



Stakeholder Engagement Plan (SEP)

120 MWp Solar Photovoltaic (PV) plant and 225 kV overhead transmission line 12 km long in Mezzouna, Sidi Bouzid Tunisia

Greenfield: Sidi Bouzid 2

REPORT: Stakeholder Engagement Plan (SEP)
120 MWp Solar Photovoltaic (PV) plant and 225 kV overhead
transmission line 12 km long in Mezzouna, Sidi Bouzid - Tunisia

PREPARED BY: Social expert: Stuart HUME (ESAS)
Health & Safety expert: Oussama DOUZI
GIS expert: Asma DOUZI
Engineers and environmentalists: Khouloud MAALAOUI, Nour El Houda
ZAYANI, Amal ARFAOUI and Anis RIAHI.

CONTROLLED BY: Project manager and international environmental expert:
Tahar KHOUAJA

VALIDATED BY: EAM General Manager and Environmental & Social Specialist:
Raja KHOUAJA

VERIFIED BY: EBRD, EIB and Scatec

REVISION OF THE REPORT		
DATE	VERSION	REFERENCE
July 15 th , 2025	00	Draft report
September 15 th , 2025	01	Final report

Table of Contents

1	INTRODUCTION.....	8
1.1	BACKGROUND	8
1.2	SCOPE OF THE STAKEHOLDER ENGAGEMENT PLAN	8
2	CHARACTERISTIC OF THE PROJECT	9
2.1	PROJECT DESCRIPTION	9
3	LEGAL FRAMEWORK AND EBRD REQUIREMENTS	11
3.1	NATIONAL LEGISLATION	11
3.2	EBRD REQUIREMENTS.....	11
3.3	ENVIRONMENTAL AND SOCIAL STANDARDS EIB	11
4	IDENTIFICATION OF STAKEHOLDERS.....	13
5	PREVIOUS CONSULTATION AND INFORMATION DISCLOSURE ACTIVITIES	19
5.1	REGIONAL GOVERNMENTAL ENTITIES: GROUP A.....	19
6	FUTURE CONSULTATION AND DISCLOSURE ACTIVITIES.....	23
6.1	SPECIFIC MEASURES FOR CONSULTATION AND DISCLOSURE OF INFORMATION TO VULNERABLE GROUPS.....	29
7	GRIEVANCE REDRESS MECHANISM	30
7.1	KEY PRINCIPLES	30
8	MONITORING AND ASSESSMENT	35
9	RESPONSIBILITIES FOR IMPLEMENTATION.....	36
9.1	RESPONSIBILITIES FOR IMPLEMENTATION.....	36
9.2	CHANGE MANAGEMENT	37
	APPENDICES	38
	APPENDIX 1 - GRIEVANCE MECHANISM LEAFLET	39
	APPENDIX 2 - GRIEVANCE REGISTER, PAPER FORM, ACKNOWLEDGEMENT FORM, AND GRIEVANCE SATISFACTION FORM.....	41

List of figures

FIGURE 1	- PROJECT LOCATION MAP	9
FIGURE 2	- SPATIAL MAP OF THE SOLAR PV PLANT AND OHTL SITE	10

List of tables

TABLE 1 - LIST OF STAKEHOLDERS AND THEIR PROFILE.....	14
TABLE 2 - SUMMARY OF STAKEHOLDER ENGAGEMENTS UNDERTAKEN TO DATE	19
TABLE 3 - SUMMARY OF STAKEHOLDER ENGAGEMENTS UNDERTAKEN TO DATE	20
TABLE 4 - STAGE 1 - FUTURE CONSULTATION AND DISCLOSURE OF KEY PROJECT DOCUMENTS ..	24
TABLE 5 - STAGE 2 - FUTURE DEVELOPMENT AND DISCLOSURE OF THE LALRP.....	25
TABLE 6 - STAGE 3 – FUTURE CONSULTATION AND DISCLOSURE ACTIVITIES DURING THE CONSTRUCTION PHASE.....	26
TABLE 7 - STAGE 4 - FUTURE CONSULTATION AND INFORMATION ACTIVITIES DURING THE OPERATIONAL PHASE	28
TABLE 8 - VULNERABLE PERSONS AND PROCEDURES FOR MEANINGFUL CONSULTATION.....	29
TABLE 9 - MONITORING AND EVALUATION INDICATORS	35
TABLE 10 - ROLES AND RESPONSIBILITIES FOR IMPLEMENTING THE SEP	36

ACRONYMES & ABBREVIATIONS

ANPE	National Environmental Protection Agency (ANPE).
CLO	Community Liaison Officer
CRDA	Regional Commissariat for Agricultural Development
E&S	Environmental & Social
EAM	Environmental Assessment & Management
EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
EPC	Engineering, Procurement, and Construction
ESP	Environmental and Social Policy
ESR	Environmental and Social Requirement
EU	European Union
GBVH	Gender-Based Violence and Harassment
GN	Guidance Note
GRM	Grievance Redress Mechanism
HV	High Voltage
INP	National Heritage Institute
kV	Kilovolt
KWh	kilowatt-hour
LALRP	Land Acquisition and Livelihood Restoration Plan
LARF	Land Acquisition and Resettlement Framework
ME	Ministry of Environment
MIME	Ministry of Industry Energy and Mining
MW	Megawatt
MWp	Megawatt Peak
NTS	Non-Technical Summary
OHTL	Overhead Transmission Line
ONAS	National Sanitation Office
PPA	Power Purchase Agreement
PV	Photovoltaic
RoW	Right of Way
RR	Regional Route
SEP	Stakeholder Engagement Plan
SONEDE	National Water Supply and Distribution Company
STEG	Tunisian Electricity and Gas Company

GLOSSARY OF TERMS

Complaint and redress mechanism	Represents the system adopted by the proponent that allows all stakeholders, particularly affected individuals and communities, to provide feedback, express their concerns, and thereby access information and, where appropriate, seek redress and remedy. The mechanism must be effective, as it must be legitimate, accessible, predictable, fair, transparent, consistent with human rights, based on engagement and dialogue, and a source of learning for all stakeholders, including the proponent. The scope of such a mechanism is the entire operation, but it is not intended to serve employer-staff relations, with a separate grievance structure dedicated exclusively to that purpose.
Public consultation	Where communities are, or are likely to be, affected by the adverse effects of a project, the proponent will undertake a meaningful consultation process to provide affected parties with an opportunity to identify and express their views on the risks, impacts and mitigation measures of the project, and to engage in a process of collaboration with the project to address and respond to the considerations raised.
Stakeholders	Any entity (person, group, organization, institution) concerned and potentially affected by a project or able to influence a project.
Vulnerable Groups	People who, because of their gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status, are more likely to be affected by resettlement than others and may not be fully able to access or benefit from resettlement assistance and related development benefits.

1 INTRODUCTION

1.1 BACKGROUND

As part of its energy transition strategy, Tunisia has set itself the target of achieving a share of renewable energies in the electricity mix of 35% by 2030 and 50% by 2035. This will result in the installation of a total functional renewable capacity of 4,850 MW by 2030 and 8,350 MW by 2035 using photovoltaic and wind.

Scatec (hereafter referred to as "the Developer"), was awarded in December 2024, the development of a 100 Mega Watt (MW) / 120 MWp Photovoltaic (PV) Solar power plant in the governorate of Sidi Bouzid hereafter referred to as "the Project" or 'PV Plant Sidi Bouzid 2'. Scatec was selected after an international competitive call of tenders launched by the Government of Tunisia under the reference AO-01-2022, represented by the Ministry of Industry, Energy and Mining (MIME). On 24 March 2025, Scatec signed a concession agreement with the Ministry of Industry, Mines and Energy and a 25-year power purchase agreement (PPA) with the Tunisian Company of Electricity and Gas (STEG).

1.2 SCOPE OF THE STAKEHOLDER ENGAGEMENT PLAN

This document is the Stakeholder Engagement Plan (SEP). The SEP describes the policy and regulatory framework associated with stakeholder consultation and information disclosure, reflecting the combined requirements of Tunisian national legislation, the European Investment Bank Group's Environmental and Social Policy (February 2022), including Standard 2: Dialogue with Stakeholders, and the EBRD Environmental and Social Policy (2024), including Environmental and Social Requirement ESR 10: Stakeholder Engagement, and the accompanying Guidance Note (GN).

The SEP includes a brief description of the project and the areas potentially affected, the results of a stakeholder identification process, details on how vulnerable people should be involved through a series of measures, a summary of consultation and disclosure activities, a complaint management mechanism, monitoring and evaluation indicators to be used to track progress during the implementation of the SEP, and the parties responsible for implementing the SEP.

This SEP is prepared for the Sidi Bouzid 2 solar PV plant and the OHTL of 12 km. It will be regularly reviewed and revised throughout the duration of the EBRD and EIB loan (at least annually) to reflect the status of the project at that time and any changes to the project design.

2 CHARACTERISTIC OF THE PROJECT

2.1 PROJECT DESCRIPTION

2.1.1 Project location and socio-economic context

Tunisia is divided into 24 governorates, which are further subdivided into 264 delegations, and these delegations are themselves subdivided into sectors (*imadats*). The Project site is located in Khobna Sector, delegation of Mezzouna in the Governorate of Sidi Bouzid Governorate. The nearest community to the Project site is Khobna 4 km South-East which has a population of approximately 3,000.

