

# Stakeholder Engagement Plan

## Vimetco Power, Tulcea

June 2011



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Date	June 2011	November 2011	December 2011	

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# 1 Introduction

## 1.1 BACKGROUND

This document is a Stakeholder Engagement Plan (SEP) for Vimetco Power (hereafter Vimetco) describing public relations and communication plans, regarding major investment programmes and the relocation of sites that will take place shortly and those that are planned in the future.

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that Vimetco will adopt and those which will be used for major investment programmes.

The SEP will be reviewed and updated on a regular basis. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during project implementation and updated as necessary.

The specific objectives of the SEP are detailed below.

## 1.2 OBJECTIVES OF THE PLAN

The methods, procedures, policies and actions undertaken by Vimetco to inform stakeholders, in a timely manner, of the potential impacts of projects are the key subjects of this document.

Stakeholder engagement in the past has primarily involved engagement on regulatory matters, internal engagement with employees and the involvement of social programmes in the community. Vimetco commit to undertake communications with key stakeholders on major investments and other key projects, through planning, design and project implementation.

Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact Vimetco and ask to be included in future information and communications. Furthermore, this document describes the way that any concerns or grievances will be handled by the Company.

This document also provides a time schedule for consultations, which may be subject to revisions during project initiation, design and implementation. The resources available to implement the SEP are also described in this document.

## 1.3 SCOPE OF THE PLAN

This document covers the following:

- Chapter 2 – Project descriptions, location of the site and key environmental and social issues;
- Chapter 3 – Public consultations and information disclosure requirements;
- Chapter 4 – Identification of stakeholders and other affected parties;
- Chapter 5 – Overview of previous Vimetco stakeholder engagement activities;
- Chapter 6 – Stakeholder engagement programme and methods of engagement and resources; and
- Chapter 7 – Grievance mechanism.

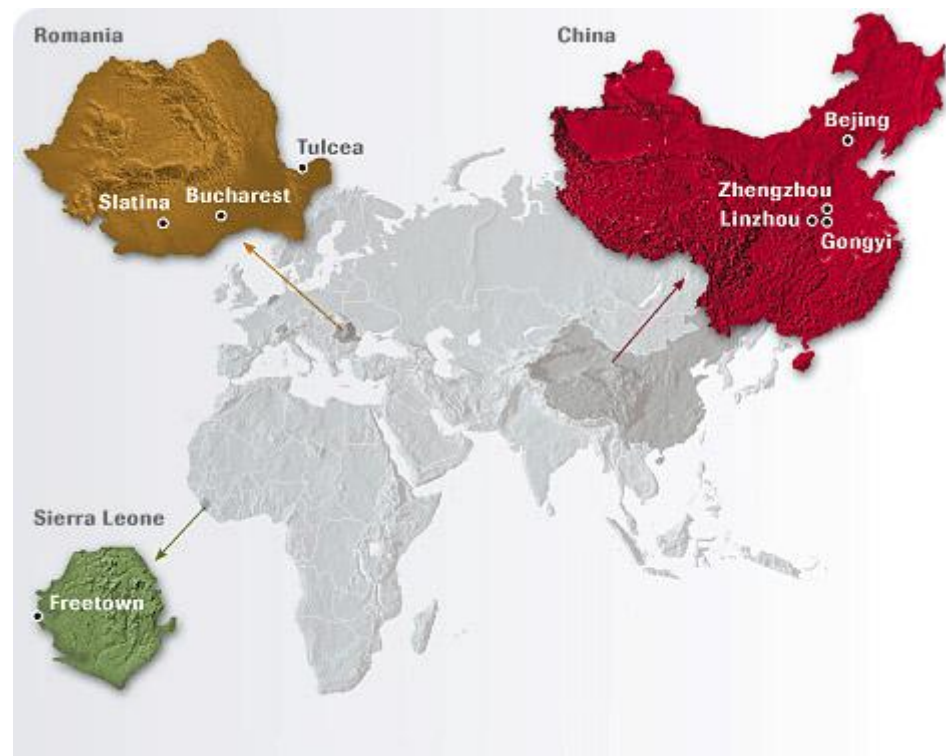
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## 2 Project Description

### 2.1 OVERVIEW OF VIMETCO POWER, TULCEA

#### Location of the Sites and Identification of Sensitive Sites

Vimetco is a globally integrated aluminium Group, with bauxite mines in Sierra Leone, coal mines, aluminium production facilities and electricity plant in China, and an alumina refinery and aluminium smelter in Romania.



