




Sistema de Gestão Integrado

PLA.SUS.013

Community Grievance Mechanism - CGM

Este plano é de propriedade intelectual da Gás Natural Açú e não pode ser divulgado para terceiros sem o prévio consentimento do responsável pelo documento.

	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	1/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

1 INTRODUCTION

The present document offers a complete description of the Community Grievance Mechanism (CGM) for the Construction Phase of the Gas Natural Açu (GNA) project (the Project) in alignment with the International Finance Corporation (IFC) and its Sustainability Framework.

The starting point for all of GNA's Social Management Plans (SMPs) for construction is the following list of Key Project Needs that are directly linked to Project Social Risks. To various degrees, the present CGM addresses these Needs/Risks.


Project Needs / Social Risks (in no particular order):

1. Guarantee Access to Water Sources
2. Guarantee Access to Marine Areas
3. Find an Available and Capable Workforce
4. Secure Permits in Time and Convey their Significance
5. Aim to Close Community Liabilities/Legacy Issues
6. Build and Keep Good Community Relations
7. Create GNA's Own Sustainability Identity
8. Maintain Safety Excellence Inside and Outside the Site
9. Ensure EPC Contractor Sustainability Performance
10. Safeguard Public Health Conditions

2 PROJECT DESCRIPTION

Prumo Logística S.A. (Prumo), BP Global Investments PLC (BP), and Siemens AG (Siemens) are the sponsors of the GNA Project, a greenfield gas-fired combined cycle thermal power plant located at the Port of Açu, a brownfield port and industrial complex located in São João da Barra, on the northern coast of the state of Rio de Janeiro, Brazil.

The Project consists of three main components. The first is the actual thermal power plant, a 1,298 MW gas-fired combined-cycle facility using four Siemens turbines (3 gas, 1 steam). It will be constructed on a 400,000 m² site inside the Port of Açu complex.

	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	2/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

The second component is the plant's electric interconnection. GNA will be linked to the grid via a 52-km double circuit 345-kV transmission line (TL) between the Port of Açú and the Campos dos Goytacazes substation. The 345-kV TL will have a 55m wide right-of-way and 123 towers. The line will cross the municipalities of São João da Barra and Campos dos Goytacazes in Rio de Janeiro/RJ.

Finally, the project includes a liquefied natural gas (LNG) marine import terminal to be built on the north pier of the Port of Açú, with a fully dedicated chartered Floating Storage and Regasification Unit (FSRU) of up to 21 million m³/day capacity, ship-to-ship LNG transfer systems from LNG carriers to the FSRU to be offloaded by fixed unloading arms, and a 12-inch diameter high pressure natural gas pipeline to transfer the regasified LNG from the FSRU to the plant.

The Project has a fully-wrapped, turn-key engineering, procurement, and construction (EPC) contract with a Siemens-Andrade Gutierrez consortium for the plant. Alubar is the EPC contractor for the 345-kV TL component. Acciona is the EPC contractor for the LNG terminal. The construction phase will be concluded by the end of 2020 and the commercial operation date will commence on January 1st, 2021.


3 GOAL

The overall goal of the CGM is to establish a straightforward procedure to address socio-environmental complaints from the population in the Project's area of influence. This procedure takes on the role and responsibility of addressing grievances brought to the attention of GNA at the local level (communities, local governments, local public & private sector, non-governmental organizations, and concerned individuals) related to construction activities on the project site and associated activities off-site.

Participation in the CGM is voluntarily and non-excluding. Any person will have easy access to it and will be encouraged to use this privately-administered system. However, users are also free to use the Brazilian judiciary system when they consider it pertinent. The CGM does not replace the public mechanisms of complaint and conflict resolution; but rather attempts to minimize use of them.