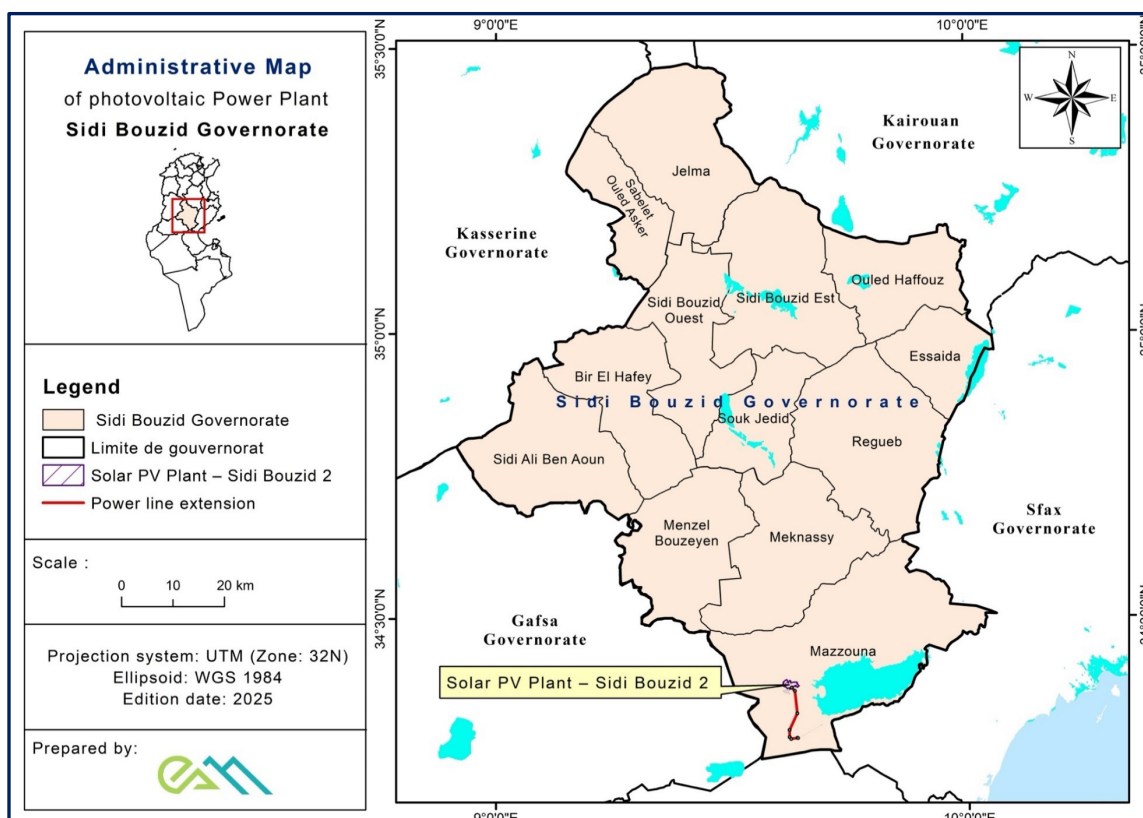


Figure 1 - Project location map

The construction and operation of the solar PV plant will be carried out on uncultivated and uninhabited land. The land is under private ownership and covers an area of 305 hectares (13 land titles) as shown in, of which only 180 hectares will be used for the project. The land is being leased to the landowners under a willing lease, willing lessor arrangement and no expropriation is required. The site is generally flat, accessible from the nearby national road of RR124, with an altitude between 60 to 80 m. The land was historically used for agriculture and there is recent evidence of land use for grazing activities, which is interpreted as being from informal land use as the landowner does not graze livestock on their land. Inside the site perimeter, there are several ruins of old buildings in very poor condition and a traditional “Majel” type rainwater reservoir, all of which are owned by the landowner. More details and photos are provided in the report.

The 12 km OHTL will be installed by the Developer to connect the PV Plant to the National Grid through the STEG Mezzouna Substation, under construction by STEG illustrated Yellow in Figure 2. The OHTL will have 7 summits (these designate a change in the direction of the OHTL) and crosses mostly state-owned land over approximately 7 km, the remainder crossing over around 19 privately owned land plots. Approximately 4% of the land intersected by the OHTL is used for

agricultural activities (land used for fruit growing (almond and olive trees)) with the rest being land used for grazing livestock.

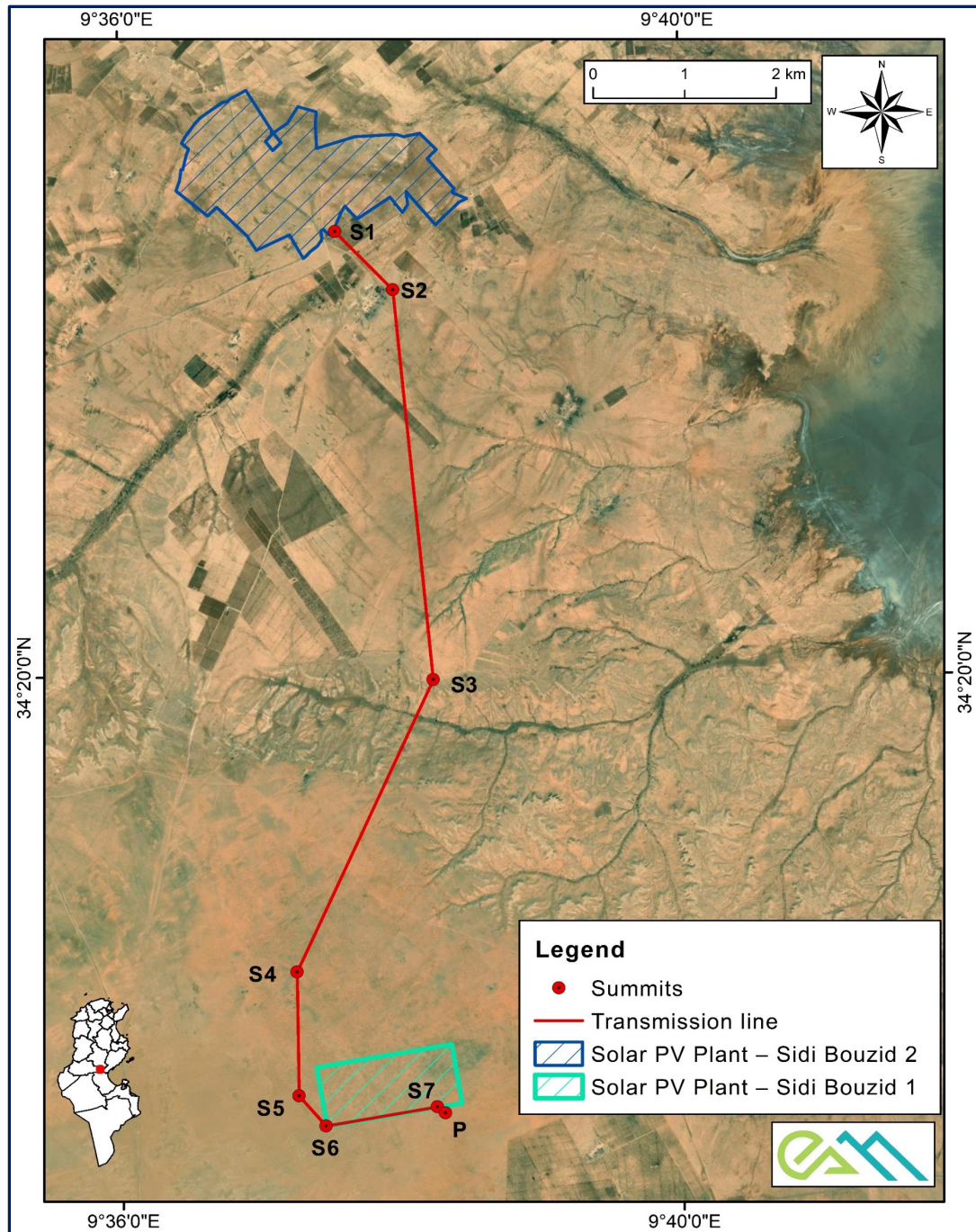


Figure 2 - Spatial map of the solar PV Plant and OHTL site

3 LEGAL FRAMEWORK AND EBRD REQUIREMENTS

3.1 NATIONAL LEGISLATION

There is no clear and defined mechanism/framework for stakeholder involvement in Tunisia for activities related to construction or operation of a project. Since the Tunisia revolution in 2011, the National Environmental Protection Agency (ANPE) as EIA regulator, has requested a stakeholder consultation report to be appended to the Environmental Impact Assessment (EIA), although this request is not defined as a requirement in law.

Decree No. 2005 - 1991 of July 11, 2005 defines the categories of units subject to environmental impact assessment and the categories of units subject to specifications, only electricity generation units with a capacity of at least 300 MW are subject to EIA. Consequently, the project to build the Mezzouna solar power plant which has a capacity of 120 MWp (less than 300 MW) **does not require an EIA**.

Analysis of the vulnerable population or an examination of gender aspects is not required by the decree or related laws. There is no obligation to publish EIA reports, nor any deadline for public consultation, unless required by donors.

3.2 EBRD REQUIREMENTS

EBRD's Environmental and Social Policy (2024) requires a meaningful and inclusive stakeholder engagement process. EBRD has 10 ESR that potentially apply to projects funded by the Bank.

