



EGYPT ELECTRICITY GRID REINFORCEMENT PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)

Project: P162019

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QUALITY CONTROL

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1. INTRODUCTION

This Stakeholder Engagement Plan (SEP) describes the suggested approach for the Egyptian Electricity Transmission Company's (EETC) (the “Sponsor” or the “Company”) Egypt Electricity Grid Reinforcement Project for interacting with the identified stakeholders and disclosing of relevant project information.

Engagement with stakeholders is an ongoing process, which applies to the entire period of the implementation of the project. The SEP includes a strategy to provide timely, understandable (in the form and language) and appropriate information to stakeholders and ensure that these stakeholders have the opportunity to express their views and make comments, and obtain timely and adequate responses to their concerns and expectations.

1.1 Project Background

EETC is planning to reinforce its electricity grid by constructing six new substations and upgrading three existing substations, including their associated overhead transmission lines (the “Project”) (Table 1-1).

The Project is part of the Egyptian national grid strengthening plan to help optimise power flows and reduce transmission losses in these areas. The Project is also intended to connect the new renewable energy plants (such as that planned for Nile West) and improve the overall energy efficiency and carbon footprint of the power sector in meeting the expected increase in energy demand in the next 5-10 years.

The EBRD is considering the finance of the Project and according to the EBRD's Environmental and Social Policy (ESP) (2014), the Project is categorized as “B”. This SEP has been prepared by ENVI-SAGE in accordance with EBRD's Performance Requirements.

Table 1-1 Project Substations

Substation	Location	New/Existing
Abo Rudeis	South Sinai, Egypt	Existing
Al Tor	South Sinai, Egypt	Existing
Belbeis	Sharkia, Egypt	New
South Port Said	Port Said, Egypt	New
San El Hagar	Sharkia, Egypt	New
Dashlout	Assiut, Egypt	New
Nile West	Menya, Egypt	New
Malawy West	Menya, Egypt	Existing
Bernisht	Giza, Egypt	New

2. STAKEHOLDER ENGAGEMENT REQUIREMENTS

The stakeholder engagement activities presented in this SEP will be conducted in accordance with:

- Regulatory requirements of Egypt; and
- EBRD's policy requirements on information disclosure and stakeholder engagement (PR 10).

2.1 Regulatory Requirements of Egypt

The Project is classified as a Scoped B project, and therefore does not require any stakeholder engagement activities to be undertaken under Egypt's Law 4/1994 prior to construction.

During operations, disclosure of information about working regulations to workers and employees is a requirement under Labour Law 12/2003. Article 48 indicates that the organization should develop a clear internal HR Policy, which organizes the working regulations including day offs, break times and other regulations. Relevant information should be clearly disclosed to workers in their mother language. Article 95 indicates that working regulations for women should be publicly disclosed for all workers. Article 102 indicates that working regulations for children under 16 should be clearly disclosed to all workers.

2.2 EBRD's Requirements for Stakeholder Engagement

EBRD's Environmental and Social Policy (ESP) (2014) considers public involvement an integral part of any business and corporate responsibility in relation to the public, and a way to improve the quality of projects. In particular, EBRD's PR 10 requires stakeholder engagement in the process of the project's development including the following:

- **Stakeholder Identification.** The first step to be made by the Project initiator to ensure successful relations with stakeholders is the identification of various individuals or groups who (a) are affected or will be affected directly or indirectly by the Project implementation or (b) can be interested in the Project ("other interested parties"). The Project proponent shall also identify whether vulnerable groups may be affected disproportionately by planned activities.
- **Stakeholder Engagement Plan.** The Project initiator will develop a plan defining a procedure for relations with the identified stakeholders at different stages of the Project preparation and implementation, including an appropriate grievance mechanism.
- **Information disclosure.** Information disclosure practices are built into the stakeholder engagement process as they help affected parties and other stakeholders embrace risks, impacts and benefits of the Project. PR 10 emphasizes the necessity to disclose information in the local language(s).
- **Meaningful consultations.** If the construction personnel and/or groups of the population are (or can be) exposed to significant risks or undesirable impacts by a project, the Project initiator should conduct consultations in a culturally appropriate and meaningful manner, with the objective of providing an opportunity for the affected parties to express their comments about the risks and impacts associated with the Project and relevant mitigation measures, as well as permit the Project initiator to consider such comments and respond to them.