In Romania, Vimetco operates an alumina refinery, recently modernised, that processes bauxite, supplying the alumina for Alro, the Company's smelter in Slatina. Alro produces primary and processed aluminium.

Alum Tulcea is the sole alumina refinery in Romania, with an average production of 500,000 tonnes per year. Alum is located in the town of Tulcea, about 280 km east of Bucharest, 125 km north-east of Constanta. The main shareholder and customer is Alro, located about 450 km west of Tulcea.

Alum's main site is located at the western limit of Tulcea city in an industrial area. The site occupies a total area of 135.48 ha of which 45.46 ha is occupied by buildings and industrial infrastructure.

Vimetco Power plans to develop a CCGT power plant at Alum's Tulcea alumina refinery site. The power plant will fulfil security of supply concerns of Alum. The CCGT power plant will provide electricity and heat to Alum under long-term supply agreements. Additional electricity will be supplied to the Romanian grid, and the city of Tulcea, which will also benefit from the supply of district heating.

The site is located close to the Danube Delta, an area recognised as a sensitive ecosystem.

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## **INVESTMENT PLAN SUMMARY**

The main investment plans of the facility will include the development of the proposed CCGT power plant. The plant will provide energy and steam to Alum and will fulfil energy security requirements of the organisation.

District heating will also be supplied to Tulcea City as part of the development.

It is intended to sell additional electrical output to the Romanian electricity day-ahead market, or through Power Purchase Agreements.

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## 3 Public Consultation and Information Disclosure Requirements

### 3.1 ALUM STRUCTURE AND MANAGEMENT

Alum has an EHSQ (Environment, Health, Safety, and Quality) Manager who is responsible for the management and maintenance of the ISO 14001:2004 certified EMS, OHSAS 18001:2007 certified HSMS, and ISO 9001:2008 certified QMS. The Alum Environmental Specialist, Health and Safety Specialist, and Quality Management Specialist report directly to the EHSQ Manager and are responsible for the day to day management of the systems.

The Human Resources Manager has the responsibility for stakeholder engagement at Alum.

### 3.2 VIMETCO POWER STRUCTURE AND MANAGEMENT

Vimetco Power has established the roles of the Director General Vimetco Power / Project Director, and a Project Manager for Vimetco Power. Recently Vimetco Power has also established the role of a Health and Safety Manager specifically related to the CCGT plant development. However, other roles have still to be defined for the CCGT plant.

The Director General Vimetco Power / Project Director has overall responsibility for stakeholder communications regarding the proposed CCGT plant. Stakeholder queries may also be addressed to the Alum Human Resources Manager.

### 3.3 THE REQUIREMENTS

Public consultations and information disclosure undertaken by Vimetco will comply with the requirements of the legislation of Romania and best international practice.

#### **National Legislation Requirements**

Vimetco will comply with national regulations on the public consultation for the major new development. These will include if necessary the planned relocation of sites that are planned. On a case by case basis, projects will be assessed to determine if an EIA is required. Key factors that will determine if an EIA is required will include the scale of any construction, transportation, use of new production equipment and their potential environmental impacts.

#### **International Financial Institution Requirements**

The plan for stakeholder engagement has been designed taking into account international best practice and the general requirements of international Financial Institutions. The programme has been specifically aligned with the requirements of the EBRD, for multi-site operations in receipt of general corporate finance, working capital or equity financing. Vimetco will adopt and implement a corporate stakeholder information and communication programme including a grievance mechanism (provided later in this document). The stakeholder engagement programme will be commensurate to the nature of the company's business and its associated environmental and social impacts,

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and the level of public interest. The programme will be rolled out to facilities in a timely manner. It will include procedures and resources to ensure that adequate stakeholder engagement is conducted at the facility level, and that stakeholders in close proximity to the facility receive information on the relevant facility's environmental and social performance. On an annual basis, Vimetco will produce a public report on their social and environmental performance, including a non-technical summary of the ESAP and progress made with the implementation of the ESAP, against agreed indicators and targets.

