

# DataVolt Data Centre Tashkent, Uzbekistan

Stakeholder Engagement Plan



August 2025

## DOCUMENT INFORMATION

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# CONTENTS

<b>1</b>	<b>INTRODUCTION</b>	<b>6</b>
1.1	Project Background	6
1.2	Scope of the SEP	6
1.3	Objectives of the SEP	7
<b>2</b>	<b>PROJECT OVERVIEW</b>	<b>8</b>
2.1	Project Context	8
2.2	Project Location	8
2.3	Key Project Elements	10
2.4	Construction Phase	10
2.4.1	Construction Activities	10
2.4.2	Temporary Facilities	11
2.4.3	Worker Accommodation and Welfare Facilities	11
2.4.4	Construction Workforce	11
2.5	Project Operational Requirements	11
2.6	Project Milestones	12
2.7	Local Context and Sensitivities	12
2.7.1	Land Use and Site Conditions	12
2.7.2	Site Surroundings and Potential Human Receptors	13
<b>3</b>	<b>REGULATIONS AND REQUIREMENTS</b>	<b>15</b>
3.1	National Requirements	15
3.1.1	Public Participation in National EIA	15
3.1.2	Management of Public Grievances	16
3.2	Lenders Requirements	16
3.2.1	International Finance Corporation - Performance Standards	16
3.2.2	Asian Development Bank	17
3.2.3	European Bank for Reconstruction and Development	19
<b>4</b>	<b>STAKEHOLDER IDENTIFICATION AND ANALYSIS</b>	<b>21</b>
4.1	Approach to Stakeholder Identification	21
<b>5</b>	<b>PREVIOUS STAKEHOLDER ENGAGEMENT PROGRAMME</b>	<b>26</b>
5.1	Scoping Stage Stakeholder Engagement	26
5.2	Stakeholder Consultations for the National EIA	26
5.3	Media Coverage of the Project	31
<b>6</b>	<b>STAKEHOLDER ENGAGEMENT PROGRAMME</b>	<b>35</b>
6.1	Engagement Methods	35

6.1.1	Key Principles for Engagement	35
6.1.2	Stakeholder Engagement Methods	35
6.1.3	Measures to Avoid Reprisal	36
6.2	Engagement Programme	36
6.2.1	Post ESIA Engagement	36
6.2.2	Construction Phase Engagement	37
6.2.3	Operations Phase Engagement	38
<b>7</b>	<b>GRIEVANCE REDRESS MECHANISM (GRM)</b>	<b>39</b>
7.1	Key Principles of Grievance Mechanism	39
7.2	Scope of Grievance Mechanism	39
7.3	Steps in Grievance Mechanism Management	40
7.3.1	Publicising Grievance Management Procedures	40
7.3.2	Means of GRM Disclosure	40
7.3.3	Submitting a Grievance	40
7.3.4	Keeping Track of Grievances	41
7.3.5	Reviewing and Investigating Grievances	41
7.3.6	Grievance Resolution Options and Response	42
7.4	Grievance Redress Committee	43
7.5	Process Flow and Timeline	43
7.5.1	Grievance Mechanism Contact Details	44
7.6	Training	44
<b>8</b>	<b>IMPLEMENTATION PLAN</b>	<b>45</b>
8.1	Roles and Responsibilities	45
8.1.1	DataVolt	45
8.1.2	GRM Committee	45
<b>9</b>	<b>REVIEW</b>	<b>46</b>
<b>APPENDIX A – GRIEVANCE TRACKER TEMPLATE</b>		<b>47</b>
<b>APPENDIX B - EXAMPLE OF GRIEVANCE FORM</b>		<b>48</b>
<b>APPENDIX C - EXAMPLE OF GRIEVANCE RESOLUTION FORM</b>		<b>49</b>
<b>APPENDIX D - EXAMPLE OF GRIEVANCE CLOSEOUT FORM</b>		<b>50</b>

## ABBREVIATIONS

ABBREVIATION	MEANING
<b>5 Capitals</b>	5 Capitals Environmental Consultants & Studies L.L.C.
<b>ADB</b>	Asian Development Bank
<b>AOI</b>	Area of Influence
<b>BESS</b>	Battery Energy Storage System
<b>COD</b>	Commercial Operational Date
<b>E&amp;S</b>	Environmental & Social
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>EHS</b>	Environment, Health and Safety
<b>EPC</b>	Engineering, Procurement, and Construction
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMS</b>	Environmental and Social Management System
<b>GBVH</b>	Gender Based Violence & Harassment
<b>GRM</b>	Grievance Redress Mechanism
<b>IFC</b>	International Finance Corporation
<b>IFIs</b>	International Financial Institutions
<b>ILO</b>	International Labour Organisation
<b>LGA</b>	Local Government Authority
<b>MDAs</b>	National Ministries, Departments, and Agencies
<b>MEEPCC</b>	Ministry of Ecology, Environmental Protection and Climate Change
<b>MV</b>	Medium-Voltage
<b>MW</b>	Megawatt
<b>O&amp;M</b>	Operations and Maintenance
<b>PC</b>	Project Company
<b>PS</b>	Performance Standards

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# 1 INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for the DataVolt 12 MW Data Centre project (the Project) in the city of Tashkent, Republic of Uzbekistan.

This SEP outlines the proposed framework methodology for stakeholder engagement during Project implementation (specifically construction and operations), with an emphasis on alignment with the requirements of the prospective Lenders, further to applicable national requirements.

## 1.1 Project Background

As part of Uzbekistan's efforts to enhance its digital infrastructure and strengthen the IT sector, data centres will be developed in Tashkent. The DataVolt Tashkent IT Park Data Centre is intended to be a 12 MW IT load facility which will support the country's digital transformation under the "Digital Uzbekistan – 2030" strategy.

A Battery Energy Storage System (BESS) is being planned which will further ensure uninterrupted green energy supply and provide stability in case of grid fluctuations. This initiative aligns with Uzbekistan's broader objective of becoming a regional IT hub while prioritizing energy efficiency and advanced technological solutions. The BESS facility will be located on an adjacent but connected plot of land to the main data centre building; also referred to herein as the 'buffer station'.

The Project will also include an underground transmission line connecting the project to a local grid sub-station. The underground line will run along existing road infrastructure and will be arranged in two alignments for contingency purposes.

Construction activities for the data centre have already commenced. Excavation works at the data centre site are now complete, and the site is prepared for foundation pouring.

At the buffer station site, the existing structure has been demolished; however, further construction works are currently on hold pending the issuance of the required permits. Similarly, works related to the underground power line (UPL) are yet to begin and remain subject to permit approval.

## 1.2 Scope of the SEP

This document is prepared for DataVolt 12 MW Data Centre at Tashkent District of the Republic of Uzbekistan, covering following project components:

- 12 MW Data Centre plot;
- BESS (buffer) station;
- Underground power lines (UPLs) connecting the Project to the grid; and

- 
- Ancillary facilities.

This SEP has been prepared to align with applicable requirements of the International Finance Corporation (IFC), European Bank for Reconstruction and Development (EBRD) and Asian Development Bank (ADB), who, if engaged as lenders have requirements for stakeholder engagement and grievance management respectively.

A separate SEP has been developed by the Project Company providing an approach to stakeholder engagement with various governmental, regulatory and other stakeholders. Hence, this SEP has been prepared specific to community engagement and those stakeholders relevant from an environmental & social perspective.

The SEP will remain relevant throughout the lifetime of the Project as a 'live document'. It will act as documented information within the Project's Environmental and Social Management System (ESMS) and would require updating as Project circumstances or stakeholder dynamics evolve; and to ensure continual improvement of the ESMS.

The responsibility for owning, managing and updating the SEP following engagement with stakeholders lies with the Project Company.

### **1.3 Objectives of the SEP**

The objectives of the SEP include:

- To identify the various community and E&S related stakeholders that may be affected by the Project or may influence the outcome of the Project, including vulnerable groups;
- To define processes for engaging with identified stakeholders about the Project and to manage stakeholder expectations;
- To define the frequency and timeline for engagement with different stakeholders/stakeholder groups;
- To understand current and potential emerging issues and to capture views and concerns of the relevant stakeholders with regard to the Project;
- To provide a basis for stakeholder participation in environmental and social impact identification, prevention and mitigation, including impacts and risks relating to Gender Based Violence & Harassment (GBVH) and Sexual Exploitation, Abuse and Harassment (SEAH);
- To propose a platform for reporting back on mechanisms to address these impacts; and
- To establish a grievance mechanism that will be implemented for the Project during the ESIA aligning it with the current grievance mechanism plan developed by the Project Company.

## 2 PROJECT OVERVIEW

### 2.1 Project Context

The project is implemented by a special-purpose vehicle (SPV) Project Company, 'DataVolt IT Park', jointly owned by DataVolt UAE (95%) and the IT Park under the Ministry (5%).

The Project will be the first Tier 3 carrier-neutral, AI-enabled data centre in Central Asia, fully powered by renewable energy (RE), provided under an energy supply agreement (ESA) with JSC "Uzenergotsotish". The data centre will be LEED-Gold certified.