Performance Requirement 10 also emphasizes on the necessity of continuous reporting to identified stakeholders during the Project's implementation. The proponent has to report additional adverse impacts and significant alterations to planned activities should they occur. If such impacts and alterations are significant, the proponent may need to carry out additional information disclosure and consultation.

Additionally, PR 10 sets the requirement to develop a fully-functioning grievance mechanism in order to be aware of and respond to stakeholder questions, comments and concerns.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholders are identified as individuals, groups, or organizations who:

- May be directly or indirectly, positively or negatively impacted by the Project
- May be interested in the Project, have environmental and social interests that may be impacted in the course of the Project, or may potentially influence Project decision-making and implementation in certain ways.

The following list includes the potential primary and secondary stakeholders of the Project that have been identified. Primary stakeholders are those whom are directly affected by the Project (either positively or negatively), while secondary stakeholders are those who are indirectly affected by the Project (either positively or negatively).

Table 3-1 Identified Stakeholders

Stakeholder	Description	Stakeholder Group Relevance / Importance of the Stakeholder to the Project
Primary Stakeholders		
Directly affected communities <i>(Special Emphasis on Communities Residing Immediately Adjacent to the Belbes and San el Hagar Substation Sites)</i>	Settlements within 1 km from Project activities Land owners (in the case of overhead transmission lines)	Local population residing within 1 km from the proposed Project's substation sites who may be positively or negatively impacted by the Project
EBRD	Project lender	Potentially providing finance for the Project. Set environmental and social requirements for the Project to abide by
Economically Interested parties (Business)	Neighbouring farms/land owners	These are existing farms and land owners located adjacent to the Project sites
	Local vendors and suppliers of goods and services	These people own businesses that may benefit from the Project's activities, especially during the construction phase
Main Contractor(s)	Engineering, Procurement and Construction Firms	These are the contractors who will be responsible for constructing the Project
Government	Egyptian Electricity Transmission Company (EETC)	EETC is the Competent Administrative Authority responsible for submitting the EIAs for the Project EETC will directly influence the Project's impact being the primary decision maker
	Ministry of Electricity and Energy (MoEE)	MoEE is in charge of electricity and energy related issues.
	Ministry of Agriculture and Land Reclamation (MARL)	Responsible for determining compensation needed for land owner crop damage (in the case of overhead transmission lines trespassing private properties)
	New and Renewable Energy Authority (NREA)	NREA is the national focal point for expanding efforts to develop and introduce renewable energy in Egypt and entrusted to plan and implement renewable energy programs in coordination with other concerned national and international institutions
	Ministry of Investment and International Cooperation (MIIC)	MIIC is responsible for facilitating investment opportunities in Egypt
	Egyptian Environmental Affairs Agency (EEAA) – including local EEAA office	Responsible for approving and/or rejecting EIAs on environmental grounds. Also responsible for monitoring the Project's environmental performance during construction and operation

Stakeholder	Description	Stakeholder Group Relevance / Importance of the Stakeholder to the Project
	Ministry of Interior	Responsible for national and local security, as well as approving emergency response and fire-fighting plans for establishments/projects
	Governorates/City Councils	Responsible for issuing several permits for the Project to proceed
	Local Labour Offices	Responsible for monitoring conditions of the workplace and mediating any conflicts between workers and management
	Civil Defence Departments	Responsible for approving emergency plans
Secondary Stakeholders		
Academia	Research Institutes	Research centres, consultancy firms, and experts are academic and technical entities, which support in conducting studies and providing technical training to various target groups
	Consultancy firms	
	Experts	
External Entities	Media	Reporters, journalists, and television and radio programmers broadcasting information about the Project

4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1 External Stakeholder Engagement Activities

EETC has not undertaken external stakeholder engagement activities for the current Project to date. A summary for the Project was published on the EBRD's official webpage in May 2018. However, the Project's scope/concept has changed since then.