For the purposes of this management plan, a community grievance is defined as a complaint or claim presented against the Project by any external party (individuals or groups). Typical community grievances associated with the construction phase may include but not be limited to:

- Traffic nuisances
- Noise

	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	3/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

- Surface runoff water and drainage impacts
- Issues with local recruitment processes
- Access and mobility restrictions
- Pressure on local services and infrastructure
- Miscommunication regarding project activities


The examples above, assuming they do not represent law infraction, Compliance breaches, or potentially severe effects on fundamental or human rights, will be considered by GNA as “low-risk community grievances”.

GNA will consider as “high-risk community grievances” all those associated with a potential severe effect on fundamental or human rights. These may include but not be limited to irreversible impacts in terms of:

- Human livelihood
- Human safety
- Human integrity
- Human life

4 OBJECTIVES

- Ensure that all grievances from the communities or others are promptly heard, analyzed, handled, and answered by GNA.
- Serve as an early warning system for social conflict in order to proactively handle concerns about a residual impact, danger, illegality, or wrongdoing.
- Establish a mechanism for responding to complaints in an understanding, transparent and culturally-suitable way.
- Develop an easy-access, no-cost, permanent, and efficient means for dialogue with the local population involved in and/or impacted by the Project.

	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	4/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

- Help to prevent unrealistic expectations and/or negative perceptions from the local population towards the Project.
- Improve the Project's social performance and license to operate through the proactive analysis and management of complaints.

5 SCOPE


The CGM is applicable to the Construction phase of the entire project (including the Plant, the Transmission Line, and the Terminal).

All necessary communication efforts will be made to disseminate GNA's own grievance mechanisms. GNA will establish alignment requirements with its EPC contractors and subcontractors in order to receive grievances that may be directed to them by their personnel.

6 RESPONSIBILITIES

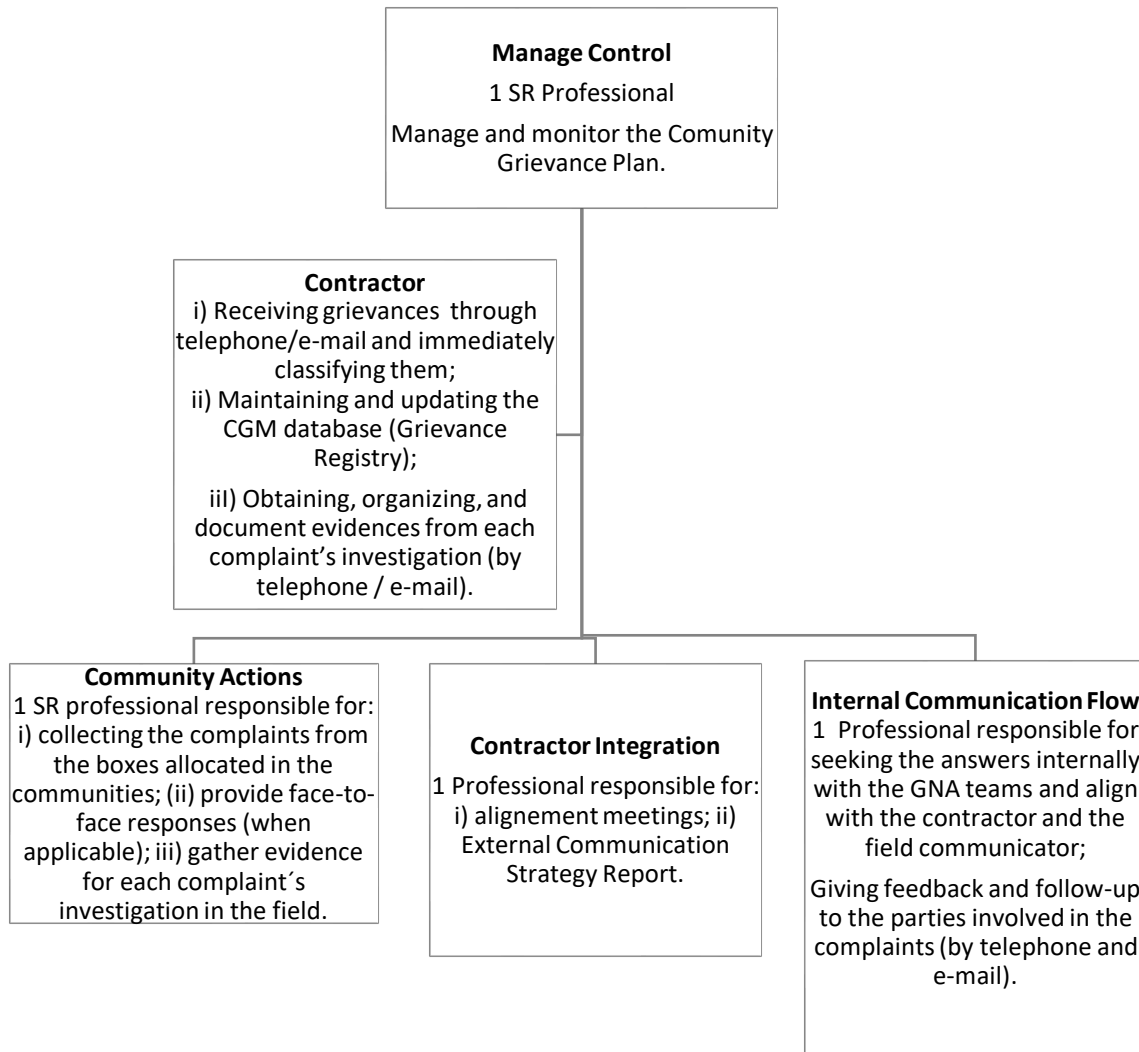
The CGM will be administered by GNA's Social Responsibility (SR) team throughout Construction, even though the active support of the Project's EPC contractors' SR personnel is expected. The GNA SR team will have the sufficient human, technical, and financial resources to cover the needs related to the CGM's implementation in the Construction Phase. Tasks for GNA's SR team related to the execution of the CGM include:

- Receiving grievances from the various means available and immediately classifying them.
- Maintaining and updating the CGM database (Grievance Registry).
- Preparing a quarterly summary report on the status of community grievances.
- Continuously communicating the locations and uses of the CGM to the external public.
- Giving feedback and follow-up to the parties involved in the complaints.
- Obtaining, organizing, and documenting evidence from each complaint's investigation.


	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	5/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

- g) Evaluating and transmitting the findings obtained from investigations to Project construction management, contractors, and other relevant stakeholders so that this information may be addressed—if is applicable—in project decision-making.

Figure 1 - Team for CGM implementation



In the event of high-risk grievances, GNA’s top management (SR Manager; E&S Director, and Legal Director) will be involved in the investigation process. It is important to highlight that multiple functions can be executed by the same professional.

	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	6/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

7 COMPONENTS


GNA's Community Grievance Mechanism will consist of the following components:

1. *Grievance Submission:*

To begin the CGM process, a Grievance Registration Form will be registered by the grievant using one of the four channels described below. To formally register a grievance, the Grievance Registration Form (provided as illustrated in the Annexes) has to be filled out, either in person, over the phone, or online. Whenever necessary and possible, company representatives may assist persons who are not able to fill out the form by themselves. A properly completed Grievance Registration Form must be submitted in order to register all grievances submitted by the community. GNA will not be required to consider any grievance that has not been submitted on a Grievance Registration Form in accordance with this procedure. All the grievants, including the anonymous, will receive a protocol number, which will be entered in the Project's database, alongside the date when a response can be expected. The face to face grievances will be captured in the database through the online option by the GNA staff member who received the grievance in the communities.

Channels for submission:

- Telephone: a dedicated line (0800 591 2094) will be available to the community for the submittal of grievances and other feedback.
- E-mail: GNA will have an exclusive e-mail (gna@canalconfidencial.com.br) for the submittal of grievances and other feedback.
- Website: <http://canalconfidencial.com.br/gna>
- Boxes: There will be five grievance boxes located in convenient and accessible locations in the communities of the Direct Area of Influence. GNA defines these places strategically, as detailed in the Annex "Grievance Box Locations - Study".