**Table 2-1 Key Project Details**

LOCATION	CAPACITY	AREA (HA)
Tashkent	12 MW	0.57

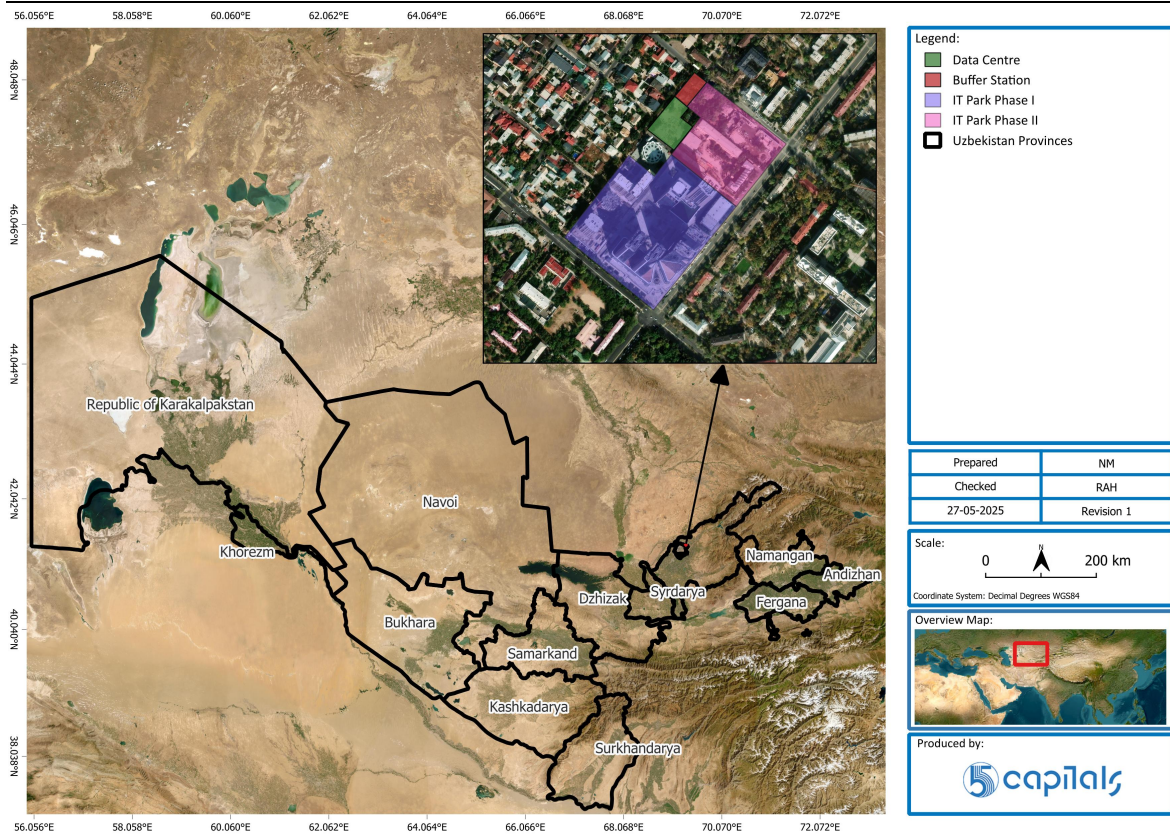
**Table 2-2 Key project Parties**

<b>PROJECT TITLE</b>	DataVolt 12 MW Data Centre, Tashkent, Uzbekistan / IT Park / TAS01
<b>PROJECT DEVELOPER</b>	DataVolt Information Technology Company
<b>PROJECT COMPANY</b>	DataVolt IT Park Tax payer ID number: 311685614 Bobour Street, House 58a, Muhandislar Mfy, Yakkasaroy District, Tashkent City, Uzbekistan Contact Person: Ankit Kumar (Project Director) a.kumar@data-volt.com
<b>EPC CONTRACTOR</b>	Larsen and Toubro Ltd. (L&T)
<b>O&amp;M COMPANY</b>	To be determined*
<b>ESIA CONSULTANT</b>	5 Capitals Environmental Consultants & Studies L.L.C. (5 Capitals) PO Box 119899, Dubai, UAE Tel: +971 (0) 4 250 8783, Fax: +971 (0) 4 343 9366 Contact Person: Max Burrow (Project Director) max.burrow@5capitals.com <a href="http://www.5capitals.com">www.5capitals.com</a>
	Nazar Business and Technology Consulting Company (NBT) Karakum 1st Passage, 100100, Tashkent, Uzbekistan Tel: +998 71 203 79 97 <a href="https://www.nbt.uz/">https://www.nbt.uz/</a>

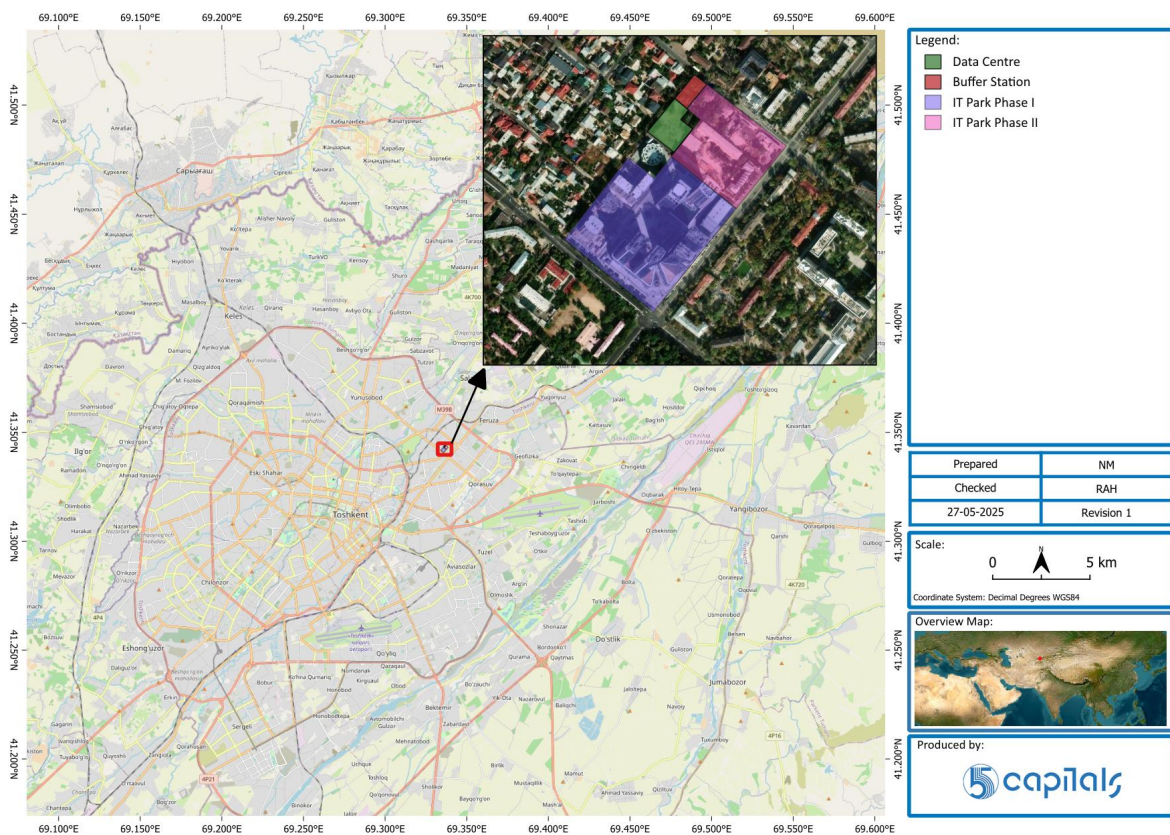
\*O&M Company details are not available as of the date of issuance of the SEP report.

### 2.2 Project Location

The Project site is located in the Tashkent IT Park in an urban area of north-east Tashkent. It is located 15.4 km from Tashkent Airport and 8.5 km from the nearest railway station. The site will occupy a land plot measuring (0.44 ha) and (0.13 ha).



**Figure 2-1 Project location – national context**



**Figure 2-2 Project location – local context**

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## 2.3 Key Project Elements

**Note:** Please refer to the ESIA Report for further details.

The data centre will be a G+7 floor building. The project design includes a basement, mezzanine floor, terrace (service platform), and chiller plant, in addition to the ground floor and seven upper floors. Data hall operations will be allocated from the 2nd floor to the 7th floor. Each floor of the data hall operations will accommodate 250 racks, with an average power density of 8 kW per rack. The total building height is designed to be 65.15 meters inclusive of the services platform terrace, and the facility will be LEED-Gold certified.

The data centre is planned to operate as a 'net zero' facility, with the potential to be powered entirely by renewable energy (RE) sources 100% of the time. The primary sources will be solar photovoltaic and wind energy supplied through the national transmission grid. To ensure uninterrupted power supply and system reliability, the facility will be supported by battery energy storage systems (BESS) and backup fuel generators.

Under the Energy Supply Agreement, the project has secured priority allocation of green power from the grid. Additionally, point-to-point temporal mapping of green electrons—tracking electricity from the grid to data centre consumption—is being implemented. The RE procured is expected to be certified under the global I-REC (International Renewable Energy Certificate) framework.

## 2.4 Construction Phase

### 2.4.1 Construction Activities

The main expected construction activities for the Project include among others:

- Site preparation;
- Erection of temporary construction areas including for storage of equipment and materials;
- Excavation and piling work for the Data Centre building.
- Construction of the Data Centre building:
  - Concrete works
  - Mechanical, Electrical, Plumbing (MEP) works
  - Architectural finishing works
  - Façade works
  - Landscaping
- Installation of IT infrastructure and equipment
- Testing and commissioning of the Data Centre
- Construction of UPL
  - Line 1 (northern side)

- 
- Line 2 (southern side)
    - Construction of BESS / Buffer Station

### 2.4.2 Temporary Facilities

Temporary construction facilities will be established within the construction site to support site activities and ensure the welfare, safety, and coordination of personnel throughout the construction period. These facilities will include office containers for the main contractor and subcontractors, as well as dedicated spaces for health, safety, and environment (HSE) induction and training, and an on-site medical station to address any immediate health concerns. Restrooms and security cabins will also be provided to ensure hygiene standards and site access control, respectively.

### 2.4.3 Worker Accommodation and Welfare Facilities

There will be few workers that require accommodating, as most will reside locally in Tashkent and commute on a daily basis to the site. It is understood that a workers' accommodation camp may be used by Gold Step, the main sub-contractor of this project. The accommodation camp is located in proximity to the east of the main data centre construction site, and may host workers from different regions of Uzbekistan and potentially other countries. This camp may be used during the construction phase and shall comply with the IFC/EBRD Workers' Accommodation: Processes and Standards.

### 2.4.4 Construction Workforce

The total number of workforces at the peak of the construction phase is estimated at 450 personnel in total. All construction workers will be residents of Uzbekistan, hired by the EPC contractor and subcontractors. Some highly skilled migrant workers from other regions in Uzbekistan may be recruited during the construction phase. International skilled workers are likely to be engaged on this project as it is the first to be developed and implemented in Uzbekistan.

The project will ensure, when possible, to have female employees during the construction phase.

## 2.5 Project Operational Requirements

The data centre will be operated by a separate O&M Company owned by DataVolt. Details about the O&M Company are not available at the time of writing.

The O&M Company will be responsible for the day-to-day operations and maintenance activities that are required to ensure constant and efficient operations of the data centre building and will for example include administration team, security staff, technicians and maintenance teams.

There will be regular maintenance and inspection of the following:

- Electrical systems.
- BESS/Buffer Station
- The cooling system for the Data Centre which will be based on air-cooled chillers, resulting in minimal water consumption for cooling operations.
- The back-up emergency diesel generators will be maintained to ensure that the emissions comply with applicable regulations. The fuel storage will be inspected and maintained to ensure there is no leakage, and the storage tank is kept in a good condition.

## 2.6 Project Milestones

Based on the details provided by DataVolt, the following timeline is currently in place for the Project.