4.2 Internal Stakeholders Engagement Activities

No documented information on previous internal stakeholder engagement activities is available. However, according to EETC engagement activities with workers/staff are in the form of staff meetings and emails.

4.3 Future Stakeholders Engagement Activities

Future stakeholder engagement activities will record the following information on an on-going basis:

- Type of information disclosed, in what forms (e.g. oral, brochure, reports, posters, radio, newspapers etc.), and how it was released or distributed;
- Locations and dates of any meetings undertaken to date;
- Individuals, groups, and / or organisations consulted;
- Key issues discussed and key concerns raised;
- Response to issues raised, including any commitments or follow-up actions; and
- Process undertaken for documenting these activities and reporting back to stakeholders.

The stakeholder engagement records table will be kept up to date on all public consultation and information disclosure that is undertaken for the current Project.

5. DISCLOSURE OF INFORMATION

Disclosure of information and further proper communication with the stakeholders is an important measure to identify issues that could affect project development or environmental or social issues that should be taken into account to meet Good International Practice (GIP). Disclosure of Project related information will be arranged following the legal requirements as well as the international standards of project development.

The disclosure of Project related information is required by law in the following circumstances:

- Requirements of the labour law during construction and operation; and
- In reaction to requests of the environmental control authorities if significant breaches of the environmental law or permit conditions were indicated by such authorities.

EETC will strictly follow legal requirements for disclosure of information. In addition, EETC will disclose environmental and social information and inform interested stakeholders on the Project development.

A non-technical summary (NTS), a list of administrative decisions related to the Project and annual project-related reports will be published on the Company's website (<http://www.eetc.net.eg/>). The NTS will be made available in hard copy at EETC's head office located in Cairo, Egypt. Communication with the organizational stakeholders will be conducted following the existing routines and procedures. The communication channels comprise regular meetings, reporting and day-to-day exchange of information via personal or mail contacts at different organizational levels between the involved parties. Meetings may also be arranged on request.

Disclosure of information to the government stakeholders will be based on formal notifications, applications and reporting – all usually done via fax or post mail. The formal communication regarding environmental issues, as well as other issues including development and health and safety subjects, will be conducted by EETC as formally responsible for social and environmental performance of the Project's development.

Internal stakeholders (workers/employees) will be informed using the internal communication channels. It is important to apply different methods and communication channels such as: periodical meetings, announcements, information letters and notifications posted on bulletin boards, trainings and flow of information through the management chain.

A communication officer will be assigned (or one of the existing employees assigned these responsibilities) for documenting the communication activities targeting workers.

6. STAKEHOLDER ENGAGEMENT PROGRAM

The type of information disclosed and the specific method of communication to be undertaken by EETC for the Project are summarised in Table 6-1 below. The objective of engagement is to provide local communities that are directly affected by the Project and interested stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.

Table 6-1 Future Stakeholder Engagement

Stakeholder	Communication method	Information to be disclosed	Objective	Language	Timeframe	Responsibility
Internal Stakeholders						
EETC Workforce	Email Bulletin boards Staff meetings Contracts Company website Fax	Schedule of preparation and construction HR Policy Environmental and social management plan Communication of grievance mechanism Working hours Annual E&S Performance Report	Familiarize workforce with company's policies Comply with company's environmental and social management system (ESMS) Address complaints in a transparent and appropriate manner	Arabic	Prior to and during construction During operation	Project Implementation Unit Site Engineers HSE Officer Grievance Mechanism Focal Point
Contractors/suppliers/casual workforce	Contracts Email Meetings Telephone Company website Fax	Schedule of preparation and construction HR Policy Communication of grievance mechanism Environmental and social management plan Sample employment contract Working hours Annual E&S Performance Report	Familiarize workforce with company's policies Comply with company's environmental and social management system (ESMS) Avoid violations of Egyptian environmental and social laws and regulations Address complaints in a transparent and appropriate manner	Arabic	Prior to and during construction During operation	Project Implementation Unit Site Engineers HSE Officer Grievance Mechanism Focal Point
External Stakeholders						
EBRD	Company website Email Meetings Telephone Company website	Reporting on construction progress Major incidents/non-compliances with EBRD's ESP (2014) EIAs for high voltage overhead transmission lines Annual E&S Performance Report	Meet the monitoring and reporting requirements of the EBRD	English	Bi-annual In the event of major incidents/non-compliances During operation	Project Implementation Unit