	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	7/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

2. *Grievance Registry Recording:*


Completed Grievance Registration Forms collected by GNA or its associates must be forwarded to the SR team as soon as possible upon reception, and no later than three business days after reception. On receipt of the Grievance Registration Form, the SR team will record the details into the Grievance Registry (database) and ensure that the appropriate departments (e.g., Health & Safety, Environmental, Construction, etc.) have received copies of the Grievance Registration Form.

3. *Grievance Investigation:*

In general, the GNA team will lead the investigation into each grievance. In high-risk grievance cases (such as ones in which human livelihood, human safety, human integrity, and human life are in peril) the legal team can lead the investigation. Depending on the nature of the grievance, different sources of information will be useful. These may include: interviews with witnesses / third parties, site visits, gathering of photographic evidence, and review of documentation, among others. Investigations shall seek to cross-check conclusions with at least two corroborating sources, when applicable. It should be noted that other feedback, such as doubts or suggestions, will not be investigated but will be clarified.

4. *Grievance Investigation Analysis and Review:*

The GNA team and identified case-specific, grievance-related personnel, as necessary, will review all the grievances. In the event of high-risk grievances, GNA's top management (SR Manager; E&S Director and Legal Director) will be informed about the investigation process and may participate. This review may involve EPC contractors and other parties, as needed, to offer a broader scope of the issue. The preliminary recommendations will take into consideration Project policy, past experience, current issues, and potential outcomes. After this review session, these preliminary recommendations will be made to the SR team in a timely manner in order to conclude the investigation of each grievance, as suggested below.

	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	8/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

5. *Grievance Response Consideration:*


The GNA team will make first contact with the grievant up to 3 (three) labor days after the grievance is registered, and the time to resolve the grievance is expected within 30 to 60 days. For low-risk grievance, and whenever possible, GNA will develop a formal written response, which will include the rationale behind the response and next steps and actions, if any, to be taken by GNA to resolve the grievance. Whenever applicable, the response will take into consideration the preliminary recommendations developed initially by the SR team, Project personnel, relevant leadership members, and oversight by the corporate group, as needed.

6. *Responding to the Grievant:*

A recordable grievance response will be provided to the grievant (in writing whenever possible and through other formats that produce documented evidence when necessary due to the medium in which the grievance was originally lodged). The reasons for the response will be explained to the grievant.. In this case, a Grievance Response Form will be returned to the SR team for recording into the Grievance Registry. In the event that the grievance is anonymous (including grievances presented through the Whistleblowing Channel), the written response will be publicized in a way that fits the grievance (i.e. communicated through a community bulletin board, as long as said communication does not include confidential or sensitive information) and no confirmation of acceptance or rejection will be expected.

7. *Rejected Response by Grievant:*

If the grievant rejects GNA's formal response, the SR team will have to inform the initial members of leadership involved in the review process and any other involved parties. This grievance will then have to go through a second review process in order to examine the merits of and reasons behind the rejection and determine whether other avenues could be approached by the Project together with the grievant. In the event that GNA determines in this second review that there is sufficient evidence showing that the initial rejection is a matter of principle and no reasonable course of action will satisfy the grievant party, GNA may choose to keep the grievance as open, monitoring the

	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	9/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

situation as needed, and not pursue further actions. In most cases, however, a second round of grievance management response will be called for and strategies such as third party conciliation or consultation with community leadership or other appropriate stakeholder groups or a grievance committee (involving legal, social, and sustainability leadership) may be sought. During this second process, either another formal written response will be provided to the grievant in 30 days or it may be decided to hold a meeting with GNA representatives and the grievant. Formal notes documenting the meeting will be issued and signed by the attending representatives. The outcomes of this meeting will be recorded, and, if agreement is reached between the Project and the grievant, the agreement will be captured on the Grievance Response Form with signature of the grievant. If no agreement can be reached, then the grievant can pursue other avenues (such as administrative or legal) at his/her discretion.