Stakeholder engagement is discussed in ESR1 and more specifically in ESR10. ESR10 focuses on Information Disclosure and Stakeholder Engagement, which is described as an ongoing process involving: (i) the client's public disclosure of appropriate information so as to enable meaningful consultation with stakeholders; (ii) meaningful consultation with potentially affected parties; and (iii) a procedure or policy by which people can make comments or complaints. This process should begin at the earliest stage of project planning and continue throughout the life of the project.

Where stakeholder groups are identified as disadvantaged or vulnerable, dedicated approaches and an increased level of resources is needed so that they fully understand potential risks and impacts that may affect them. Periodic reports should be issued by the client to identified stakeholders, commensurate to the nature of the Project and its associated environmental and social impacts, and the level of public interest (ESR 10, paragraph 28).

Based upon the above, stakeholder and information disclosure activities will be conducted during the following project stages:

- During the environmental and social assessment phase (the current phase of the project).
- Before construction begins and regularly during the construction period; and
- During the project's operational phase.

3.3 ENVIRONMENTAL AND SOCIAL STANDARDS EIB

The EIB's Environmental and Social Standards (2022) requires Standard 2: Stakeholder Engagement to ensure the effectiveness of the assessment, management, and monitoring of environmental, climate, and/or social impacts and risks. It also contributes to overall sustainability and improved project outcomes.

Stakeholder engagement is addressed in Standard 1 and more specifically in Standard 2.

Dialogue with stakeholders as a means of ensuring respect for rights concerning (i) access to information, (ii) public participation in decision-making, and (iii) access to justice.

The developer identifies, analyzes, and documents the various stakeholders. In doing so, they pay particular attention and give priority to identifying and analyzing individuals or groups that are likely to be affected in a differentiated or disproportionate manner due to their vulnerability.

Given that the legitimate representatives of stakeholders often play an important role in the dialogue process, the proponent cooperates with them so that they can facilitate communication and convey the observations of the affected communities, where appropriate.

The developer shall regularly monitor the dialogue with stakeholders, as agreed with the EIB, and use this information to identify areas where this dialogue needs to be strengthened, including through the revision and updating of the Stakeholder Engagement Plan (SEP) or adjustments to the grievance mechanism, where appropriate. (Standard 2, paragraph 42).

4 IDENTIFICATION OF STAKEHOLDERS

Project stakeholders are defined as individuals, groups or communities who:

- Will be affected or are likely to be affected, positively or negatively, and directly or indirectly by the Project ("Project affected parties"), particularly those directly and adversely affected by project activities, including those who are disadvantaged or vulnerable; or
- May have an interest in the Project and/or the ability to influence its outcomes, either positively or negatively ("other influential/interested groups").

A stakeholder identification process was conducted by EAM through the following steps:

- 1) identifying individuals, groups, local communities and other stakeholders that may be affected by the project, positively or negatively, and directly or indirectly, particularly those directly and adversely affected by project activities, including those who are disadvantaged or vulnerable.
- 2) identifying broader stakeholders who may be able to influence the outcome of the project because of their knowledge about the Affected Communities or political influence over them given the administration context of the Project site.
- 3) identifying legitimate stakeholder representatives, including officials, non-elected community leaders, leaders of informal or traditional community institutions, and elders within the Affected Community.
- 4) mapping the impact zones by placing the Affected Communities within a geographic area including identifying the road sections to be used, to enable the geographical area of impacts to be explored.

The stakeholders identified were subsequently divided into the following groups and a profile prepared which is presented in Table 1:

- Group A: Regional government and municipal authorities (including media).
- Group B: Civil society organisations.
- Group C: Affected Communities including landowners and land users.
- Group D: The Project construction workforce.

Table 1 - List of Stakeholders and their profile

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
A – Regional government and municipal authorities (including media)			
A1	Governorate of Sidi Bouzid	Regional political authority (non-elected position). Main leader at regional level and representative of the governorate at national level. The governor's main role is to support the project by providing the necessary authorizations and support on the various issues that may be encountered during the life of the project, such as land use, security, community conflicts and grievance management, project employment priorities within the communities, health issues, social development programs.	- Economic displacement that impacts landowners and land users. - Potential road safety risks and how these are to be managed. - Local employment opportunities arising from the Project. - The potential for the developer to design and implement future social development programs.
A2	Mezzouna Delegation	Delegate (non-elected position). Head of delegation and delegation representative at regional level. He oversees local administrative services.	- Ensuring that vulnerable people are included in stakeholder consultation and information disclosure activities adequately and are also aware of the project.
A3	Mezzouna municipality	Mayor: President of the municipal council, responsible for business, managing municipal interests and contributing to the social, economic and cultural of the municipality. He/she issues permits for all construction. He/she oversees solid waste & waste waters management during the construction and operation phases. And he/she coordinates the Developer and its contractors on solid waste disposal.	- Waste management operations. - National permitting and licensing of the Project.
A4	Khobna: local administrative unit	Local Chief: operates under the authority of the delegate. He/She is responsible for assisting various administrative bodies and ensuring the welfare of citizens. He / She coordinates the developer and its contractors on public consultations, social aspects and Community Development Plan implementation,	
A5	STEG regional district	STEG's regional district will liaise with the STEG's national management for connection to the national grid.	- The intersection of the project with future projects in the region concerning the development of renewable energy projects, including associated facilities (HV transmission line). - Understand the local needs of the region to meet future electricity supply projections.
A6	Ministry of the Environment (ME)	The ME is represented at regional level by the ANPE, which is responsible for monitoring the implementation of the environmental management plan (EMP) by the Developer.	- Economic displacement that impacts landowners and land users. - The need to protect the environment, even if an EIA is not required under national legislation. - The availability of relevant E&S data held by the ANPE.
A7	Regional Commission for Agricultural Development (CRDA)	Representative of the Ministry of Agriculture, Hydraulic Resources and Fisheries (MARHP) at regional level. The CRDA manages floods and	- Economic displacement that impacts landowners and land users.

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
		watercourses in the project area. It is also responsible for authorizing the drilling of water wells.	- Potential groundwater abstraction impacts to other water users. - Providing information on use of state-owned land. - Providing livelihood restoration measures if any material impacts.
A8	Housing Equipment Department and land use planning	Representative of the Ministry of Equipment, Housing, and Regional Planning (MEHAT) at the regional level.	- The classification of land intersected by the project. - The potential for future land use changes to occur in the vicinity of the project, which must be taken into consideration at the project design stage (now), as otherwise this could lead to future land use conflicts. - Potential grievances from landowners and land users. - Potential road safety risks and how these are to be managed.
A9	Regional Department of State Domains and Land Affairs of Sidi Bouzid	Under the supervision of the Ministry of State Domains and Land Affairs. It is responsible for the control, management and use of movable and immovable property belonging to the State, the design of State policy relating to public and private domains, and the acquisition and expropriation of real estate for the benefit of the State and public administrative establishments at their request, in collaboration with the relevant ministries.	- Classification of land ownership along the project. - The accuracy of the cadastral database and the possible need for additional surveys along the route to clarify land boundaries. - Potential grievances from landowners and land users. - The legal process and time required to commence expropriation procedures where land is under private ownership. - The potential for future land use changes to occur in the vicinity of the project.
A10	National Company of Exploitation and Distribution of Water (SONEDE)	A Tunisian non-administrative public-sector company that supplies drinking water throughout Tunisia. It is placed under the supervision of the Ministry of Agriculture, Hydraulic Resources and Fisheries.	- Potential groundwater abstraction impacts to other water users.
A11	National Sanitation Office (ONAS)	ONAS is a public establishment of an industrial and commercial status. It is placed under the supervision of the Ministry of Local Affairs and the Environment. ONAS is the main actor in the protection of the water environment and the fight against all sources of pollution.	- The management of wastewater generated by the Project.
A12	National Guard	The National Guard is the national gendarmerie (i.e. a police force with military status) of Tunisia. It is distinct from the armed forces in that it is part of the Ministry of the Interior. It serves both as a defence force against external threats and as a security force against internal threats. Within the territorial limits of its jurisdiction, the National Guard is responsible for: 1) maintaining public order; 2) preserving the safety of people and property; 3) protecting land and sea borders; 4) road and	- The management of regional security risks in the Mezzouna delegation - The potential need for security personnel to protect workers, materials and construction equipment.