Stakeholder	Communication method	Information to be disclosed	Objective	Language	Timeframe	Responsibility
Settlements within 1 km from substation site Land owners <i>(Special emphasis to be placed on local communities residing immediately adjacent to the substation locations of Belbes and San el Hagar)</i>	Meetings Fax Post Mail Email Local Media (newspapers, radio, etc) Construction signs and warnings	Project Non-Technical Summary (NTS) Grievance mechanism Schedule of preparation and construction Outline of construction and operation environmental and social impacts and proposed mitigation measures Compensation procedures for land owners on which overhead transmission lines will pass Livelihood Restoration Plan (only if applicable)	Familiarize local communities with company's policies Provide access to grievance mechanism Address complaints in a transparent and appropriate manner	Arabic	Prior to and during construction During operation	Project Implementation Unit Site Engineers Grievance Mechanism Focal Point
EEAA	Formal meetings Post mail Fax	EIA - anticipated construction and operation impacts and mitigation measures Environmental register	Obtaining environmental approval Comply with Law 4/1994	Arabic	Prior to construction	Project Implementation Unit
Labour Office	Formal meetings Post mail Fax	Bi-annual health and safety statistics Employment needs and opportunities	Complying with Law 12/2003	Arabic	Bi-annual	HSE Officer
Governorates/City Council	Formal meetings Post mail Fax	Schedule of preparation and construction Documentation required for permitting	Obtaining required permits	Arabic	Prior to construction	Project Implementation Unit
Media/Academia	Company website Newspapers Online social media platforms Newsletters Brochures TV/Radio broadcasts	Disclose project design plans and high level Project environmental and social impacts and mitigation Construction progress	Inform the public about potential environmental and social impacts and mitigation measures in place Inform the public about the Project's ongoing progress	English Arabic	During construction	Project Implementation Unit

7. GRIEVANCE MECHANISM

The grievance mechanism procedures aim to address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all workers, and at no cost and without retribution. The procedure described in this document is extended to all workers onsite, including permanent workers, casual workers, service providers, consultants, suppliers, subcontractors and external stakeholders. The grievance mechanism is a participatory tool for the internal and external stakeholders, while it is a mandatory process for EETC.

The grievance mechanism will deal with suggestions, concerns, and grievances related to any issues arising from Project specific activities. The grievance mechanism is not designed to obstruct access to other judicial or administrative processes that are available under Egyptian law.

EETC's focal point for implementing the grievance mechanism will inform all Project workers (including non-employee workers) and community members of the grievance procedure (see below) from the beginning of the EIA process and during construction via public leaflets, public notices, webpages and/or during toolbox talks and inductions, and report regularly on its implementation, while always protecting the privacy of affected individuals. Handling of grievances will be done in a discreet, objective, sensitive and responsive to the stakeholders' (i.e. workers) needs and concerns. The mechanism will also allow for anonymous complaints to be raised and addressed.

The focal point managing the grievance mechanism will be responsible for:

- Receiving queries, interventions and grievances from the workers or the surrounding community;
- Inspections in the locations to which grievances were addressed, analysis of the received queries; and
- Responding and maintaining further communication.

EETC's focal point will inform all Project workers of the grievance procedure during toolbox talks and inductions, and report regularly on its implementation, while always protecting the privacy of affected individuals. Handling of grievances will be done in a manner which is discreet, objective, sensitive and responsive to the stakeholders' needs and concerns. The mechanism will also allow for anonymous complaints to be raised and addressed.