**Table 2-3 Project Milestones for Data Centre**

MILESTONE	SCHEDULED DATE
Limited Notice to Proceed (LNTP)	2 <sup>nd</sup> week of February 2025
Notice to Proceed (NTP)	7 <sup>th</sup> of March 2025
Phase I Completion	31 <sup>st</sup> of December, 2026
Phase II Completion	31 <sup>st</sup> of March, 2027
Commercial Operation Date (COD)	31 <sup>st</sup> of March, 2027

## 2.7 Local Context and Sensitivities

**Note:** Full details of receptors, local sensitivities, land users and site baseline are described in the ESIA Report. A summary of this has been included below for context in this SEP.

### 2.7.1 Land Use and Site Conditions

The project site is situated within the Tashkent IT Park masterplan, surrounded by existing urban developments. A mosque, constructed several years ago and more recently re-developed, is located immediately adjacent to the proposed Data Centre building. The land use surrounding the IT Park is a mix of residential, commercial, educational and medical uses.

Since mid-2024 the site has been fenced and is not accessible to external parties. The EPC Contractor (L&T) has engaged a security service company to provide 24/7 security at the site since this time.

DataVolt has obtained the land plot for the Data Centre building on a 25-year lease from the Ministry of Digital Technologies of the Republic of Uzbekistan with options to extend the lease. The land lease has been approved following issuance of a Presidential Decree.

For the buffer (BESS station) plot, DataVolt has secured an adjacent land parcel to the main Data Centre plot. This plot, which previously contained a residential building, was acquired by

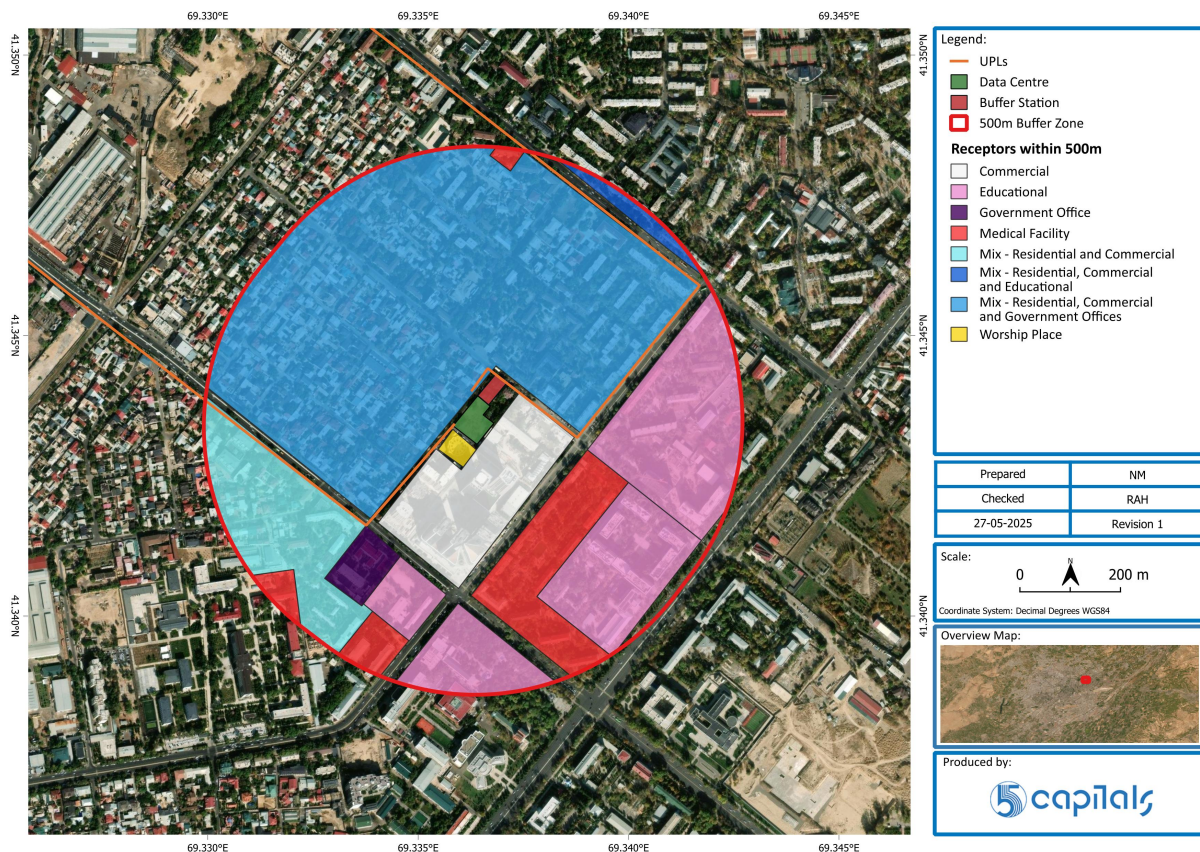
the SPV Project Company DataVolt IT Park through a mutual willing seller and buyer agreement. The agreement is valid for 6-months following which the land lease will be under a Land Lease Agreement with Local Khokimiyat (Mirza Ulukbek District Corporation). The land designation will be changed once the land ownership is transferred to the local area's Khokimiyat.

### 2.7.2 Site Surroundings and Potential Human Receptors

Key E&S receptors within 500 metres of the Project components have been mapped and are presented in the Figure below with further details in the following table. 500 metres is considered to be the maximum anticipated extent of potential direct impacts associated with the project facilities from the data centre and buffer station site.

This assessment was based on a review of satellite imagery and findings from site visits. As illustrated in Figure 2-3, the identified receptors include residential buildings and compounds, commercial, medical, educational and industrial facilities and utility infrastructure.

The below map and table provide an overview of the E&S impact receptors pre-identified within the expected AOI, for the Project's non-linear facilities.



**Figure 2-3 Potential E&S impact receptors within 500 metres from the project site**

**Table 2-4 Potential human receptors with 500 meters of the project site**

ID	RECEPTOR TYPE	PROXIMITY TO PROJECT	DESCRIPTION
R01	Government offices	260 m	The Shanghai Cooperation Organisation
R02	Worship place	10 m	Tepamasjid mosque
R03	Medical facility	170 m	Clinical hospital
R04	Educational establishment	270 m	School
R05	Medical facility	540 m	Military medical academy
R06	Medical facility	450 m	Medical clinic
R07	Medical facility	435 m	Military hospital
R08	Commercial	510 m	Warehouses and shops
R09	Educational establishment	280 m	University campus
R10	Educational establishment	320 m	University campus
R11	Educational establishment	180 m	Educational campus (university and school)
R12	Medical facility	400 m	Children's hospital
R13	Mixed urban land-use	10 m	Mix - residential, commercial and government offices
R14	Mixed urban land-use	260 m	Mix – residential and commercial
R15	Mixed urban land-use	400 m	Mix – residential, commercial, and educational

A receptor map is not provided for the planned UPLs, considering the multitude of receptors linked to their linear footprint. Further details on the UPLs are provided in Volume II of the ESIA package.

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## 3 REGULATIONS AND REQUIREMENTS

### 3.1 National Requirements

#### 3.1.1 Public Participation in National EIA

In recent years, changes in the national legislation regarding the process of National Environmental Impact Assessment means that conducting public consultation is now a mandatory part of the Stage I EIA process.

According to the Resolution of the Cabinet of Ministries of the Republic of Uzbekistan “On further improvement of mechanism for Environmental Impact Assessment” No. 541 dated 07.09.2020 the procedure of conducting public consultations is as follows:

- Annex 3 of the Resolution No 541 – Rules and regulations for conducting public consultations states that public consultations should include discussions and decision making regarding planned activities (for construction of any facility) that may have negative impacts on the environment.
- A non-technical summary regarding any planned project activity that is categorized as I & II group (in accordance with national requirements for categorization) shall be prepared. The Non-technical Summary (NTS) should include information about the following:
  - Brief description of the project;
  - Technology solutions and alternative options for the project;
  - Current state of the environment at the selected project site;
  - A brief assessment of socio-economic conditions;
  - Brief description of the causes and type of negative impacts on the environment as a result of the project;
  - Forecast and assessment of possible changes in the state of the environment, socio-economic conditions;
  - Forecast and assessment of project and non-project risks;
  - Measures to prevent, minimise and/or compensate for adverse impacts; and
  - Assessment of possible significant adverse cross-border impacts.
- A public consultation shall be based on the review of non-technical summary by providing equal rights to all participants to express their concerns, opinion and suggestions.
- The following entities shall be considered as part of public consultations:
  - Representatives of local departments of State Committee on Ecology and Environmental Protection who will be considered as observers of public consultations.
  - Local municipalities (considered as the responsible organisation for organising and inviting participants to the meetings);
  - Non-governmental Organisations (NGOs);
  - All organisations interested in the project;
  - Local communities; and

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- Mass media.

- Expenses, if any, related to the public consultations shall be financed by the Project Developer. Law № 781 “On Procedures for the Withdrawal of Land Plots for Public Needs with Compensation” requires meaningful consultations with Project affected people (PAP) who can be physically or economically displaced due to the realization of the Project.

### 3.1.2 Management of Public Grievances

The Resolution No. 728 provides for a centralized Grievance Redress Mechanism (GRM) for the resolution of broad-ranging grievances from the public. This system draws on a publicly accessible online platform for the collection of grievances from residents across the country. The Portal allows any member of the public to submit a grievance, for the attention of various authorities within the various domains of local and central Government. The application for grievance resolution can target any authority within the hierarchy of executive Government. Upon initial review of the grievance statement by the target authority, the grievance is allocated to the most relevant local government authority (LGA) for further review and remedial action. In the event that resolution cannot be delivered by the most relevant LGA level, the grievance is cascaded higher along the administrative hierarchy, until an appropriate executive decision is provided by a competent authority.

Furthermore, the Law of the Republic of Uzbekistan № 378 “On Appeals of Individuals and Legal Entities” dated 3.12.2014 (as amended on 17.08.2017), provides a legal basis for communication between individuals and legal entities with state organizations as well as their officials. According to this Law, individuals and legal entities can send their grievances and appeals in any form (verbal, written, or electronic). Submitted appeals should be reviewed within 15 days from the date of receipt. If additional investigation is required, a response should be sent within one month.