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
		freeway traffic, safety and control; 5) public safety, recording offences and tracking down their perpetrators; 6) judicial investigations, assisting in the enforcement of judicial decisions and administrative regulations; 7) intelligence on all aspects of political, economic, social and cultural life; 8) tourism safety; 9) control of explosive and hazardous materials; 10) mobilization and incorporation, and gradual intervention in the first and second degree throughout the territory of the Republic ¹ .	- The management of potential road safety risks, as it is this stakeholder who has the legal responsibility to intervene in the event of a road accident.
A13	Department of Vocational Training and Employment	Representing the Ministry of Vocational Training and Employment (MFPE) at regional level. Provides skilled and unskilled manpower requirements.	- Local employment opportunities available. - Ensuring that there are no violations of worker rights defined by national legislation of the employed persons.
A14	National Heritage Institute (INP)	The National Heritage Institute (INP) is a public administrative institution with legal personality and financial autonomy. It is a scientific and technical institution responsible for establishing the inventory of cultural heritage, archaeological, historical, civilizational and artistic, of his study, his Safeguard and its development.	- Potential impacts to archaeological remains or protected heritage sites. - The National Heritage Institute (INP) can evaluate the project's potential impact on historical sites (if present). - If heritage elements are uncovered during construction, the INP has the authority to intervene, document them, and preserve them.
A15	Civil protection	It is responsible, throughout the territory of the Republic, for all missions and interventions required for the rescue of people and the protection of property from various accidents, calamities and disasters, and for the safety of public and private establishments and companies, whatever their nature (Decree no. 2006-1164 of April 13, 2006, on the special status of civil protection corps agents).	- Requires compliance with national building safety standards for fire, flooding, etc.
A16	Assembly of People's Representatives for the governorate of Sidi Bouzid	It has been the first parliamentary chamber, since the promulgation of the Constitution on August 16, 2022. It shares legislative with the second chamber known as the National Council of Regions and Districts.	- Ensures that all infrastructure projects are aligned with local and national government priorities.
A17	Regional Council	Regional Councils in Tunisia are autonomous local authorities responsible for coordinating regional development, representing citizens at regional level, and promoting equity between regions. They participate in planning, gather recommendations from the communes, and meet regularly to decide on local priorities.	- Coordinates with local councils to integrate their recommendations into regional projects. - Propose and design projects that align with the region's economic and social priorities and meet citizens' expectations.
A18	Office of Livestock and Pastures	The Office of Livestock and Pastures (OEP) is responsible for promoting and developing the livestock sector. It is responsible for the following tasks: (1) developing livestock productivity, (2) developing forage and pasture resources, (3) promoting livestock farming techniques, (4)	- OEP takes care to preserve pastoral activity while promoting sustainable cohabitation with the project.

¹ <https://www.force-publique.net/wp-content/uploads/2023/05/2023-Tunisie-fr-1.pdf>

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
		monitoring the sector and contributing to its economic development, and generally carrying out all the specific tasks entrusted to it by the State with a view to developing the sector.	- This stakeholder (in partnership with the CRDA above) could have a role in providing livelihood restoration measures if any impacts.
A19	Medical Centres: Local Hospital of Menzel Habib / Local Hospital of Mezzouna	Given the nature of the renewable energy project and the presence of various species of snakes and scorpions in the area, local medical centres (Menzel Habib (18 Km from the site) and Mezzouna hospitals (50 Km from the site)) could play a key role in: - Supporting the project's emergency response plan, especially in cases of envenomation or bites and heat-related incidents. - Ensuring the availability of antivenom treatments and rapid response capacity. - Participating in coordination protocols with the plant's HSSE team and assisting in awareness-raising initiatives related to local health risks. - Providing training or guidance on first-aid measures for site personnel.	- Coordinates with medical centres to ensure the availability of antivenom and other critical care. - Raising awareness on potential project-related risks (heatstroke, snakebites).
A20	Press and Media	The press and media will be invited by the Governor to attend the consultation meeting.	- Enable the dissemination of information about the project to a wide audience, including those who do not directly take part in public meetings.
B- Civil society organisations			
B3	NGO - Association "Les Amis des Oiseaux" (AAO), which is BirdLife International partner in Tunisia -	The association contributes to the conservation, proper management and enhancement of Key Biodiversity Areas (KBAs) in Tunisia.	- Sources of potential risk to biodiversity and specifically to birds from the physical presence of the OHTL wires which could lead to bird fatalities/injuries. - The need to avoid sensitive biodiversity areas. - Provide baseline data on bird movements in the study area to supplement the report of the ornithologist. - Potentially provide ongoing monitoring of bird-related fatalities and injuries from the OHTL.
B4	NGO – Tunisian Red Crescent	Awareness sessions are conducted by the Tunisian Red Crescent to explain the legal protections available to women and their children against all forms of violence. The sessions also provide guidance on the procedure to follow if they or their children are subjected to violence. This procedure involves filing a complaint with the Women and Children Protection Center in Regueb. Regueb also hosts the El Amen Center, a shelter dedicated to supporting women survivors of violence and their accompanying children.	- The protection of women amongst local communities from negative interactions with the incoming project workforce. - The protection of women in the workplace. - The provision of assistance to women of economically displaced households.

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
		Assistance in managing GBVH-related cases raised through either the community grievance mechanism or the worker grievance mechanism.	
C – Affected communities including displaced persons			
C1	Local communities	The nearest local community to the project is Khobna, as it is the closest at around 4 km.	- Local employment opportunities that may be available for displaced persons and local people. - Economic displacement that impacts landowners and land users. - Potential increased road safety risks form the movement of materials and personnel on the public road network. - The availability and operation of the Developer grievance mechanism.
C2	Vulnerable groups	Vulnerable groups may be disproportionately impacted by the Project through changes in access to land and associated impacts to livelihoods, from increased road transport movements, and from the presence of an incoming and predominately male workforce.	
C3	Landowners and land users (formal, informal, and seasonal)	Land users and landowners may be impacted by the Project through the restrictions of future access into the solar PV site, the installation of pylons, and from long-term restrictions on land below the OHTL during operations.	
D – Project Construction Workforce			
D1	Project construction workforce	The continuation of existing worker contracts during construction for those already employed, and the generation of new employment positions during the construction stage. The risk of exposure from occupational health and safety hazards. The benefits from potential vocational and capacity development programs during construction.	- Worker terms and conditions, including salaries and on-site accommodation and worker welfare facilities. - Occupational health and safety. - Training and capacity development opportunities.

5 PREVIOUS CONSULTATION AND INFORMATION DISCLOSURE ACTIVITIES

This section provides a summary of the activities carried out and the main results and is aligned with the content of the project's Environmental & Social Assessment Report (ESAR) dated July 2025.

The objectives of the consultation and information disclosure activities were to:

- Disclose accurate information related to the project based on available information using maps and other tools in a culturally appropriate manner.
- Gather perspectives and opinions on the project and use local knowledge and expertise of stakeholders to identify key environmental and social risks and impacts that need to be considered during the environmental and social assessment of the project.
- Discuss E&S issues associated with similar previous projects to understand how environmental and social aspects were addressed, and to provide useful information for the preparation of the project's environmental and social assessment report.
- Identify environmentally and socially sensitive receptors if any that intersect with or are located near the OHTL and solar PV power plant route, and that should be avoided or studied in detail, with the aim of avoiding/minimizing risks and negative impacts where possible.
- Understand the risks to specific areas, including formal and informal land users, seasonal land use, and biodiversity concerns regarding risks to avian wildlife and other ecological receptors.
- Jointly identify gaps in environmental and social knowledge that need to be filled during later stages of the project through field surveys or similar activities.
- Gather views and opinions on the likely perceptions of local communities towards the project and how to manage them during the construction and operational phases of the project.
- Understand future permits and licenses, as well as compliance with standards to which the project must adhere, to ensure future compliance with national legislation.

5.1 REGIONAL GOVERNMENTAL ENTITIES: GROUP A

A consultation session with the key regional governmental entities took place on June 20th, 2025, in the governorate of Sidi Bouzid. Throughout the consultations a leaflet was prepared and distributed to such stakeholder groups with key information that included a map of the project location. Details of the main infrastructure components (solar panels, the OHTL route), the scope of the E&S assessment and planned future stakeholder engagement was provided using a presentation. The table below presents a summary for the outcomes of the stakeholder consultation undertaken with regional government entities.

Table 2 - Summary of stakeholder engagements undertaken to date

Stakeholder	Key summary
Date: June 20, 2025 Participants (26): <u>20 representatives from regional governments and municipal authorities</u> + 2 Developer (SCATEC) + 4 EAM ▪ Governor of Sidi Bouzid ▪ Civil Protection representative ▪ STEG District ▪ Livestock and Pastures Office representative ▪ State Property representative ▪ National Guard representative ▪ Representative of the National Agency for Energy Management (ANME)	1. Local employment and social inclusion (Top priority) - Workforce mobilisation during the construction phase should prioritise local communities to support inclusive growth and regional economic development. - Employment opportunities are encouraged for residents of the immediate project area as well as the wider governorate, with a focus on youth and women. - Tailored training programmes can be introduced as CSR initiatives to enhance employability and skills development in the region. - Collaboration with regional vocational training and employment institutions will help ensure fair and transparent recruitment processes. - Commitment to fair wages and strict compliance with labour laws is essential to safeguard worker motivation, stability, and

Stakeholder	Key summary
- Representative of the Ministry of the Environment - Representative of the CRDA - Representative of the Regional Health Directorate - Regional Directorates for Education and Training - Municipality of Mezzouna - Delegate of Mezzouna - Member of the Local Council - Member of the Assembly of People's	community trust. 2. Coordination with local entities - Ensure close coordination with relevant local authorities to address any situations or challenges that may arise during project implementation. - Maintain clear, consistent, and regular communication with all institutional stakeholders, including agencies responsible for infrastructure, agriculture, environment, and security. 3. Environment and authorisations - Provide clear communication on the project's environmental and social action plan, including measures to prevent and mitigate environmental impacts and mechanisms for monitoring social impacts. - Ensure all necessary authorisations for the use of state-owned land are obtained in full compliance with legal and regulatory requirements, through coordination with the competent regional authorities. 4. Road safety - Implement construction practices that minimise disruption to local traffic and ensure the protection and preservation of existing road infrastructure. 5. Clarification of the project schedule - Provide a clear and detailed project schedule to allow relevant authorities and stakeholders to plan and coordinate their interventions effectively.