### **Best International Practice**

The key principles of effective engagement for projects are summarised as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including ages, women and men, vulnerable and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;
- Clear mechanisms for responding to people's concerns, suggestions and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

These principles will be reviewed and accordingly adopted by Vimetco, dependent of the nature and size of future projects undertaken.

### **General Stakeholder Communication Records Maintenance**

Communication records will be maintained by Vimetco clearly logging the key information provided to stakeholders and also the key incoming communications (i.e. general questions, complaints etc.) to Vimetco, along with a summary of actions taken.

As part of this communications procedure, Vimetco will record and update these on-going stakeholder engagement activities on an on-going basis.

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## 4 Stakeholder Identification

### 4.1 IDENTIFICATION OF MAIN STAKEHOLDERS

#### Overview

This section of the document identifies interested parties i.e. stakeholders and others affected at a local, district and regional level.

Stakeholders could also be individuals and organisations that may be directly or indirectly affected by the project either in a positive or negative way, who wish to express their views.

In order to identify key stakeholders, the following definitions have been applied:

- **Stakeholders:** any person, group or organisation with a vested interest in the outcome of a body of work; and
- **Key stakeholders:** any stakeholders with significant influence on or significantly impacted by, the work and where these interests and influence must be recognised if the work is to be successful.

There are partnerships and formal advisory arrangements and also less formal but important relationships with groups or individuals with a particular interest in the work Vimetco undertakes.

Stakeholders can be grouped into the following categories:

- International
- Government (Romania / regional and local)
- Advisory Non-Government
- Services / Suppliers / Contractors
- Clients
- Institutions (universities, think tanks, etc.)
- The Aluminium Industry
- Internal Stakeholders (employees, unions etc.)
- General Communities and Community Representatives.
- Public Groups – (hospitals, local schools etc.)
- The Media

All the key stakeholders identified are presented in Table 2 below.

If you are not on the list and would like to be kept informed about the company and project, please contact:

Mrs. Mariana Feodorof  
Human Resources Manager Alum  
str. Isaccai, nr. 82, Tulcea,  
Tulcea,  
Romania,  
Tel: +40 (0)240 535022 / +40 (0)240 535022  
Fax: +40 (0)240 535495, 535230;  
Web: <http://www.alum.ro>

**Table 2: Key Stakeholders and Other Key Affected Parties**

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
<i>International</i>	<ul style="list-style-type: none"> <li>■ International Suppliers and Contractors <i>Tractebel (CCGT Plant Engineer, Alexandru Constantinescu, 6, 011473, Bucharest, + 40 31 2248 101</i></li> </ul>	<p><i>EHSS best practice, Equator Principles, IPPC BAT</i></p> <p><i>Environment and Social Action Plan responses as required</i></p>
<i>Government (Romania state)</i>	<ul style="list-style-type: none"> <li>■ National Environmental Protection Agency</li> <li>■ Environmental Protection Agency, Galati Region</li> <li>■ Danube Delta Biosphere Reserve Authority (DDBRA)</li> </ul>	<p><i>National environmental policy</i></p>
<i>Government (Regional and local)</i>	<ul style="list-style-type: none"> <li>■ Mayor's Office of Tulcea (Vice-Mayor George Blejan) <i>STR.PACII NR. 20, Tulcea, Tulcea, Romania, cod postal 820033; Tel. +40 240 511440; fax +40 240 517736; e-mail: cabinetprimar@primaria-tulcea.ro</i></li> <li>■ Environmental Protection Agency, Tulcea (Viorica Bisca) <i>Strada 14 Noiembrie nr. 5, Tulcea, Tulcea, Romania, cod postal 820009; tel: +40 240 510620 / +40 240 510623 / +40 240 510622; fax; +40 240 510 621; e-mail:office@apmtl.ro</i></li> <li>■ Tulcea Social Work Department, Tulcea City Hall (Zibileanu Stefana)</li> <li>■ County Direction for Culture and National Patrimony, Tulcea (Iulian Vizauer) <i>Str. Isacpei nr. 20, Tulcea, Tulcea, Romania; Tel: +40 240516072; Fax: +40 240516072; E-mail: contact@tulcea.djc.ro</i></li> <li>■ The Eco-Museum Research Institute (Cristina Dinu &amp; Aurel Stanica); <i>str. 14 Noiembrie, nr. 1 bis, Tulcea, Tulcea, Romania, cod postal: 820009; tel / fax: +40 240 513231; e-mail; icemtl@icemtl.ro</i></li> </ul>	<p><i>Regulator and legislator bodies at local, regional levels and national level covering:</i></p> <p><i>Planning consents, permits, SPZ projects and statistical reporting – covering Waste, Water and ambient air</i></p>
<i>Advisory / Non-government Organisations</i>	<ul style="list-style-type: none"> <li>■ Local and national consulting and contracting firms e.g. CCGT consulting engineer (Tractebel) and construction engineer(s) (to be confirmed).</li> </ul>	<p><i>Consulting companies – engineering, construction</i></p>
<i>Operational suppliers, clients</i>	<ul style="list-style-type: none"> <li>■ Local and national aluminium products customers and dealers</li> </ul>	<p><i>Utility suppliers, distributors, clients</i></p>