EETC will disclose its grievance mechanism on all Project sites for external stakeholders (**with an emphasis on community members residing immediately adjacent to Project sites and who have limited access to the internet**) during meetings and various other communication channels (leaflets, telephone, etc.). EETC may consider adding a feature to their webpage allowing external grievances to be submitted online, where they will be directed to the focal point.

EETC's procedure for grievances will be as follows:

Step 1: Informal Discussion

EETC encourages all workers (including non-employee workers) and community members to attempt to resolve all disagreements or disputes informally first. This can be achieved by talking directly to a manager and/or supervisor. This allows for the potential to resolve the dispute in a faster manner and avoid escalation. Should the complainant feel that they do not wish to talk to a direct manager and/or supervisor, or if the dispute has not been resolved, they may also informally approach EETC's focal point for the grievance mechanism who may arrange for an informal meeting/discussion to resolve the issue.

Step 2: Formal Grievance

In the event that informal discussions were not successful in resolving the issue, the complainant may file a formal complaint, anonymously or non-anonymously, through the completion of a grievance form (to be available in Arabic and English) (**Annex 1**) which can be found in grievance/suggestion boxes in several locations across Project sites, including strategic locations for community members. EETC's focal point will check grievance boxes every ten days. Once a grievance has been received, the focal point will make sure it is recorded in a grievance register (**Annex 2**), noting that there will be two separate registers for internal and external grievances. The focal point will be required to acknowledge the grievance within seven days

and inform the complainant (if non-anonymous) either verbally or in writing of having received the complaint and next steps. If it is an anonymous complaint, the focal point will ensure that all relevant departments are notified of the issue for necessary action to be taken. If it is a non-anonymous complaint, the focal point will contact the complainant directly, and if necessary personnel from the relevant department(s), in order to resolve the issue.

A response or resolution to all complaints shall be provided within 15 working days either directly to the complainant in the case of non-anonymous complaints or during a toolbox talk to all workers onsite for anonymous complaints. Responses or resolutions for non-anonymous community/external complaints will be posted on external notice boards at Project sites.

Step 3: Appeal

If the complainant is not satisfied with the response or resolution provided by the focal point, he/she will have the right to let the focal point know. A hearing with a more senior manager onsite will be arranged within a defined period of time. The complainant will have the right to be accompanied by another individual (in the case of a community member) or a colleague and/or worker's representative (in the case of a worker). The senior manager will be required to provide the complainant with a decision within a predetermined period.

Step 4: Escalation to Labour Office (For Workers Only)

In the event that the issue/dispute cannot be resolved by EETC, the complainant can file their complaint with the local labour office and/or resort to other judicial or administrative processes that are available under Egyptian law.

Step 5: Third Party Involvement: Independent Mediation or Arbitration (For Land Owners Affected by Overhead Transmission Lines Associated with the Project)

Grievances related to land acquisition and/or livelihood restoration will be managed separately by EETC from other community grievances. Egyptian laws and regulations governing compensation for land acquisition will be the primary recourse in such cases. However, in the event that a complainant is dissatisfied with the outcomes, EETC will allow for a second tier of grievance management with a degree of independence. The second tier grievance management can include mediation or arbitration. If a resolution still cannot be reached, either EETC or the complainant can resort to the Egyptian justice system.

EETC will also inform local authorities of the grievance mechanism and provide them with contact details on which grievances can be submitted.

All grievances should be addressed to the focal point whose contact details are as follows:

Ms. Eng. Rasha ElSherbiny

Address: Emtedad Ramsis St. †ABBASSEYA †Al Waili, Cairo Governorate

Telephone: +20 227 360 429

Email: rasha.elsherbiny73@hotmail.com

8. MONITORING AND REPORTING

This SEP shall be periodically revised and updated as necessary during Project implementation and as a minimum prior to the operation any of the substations. This will help ensure the validity and adequacy of the information presented herein, and that the identified methods of engagement remain appropriate in relation to the legislative requirements or standards and specific activities of the Company. Any major alterations to the Company activities shall be duly reflected in the SEP in future.