5.1.1 Khobna Local community and land users

The following consultations were completed:

- Small group discussion with local women residents (24) and local male residents (35) in a local primary school on June 20, 2025.
- Engagement with a single land user (herder).
- Key informant interview with 2 of the landowners on June 21, 2025.

The consultation with the local community was organized by the Community Liaison Officer (CLO) and the Omda, (Community Leader) at the request of the Developer, in response to the recommendations of EAM. A leaflet was used to include an overview of the Project and printed maps were provided to present a map of the Project. The table below presents summary for the outcomes of the stakeholder consultation undertaken.

Table 3 - Summary of stakeholder engagements undertaken to date

Stakeholder	Key summary
Date: June 20, 2025 Local community residents: Khobna Women's Group (24 women)	- Women in the local area are primarily employed in the agricultural sector, often on a seasonal basis, and many do not work due to limited transport and employment opportunities. They are also responsible for household tasks. - Key basic needs include access to clean drinking water and reliable public transportation for both personal mobility and school access for children. - Young people must continue education outside the village, which often requires families to use costly private transport. - The poor condition of local roads presents safety risks and can contribute to unsafe practices, including illicit transport activities. - Access to medical care is limited and does not fully meet the needs of residents. - The project should create local job opportunities during the construction phase, prioritising fair and transparent recruitment to ensure that at least one member per household can be employed, without discrimination based on gender, origin, social status, or

Stakeholder	Key summary
	personal connections. - Women do not use the project site informally; seasonal agricultural work occurs on surrounding land, not within the site. - Community feedback indicated no reported cases of gender-based violence, with women often leading household management and decision-making.
Date: June 20, 2025 Local community residents: Khobna Men's Group (35 men)	- Khobna community has approximately 3,000 inhabitants. - The main sources of income for local men in the Khobna region are seasonal agricultural work (field crops, watermelons, tomatoes, etc.) and livestock farming. - Concerns were raised regarding the recruitment of workers from outside the immediate governorate for the project. The Developer clarified that in certain cases, recruitment from geographically closer communities may be necessary. Priority in recruitment will continue to be given to residents of the local community for future phases of the project. - The priority needs expressed are: - Drinking water supply (the region is not connected to the SONEDE network. Residents buy water from tanks at 80 DT per unit); - Improved health services; - Lack of educational infrastructure for children; - The roads are in poor condition and need improvement; - Several areas lack adequate telecommunications network coverage (telephone and internet). - It was raised the existence of a cemetery for ancestors of the local community. The EAM team and a member of the local community visited the location of the cemetery and confirmed that it is located outside the PV site. The cemetery does not appear to be actively maintained or used for recent or ongoing cultural or religious practices. The distance to the cemetery is 15 m from the PV boundary.
Date: June 21, 2025 to August 2025 Landowners of the PV site were engaged with, either face-to-face or by phone. A summary of the engagements is provided here.	- All of the landowners have private land title. - Landowners vary in how often they visit their land, with most visiting it every month and others visiting once a year. - All of the landowners stated that they do not use their land. Historically back in the 1960s-70s some of the land was used for agriculture and grazing although this is no longer the case due to drought and poor soil quality as it is rich in gypsum. Only one landowner reported having previously cultivated field crops for household consumption during the rainy season of 2024. - One of the landowners used to have 42 sheep although these were all stolen four years ago and his livestock has not been replaced. - Out of the 10 landowners engaged with, just 1 allows other people to use their land which for a single herder grazing livestock (the identify of this herder is known to the landowner and EAM). - In relation to the informal use of land, the landowners stated that they have not seen any people using their land for grazing or other activity, with the exception of the single herder stated above. - All landowners stated that the male head of the household makes the decisions associated with the land, including the decision to use the land for the Solar PV site. - Four of the landowners stated that their land is important to their cultural identify. Their land is not currently important to their income as it is not currently being used and is "abandoned due to poor soil and drought". - Out of the 10 landowners engaged with, 2 of them stated that they have vulnerable people inside their household: an elderly person over 80 who lacks access to adequate healthcare resources near their home, and a second household with two adults where one has a physical disability, and the other a mental disability.
Date: June 21, 2025 Herder	- According to the herder consulted, he is the only herder currently using land owned by landowner 1. He owns approximately 300 sheep and goats and employs two additional workers to support his herding activities which cover a wide area. This grazing activity represents a significant livelihood for him and his two employees. The main

Stakeholder	Key summary
	concern raised by the herder relates to potential access restrictions due to road closures during the construction phase of the project. EAM explained that the PV plant site is crossed by an unclassified road that will remain unfenced, ensuring continued access for herders and livestock along this route. The general area does not represent favourable grazing vegetation and so herding activity is generally low in the region. He has a verbal agreement with landowner 1 for his grazing activity. - <i>NOTE: This information was confirmed with Landowner 1 who took part in the local men community resident meeting above.</i>

6 FUTURE CONSULTATION AND DISCLOSURE ACTIVITIES

A summary of future stakeholder consultation and disclosure activities has been prepared and is presented in Tables 6.1, 6.2, 6.3, and 6.4. The activities cover the following project stages:

- Stage 1 - Future consultation and disclosure of key Project documents, namely: Environmental and Social Assessment Report, Non-Technical Summary (NTS), Stakeholder Engagement Plan (SEP), and Land Acquisition and Resettlement Framework (LARF)
- Stage 2 - Future development and disclosure of the Land Acquisition and Livelihood Restoration Plan (LALRP)
- Stage 3 - Future consultation and disclosure during the construction stage;
- Stage 4 - Future consultation and disclosure during the operational stage.

The activities described include the stakeholders to be involved, the format of engagement used, how project information should be disclosed, and how awareness of the grievance mechanism should be improved during each engagement activity.

During the project (construction and operations), an annual report on environmental and social performance will be prepared each year with the aim of providing stakeholders with information covering relevant areas. It will include a summary of how stakeholder feedback has been used to refine the project design, an updated schedule, details on the workforce recruited and their welfare conditions, a breakdown of capital spent through procurement from national/regional/local suppliers for the provision of materials and services, ongoing consultation and disclosure activities with stakeholders, complaint management and contact details for the mechanism, a summary of environmental monitoring for specific areas (which will likely include occupational health and safety performance, noise, water consumption, waste generation and management), and any other relevant topics.

Additional activities will be undertaken by the Developer to disclose the annual environmental and social performance report to stakeholders in group A using leaflets and other tools, all in French and Arabic.

Table 4 - Stage 1 - Future consultation and disclosure of key Project documents

Stakeholder category	Consultation and disclosure activities
- Ministries, national government agencies, regional government, municipal authorities - Environmental and social NGOs	<u>Electronic link to Project files:</u> The electronic link to the Project disclosure files (NTS, SEP) to be available on the EBRD website, with separate files for French and Arabic. <u>Consultation with Ministries, national government agencies, regional government, municipal authorities, and Environmental and social NGOs:</u> An official letter from the Developer inviting them to review the contents of the disclosure file and a printed copy of the NTS using an electronic link to large, printed maps showing the location of the PV plant and the high-voltage transmission line and the ESAR, NTS, SEP, LARF). All files/maps to be available in French. It is understood that press and media will be invited to the consultations.
Local communities, vulnerable people, landowners and land users, and livestock farmers	Consultation with Khobna community, vulnerable people, landowners, and livestock farmers - A face-to-face meeting with the leaders of Khobna community (men and women). The meeting with women representatives will aim to understand the types of GBV that are present in the community and that may be exacerbated by the project; including identification of what groups of individuals are most vulnerable to harm; where women and girls feel most unsafe; how the community currently deals with GBV incidences; and why GBV may be exacerbated by the project. Details of existing (if any) services and safe spaces available to survivors of GBV and spaces where GBV is currently reported will be discussed, and the discussion will also aim to identify measures to mitigate project risks associated from the influx of the workforce and payment of compensation to displaced households that may lead to heightened GBVH risks to adult females. The discussion will also include the GBVH-related aspects of the community grievance mechanism to ensure that this is practical and suitable for the cultural context; - A public meeting held at Khobna Primary School (men and women), and a separate meeting for women only, to be attended by households within 500 m of the Project Solar PV Site that will be invited. - A face-to-face meeting with teachers and children (separate meetings) in Khobna Primary School. - A face-to-face meeting with representatives of the Tunisian Red Crescent to discuss and agree their future role in the Project during implementation. This may include providing safe spaces and services to victims of GBVH and raising awareness about women's rights in Khobna community. <i>Disclosure tools:</i> Large printed maps showing the location of the PV plant and the OHTL. A Project Information Leaflet. Printed copies comment forms to be used adjacent to comment boxes. All available in Arabic.