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
<i>and client representation</i>		
<i>Institutions (universities, think tanks etc.)</i>	<ul style="list-style-type: none"> <li>■ no stakeholders identified</li> </ul>	
<i>Internal stakeholders (Employees, labour unions)</i>	<ul style="list-style-type: none"> <li>■ Internal Employees</li> </ul>	<i>Retrenchment, training, employment and social policy, other procedures / policies, migrant workers etc</i>
<i>Public groups</i>	<ul style="list-style-type: none"> <li>■ Counsellor of the Mayor for Roma Problems (Ghihan Daniela)</li> <li>■ Informal Leader of Roma Community (Ghiocei Mircea)</li> </ul>	<i>Potential for incidents during construction.</i>
<i>General communities</i>	<ul style="list-style-type: none"> <li>■ Local Residents (Direct Communication)</li> <li>■ Tulcea Educational Mediator (Filip Mirela)</li> <li>■ School Inspector, Manager of the Centre for Information, Consultation and Promotion of Romas (NGO) (Stoica Gabriel)</li> <li>■ Counsellor of the Mayor for Roma Problems (Ghihan Daniela)</li> <li>■ Informal Leader of Roma Community (Ghiocei Mircea)</li> </ul>	<i>Local air quality, land use, construction traffic, migrant workers</i>  <i>Local community centres, schools or hospitals.</i>
<i>Other key affected parties</i>	<ul style="list-style-type: none"> <li>■ None identified</li> </ul>	

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### **The Media**

The media are considered as stakeholders for Vimetco, however these details are provided in the next section, where the methods of communication including via the media are demonstrated.

The identification of stakeholders will be reviewed and the range of interested parties can be expanded and contracted as required during the project implementation.

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## 5 Vimetco Stakeholder Relations

### 5.1 OVERVIEW OF EXISTING STAKEHOLDER RELATIONS

Alum has a very good relationship with the local community and is a major employer in Tulcea. The relationship with the Mayor's Office in Tulcea and the local Environmental Protection Agency in Tulcea are also recognised as being particularly strong.

Previous stakeholder engagement activities have primarily involved engagement on regulatory engagement activities and involvement in social and sponsorship programmes with the local community in Tulcea.

Vimetco Power and Alum are committed to undertaking communications with key stakeholders, local communities, and other interested parties on future major investments and other key projects including the proposed CCGT plant. This Stakeholder Engagement Plan (SEP) has been developed with the express objectives of identifying key stakeholders and ensuring that, where practicable, they are informed of the potential impact of projects in a timely manner. The plan also includes a formal grievance mechanism to be used by stakeholders for dealing with complaints, concerns, queries, and grievances etc.

### 5.2 SUMMARY OF ENGAGEMENT ACTIVITIES

#### International Funders Requirements

An example table demonstrating the type of public consultation and information disclosure that will be recorded for major projects is provided in the next section. Vimetco will record the following information on an on-going basis:

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

This table will be kept up to date on all public consultation and information disclosure that is undertaken for future projects.

#### Previous Stakeholder Engagement

Previous stakeholder engagement has been conducted through regular consultation with the Mayor's Office and EPA in Tulcea with regard to the development of the proposed CCGT plant.

