, once in two weeks. The responsibility for checking the boxes would lie with the CLO. Grievance forms will be widely disseminated among local communities in order to streamline the grievance mechanism. A standard grievance form is given in Appendix A, which will be translated into Mongolian.

Grievances submitted through other channels, including telephone, email and letters, as well as in person at meetings will also be accepted, and put through the same single grievance mechanism.

It should be noted that this mechanism does not take the place of complainants' legal rights. Even if a person submits a grievance, he or she may use other legal avenues to resolve their grievance.

CEA will monitor the way in which grievances are being handled by the Contractor(s) and ensure they are properly addressed within deadlines specified above.

A separate, internal grievance mechanism is available for CEA employees and will also be made available for contracted workers, once they begin working.

7 Company contact information

At the time of writing of this SEP, a CLO has not yet been appointed. CEA has committed to appointing a CLO to manage stakeholder engagement and grievance before or at the time of disclosure of the DEIA, ESIA, the Environmental and Social Action Plan and this SEP.

The contact details of the Project Company are therefore provisional and will be updated once the CLO has been appointed.

Company contact name: Ariunbold Munkhbaatar

Local address: To be confirmed once Project Site has been established

Telephone number: +976 313183 (46)

Ulaanbaatar address: Naiman Zovkhis Building, 10th Floor

21 Seoul Street

Ulaanbaatar 14251

Mongolia

Email: Ariunbold@newcom.mn

Appendix A. Community Grievance Form

| | |
|--|---|
| <i>If you wish to remain anonymous, please do not fill the first three rows below.</i> | |
| Full Name | |
| Contact Information <i>Please include how you wish to be contacted (i.e. mail, telephone or e-mail). If you wish to remain anonymous, please do not fill this box.</i> | Postal Address: Telephone number: E-mail address: |
| Preferred language (please tick) | Mongolian <input type="checkbox"/> Russian <input type="checkbox"/> Mandarin <input type="checkbox"/> English <input type="checkbox"/> Other <input type="checkbox"/> |
| <i>Please start below this line, if you wish to remain anonymous.</i> | |
| Description of feedback or grievance (<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>): | |
| | |
| Date of incident / grievance | |
| One time incident / grievance date..... Happened more than once? How many times? Still on-going (i.e. currently experiencing problem) Y / N (<i>please circle</i>) | |
| | |
| How would you like to see this problem resolved? | |
| | |
| Signature.....Date..... | |
| Please return this form to: CEA Tsetsii Wind Project or any of the grievance boxes listed below. Location of grievance boxes: [to be determined] | |