## 3.2 Lenders Requirements

### 3.2.1 International Finance Corporation - Performance Standards

All of the IFC Performance Standards (PSs) include requirements for an amount of stakeholder consultation/engagement and therefore the Project will require a level of engagement. In particular, IFC Performance Standard 1 on “Social and Environmental Assessment and Management Systems” describes the stakeholder engagement requirements in more depth. It states the following:

*“Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project’s environmental and social impacts.”* Stakeholder engagement is an on-going process that may involve, in varying degrees, the following elements:

- Stakeholder analysis and planning;

- 
- Disclosure and dissemination of information;
  - Consultation and participation;
  - Grievance mechanism; and
  - On-going reporting to Affected Communities.

*The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project's risks and adverse impacts, and the project's phase of development."*

The IFC Performance Standards indicate that when Affected Communities are subject to identified risks and adverse impacts from a project, the developer/client will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them. Effective consultation is a two-way process that will:

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

### 3.2.2 Asian Development Bank

The Asian Development Bank (ADB) have established an Operational Manual and Policy Statement that includes the need for an amount of consultation, participation and stakeholder engagement. Both documents set out the applicable requirements the banks investment projects should fulfil in the potential receipt of finance.

#### **STAKEHOLDER ENGAGEMENT**

ADB Operational Manual on "Project Design and Preparation: Item C- Consultation and Participation" requires meaningful consultation to be carried out with affected people and the consultation processes to be appropriately documented in the EIA, IEE, resettlement plan and/or IPP as applicable to the project.

The Operational Manual requires that vulnerable groups have sufficient opportunities to participate in consultations.

ADB Safeguard Requirement 1 on Environment: Consultation and Participation states that the client will undertake "*meaningful consultation with affected people and other concerned*

stakeholders, including civil society, and facilitate their informed participation. Meaningful consultation is a process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues”.

The 2009 ADB Safeguard Policy Statement: requires “borrowers/clients to engage with communities, groups, or people affected by proposed projects, and with civil society through information disclosure, consultation, and informed participation in a manner commensurate with the risks to and impacts on affected communities”.

ADB Policy on Incorporation of Social Dimensions into ADB Operations requires social dimensions should be included in ADB operations to ensure the social development outcomes especially for the poor, vulnerable and excluded groups. These social dimensions include

- Participation;
- Gender and development
- Social safeguards and;
- Management of social risks especially among vulnerable groups.

In pursuing social development outcomes, ADB encourages consultation with and participation by stakeholders (including the government, executing and implementing agencies, clients and/or beneficiaries, people affected by ADB – supported projects); provides them with opportunities to engage in key stages of the country strategy formulation, programming and project cycles and actively seeks where appropriate, the cooperation of non-government organizations and other civil society groups in formulating, designing, implementing, monitoring and evaluating projects.

ADB Policy on Promotion of Engagement with Civil Society Organizations: requires proactive, meaningful and productive engagement with Civil Society Organizations (CSOs) should be undertaken to explore opportunities for increasing their involvement in the design and implementation of ADB Operations where appropriate.

### **GRIEVANCE REDRESS MECHANISM**

According to the ADB Safeguard Policy Statement (2009), the bank “requires that the borrower/client establish and maintain a grievance redress mechanism to receive and facilitate resolution of affected peoples’ concerns and grievances about the borrower’s/client’s social and environmental performance at project level. The grievance redress mechanism should be scaled to the risks and impacts of the project. It should address affected people’s concerns and complaints promptly, using an understandable and

*transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the affected people".*

ADB Safeguard Requirement 2 and Requirement 3 specifically requires the grievance mechanism to receive and facilitate the resolution of:

- Affected persons' concerns and grievances about physical and economic displacement and other project impacts, paying particular attention to the impacts on vulnerable groups (ADB Safeguard Requirement 2 on Involuntary Resettlement);
- Resolution of the affected Indigenous Peoples communities' concerns, complaints, and grievances (ADB Safeguard Requirement 3 on Indigenous Peoples).

### **ACCOUNTABILITY MECHANISM (2012)**

The Accountability Mechanism aims to offer an independent and effective platform for individuals negatively impacted by ADB-supported projects to express their concerns, seek solutions to their issues, and request a compliance review of alleged breaches by ADB of its operational policies and procedures that may have caused or could potentially cause them direct and significant harm.

The key change introduced in the 2003 to the Accountability Policy was the creation of two distinct yet complementary stages within the Accountability Mechanism:

- Consultation phase, which involves a Special Project Facilitator (SPF) to address the concerns of individuals impacted by ADB-funded projects using informal and flexible approaches; and
- Compliance review phase, which involves a Compliance Review Panel (CRP) to examine alleged breaches of ADB's operational policies and procedures that have caused or could cause direct and significant harm to affected people

### **3.2.3 European Bank for Reconstruction and Development**

All Projects financed by EBRD shall be undertaken to meet the requirements of the EBRD Environmental and Social Policy (2024) which includes ten (10) Environmental and Social Requirements (ESRs) for key areas of environmental and social sustainability that projects are required to meet, including ESR 10 on Stakeholder Engagement

The EBRD is committed to stakeholder engagement processes which are inclusive and on-going to manage Projects' E&S risks and impacts. The following elements are involved in stakeholder engagement: (i) stakeholder identification and analysis; (ii) stakeholder engagement planning; (iii) disclosure of information; (iv) meaningful consultation; (v) implementation of an effective grievance mechanism, and (vi) ongoing reporting to relevant stakeholders. The process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the project life.

An essential element in the stakeholder engagement process to ensure meaningful and effective consultation process, is the careful identification and consideration of the

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characteristics of relevant stakeholders, and the examination of their concerns, expectations, and preferences. ESR10 states “the client will identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantages or vulnerable”. Engagement with vulnerable groups should be appropriate, planned, and managed with special attention.

Furthermore, the EBRD requires that the project developer establishes and maintain an effective grievance mechanism proportionate to the Project risks and impacts, ensuring that any stakeholder concerns and grievances are received, handled in a timely manner. Project developers are also expected to monitor the effectiveness of engagement processes and the grievance mechanism. A SEP should also include provisions of stakeholder engagement for any changes during the Project lifecycle to ensure the disclosure of mitigations to stakeholders.

In addition, the EBRD has established an Independent Project Accountability Mechanism (IPAM). This mechanism is intended to:

- Help resolve social, environmental, and public disclosure concerns raised by Project-affected people and civil society organisations;
- Facilitate dialogue among Project stakeholders; and
- Assess whether the Bank has complied with its Environmental and Social Policy (ESP) a IPAM exists to address non-compliance with these policies and helps prevent future non-compliance by the Bank.

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## 4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder engagement can be described as the systematic method to understand and involve stakeholders and their concerns in project activities and decision-making processes. It identifies the appropriate approach to be used for consultation and information disclosure.

The SEP for the Project has been prepared to guide on-going stakeholder engagement during the construction and operational phase. The Stakeholders included in this plan include persons or groups that may be directly or indirectly affected by the project, as well as those that may have interest in the project and/or those that may influence the projects outcome either positively or negatively. These stakeholders may change over time and as such this plan will need to be updated as and when new stakeholders are identified, or the circumstances of stakeholders evolve.

### 4.1 Approach to Stakeholder Identification

A systematic approach to identify affected stakeholders has been used. The stakeholders identified have been classified into three categories:

- **Affected Stakeholders (A)** – those who can be potentially affected by one or more of the potential impacts of the project;
  - The affected stakeholders are individuals or group of people that might be potentially affected by the Project's environmental and social impacts either directly or indirectly. Potential environmental and social impacts of the Project to receptors (i.e. those outlined in Sub-section 2.8) have been assessed in the ESIA. Such impacts can directly or indirectly impact project stakeholders.
- **Interest-based Stakeholders (I)** – Stakeholders concerned with any of the procedures set by the Project, the Project's beneficiaries, national and international non-governmental organisations and the interested part of the civil society.
  - Interest-based stakeholders are groups or organisations that are not adversely affected by the Project but whose interests determine them as stakeholders. In addition, there are stakeholders outside the affected area, which can be identified through "interest-based" analysis. These are usually government authorities, NGOs and national, social and environmental public-sector agencies whose area of interest is related to the Project, or where such organisations are undertaking projects with communities in these areas.
- **Decision Making Stakeholders (D)** – those who are involved in the development of the project and its financing. In addition, this includes the regulators such as the MEEPCC.

The following Stakeholder Engagement matrix is presented based on these categories which also include vulnerable groups.

Most lenders consider vulnerable groups to include those people or groups of people who may be more adversely affected by project impacts than other by virtue of characteristics

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such as gender, gender identity, religion, ethnicity, indigenous status, age (including children, youths and the elderly), physical or mental disability, literacy, political views or social status.

Vulnerable individuals and/or groups may also include, but are not limited to, people in vulnerable situations such as people living below the poverty line, the landless, single-headed households, natural resource dependent communities, migrant workers, refugees, internally displaced people (IDPs), or other displaced persons who may not be protected through national legislation and/or public international law.

**Table 4-1 Stakeholder engagement matrix**

STAKEHOLDER GROUP	STAKEHOLDER BODY	RELEVANCE TO PROJECT: AFFECTED (A), INTEREST-BASED (I), OR DECISION MAKER (D)
<b>Directly affected stakeholders</b>	Residents in surrounding communities	<b>A:</b> Communities subject to E&S impacts from various project aspects.
	Local businesses	<b>A:</b> The closest businesses to Project boundaries subject to E&S impacts from various project aspects.
	Local educational facilities in the surroundings of the project	<b>A:</b> educational facilities are subject to E&S impacts from traffic, noise, and air quality emissions during the project lifecycle.
	Tepamasjid mosque	<b>A:</b> the mosque is at proximity to the project site within the IT Park complex, and hence is subject to E&S impacts from various project aspects.
	Project's construction workforce including the Project Company, EPC Contractor's, subcontractors and key supplier workers.	<b>A:</b> Direct Project related impacts during construction phase and potential labour issues.
<b>Indirectly affected stakeholders</b>	Other surrounding communities	<b>A:</b> Indirect Project impacts related to commodity price change, employment opportunities.
<b>Vulnerable groups</b>	<p>Vulnerable groups in the Project area (such as martyr families, unemployed youth, low-income families and women, female led households &amp; persons living with disabilities, women and elderly members of the community).</p> <p>While these have not been identified some are expected to exist within the project's surrounding communities.</p>	<b>A:</b> These groups may be disproportionately impacted by the Project impacts such as those relating to mobility, GBVH, spread of diseases, labour/economic exploitation etc.
<b>Local governmental authorities</b>	Makhalla leadership	<p><b>D:</b></p> <ul style="list-style-type: none"> <li>-Grass-roots administration and monitoring of development projects, and coordination with district administration.</li> <li>- Registration of community grievances.</li> </ul>
	District khokimiyat	<p><b>D:</b></p> <ul style="list-style-type: none"> <li>- District-level planning and administration of development projects.</li> <li>- Preparation of land-use proposals, approval of subsequent land-use plans, commissioning of cadastral registration of landholdings, and administration of Land Lease Agreements (LLAs).</li> <li>- Implementation of land expropriation for the Project.</li> </ul>