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## 6 Stakeholder Engagement Programme

### 6.1 DISCLOSURE OF INFORMATION

#### The Types of Information to be Disclosed

The information that will be disclosed will be assessed on a specific project by project basis. The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the company activities, including company performance, company development and investment plans and their implementation.

#### The Methods of Communications

In general terms, internal and external communications are handled by Vimetco in a number of ways.

The types of information disclosed and the specific methods of communication to be undertaken by Vimetco are summarised in the Stakeholder Engagement Programme in Table 3 below.

### 6.2 THE FUTURE PROGRAMME

The Non-Technical Summary (NTS) of the Project and the Environmental Impact Assessment (EIA) is included, in both English and Romanian, on the Vimetco and Alum websites and at key locations:

Sources for the communication of information will be presented at key locations:

**Vimetco:** <http://www.vimetco.com/article/ccgt-announcement>

**Alum:** <http://www.alum.ro/en/article/ccgt-announcement>

#### Also at the following:

##### Vimetco

Vimetco Power  
Rivergate Center  
No. 64, Splaiul Unirii  
040036 Bucharest District 4  
Romania

Tel: +40 (0)21 408 35 00  
Fax: +40 (0)21 408 35 82

##### Alum

SC Alum SA  
Str. Isaccei, nr. 82,  
Tulcea, jud.  
Tulcea,  
820228  
Romania

PRIMARIA MUNICIPIULUI TULCEA  
Strada Pacii nr. 20,  
Tulcea,  
Jud Tulcea  
820033

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ENERGOTERM  
Administrative office  
SC Energoterm SA  
Str. Isaccai nr 73,  
Tulcea,  
jud Tulcea  
820207

**Contact**

Mr. Marian Cilianu Ph.D  
Director General Vimetco Power / Project Director  
E-mail: [mcilianu@alro.ro](mailto:mcilianu@alro.ro)  
Mobile: +4 0741 124 033

**EBRD (Bucharest Office)**

Metropolis Center  
56-60, Iancu de Hunedoara Bd., 3rd floor, West Wing  
Sector 1, Bucharest  
Romania  
Tel: +40 21 202 7100  
Fax: +40 21 202 7110

Further, this Stakeholder Engagement Programme (SEP) and the Project Environmental and Social Action Plan (ESAP) are also included in English and Romanian on the companies website.

Vimetco will collate any comments and feedback associated with future projects and will document these.

All comments received will be reviewed in accordance with the commitments made under 'Best International Practice' as documented within 'The Requirements' section provided in section 3.2.

All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed on the outcome.

The future programme of engagement is presented below.

Table 3: Stakeholder Engagement Programme

Activity / Project	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups consulted
<p>Approval of full project funding for the CCGT plant.</p>	<p>Announcement of full decision to develop the plant and the generation energy efficiency / plant emissions.</p> <p>The ESIA, NTS, ESAP and SEP need to be posted on the company website for a minimum of 60 days prior to the final funding agreement for loans from EBRD. This should be tied closely into the timing for the permit determination (see below).</p>	<p>Project ESIA and NTS (English and Romanian) available at the company's website and at the location described in section 6.2 above.</p> <p>ESAP and SEP (in both English and Romanian) should be posted at the company's website.</p> <p>Other methods of communication are as follows:</p> <ul style="list-style-type: none"> <li>Press announcement</li> <li>Newsletter</li> <li>Direct written confirmation with direction to Vimetco Power for responses</li> <li>Notices in public areas</li> <li>Specific mail delivery to local residents</li> </ul>	<p><i>Roma community</i></p> <p><i>General communities</i></p> <p><i>Public groups</i></p> <p><i>Government</i></p> <p><i>International</i></p> <p><i>Internal stakeholders</i></p> <p><i>Operational suppliers, clients and client representation</i></p>
<p>Pre- construction phase and operational IPPC / IED Permit Application</p>	<p>Public consultation session:</p> <p>Delivery of a public consultation session, including an informal 'drop in session' with comments book. This should ideally cover:</p>	<p>Press announcement of consultation session.</p> <p>Public notices in surrounding area inviting attendees.</p> <p>Consultation session, including</p>	<p><i>Roma community</i></p> <p><i>General communities</i></p> <p><i>Public groups</i></p> <p><i>Government bodies, including Environmental</i></p>