Table 5 - Stage 2 - Future development and disclosure of the LALRP

Stakeholder category	Consultation and information activities
- Ministries, national government agencies, regional government, municipal authorities - Environmental and social NGOs	An official letter from the Developer inviting them to review the contents of the LALRP and provide comments within 15 days. The LALRP to include a detailed Executive Summary. The LALRP to be available in French and Arabic.
Local communities, vulnerable people, landowners and land users, and livestock farmers	<u>Activities:</u> Direct engagement with: (1) landowners and land users impacted by the OHTL; and (2) the herder who will be impacted from restrictions in access to the solar PV site. This includes vulnerable people inside economically displaced households who will be visited separately to their specific household. <u>The activities to discuss the following topics:</u> - A summary of the Project, location of the future permitter fences, and the Developer's grievance mechanism. - The locations of the OHTL pylons and details of future land use restrictions below the OHTL RoW. - Surveys required for the LALRP (census, asset and inventory survey, socio-economic survey). - Separate engagements with women and vulnerable people in displaced households; and - Small group meetings where the displaced persons can come together and discuss preferences associated with livelihood restoration measures. These will include separate meetings with women of displaced households to ensure that the measures proposed include those specifically targeted towards the livelihoods of women. <i>NOTE: After preparation of the LALRP, the draft version will subsequently be disclosed to the same stakeholders listed above to explain their eligibility and entitlements, respond to any questions, and verify that their preferences for livelihood restoration measures have been adequately incorporated into the document. A summary will be printed (Arabic and French) and will be verbally read out to address any literacy challenges. The LALRP to be updated to reflect the outcome of these engagements.</i>

Table 6 - Stage 3 – Future consultation and disclosure activities during the construction phase

Stakeholder category	Consultation and information activities
Ministries, national government agencies, regional government, municipal authorities, local health centres;	An official letter from the Developer indicating the upcoming start of the construction phase in order to provide stakeholders with details on the current status of construction work and the final design of the solar PV power plant and OHTL. Individual meetings with stakeholders when specifically requested. Disclosure tools: A link to the latest set of GIS maps available for the project, to be published on the Developer's website (Arabic and French). Project Information Leaflet to be available (Arabic and French). Frequency: The letter to be issued at least 3 months before the start of construction work, followed by updates at key project milestones or whenever there are significant changes in schedule, design, or anticipated impacts, until the completion of construction.
Local communities, vulnerable people, landowners, livestock farmers, and women in the delegation of Mezzouna	<u>Activities:</u> - A public meeting at Khobna community to include a separate public meeting with local women, undertaken every 6 months during construction. - Engagements with vulnerable people living in Khobna community which include elderly people and others who are not likely to attend the public meetings (refer to Section 6.1), undertaken every 6 months during construction. - Engagements in local primary schools to inform young people of community health and safety risks undertaken every 6 months during construction. <u>The activities to discuss the following topics using maps and the Project Information Leaflet:</u> - A brief summary of the construction stage including installation of the perimeter fences and the presence of the workforce. This will include the future restrictions on land access within the solar PV site. - The locations of the OHTL pylons and details of future land use restrictions below the OHTL RoW. - Community health and safety risks associated with people trying to enter the construction site, and the future risks of people trying to climb the pylons during the operational stage, - The process used to recruit local people during the construction stage - The grievance mechanism that can be used to raise a concern including the use of CLOs to help the developer interact with the community, and also for the community to raise concerns about the project should they wish to do so. This will also include details of the male and female CLOs that are to be available. - The controls used to ensure that all road movements are completed safely - The Projects use of water and the generation of wastewater, and the controls to prevent pollution - The projects generation of waste and the controls to prevent pollution

Stakeholder category	Consultation and information activities
	▪ The potential future generation of noise and air emissions including dust ▪ The presence of the worker camp if required and the Worker Code of Conduct to ensure responsible behaviour of the workforce at all times. ▪ A time for questions and answers.
• Environmental and social NGOs	An official letter from the Developer indicating the upcoming start of the construction phase to provide stakeholders with details on the current status of construction work and project design. Individual meetings with stakeholders when expressly requested by them. Disclosure tools: A link to the latest set of GIS maps available for the project, to be published on the Developer's website (Arabic and French). Project Information Leaflet to be available (Arabic and French). Frequency: The letter to be issued at least 3 months before the start of construction work, followed by updates at key project milestones or whenever there are significant changes in schedule, design, or anticipated impacts, until the completion of construction.

Table 7 - Stage 4 - Future Consultation and information activities during the operational phase

Stakeholder category	Consultation and information activities during the construction phase
- Ministries, national government agencies, regional government, municipal authorities, local health centres. - Environmental and social NGOs	Submission of an annual environmental and social performance report available in French and Arabic. Individual meetings with stakeholders when necessary. Disclosure tools: <i>The annual environmental and social performance report.</i>
Local communities, vulnerable people, landowners, livestock farmers, and women in the delegation of Mezzouna	Summary of the annual environmental and social report integrated into a 3–4-page printed summary to provide details on the risks and impacts of operational communities, and to raise awareness of the complaint management mechanism. Every 6 months, individual meetings with landowners, land users, and shepherds who graze in the project area to remind them of the height restrictions associated with land use activities during the operational phase.

6.1 SPECIFIC MEASURES FOR CONSULTATION AND DISCLOSURE OF INFORMATION TO VULNERABLE GROUPS

The activities described in section 5.1.1 include specific provisions for engaging vulnerable groups among Group C stakeholders, so that they are also informed about the project, have the opportunity to participate in discussions related to the design, and their sources of vulnerability, views, and opinions are taken into consideration.

A summary of vulnerable groups is provided in Table 8.

The engagement with vulnerable groups described in the table below will initially be undertaken during the remainder of the environmental and social assessment process.

Table 8 - Vulnerable persons and procedures for meaningful consultation

Description of the vulnerable group	How meaningful consultation will be undertaken
<i>Vulnerability in the context of planning stakeholder consultation and disclosure activities</i>	
Young people under the age of 18 who may: (1) engage in high-risk activities that older people are less likely to do, such as attempting to enter areas where construction work is underway; and (2) have a poor understanding of road safety risks.	Direct engagement with local young people resident in Khobna community. Additional engagements in local schools may be required.
Women especially female-headed households may face limited access to information, restricted mobility and lower participation in decision-making due to cultural, social or economic barriers.	Direct engagement in livelihood compensation / restoration if any such impact.
People in poor health, people with disabilities, including wheelchair users, deaf and/or visually impaired people, and people with reduced mobility, who are unable or unwilling to participate in public consultations.	Direct engagement in displaced households.

7 GRIEVANCE REDRESS MECHANISM

The purpose of this section is to describe the independent appeal mechanisms that will be managed by the developer with the active participation of other entities, if necessary. In accordance with EPR1 and EIB Standard 2, the Developer has established an effective project-level grievance mechanism to receive and facilitate redress for concerns and grievances of stakeholders throughout the project cycle. This mechanism covers all Project E&S aspects except for employer-workforce relations including occupational health, safety and security aspects, as a separate grievance structure is dedicated to this purpose in line with requirements in EIB Standards 8 and 9.

The grievance mechanism sets out a clear step-by-step process with indicative timeframes, outcomes, defined monitoring and performance indicators, and reporting requirements.

7.1 KEY PRINCIPLES

The key principles of the Grievance Redress Mechanism (GRM) are to:

- Ensure that it is available, and that women and vulnerable people are willing and able to access the mechanism, should they wish to do so, for any reason, including Project-related grievances associated with GBVH. The GRM includes multiple channels through which complaints can be registered in a safe and confidential manner.
- Respond quickly and effectively to concerns in a transparent and culturally appropriate manner, without manipulation, interference, coercion, intimidation, or retribution, and will be easily accessible to all parties concerned, free of charge.
- To not prevent access to judicial or administrative remedies.
- To allow anonymous complaints to be filed and processed.
- To monitor use of the GRM over time and to identify trends so that the environmental and social performance of the project improves over time.
- To ensure that all information recorded remains confidential.
- To ensure that there are no reprisal actions taken against those who raise grievances, especially those associated with GBVH where there are heightened risks of stigmatization, rejection and reprisals against survivors, creating and reinforcing a culture of silence so survivors may be reticent to approach the project directly.

The scope of the grievance mechanism covers the entire project, including the actions of the EPC Contractor and their sub-contractors. The grievance mechanism aims to resolve concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible, at no cost and without retribution to the group/individual that has raised the grievance. The mechanism has been designed so that it does not impede access to any future judicial, or other type of administrative process, and includes provisions to ensure that details of the grievance and person(s) raising the grievance are kept confidential.

Disclosure

Information associated with the content of the grievance mechanism, and how a concern can be raised, shall be disclosed in the following ways:

- Using printed information which is included in the Project Information Leaflet.
- Using the Grievance Mechanism leaflet.
- Including the details in a sign at the front of the Project site
- By verbally mentioning the Grievance mechanism during stakeholder engagement activities and through the Developer's CLOs, including women-only engagements with community leaders and local residents.

Recording and logging grievances

All complaints shall be considered and acknowledged.

To contact SCATEC please use the contact details provided below:

By post to the following address: 24 rue du Lac Tanganyika, Les Berges du Lac 1, 1053 La Marsa, Tunis, Tunisia.

- by e-mail (moez.bahloul@scatec.com)
- Telephone call to SCATEC E&S Project Manager (+216) 98 157 018.
Male CLO contact: Mhadheb Messaadi (+216) 98 157 015
Female CLO contact: to be completed by the Developer

The grievance shall be recorded using the electronic grievance log and paper record form (refer to Appendix 2), noting the following information:

- The individual (or group representative) complaint's name (as long as the person wishes to disclose his/her name), their gender, details of their vulnerability (if any), physical address (where applicable), community they are resident in, or group name.
- Date, time, and place where the incident was experienced (where the grievance relates to a specific event).
- Description of complaints and the details of any third-party companies involved; and
- The preferred means of future communication with during the grievance resolution process noting any language preferences, and if an individual wishes to involve their own representative (such as a community leader) in all future communication.