STAKEHOLDER GROUP	STAKEHOLDER BODY	RELEVANCE TO PROJECT: AFFECTED (A), INTEREST-BASED (I), OR DECISION MAKER (D)
	Regional Khokimiyat (the region of Tashkent)	<b>D:</b> Regional planning and administration of development projects.
<b>National Ministries, Departments, and Agencies (MDAs)</b>	Ministry of Digital Technologies	<b>I:</b> Public partner on this project.
	Ministry of Ecology, Environmental Protection and Climate Change (MEEPCC)	<b>D:</b> <ul style="list-style-type: none"> <li>-Execution of laws and regulations pertaining to environmental management.</li> <li>-Review of national EIA reports for planned project facilities.</li> <li>-Issue of environmental permits for construction and operation.</li> <li>-Follow-up monitoring of E&amp;S compliance.</li> </ul>
	MEEPCC - Regional Offices (for Tashkent Region)	<b>D:</b> General monitoring of E&S compliance during the Project's construction and operational phases.
	Mirzo Ulugbek District Emergency Department	<b>D:</b> <ul style="list-style-type: none"> <li>-Assess and monitor natural and man-made hazard risks</li> <li>-Coordinate emergency preparedness and response activities</li> <li>-Approve and inspect fire safety and emergency plans for projects</li> <li>-Conduct public awareness and safety education campaigns</li> <li>-Provide technical guidance during project development and construction</li> </ul>
	Toza Hudud	<b>A:</b> State waste management agency that is responsible for the provision of waste collection and management services within project-affected makhallas (communities).
	Committee on Industry, Radiation, & Nuclear Safety	<b>D:</b> <ul style="list-style-type: none"> <li>-Execution of laws and regulations pertaining to public health and safety.</li> <li>-Establishment of health and safety buffer zones.</li> <li>- Regular monitoring of E&amp;S compliance in relation to impacts on environment and public health and safety.</li> </ul>
	Ministry of Transportation – Regional and District Offices	<b>I:</b> Provision of information on the transport infrastructure within the project-affected areas, and execution of laws and regulations pertaining to the

STAKEHOLDER GROUP	STAKEHOLDER BODY	RELEVANCE TO PROJECT: AFFECTED (A), INTEREST-BASED (I), OR DECISION MAKER (D)
		operation and maintenance of related infrastructure (e.g., construction of crossings, upgrade or extension of existing roads, and traffic regulation).
	Cultural Heritage Agency – Regional Offices	<b>I:</b> Provision of information on tangible and intangible cultural heritage within the project-affected areas, and execution of laws and regulations pertaining to cultural heritage in Uzbekistan.
	Police	<b>D:</b> Provision of permits relating to night-time construction works.
<b>Project Lenders</b>	ADB, EBRD, and IFC	<b>D:</b> Providing project finance and a key interest in the project development and project success. Interest includes potential environmental and social risks.
<b>Media</b>	Regional and local media	<b>I:</b> Will potentially be involved in reporting on and disseminating information about the Project whether generally or in relation to E&S elements.
<b>Workers and workers organisations</b>	Project workers and employees (including EPC Contractor and subcontractors), intermediary agencies, trade unions.	<b>A:</b> Potential project related impacts during both construction and operation phase.

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## 5 PREVIOUS STAKEHOLDER ENGAGEMENT PROGRAMME

Certain stakeholder consultations for the Project were conducted during the Scoping and ESIA Stage.

### 5.1 Scoping Stage Stakeholder Engagement

DataVolt conducted several consultations with the local authorities for planning approval. The outcomes of the consultations, mainly in the form of formal response letters from government agencies. Based on the results of the consultations, DataVolt adjusted the project design according to the recommendations received from the agencies.

A summary of conducted scoping consultations provided in following table.

### 5.2 Stakeholder Consultations for the National EIA

According to the legislation in force in Uzbekistan (Annex 1 of Resolution of Cabinet of Ministries No541), dedicated public hearing meetings will be conducted for Project as a part of Stage I Preliminary Environmental Impact Assessment of National EIA stage, as current Project fall under Category I.

A public hearing session was conducted by the Ministry of Digital Technologies and a local consultant to inform the relevant stakeholders about the IT Park masterplan and the Project.

Specific information on this session has not been shared by the Ministry of Digital Technologies; however, the outcomes of this consultation were sufficient to enable approval and permitting of the National EIA by the regulatory authorities in Uzbekistan.

**Table 5-1 Overview of project stakeholders, and their respective engagement modes, consultation agenda and inputs**

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS TO DATE
National Ministries, Departments, and Agencies (MDAs)	Institute of Seismology	<b>D:</b> Provision of information about the seismic activities in Uzbekistan.	<ul style="list-style-type: none"> <li>Seismically active zones around the project location</li> </ul>	Letter	In the letter date 2nd July 2024, the administration of the Institute of Seismology informed the Project to implement the procedure for issuing scientific conclusions on earthquake resistance to buildings and structures planned to be built in the seismically active zone of the Republic of Uzbekistan No. 603 dated October 15, 2022, to objects planned to be built in the seismically active zone on" decision was confirmed. The Institute of Seismology informs that the engineer will carry out seismological research in the construction site on the basis of economic contracts.
	Mirzo Ulugbek District Emergency Department	<b>D:</b> -Assess and monitor natural and man-made hazard risks -Coordinate emergency preparedness and response activities -Approve and inspect fire safety and emergency plans for projects -Conduct public awareness and safety education campaigns -Provide technical guidance during project development and construction	<ul style="list-style-type: none"> <li>Request for a review of the project design.</li> </ul>	Letter	The Mirzo Ulugbek District Emergency Department confirmed the issuance of the main design and preliminary project documentation for the construction of the DataVolt building. The documentation has been reviewed and deemed compliant in accordance with Paragraph 4 of Resolution No. 200 (dated April 20, 2022) of the Cabinet of Ministers of the Republic of Uzbekistan and the administrative regulations for design and estimate documentation coordination via the "my.gov.uz" portal.
	Uzsuvtaminot	Development and operation of water supply and sanitation facilities.	<ul style="list-style-type: none"> <li>Enquiry about drinking water connection to the project site.</li> </ul>	Letter	The Project has requested to be connected to a drinking water supply. In the response letter, the agency recommends that the Project

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS TO DATE
					connect to the drinking water network via a 300 mm pipeline along Olimlar Street and a 1200 mm pipeline along Durmon Yoli Street.
	Sanitary and Epidemiological Welfare and Public Health Service of The Republic of Uzbekistan	<p><b>D:</b></p> <ul style="list-style-type: none"> <li>-Execution of laws and regulations pertaining to public health and safety.</li> <li>-Establishment of health and safety buffer zones.</li> <li>- Regular monitoring of E&amp;S compliance in relation to impacts on environment and public health and safety.</li> </ul>	<ul style="list-style-type: none"> <li>Sanitary protection zone for the project's buffer station.</li> </ul>	Letter	Further, the local ESIA consultant engaged with the Sanitary Epidemiological Service to enquire whether there are sanitary protection zones to be considered for the project's buffer station. The Sanitary Epidemiological Service confirmed that a buffer zone is required around the BESS station.
	Committee on Industry, Radiation, & Nuclear Safety	<p><b>D:</b></p> <ul style="list-style-type: none"> <li>-Execution of laws and regulations pertaining to public health and safety.</li> <li>-Establishment of health and safety buffer zones.</li> <li>- Regular monitoring of E&amp;S compliance in relation to impacts on environment and public health and safety.</li> </ul>	<ul style="list-style-type: none"> <li>Enquiry about the sanitary protection zone for the hydrogen buffer station.</li> </ul>	Letter	<p>The local EIA consultant engaged with the Sanitary Epidemiological Service and the Committee on Industry, Radiation, and Nuclear Safety to determine whether any sanitary protection zones should be considered for the Project's buffer station. In a letter dated September 2024, the Sanitary Epidemiological Service confirmed that for power lines with a capacity of up to 35 kV, as per the Project's design, a sanitary protection zone of 5 meters must be established.</p> <p>In a separate response from the Committee on Industry, Radiation, and Nuclear Safety, it was noted that the previously proposed hydrogen fuel cell storage—now removed from the Project scope—would have required strict adherence to applicable design, installation, and operational regulations due to the high associated risks.</p>

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS TO DATE
					As a result of the consultations with both agencies, the Project Company revised its design to exclude the hydrogen fuel cell component due to its potential risks. Additionally, the design was updated to comply with the regulatory requirements and recommendations provided by the competent authorities.
	Natural Gas Agency	<b>D:</b> Provision of gas connection	<ul style="list-style-type: none"> <li>Enquiry on gas connection to the site</li> </ul>	Letter	In the letter date July 2024, the agency confirmed that it is possible to connect the construction site to the natural gas supply system. The connection can be made using a medium-pressure gas pipeline with a diameter of 530 mm located on Durmon Yuli Street.
	Electricity Agency	<b>D:</b> Regulation of electricity connections and power connections.	<ul style="list-style-type: none"> <li>Enquiry on power connection through the UPLs to the project site.</li> </ul>	Letter	In the letter, the Electricity Agency informed the Project company needs to apply for a technical condition by submit the project document and technical document to Public Service Centre.
	Uzbektelecom	<b>D:</b> Provision of information on the telecommunication cables within the project-affected areas, and execution of laws and regulations pertaining to the security and relocation of underground cables.	<ul style="list-style-type: none"> <li>Enquiry on internet and telecommunication connections to the project site.</li> </ul>	Letter	In the response letter from the agency, the agency confirmed the availability of a high-speed internet connection of 10 Gbit/sec, both as a primary connection and a backup, for the specified address, which guarantees the speed and the quality of internet required for the data centre's operations. The agency invited the Project Company to their office to formalize the contract.
	Police	<b>D:</b> Provision of approvals relating to night works	<ul style="list-style-type: none"> <li>Request for the construction night works permit</li> </ul>	Letter	Request for the night-time works permit.
<b>Project Lenders (Fls)</b>	IFC, ADB, EBRD	<b>D:</b> Providing project finance and undertaking related due diligence over	Site visit and technical reviews and feedback to be provided through ongoing E&S due diligence.		

STAKEHOLDER GROUP	STAKEHOLDER	RELEVANCE CATEGORY	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUTS TO DATE
		the period of the financing agreement.			