8. *Completing Actions and Grievance Closeout:*

Following the completion of response actions by GNA, photos and/or other documentary evidences will be collected by the SR team to form a comprehensive record of the grievance being resolved. Where the formal written response identified action that needed to be taken to resolve the grievance, the grievant will confirm the work has been completed. The SR team will record the completion of the actions into the Grievance Registry.


8 KEY PERFORMANCE INDICATORS

The KPI's that will continuously evaluate the CGM's execution will be:

- 90% of grievances receiving timely responses, as stipulated in the mechanism.
- 85% of grievances getting resolved as stipulated in the mechanism.
- 100% Community Grievance Reports delivery quarterly.

9 RECORD KEEPING & REPORTING

Beyond the maintenance of the Grievance Registry, the following reports and documentation associated with community grievance management will be produced:

	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	10/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

- Community Grievance Report:

A quarterly summary of the status of community grievances detailing the performance of the CGM through the previously detailed KPI's, how many new grievances were registered, their risk level, how many were closed, and providing additional detail for cases in which the investigation or closeout processes has required special considerations or actions. This report is to be produced every quarter.

- CGM Alignment Meetings:

In order to ensure the alignment between areas involved in this plan, there will be internal meetings on the CGM every quarter.

- External Communication Strategy Report:

Ensuring that community members and other external stakeholders are well-aware of the grievance mechanism's use and value will require constant communication efforts. A summary of GNA's promotion of its CGM in the Project's area of influence will be produced every trimester.


All documents will be strictly controlled and kept in electronic format, with physical print-out copies used only as reference and not considered official.

10 MONITORING & EVALUATION

In the spirit of continuous improvement, every semester from the time of implementation the CGM will undergo an internal evaluation process from which improvement recommendations will emerge. Upon completing a full year of implementation and two such rounds of internal evaluation, an expert, independent, external evaluation will be carried out. Additionally, the SR team will prepare every semester an evaluation of the nature of the grievances vis-à-vis the Project's performance, determining if there are any recurring grievances that point to a need for changes in company policies, procedures, or activities, including the non-formal grievances.

11 REFERENCES

- DCO.RHU.001 - Code of Conduct
- IFC Performance Standard 1

	TIPO	PLANO	N.	PLA.SUS.013	DATA	31/10/2018	REV.	00	FOLHA	11/11
	ÁREA	SUSTENTABILIDADE								
	TÍTULO	COMMUNITY GRIEVANCE MECHANISM - CGM								

12 RELEVANT GNA SOCIAL MANAGEMENT PLANS FOR CONSTRUCTION PHASE

- PLA.RHU.001 - Local Hiring Plan (LHP)
- PLA.SEG.001 - Security Forces and Service Management Plan (SFS)
- PLA.SUP.001 - Local Procurement Plan (LPP)
- PLA.SUS.001 - Stakeholder Engagement Plan (SEP)
- PLA.SUS.002 - Fishers Management and Support Plan (FMP)
- PLA.SUS.003 - Social Investment Plan (SIP)
- PLA.SUS.006 - Management Plan for People Affected by Land Acquisition (LAP)
- PLA.SUS.014 - Labor Grievance Mechanism (LGM)

13 ANNEXES

Annex A - Grievance Box Locations - Study.

Annex B - Community Grievance Mechanism (phone, email, protocol)

Annex C - CGM External Communication Materials

Annex D - Grievance Registration Form (Box)

14 COMPETENT AUTHORITIES

Função	Nome	Cargo
Elaborador(a)	Agatha Franco	Especialista de Responsabilidade Social
Revisor(a)	Franciara Oliveira	Coordenadora de Responsabilidade Social
Aprovador(a)	Carla Assemany	Gerente de Comunicação

15 REVIEW CONTROL

Emissão	Revisão	Descrição da Alteração
31/10/2018	00	Versão Inicial