Confidentiality of the grievance shall be maintained through keeping all paper records stored in a locked file that only the Developer has access to and using a secure password to keep electronic records confidential. The electronic grievance registry and paper records shall be used to record, on an ongoing basis, grievances as they are reported, evaluated and resolved.

Steps to be taken if the grievance is associated with gender-based violence and harassment (GBVH)

If a grievance is raised that is associated with GBVH then this shall be passed to a person within SCATEC who: (1) is the same sex of the person raising the concern; and (2) who has received training on the management of GBVH cases. If necessary, protection of the victims will be provided by SCATEC which may include temporary housing and other actions to prevent future harm. Relevant stakeholders (such as women leaders in Khobna community and the Tunisia Association of the Tunisian Red Crescent will be requested to provide additional support, so that all of the actions SCATEC undertakes reflect local cultural norms and are aligned with the wishes of local community leaders and regional government. The same actions to prevent retaliation and protect confidentiality will be in place.

Additionally, no identifiable information on the survivor should be stored in the GRM and information apart from the three aspects related to the GBV incident will be recorded:

- o The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- o If, to the best of their knowledge, the perpetrator was associated with the project; and,
- o If possible, the age and sex of the survivor.

The GRM will refer GBVH complaints to the Tunisian Red Crescent and record the resolution of the complaint process.

Grievance investigation and attempt at resolution

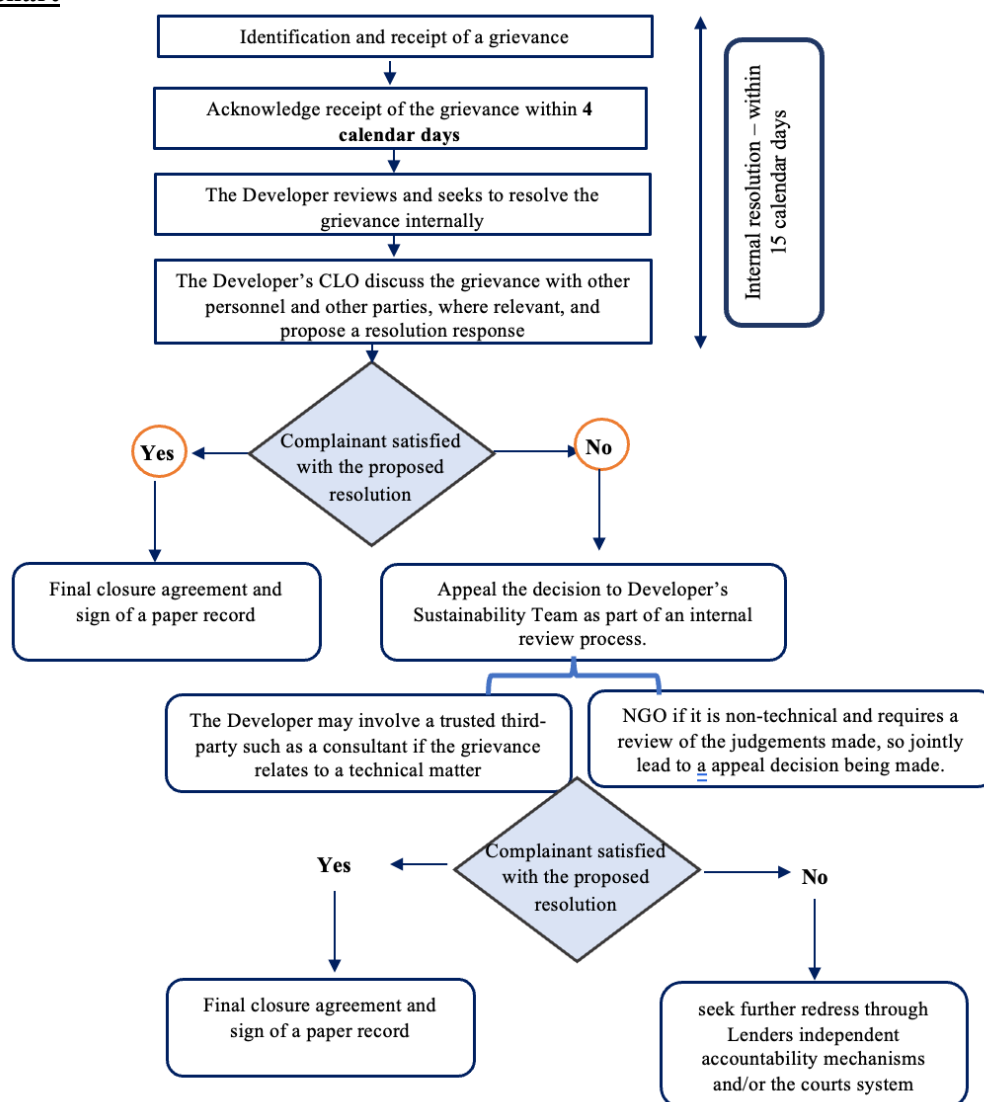
After a new grievance has been recorded, the Developer shall acknowledge receipt of the grievance within 4 working days by phone or using a written letter (Appendix 2). Thereafter, the Developer shall communicate with the individual/group who raised the grievance to learn as much as possible

about the details. It shall be important to listen attentively to the person in order to reflect the fact that the Developer take grievances seriously, and to try and build a positive relationship with the individual/group at the start of the resolution process.

Thereafter, the Developer's CLO shall take responsibility to discuss the grievance with other personnel and other parties, where relevant, and propose a resolution response. The CLO shall subsequently communicate the response to the individual/group raising the grievance with the aim of resolving the issue. The target response time from the date a grievance is received until a resolution response is sent back is 15 working days. The CLO shall consider what recommendations are needed to try and ensure that a reoccurrence of similar grievances do not occur in the future. Before the grievance is classified as being 'resolved' the CLO shall check with the individual/group that raised the grievance that they are satisfied with the response provided. The individual /group representative shall be asked to sign a Grievance Satisfaction Form indicating that they are satisfied with the response. If they are not satisfied, then they have the choice to appeal the decision to SCATEC's Sustainability Team as part of an internal review process.

NOTE: If the individual/group raising a grievance wishes to seek a judicial resolution before the final decision of the Developer, then the Developer shall continue the grievance resolution process in parallel and provide copies of all non-confidential and relevant documentation needed for the judicial process.

Flowchart



Steps to be taken if the grievance is associated with gender-based violence and harassment (GBVH)

If a grievance is raised that is associated with GBVH then this shall be passed to a person within SCATEC who: (1) is the same sex of the person raising the concern; and (2) who has received training on the management of GBVH cases. If necessary, protection of the person who has been subjected to GBVH will be provided by SCATEC. The same actions to prevent retaliation and protect confidentiality will be in place.

Supporting documents

The following supporting documents/files accompany this Grievance Mechanism:

- Electronic grievance log; and
- Paper grievance reporting and acknowledgment form.

Monitoring

The following performance indicators shall be used to check the effectiveness of implementation of the grievance mechanism:

Usage – the target is for all grievances (100%) to be channelled through the Grievance Mechanism before the concerns of an individual, group or community are raised to another entity, such as a national regulator or media outlet.

Number – the number of grievances received each month shall be closely monitored to identify trends in the frequency and type (see below) of grievances that are being raised.

Type – the number of grievances associated with specific topics such as:

- The behaviour of the workforce towards community members including harassment and GHVH
- The use of vehicles on the public network (damage, community safety risks)
- The inappropriate behaviour of security personnel
- The way in which local people were selected for recruitment by the EPC Contractor
- Stakeholder engagement, information disclosure and consultation.
- The effectiveness of the grievance mechanism to resolve concerns quickly.
- Environmental pollution including noise, air emissions and dust, soil and groundwater pollution, waste management.
- Impacts to water resources.
- Impacts to landowners and land users.
- Impacts to cultural heritage resources

Gender and vulnerability – the gender of individuals raising grievances shall be recorded and reported separately, as well as details of any vulnerability.

Community – the name of the individual/group/community are resident in shall be recorded.

Resolution time - the target for the resolution of grievances is 20 calendar days, starting from the date the grievance was recorded. All appeals to the decision of the grievance are expected to be fully resolved within a further period of 20 calendar days, starting from the date the initial response was provided to person raising the grievance; and

Reoccurrence – ideally there should be no (or at least a consistent reduction) in the type of grievances that are raised on similar issues over time. This is expected to be achieved by implementing improvements in working procedures and broader stakeholder engagement activities, with the objective of demonstrating continual improvement.

Notification arrangements specific to GBVH

If a GBVH-related grievance is raised, this shall be notified by SCATEC to Lenders within a period of 2 working days.