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### 5.3 Media Coverage of the Project

The project launch and groundbreaking ceremony were covered in international and local news as the project is considered the first of its kind in the IT sector in Uzbekistan and Central Asia. Below is a list of the media sources that mentioned the project in articles and press releases.

**Table 5-2 Media coverage of the project**

TYPE OF MEDIA	NEWS SOURCE	LANGUAGE	DATE	BRIEF SUMMARY	REFERENCE
Website	Data Center Dynamics	English	9 <sup>th</sup> May, 2024	Project's groundbreaking ceremony	<a href="https://www.datacenterdynamics.com/en/news/datavolt-breaks-ground-on-data-center-in-tashkent-uzbekistan/">https://www.datacenterdynamics.com/en/news/datavolt-breaks-ground-on-data-center-in-tashkent-uzbekistan/</a>
Website	Euro News	English	12 <sup>th</sup> June 2025	Project's launch in Uzbekistan	<a href="https://www.euronews.com/next/2025/06/12/tech-could-be-green-sustainable-digital-infrastructure-is-being-built-in-uzbekistan">https://www.euronews.com/next/2025/06/12/tech-could-be-green-sustainable-digital-infrastructure-is-being-built-in-uzbekistan</a>
Website	Developing Telecoms	English	14 <sup>th</sup> May 2025	Announcement of the project	<a href="https://developingtelecoms.com/telecom-technology/data-centres-networks/16702-saudi-s-datavolt-to-invest-in-data-centres-across-uzbekistan.html">https://developingtelecoms.com/telecom-technology/data-centres-networks/16702-saudi-s-datavolt-to-invest-in-data-centres-across-uzbekistan.html</a>
Website	The Government Portal of the Republic of Uzbekistan	English	3 <sup>rd</sup> May 2024	Announcement of the project	<a href="https://gov.uz/en/digital/news/view/10951">https://gov.uz/en/digital/news/view/10951</a>
Website	The Government Portal of the Republic of Uzbekistan	English	21 <sup>st</sup> July 2025	Updates and news about the project progression	<a href="https://new.gov.uz/en/digital/news/view/70362">https://new.gov.uz/en/digital/news/view/70362</a>
Website	DataVolt (redirecting to AP News website)	English	8 <sup>th</sup> May 2024	Announcement of the project	<a href="https://data-volt.com/media/breaking-news/">https://data-volt.com/media/breaking-news/</a> <a href="https://apnews.com/press-release/ein-presswire-newsmatics/uzbekistan-artificial-intelligence-f78e9c1f48cf9140d7e19a323261c426">https://apnews.com/press-release/ein-presswire-newsmatics/uzbekistan-artificial-intelligence-f78e9c1f48cf9140d7e19a323261c426</a>
Website	UZ Daily	English	4 <sup>th</sup> May 2024	Announcement of the project's groundbreaking ceremony	<a href="https://www.uzdaily.uz/en/datavolt-starts-building-a-data-center-in-uzbekistan/">https://www.uzdaily.uz/en/datavolt-starts-building-a-data-center-in-uzbekistan/</a>
Website	Data Center Dynamics	English	20 <sup>th</sup> November 2024	Announcement of the project	<a href="https://www.datacenterdynamics.com/en/news/uzbekistan-to-build-carbon-free-data-center-with-saudi-partners/">https://www.datacenterdynamics.com/en/news/uzbekistan-to-build-carbon-free-data-center-with-saudi-partners/</a>
Website	First News Media	Russian	16 <sup>th</sup> November 2024	Statement of the Minister of Digital Technologies relating to the plan of	<a href="https://1news.az/news/20241116114940699-Uzbekistan-planiruet-sozdat-bezuglerodnyi-Data-tsentr-Ministr">https://1news.az/news/20241116114940699-Uzbekistan-planiruet-sozdat-bezuglerodnyi-Data-tsentr-Ministr</a>

TYPE OF MEDIA	NEWS SOURCE	LANGUAGE	DATE	BRIEF SUMMARY	REFERENCE
				constructing a carbon-free data centre.	
<b>Website</b>	Middle East Monitor	English	8 <sup>th</sup> May 2024	Announcement of the project and Saudi partners	<a href="https://www.middleeastmonitor.com/20240508-uzbekistan-partners-with-saudis-datavolt-to-build-green-data-centres/">https://www.middleeastmonitor.com/20240508-uzbekistan-partners-with-saudis-datavolt-to-build-green-data-centres/</a>
<b>Website</b>	WATE website	English	4 <sup>th</sup> May 2024	Announcement of the project's groundbreaking ceremony	<a href="https://www.wate.com/business/press-releases/ein-presswire/708893095/uzbekistan-initiates-construction-of-green-data-center-to-boost-it-sector/">https://www.wate.com/business/press-releases/ein-presswire/708893095/uzbekistan-initiates-construction-of-green-data-center-to-boost-it-sector/</a>
<b>Website</b>	WE Project	English	6 <sup>th</sup> September 2024	Collaboration with DataVolt to establish green data centres in Uzbekistan	<a href="https://weproject.media/en/articles/detail/why-uzbekistan-is-the-new-outsourcing-destination-and-how-it-park-can-help-foreign-companies-succeed/">https://weproject.media/en/articles/detail/why-uzbekistan-is-the-new-outsourcing-destination-and-how-it-park-can-help-foreign-companies-succeed/</a>
<b>Website</b>	Gazeta	English	14 <sup>th</sup> June 2025	Uzbekistan to adopt national AI ethics law by end of 2025. The article mentions that the IT Park is under construction.	<a href="https://www.gazeta.uz/en/2025/06/14/it-ai/">https://www.gazeta.uz/en/2025/06/14/it-ai/</a>
<b>Website</b>	The Economic Times	English	28 <sup>th</sup> January 2025	L&T appointed as EPC Contractor to construct the data centre.	<a href="https://economictimes.indiatimes.com/industry/indl-goods/svs/engineering/it-to-construct-uzbekistans-first-ai-enabled-sustainable-10-mw-data-center-in-tashkent/articleshow/117637776.cms?from=mdr">https://economictimes.indiatimes.com/industry/indl-goods/svs/engineering/it-to-construct-uzbekistans-first-ai-enabled-sustainable-10-mw-data-center-in-tashkent/articleshow/117637776.cms?from=mdr</a>
<b>Website</b>	AETOS Wire	English	29 <sup>th</sup> November 2023	Memorandum of Understanding (MOU) signed between Ministry of Digital Technologies, the Ministry of Energy and the Ministry of Investment, Industry and Trade of the Republic of Uzbekistan and DataVolt to	<a href="https://aetoswire.com/en/news/2911202336173">https://aetoswire.com/en/news/2911202336173</a>

TYPE OF MEDIA	NEWS SOURCE	LANGUAGE	DATE	BRIEF SUMMARY	REFERENCE
				develop green data centres in Uzbekistan.	
<b>Website</b>	Saudi ICT	Arabic	6 <sup>th</sup> December 2023	Memorandum of Understanding (MOU) signed between Ministry of Digital Technologies, the Ministry of Energy and the Ministry of Investment, Industry and Trade of the Republic of Uzbekistan and DataVolt to develop green data centres in Uzbekistan.	<a href="https://saudiict.com/%D8%B4%D8%B1%D9%83%D8%A9-%D8%AF%D8%A7%D8%AA%D8%A7-%D9%81%D9%88%D9%84%D8%AA-%D8%AA%D9%8F%D9%88%D9%82%D8%B9-%D9%85%D8%B0%D9%83%D8%B1%D8%A9-%D8%AA%D9%81%D8%A7%D9%87%D9%85-%D9%84%D8%AA%D8%B7%D9%88%D9%8A/">https://saudiict.com/%D8%B4%D8%B1%D9%83%D8%A9-%D8%AF%D8%A7%D8%AA%D8%A7-%D9%81%D9%88%D9%84%D8%AA-%D8%AA%D9%8F%D9%88%D9%82%D8%B9-%D9%85%D8%B0%D9%83%D8%B1%D8%A9-%D8%AA%D9%81%D8%A7%D9%87%D9%85-%D9%84%D8%AA%D8%B7%D9%88%D9%8A/</a>

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## 6 STAKEHOLDER ENGAGEMENT PROGRAMME

### 6.1 Engagement Methods

#### 6.1.1 Key Principles for Engagement

The following measures will be considered and implemented for all consultation and engagement processes under the SEP:

- Engagement will be inclusive and not be selective (e.g. avoiding stakeholders who may not be supportive of the project).
- Arrangements will be made to ensure that engagement sessions are accessible to the target stakeholder(s).
- Engagement sessions will be conducted in a culturally appropriate and sensitive manner for the relevant topic or target stakeholder(s).
- All engagement sessions will ensure confidentiality of information and consent from stakeholders to take part.
- Participants will be informed about the purpose of the consultation and how the information gathered would be used.
- Consent to signing attendance sheets (if applicable) will be sought. Participants will be informed about how this information will be used and to be given the option not to have their names disclosed.
- If meetings are to be recorded, participants will be informed in advance and their consent obtained. They will also be told how the recordings will be used and offered the option to decline being recorded.
- At the start of the meetings stakeholders will be encouraged to express their opinions without fear of retaliation.
- Engagement will be free of manipulation and coercion.
- Consultations for sensitive groups such as women will be conducted separately (and by a female social specialist) to allow them to voice their concerns and give feedback without fear of retaliation.
- Allegations of reprisals will be taken seriously, investigated, and addressed in coordination with DataVolt. Personal information will be kept confidential.
- Participants will be given the opportunity to provide written feedback at the end of the meetings if they are not comfortable sharing their views verbally.
- As applicable for documents or minutes that may be made public, personal or identifiable information in documents will be redacted.

#### 6.1.2 Stakeholder Engagement Methods

Based on the identified stakeholders and stakeholder groups, a combination of the following methods will be used as best suited to the stakeholder(s).

- **Letters, Phone calls and email** – These channels are suitable for engaging decision makers and interest-based stakeholders, primarily to notify them of the engagement and disclosure mechanisms;
- **Bilateral meetings** – Suitable to engage impacted and interest-based stakeholders as identified, to allow these stakeholders provide their views and opinions, and to notify them of the engagement and disclosure mechanisms.
- **Community Dialogues/Door-to-Door Consultations** – Open community dialogues for initial disclosure of Project information, introducing key concepts, consultation about E&S impacts and offering explanations regarding the Project.
- **Meetings with community leaders** – These can be informal meetings held with community leaders to foster positive relations and promptly address any concerns raised by the communities.
- **Online** – This method is useful for Interest-based Stakeholders for dissemination of broader information. For example, the engagement and disclosure mechanisms for the ESIA package. Similar information will also be made available on the websites of the lenders.
- **Training** – Dedicated training sessions for the workforce covering topics such as occupational health and safety, the Project's grievance mechanism committee, gender-based violence , and related issues.