The focal point shall compile quarterly summary reports for the Project Implementation Unit on all of the engagement activities held by the Company during the reporting period. The report shall include:

- Summary of engagement activities with local communities, entities and non-governmental organizations;
- Summary of contacts with authorities and nature of such contacts;
- Summary of press statements released and other contacts with media (e.g. interviews or TV entries regarding the Company);
- Number of grievances received, their nature and progress on their resolution if appropriate corrective measure were agreed to be taken.

The Company shall also report biannually on progress on environmental and social performance, which shall include a description of engagement activities and effectiveness of the grievance mechanism.

9. RESOURCES AND RESPONSIBILITIES

This SEP will be implemented by the focal point/Project Implementation Unit, whose main responsibilities will be:

- Provision of responses to the queries from the public, authorities, media and non-governmental organizations;
- Ensuring timely approvals and dissemination of responses and satisfaction on grievances closure;
- Control over implementation of the corrective actions addressing the grievances of third parties;
- Regular monitoring of the effectiveness of the mechanism of interaction with stakeholders;
- Grievance mechanism administration, including collection, registration, keeping of the grievance database, keeping up with the deadlines set for response, sending mail responses and posting information on information boards;
- Managing information for public disclosure at the Company's website;
- Participation in discussions of grievance responses and disputes resolution;
- Arranging and managing public consultations when necessary;
- Regular communication with local and regional media, including ensuring that press statements with update on the Company's activities progress are delivered to major newspapers, TV channels, radio stations and Internet-based media;
- Assistance in the annual report preparation and the environmental and social action plan implementation;
- Regular implementation and update of this SEP; and
- Report on SEP implementation progress to the Project Implementation Unit.

The Company's contact information, namely e-mail, phone and address of the head office, shall be available to the key stakeholders.

The focal point and Project Implementation Unit are also in charge of internal communication with personnel, including collection of internal grievances from workers of the Company and its subcontractors/suppliers. The contact details for the focal point, namely office address, e-mails and phone numbers, shall be made available to the Project workforce, including contractors' personnel.

ANNEX 1 SAMPLE GRIEVANCE FORM

Reference No:	
Full Name <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	My first name _____ My last name _____ <input type="checkbox"/> I wish to raise my grievance anonymously (note in this case a response will not be provided) <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information <i>Please mark how you wish to be contacted (mail, telephone, e-mail).</i>	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> Arabic <input type="checkbox"/> English
Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
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)
What would you like to see happen to resolve the problem?	
Signature: _____ Date: _____	
Please return this form to: [name], Grievance Mechanism Focal Point, [company name], Address _____ : Tel.: _____ or E-mail: _____@_____.com.	

ANNEX 2 SAMPLE GRIEVANCE REGISTER

No.	Reference No.	Registration Date	Name of Complainant, Location and Contact Information	Gender	Occupation	Company & Site Location (if complainant is a Project worker)	Complaint Category	Details of Complaint	Frequency	Report of the Investigation	Resolution/ Management Status	How Was the Issue Resolved / Managed	Date Issued Was Resolved	Duration to Closure	Complaint Closure Signed Off by:
	<i>Month-Year-Case Number</i>	<i>When was the grievance reported?</i>	<i>What is the full name of the complainant? Where are they from? What is their mobile number or email address?</i>	<i>Is the complainant a male or female?</i>	<i>What does he/she work?</i>	<i>What is the name of his/her company? Which site is he/she located on?</i>	<i>What is the category of the complaint?</i>	<i>How did he/she describe the complaint?</i>	<i>Is the complaint filed for the first time?</i>	<i>Did the focal point issue any investigation reports?</i>	<i>What is the current status?</i>	<i>How was the issue resolved by the focal point?</i>	<i>When was the case closed?</i>	<i>How long did take the focal point to close the case?</i>	<i>Who signed off the closure of the case?</i>