Access to Lenders Independent Accountability Mechanisms

All projects financed by EBRD shall be structured to meet the requirements of the EBRD [Environmental and Social Policy](#) (2024) which includes ten Environmental and Social Requirements (ESRs) for key areas of environmental and social sustainability that projects are required to meet, including ESR10 Stakeholder Engagement. In addition, EBRD's [Independent Project Accountability Mechanism](#) (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its [Access to Information Policy](#); and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

8 MONITORING AND ASSESSMENT

The implementation of the SEP will be monitored with the aim of improving the way stakeholder consultation and disclosure activities are conducted throughout the life of the project. The developer will conduct a monthly review of the SEP implementation process and gather information on key performance indicators for internal discussion and review. This will take the form of a workshop facilitated by the developer.

The agenda for the monthly internal workshop will include the following items:

- Presentations and objectives of the workshop.
- Review of SEP key performance indicators.
- Review of the complaints register and the overall functionality of the GRM process, aiming to ensure that stakeholders continue to be aware of the process that can be used to raise a complaint, and the steps to be taken to protect confidentiality, prevent retaliation, and resolve the complaint as quickly as possible, aiming to strengthen the mechanism over time;
- Review of files relating to recent stakeholder engagements; and
- Review and discussion of the current SEP implementation process and assessment of additional resource needs.

The SEP is monitored using the indicators presented in the table below.

Table 9 - Monitoring and evaluation indicators

Indicator	Information Source	Frequency
Total expenditures by SEP budget category	Financial records	Monthly
Number of training sessions held with SCATEC personnel associated with the functionality of the GRM	Grievance records	Monthly
Breakdown of expenses by: - Internal personnel	Financial records	Monthly
Number of personnel assigned to SEP implementation	Human Resources Department	Monthly
Number of engagements with stakeholders to explain the GRM process: - Affected persons (men and women) - Affected persons identified as vulnerable - Women-only community groups - Local residents (men and women) - Local residents (school children who might approach the site during construction) - NGOs and civil society groups	Stakeholder engagement records	Monthly
Number of times project details were publicly disclosed using various formats (traditional print media, social media, TV/radio, other formats)	Disclosure records	Monthly
Total number of complaints raised	Grievance records	Monthly
Number of complaints submitted anonymously	Grievance records	Monthly
Number of complaints acknowledged within the required timeframe	Grievance records	Monthly
Number of complaints investigated, and resolution proposal submitted to complainant within the required timeframe	Grievance records	Monthly
Number of complaints that were accepted	Grievance records	Monthly
Number of complaints resolved through mediation	Grievance records	Monthly
Number of complaints raised to the Sustainability Team for an internal review process	Grievance records	Monthly
Number of complaints resolved through a court process	Grievance records	Monthly

9 RESPONSIBILITIES FOR IMPLEMENTATION

9.1 RESPONSIBILITIES FOR IMPLEMENTATION

The project will be implemented by the developer, who will have the necessary staff resources and capacity to implement the SEP in accordance with the combined requirements of national legislation, the EBRD Environmental and Social Policy (2024) and the European Investment Bank (EIB) Environmental and Social Policy (2022).

The following staff will be required for the successful implementation of the SEP:

- E&S Manager
- Community Liaison Officers

The roles and responsibilities for the implementation of the SEP are outlined in the below table and include the Developer and the EPC contractor.

Table 10 - Roles and responsibilities for implementing the SEP

Role	Responsibilities
E&S Manager: Responsible for stakeholder engagement on behalf of the Developer	- Approve the SEP and revise the document as necessary each year. - Ensure that the Developer's internal staff has adequate training to implement the SEP. - Manage the complaint management mechanism, including reporting on the current status of complaints in the complaint register. - Provide advice to the construction contractor on activities related to the SEP. - Coordinating the adequate disclosure of the Project documents (ESAR, SEP, LARF, and LALRP) - Ensuring the SEP is updated at least every 6 months during the construction period, or earlier if a major changes in the schedule or scope of the Project takes place. - Ensuring that the CLOs used by SCATEC are adequately trained in engagement techniques, including the management of GBVH grievances from a local community resident, member of the workforce, or other stakeholder.
Community Liaison Officers of the Developer (male and female)	- Organize and facilitate all stakeholder engagement activities, including inviting them to participate, preparing appropriate disclosure tools, drafting meeting minutes, and undertaking any necessary follow-up actions. - Ensure that specific measures to ensure consultation and disclosure of information to vulnerable persons are implemented in accordance with the PMU. - Raise awareness of and use the grievance mechanism, including reporting on the current status of grievances in the grievance register. - Provide advice to the construction contractor on SEP-related activities. - Engage with landowners who are using land informally within the Solar PV Site. - Engage with landowners and land users who are be impacted from the installation of a pylon on their land along the OHTL route. - Ongoing engagement with landowners and land users where construction works are ongoing to ensure that they are satisfied with the actions being taken and steps to protect the local environment and safety of the public. - The receipt, recording, investigation, and follow-up of grievances, including GBVH-related grievances. - Ensuring that all grievances, including GBVH-related concerns, are kept confidential and that no retaliation is made to the person raising the concern. - Liaising with external parties (community leaders, the NGO, Tunisian Red Crescent, relevant government departments, etc.) to provide support (safe spaces, additional services, etc.) to victims of GBVH.

Role	Responsibilities
Construction Contractor	- The Construction Contractor shall comply with relevant E&S requirements as communicated by the Developer, including any measures or procedures specified in the SEP that directly relate to construction activities. - Any stakeholder complaints directly related to the Contractor's activities shall be reported immediately to the Developer. The Developer remains responsible for managing, reviewing, and resolving complaints, while the Contractor shall implement any corrective actions as instructed by the Developer to ensure alignment with the agreed resolution measures. - The Contractor shall provide operational support for SEP implementation only in areas relevant to their scope of work, such as facilitating site access for consultations, participating in site-based awareness activities, or providing requested data, under the direction of the Developer. The Contractor is not responsible for overall SEP management or direct engagement with stakeholders. Comply with all relevant provisions included in the SEP.

9.2 *CHANGE MANAGEMENT*

A change management procedure must be part of the construction contractor's environmental and social management system, which is a set of specific policies, procedures, and management plans that describe how E&S risks and impacts are to be managed. A formal procedure must be developed to filter changes to the project so that, based on certain materiality thresholds, the need to undertake additional stakeholder consultation and disclosure activities is identified, assessed, and addressed. This may include, for example, the need to inform stakeholders of changes to the project design, the start of construction, or another important aspect.

APPENDICES

APPENDIX 1 - GRIEVANCE MECHANISM LEAFLET

SCATEC aims to resolve Grievance as quickly as possible and has established a Grievance Redress Mechanism specific to the 120 MWp solar PV power plant and OHTL project in Sidi Bouzid 2. Any individual, group, or other stakeholder may contact the Developer and file a grievance that is relevant to the Project. This includes the actions of SCATEC's employees, SCATEC's contractors, and other activities relevant to the Project.

To contact SCATEC please use the contact details provided below:

- By post to the following address: 24 Rue du Lac de Tanganyika, I 1053, Tunis - Tunisia
- By e-mail (moez.bahloul@scatec.com)
- Telephone call to SCATEC E&S Project Manager (+216) 98 157 018.
Male CLO contact: Mhadheb Messaadi (+216) 98 157 015
Female CLO contact: to be completed by the developer

All grievances raised shall be immediately recorded into a central Grievance Register. The following information shall be requested:

- Your (or your group's) name and address (community name) and full contact details.
- A detailed description of complaint, where this occurred, and details of any third parties involved (such as a contractor).
- Your preferred means of future communication so that we can regularly contact you in the future during the resolution process.
- How you wish the complaint to be resolved.

Please note that you are not obliged to provide your name and contact details if you do not wish to do so. SCATEC accepts all grievances even if these are raised anonymously. A Grievance Form is included on the last page of this leaflet which can be used to raise a grievance. SCATEC will provide any form of support necessary to complete the Grievance Form should this be required, due to literacy or other type of challenge.

Once the grievance has been raised and logged in the Grievance Register, the SCATEC Community Liaison Officer (CLO) will acknowledge this to you within 4 working days and ensure that all information is kept confidential. Paper records will be stored in a locked file, and a secure password is used to keep all electronic records and files private.

Thereafter, the grievance will be investigated by the CLO to gather information about the grievance and obtain more information about what has taken place. During the investigation process, the CLO may contact you to provide an update and discuss with you the steps that could be taken to reach a resolution.

We aim for a proposed resolution to be presented to you, in writing, within a period of 15 working days, starting from the date the grievance was acknowledged by SCATEC. We will ask you to confirm that you are satisfied with the proposed resolution prior to implementing the steps required, and later closing the grievance. If you are satisfied, then we will ask you to sign a Grievance Satisfaction Form. If you are not satisfied, then you have the right to appeal.

If an appeal is launched, SCATEC will help you to pass all of the information associated with the grievance onto the SCATEC Sustainability Team who will review the grievance resolution process conducted to date. The outcome of this review will either suggest an alternative resolution proposal, to decline to change the previous resolution response, or other action.

Steps to be taken if the grievance is associated with gender-based violence and harassment (GBVH)

If a grievance is raised that is associated with GBVH then this shall be passed to a person within SCATEC who: (1) is the same sex of the person raising the concern; and (2) who has received training on the management of GBVH cases. If necessary, protection of the person who has been

subjected to GBVH will be provided by SCATEC. The same actions to prevent retaliation and protect confidentiality will be in place.

**APPENDIX 2 - GRIEVANCE REGISTER, PAPER FORM, ACKNOWLEDGEMENT FORM,
AND GRIEVANCE SATISFACTION FORM**