<b>Activity / Project</b>	<b>Type of information disclosed</b>	<b>Locations and dates of meetings / forms of communication</b>	<b>Stakeholder Groups consulted</b>
	<ul style="list-style-type: none"> <li>- Presentation of the development phases of the project with the key impacts and mitigation commitments at each phase.</li> <li>- The required Public Participation Directive Consultation as required under the EU IPPC / Industrial Emissions Directive (as applicable dependent on application timescales).</li> </ul>	<p>drop in public exhibition and comments book.</p> <p>Copies of the Project ESIA NTS for communication, ideally in advance of the session.</p>	<p><i>Regulators</i></p> <p><i>International</i></p> <p><i>Internal stakeholders</i></p> <p><i>Operational suppliers, clients and client representation</i></p>
<b>Demolition of existing buildings / preparation of ground</b>	<b>Site preparation impacts and mitigation proposals</b>	<b>Notices in local resident areas and other public areas</b>	<p><i>Roma community</i></p> <p><i>General communities</i></p> <p><i>Public groups</i></p>
<b>Pre-construction planning</b>	<b>Construction impacts and mitigation proposals</b>	<b>Notices in local resident areas and other public areas</b>	<p><i>Roma community</i></p> <p><i>General communities</i></p> <p><i>Public groups</i></p>
<b>Prior to CCGT plant commissioning</b>	<p>Operational plans</p> <p>Technology position</p> <p>Site operation</p>	<b>Regular written communications</b>	<p>Operational suppliers, clients, and client representation</p> <p>Public groups</p> <p>Full details of plant prior to commissioning ensuring</p>

<b>Activity / Project</b>	<b>Type of information disclosed</b>	<b>Locations and dates of meetings / forms of communication</b>	<b>Stakeholder Groups consulted</b>
			that required permits are in place and pre-operational conditions met.
<b>Site opening</b>	<b>Description of plant</b>	<b>Site opening ceremony Newsletter Press release Specific invitation to key stakeholder groups</b>	<b><i>Roma community General communities Public groups Government International Internal stakeholders Operational suppliers, clients and client representation</i></b>
<b>Corporate engagement</b>	<b>Annual update of ESAP etc</b>	<b>Reports</b>	<b>International Funders</b>

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### **6.3 MONITORING, REPORTING AND FEEDBACK MECHANISMS**

Through communication channels such as media and newsletter notifications, surveys, exhibitions, one-to-one meetings and the periodic meetings, Vimetco will monitor and provide feedback as appropriate.

For future public consultation meetings or public exhibitions, Vimetco will use an open book (with pens provided) for recording comments anonymously. This book will be presented in an obvious area of the exhibition but in an area that will not be directly monitored by host staff (e.g. by the exit). The information will be recorded by Vimetco so that a response and feedback can be made to stakeholders.

General information on the Tulcea CCGT Project will be periodically updated on the companies website at:

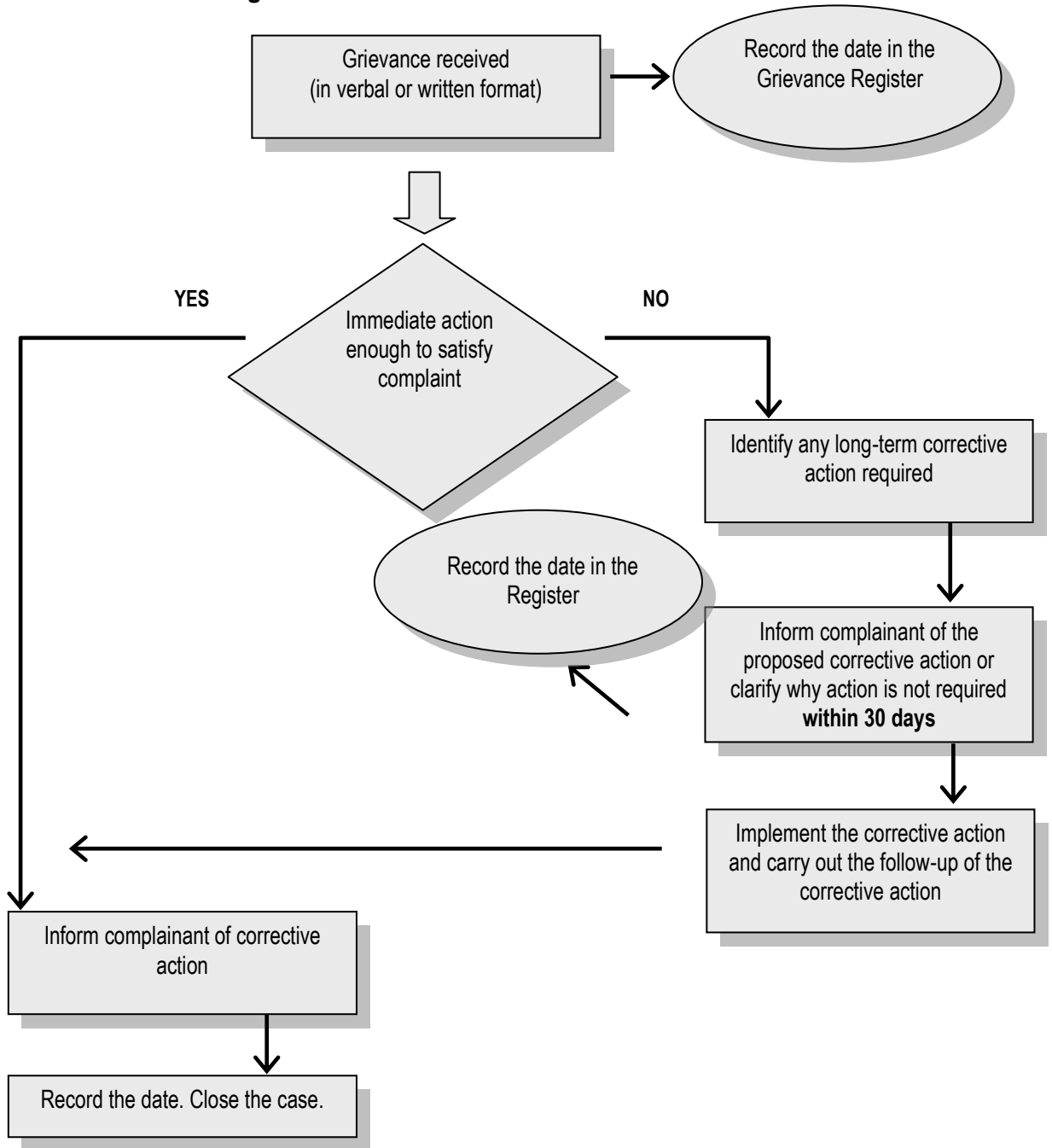
<http://www.alum.ro> and <http://www.vimetco.com>

### **6.4 GRIEVANCE MECHANISM**

Alum has a formal grievance mechanism in place, which is open to members of staff. The grievance mechanism is also applicable to the public and stakeholders. Grievance hearings are held at the Alum site on a monthly basis.

If there are questions or complaints regarding future projects, the following grievance mechanism will be used as presented in flowchart in Figure 1 below. In addition, a grievance form will be used to record this information.

Figure 1: Flowchart for Processing Grievances



## Public Grievance Form

<b>Reference No:</b>	
<b>Full Name</b>	
<b>Contact Information</b>  Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> <b>By Post:</b> Please provide mailing address: _____ _____ _____  <input type="checkbox"/> <b>By Telephone:</b> _____  <input type="checkbox"/> <b>By E-mail</b> _____
<b>Preferred Language for communication</b>	<input type="checkbox"/> <b>[English]</b> <input type="checkbox"/> <b>[Romanian]</b>
<b>Description of Incident or Grievance:</b>	
What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
<b>Date of Incident/Grievance</b>	
	<input type="checkbox"/> <b>One time incident/grievance (date _____)</b> <input type="checkbox"/> <b>Happened more than once (how many times? _____)</b> <input type="checkbox"/> <b>On-going (currently experiencing problem)</b>
<b>What would you like to see happen to resolve the problem?</b>	

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Please return** this form to:

Mrs. Mariana Feodorof  
 Human Resources Manager Alum  
 str. Isacpei, nr. 82, Tulcea,  
 Tulcea,  
 Romania,  
 Tel: +40 (0)240 535022 / +40 (0)240 535022  
 Fax: +40 (0)240 535495, 535230;  
 Web: <http://www.alum.ro>