### 6.1.3 Measures to Avoid Reprisal

Stakeholders must be able to provide their feedback, opinions and raise concerns without fear of retaliation (e.g., threats, intimidation, harassment or violence) to ensure meaningful engagement.

## 6.2 Engagement Programme

### 6.2.1 Post ESIA Engagement

#### **ONLINE DISCLOSURE OF ESIA PACKAGE**

The Project's ESIA package (Volumes 1, 2, 3 & 4) and this SEP will be disclosed on the DataVolt website and the lenders' website.

#### **HARD COPY DISCLOSURE OF NTS AND SEP**

Other hard copies will be made available locally at key locations accessible to the community. The table below provides the ESIA package public disclosure timetable.

#### **PUBLIC CONSULTATION SESSION**

DataVolt will conduct a one-time public consultation session where local communities are provided with an open invitation through the local makhalla office to attend.

The purpose of this session will be to introduce the stakeholders to the Project, provide an update on project construction status, timelines and an overview of the processes for National EIA and Lenders ESIA that have been undertaken. The key E&S impacts and mitigation measures that are being put in place during the construction phase and those that will be

implemented during operations will be explained. There will be an opportunity for feedback to be provided by attendees, which will be collected and reflected (as necessary) into the Project's SEP in case of required changes to on-going engagement.

Stakeholders will be informed about the GRM procedure and how complaints related to the Project can be raised and the process for response.

The session will be conducted at a local venue accessible to the nearby community and delivered in Uzbek. Attendees will be advised of the location of the online disclosed ESIA and hard copies at the local makhalla office.

**Table 6-1 Post ESIA Engagement**

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Disclosure of E&S documents	All identified stakeholder (impacted and interest-based including vulnerable groups).	Once agreed with the Lenders, the ESIA package and SEP will be fully disclosed online. The documents will be available on the website of DataVolt. Stakeholders will be able to comment or request additional information from DataVolt in regard to the ESIA and SEP. <b>Note:</b> It is understood that these documents may also be disclosed on Lenders websites.	Prior to Financial Close
	Residents in surrounding communities, Local businesses, Vulnerable groups in the Project area, Makhalla leadership	Hard copies of the ESIA NTS and SEP will be made available by DataVolt in Uzbek language at the local makhalla office, so that they are accessible to those may not have access to internet.	Prior to Financial Close
Public Consultation Session	Residents in surrounding communities, Local businesses, Vulnerable groups in the Project area, Makhalla leadership	One-time session at a local venue accessible to the nearby community, to introduce the Project, provide an update on project construction status, timelines and an overview of the processes for National EIA and Lenders ESIA that have been undertaken, as well as key mitigation. Disclosure of the GRM, how it can be accessed and how it will address received grievances will also be provided.	Prior to Financial Close

## 6.2.2 Construction Phase Engagement

**Table 6-2 Construction Stage Engagement**

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
Emergency Planning Communications	Makhalla leadership (Residents in surrounding communities – as applicable)	To advise the local makhalla leadership on potential emergency arrangements during the construction phase, particularly in relation to any reasonably foreseeable situations that could affect nearby communities, and to seek their feedback on how the plans can be improved.	Within 6 months from financial close

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
<b>Access to the GRM</b>	All identified stakeholder (impacted and interest-based including vulnerable groups).	Ensuring that the GRM (as outlined in the following section) is continued to be available and accessible to local communities throughout construction to receive grievances from communities.	Throughout construction

### 6.2.3 Operations Phase Engagement

**Table 6-3 Operational Stage Engagement**

ACTIVITY	STAKEHOLDERS	ENGAGEMENT METHOD	TIMING AND FREQUENCY
<b>Emergency Planning Communications</b>	Makhalla leadership (Residents in surrounding communities – as applicable)	To advise the local makhalla leadership on potential emergency arrangements during the operations, particularly in relation to any reasonably foreseeable situations that could affect nearby communities, and to seek their feedback on how the plans can be improved.	When drafting the operations phase 'Emergency Preparedness and Response Plan'
<b>Access to the GRM</b>	All identified stakeholder (impacted and interest-based including vulnerable groups).	Ensuring that the GRM (as outlined in the following section) is available and accessible to local communities throughout operations to receive grievances from communities.	Throughout construction

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## 7 GRIEVANCE REDRESS MECHANISM (GRM)

The GRM is an important part of stakeholder engagement and will be in place throughout Project implementation. It will use an understandable and transparent process that is culturally appropriate and readily accessible at no cost; so, all stakeholders/affected parties will have the opportunity to raise a complaint.

A grievance redress mechanism has been established by DataVolt for the Project to receive and facilitate resolution of affected stakeholders' concerns, complaints and grievances. The GRM included as part of this SEP takes into consideration the already established plan, while ensuring alignment with lenders' requirements.

### 7.1 Key Principles of Grievance Mechanism

The grievance mechanism for the Project will comply with the following principles:

- The purpose of the grievance mechanism procedure will be clarified at the outset;
- The process will be scaled to the risks and impacts of the Project;
- The process will be transparent and accountable to all stakeholders by putting it into writing, publicising it and explaining it to relevant stakeholders;
- The grievance mechanism will be made clear, understandable and easily accessible by providing information in the local language and orally where communities cannot read;
- Complaints or concerns will be rapidly resolved;
- The mechanism will not involve any costs nor retribution associated with lodging a grievance; and
- Precautionary measures such as clear non-retaliation policy, confidentiality measures and safeguarding of personal data collected in relation to a complaint, as well as an option to submit grievances anonymously will be in place.

### 7.2 Scope of Grievance Mechanism

The scope of the grievance mechanism is to evaluate and address stakeholders' complaints and concerns regarding project activities and environmental and social performance of the Project.

All relevant claims from affected stakeholders will be accepted and no judgment made prior to investigation, even if complaints are minor.

However, according to good practice, the following claims will be directed outside of Project-level mechanisms:

- Complaints clearly not related to the project based on assessment of its legitimacy;

- 
- Issues related to governmental policy and government institutions;
  - Complaints constituting criminal activity and violence, which will be referred to the justice system; and
  - Commercial disputes: Commercial matters will be stipulated for in contractual agreements and issues will be resolved through a variety of commercial resolution mechanisms or civil courts.

In the event that any of the grievances are rejected at the screening stage, the complainant will be informed of this decision including a justification why.

## 7.3 Steps in Grievance Mechanism Management

### 7.3.1 Publicising Grievance Management Procedures

The grievance mechanism will be publicised to include the following information:

- What Project-level mechanisms are capable of delivering and what benefits complainants can receive from using the company's grievance mechanism, as opposed to other resolution mechanisms;
- Who can raise complaints (i.e., all stakeholders);
- Where, when, and how community members can file complaints;
- Who is responsible for receiving and responding to complaints;
- What sort of response complainants can expect from the company, including timing of response; and
- What other rights and protection are guaranteed.

### 7.3.2 Means of GRM Disclosure

As highlighted in the Project Company's Grievance Mechanism Plan, the GRM will be publicised at the Project site through a grievance disclosure leaflet. The leaflet will be made available in Uzbek and English languages.

### 7.3.3 Submitting a Grievance

Stakeholders will be fully informed of their rights to the GRM and of the procedures for lodging a grievance, addressing it whether verbally or in writing in accordance with the process described in this chapter.

As per the Project Company's Grievance Mechanism Plan, grievances can be registered through filling in the grievance form, submitting the grievance at the entrance of the Project site, phone calls, emails, and other means used by the complainant.

Information about the availability and accessibility of the GRM will be communicated to the stakeholders during stakeholder meetings (outlined in the stakeholder engagement

programme) and the contact details posted at the entrance of the Project site and makhalla offices.

For illiterate complainants or those that prefer to submit their grievances verbally, they will have the possibility to meet with the GRM manager (or other management) who will take notes on the details of the complainant and read them out loud to the complainant to confirm that the key elements of the complaint have been captured.

If an anonymous grievance (e.g., letter or email without details about the complainant) or the grievant requests to remain anonymous is submitted, the grievance will also be accepted and processed.

### 7.3.4 Keeping Track of Grievances

Upon receiving grievances submitted by any means mentioned above, the steps below will be followed to ensure all grievances are adequately investigated in order to avoid leaving any issues or concerns raised opened.

- The grievance will be recorded in a form of register (Appendix A) by the Project Company's H&S Executive Manager. The register will contain:
  - Details of the grievance;
  - The personnel/division(s) responsible for resolving the grievance;
  - Process tracking fields (receipt dates, status, result dates);
  - Response provided to the complainant;
  - Corrective and preventive actions taken to prevent reoccurrence of such complaint; and
  - The grievances will be acknowledged as soon as possible (within three working days from receipt) by sending a formal confirmation with a complaint number and a timeline for response to the complainant to assure the complainant that the organization is responding properly.
- In cases of sensitive grievances, such as those involving multiple interests and a large number of affected people, where a more complex investigation is required, the complainant will receive an update within two weeks of the grievance being received, explaining the actions required to resolve the complaint, and the likely timeframe; and
- The Project Company will explain in the first letter of acknowledgment, which claims are clearly outside the scope of the mechanism and what alternative mechanisms stakeholders can use to address these potential issues.

### 7.3.5 Reviewing and Investigating Grievances

The review and investigation of grievances submitted to the Project will be the responsibility of DataVolt. DataVolt has appointed the H&S Executive Manager for handling grievances.

All grievances will be investigated within two weeks of submittal. Where grievances require a longer duration for investigation, the grievant will be informed of this delay and advised of the expected timeline for a response. Sensitive and complex grievances – such as those involving

multiple interests or community related conflict- will be submitted to the GRM Committee to support in the resolution. Additionally, a third-party may be involved but the complainants must be informed and agree to this approach.

### 7.3.6 Grievance Resolution Options and Response

The approach used in resolving various types of grievances will be different depending on the nature of the issue, frequency of occurrence and the number of grievances. Rather than prescribing a specific procedure for each particular type of complaint, the flexibility of the grievance mechanism will allow for resolution options appropriate for different types of grievances to be provided.

Resolution to the grievance will be communicated to the grievant either in written format or verbally depending on what format the grievant has selected as preferred, but in all cases a written record will be kept by the Project Company through a Grievance Resolution Form, as per the Project Company's Grievance Mechanism Plan.

In cases where the grievance/claim is rejected or there is no requirement for action, the Project GRM representative (s) will be diplomatic when informing the grievant about the outcome of the eligibility review process so as to prevent conflict from escalating.

Where the claim is accepted, a proposed solution will be provided and communicated to the grievant within a stipulated period. If the grievant does not accept the proposed resolution, the Project would re-assess the situation, discuss and clarify the finding with the grievant and make sure that all alternatives within the grievance mechanism are explored. If the grievant is still not satisfied with the proposed resolution, the grievant can take the dispute resolution mechanism outside of the established grievance mechanism (external mechanism).

**Note:** *The Project GRM does not replace any other available grievance mechanism including legal ones.*

Where a proposed solution is accepted or agreed upon by all parties involved, the case will be closed out and evidence that necessary actions have taken place will be collected. Such evidence includes:

- Conducting a meeting with the complainant to reach a collective agreement or get a confirmation and file it along with the case documentation to close out the claim; and
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how they were resolved.

Upon resolving the grievance, the Project Company's H&S Executive Manager will fill in the Grievance Closeout Form which will be communicated and countersigned by the complainant.

Where the grievant is not satisfied with the outcome of the proposed resolution, actions concerning further discussion and re-assessment shall be completed and advised within two weeks of notification of dissatisfaction by the grievant.

## 7.4 Grievance Redress Committee

The Project will establish a Grievance Redress Committee (GRC) to support in the resolution of sensitive and complex grievances that cannot be resolved at the Project level. The Committee will include representatives from local communities – including leaders and community members and women – as well as relevant local government agencies.

The purpose of the GRM Committee will be to:

- Support the Project in ensuring that complex and sensitive grievances are handled promptly and with transparency in line with the requirements in this SEP. This will include providing recommended corrective actions.
- Receive and register grievances submitted by community members and other stakeholders, and forward them to the GRM Personnel for further investigation and resolution.
- Ensuring that the Project informs complainants of the status and outcome of their cases.

The composition of the GRC will be determined but will likely include the following members:

- DataVolt representative;
- Makhalla leader representative; and
- Two members from each affected community, including at least one female.

## 7.5 Process Flow and Timeline

The process flow and timeline below will be followed as part of the GRM. Where complex grievances, or other factors are extending the investigation time, the Grievant will be informed of this delay and advised of an updated expected timeline for response.

**Table 7-1 Grievance process and timeline**

STAGE	TIMELINE
Grievance Received/Submitted	-
Grievance logged and acknowledged	Within three working days of grievance being submitted
Grievance investigated	Within 14 days of grievance being submitted
Proposed resolution conveyed to grievant	Within 14 days of grievance being submitted
<b>If applicable following dissatisfaction of resolution by Grievant</b>	
Actions to re-assess grievance/propose new solution/inform Grievant of final decision	Within 14 days of notification of dissatisfaction by the Grievant
In the event that a grievance cannot be resolved between the two parties a mediator will be involved i.e. local leaders who understand the culture and practices within the Project site.	Within 14 days of notification of dissatisfaction by the Grievant

STAGE	TIMELINE
Grievances that are not resolved at the Project level - a grievance committee involving senior management from DataVolt, municipality and any other relevant authorities (if required).	Within 30 days of notification of dissatisfaction by the Grievant

### 7.5.1 Grievance Mechanism Contact Details

The following details will be provided to the stakeholders in order to be able to submit their grievances or comments regarding the proposed Project.

**Table 7-2 ESIA Phase Grievance Mechanism Contact Details**

COMPANY	CONTACT DETAILS
<b>DataVolt</b>	Fariz Mammadov – H&S Executive Manager +988 94 024 52 84 f.mammadov@data-volt.com

## 7.6 Training

It will be critical that all the staff involved in the GRM process are provided with the necessary training to ensure compliance with the lenders' requirements. This should include security staff who will likely provide the interface between the project and communities.

The training provided will include:

- The key principles of the GRM and management of grievances.
- How to correctly receive, and document the grievances including the use of the grievance forms, verbal complaints, anonymous submissions.
- How to handle and resolve complaints in line with the lenders' requirements. This will include steps on how to assess, categorize, and escalate grievances, timelines for response and resolution. This will also include how complex grievances will be handled.
- How to remain impartial and build trust during the process of receiving and resolving grievances.
- How to maintain the grievance log, track complaints status, ensure follow-up, collection of evidence etc.
- How to ensure data privacy and confidentiality.
- How to explain the GRM process to community members and other stakeholders and encourage its use.

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## 8 IMPLEMENTATION PLAN

### 8.1 Roles and Responsibilities

#### 8.1.1 DataVolt

- Provide details and information about the proposed Project for disclosure to stakeholders.
- Participate in stakeholder engagement meetings.
- Ensure there is a staff representative to participate in the resolution of grievances, and provide their contact information in the SEP.
- Implement the grievance complaint tracker system to monitor the type of complaints received, details of complainants, and the status of each grievance. This will be undertaken in coordination with the ESIA consultant.
- Translating grievance responses, as needed, before sending them to the complainants.
- As required, establish the GRC. This will also include providing the training and ensuring members of the GRC sign the confidentiality agreements.
- Ensuring that sufficient resources are allocated for the effective implementation of this SEP.

#### 8.1.2 GRM Committee

- Support the Project in ensuring that complex and sensitive grievances are handled promptly and with transparency in line with the requirements in this SEP.
- Receive and register grievances submitted by community members and other stakeholders, and forward them to the GRM Personnel for further investigation and resolution.
- Provide recommended corrective actions for the grievances submitted to the Committee.
- Ensuring that the Project informs complainants of the status and outcome of their cases.

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## 9 REVIEW

As stated herein, the SEP is a living document and should be updated to reflect the outcomes of stakeholder engagement as relevant. This may include:

- Summary of consultations undertaken and the key outcomes;
- Updates to the stakeholder matrix, if required;
- Updates to the stakeholder engagement methods/approach, if required; and
- Updates to grievance mechanism, based on initial findings from implementation, success/failure or other feedback etc.

## APPENDIX A – GRIEVANCE TRACKER TEMPLATE

GRM NO	DATE	NAME OR GRIEVANT	REQUEST TYPE	REQUEST NATURE	TEXT OF APPLICATION	ACKNOWLEDGEMENT ON RECEIPT	PROVIDED RESPONSE	DATE OF RESPONSE	REQUESTED FOLLOW UP	GRIEVANCE STATUS	FOLLOW UP (IF REQUESTED)	HAS GRIEVANCE BEEN REPEATED (Y/N)	SATISFACTION BY APPLICANT (YES/NO)

## APPENDIX B - EXAMPLE OF GRIEVANCE FORM

<b>GRIEVANCE FORM</b>	
<i>To be used for grievance(s) only. Shall not be used to raise comments, suggestions, or/and inquires or any other matters</i>	
<b>INSTRUCTIONS</b>	Please fill in this Grievance form in clear handwriting and submit through one of the following means: <ul style="list-style-type: none"> <li>- Directly to the H&amp;S Executive Manager:</li> <li>- By email to:</li> <li>-</li> </ul>
<b>Full Name</b>	First Name:
	Last Name:
	<input type="checkbox"/> I wish to raise my grievance anonymously ( <i>You can remain anonymous if you prefer but we will not be able to contact you with a response to your concern</i> )
<b>Contact Information</b> Please mark how you wish to be contacted (mail, telephone, e- mail).	<input type="checkbox"/> By Post: <i>Please provide mailing address:</i>
	<input type="checkbox"/> By telephone:
	<input type="checkbox"/> By email:
<b>Preferred Language of Communication</b>	<input type="checkbox"/> Uzbek
	<input type="checkbox"/> English
	<input type="checkbox"/> Other language
<b>Description of Incident/Grievance</b>	<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>
<b>Date of Incident/Grievance</b>	<input type="checkbox"/> One-time incident/grievance (date...)
	<input type="checkbox"/> Happened more than once (how many times?)
	<input type="checkbox"/> On-going (currently experiencing problem)
<b>What would you like to see happen to resolve the problem?</b>	
<b>Signature:</b>	
<b>Date:</b>	

## APPENDIX C - EXAMPLE OF GRIEVANCE RESOLUTION FORM

<b>GRIEVANCE RESOLUTION FORM</b>	
<i>To be used for the resolution of grievance(s) only. Shall not be used to raise comments, suggestions, or/and inquires or any other matters</i>	
How was the grievance received	<input type="checkbox"/> Grievance box: <i>specify which box</i>
	<input type="checkbox"/> Direct contact with the H&S Executive Manager
	<input type="checkbox"/> By telephone:
	<input type="checkbox"/> By email:
Grievance reference number	
Date of Incident/Grievance	<input type="checkbox"/> One-time incident/grievance (date...)
	<input type="checkbox"/> Happened more than once (how many times?)
	<input type="checkbox"/> On-going (currently experiencing problem)
Has the grievance been resolved?	<input type="checkbox"/> Yes
	<input type="checkbox"/> No: <i>provide a justification below on why the grievance has not been resolved</i>
<b>Section A: fill out either Section A or B of this form</b>	
Summary of the actions undertaken to resolve this grievance	
Date of implementation	
<b>Section B: fill out either Section A or B of this form</b>	
Summary of proposed actions to be implemented to resolve the grievance	
Timeline for implementation	
Signature	H&S Executive Manager:
Date	

## APPENDIX D - EXAMPLE OF GRIEVANCE CLOSEOUT FORM

<b>GRIEVANCE CLOSEOUT FORM</b>	
<i>To be used for the resolution of grievance(s) only. Shall not be used to raise comments, suggestions, or/and inquires or any other matters</i>	
<b>Grievance reference number</b>	
<b>Date of submission of the grievance</b>	
<b>Section A: fill out either Section A or B of this form</b>	
<b>Date of communication of the resolution for this grievance</b>	
<b>Has the grievance been resolved?</b>	<input type="checkbox"/> Yes
	<input type="checkbox"/> No: <i>provide a justification below on why the grievance has not been resolved</i>
<b>Section A: fill out either Section A or B of this form</b>	
<b>Summary of the actions undertaken to resolve this grievance</b>	
<b>Date of implementation</b>	
<b>Section B: fill out either Section A or B of this form</b>	
<b>Summary of proposed actions to be implemented to resolve the grievance</b>	
<b>Timeline for implementation</b>	
<b>Section C: Signatures and Dates</b>	
<b>Signature</b>	H&S Executive Manager:
<b>Date</b>	
<b>Signature</b>	Complainant:
<b>Date</b>	