



1. Purpose

This External Grievance Mechanism Procedure has been developed to receive and facilitate resolution of concerns and grievances raised by external stakeholders, communities and members of the general public (collectively referred to herein as External Stakeholders) related to the Project's environmental and social performance. The aim of the External Grievance Mechanism is to ensure that grievances or concerns raised by External Stakeholders are addressed in a manner that:

- Provides a predictable, transparent, and credible process to all parties, resulting in outcomes that are seen as fair, effective, and lasting.
- Builds trust as an integral component of broader external stakeholder relations and activities.
- Enables more systematic identification of emerging issues and trends, facilitating corrective action and pre-emptive engagement.

The aim of this External Grievance Mechanism Procedure is to address grievances in a manner that does not require a potentially costly and time-consuming legal process.

2. Scope

The Project shall implement this Grievance Mechanism throughout all Project stages. All external stakeholders shall have access to this Mechanism.

This External Grievance Mechanism procedure sets out the steps to be taken to resolve grievances, role players involved in the process and timeframes to resolve grievances. The types of grievances that people may raise include but are not limited to:

- Negative impacts on communities, which may include financial loss, physical harm and nuisance from construction or operational activities;
- Health and safety risks;
- Negative impacts on the environment; and
- Unacceptable behaviour by staff or Contractors associated with the Project.



3. Responsibilities

Table 1: Responsibility matrix.

Role	Project Level
Process owner	Red Rocket Sustainable Investment Team
Implementor	Project Community Relations Manager
Support	Overberg Wind Farm, Red Rocket PPCM Team and Asset Management Team, Employees, Stakeholders and Communities, Community Liaison Officer

Table 2: Expected outputs.

Inputs	→	Activity	→	Outputs
<ul style="list-style-type: none">Receipt of External Grievance		<ul style="list-style-type: none">Grievance Process		<ul style="list-style-type: none">Grievance reportGrievance registerMonthly grievance summary report

4. Procedure

In the development of this External Grievance Mechanism, guidance was taken from the International Finance Corporation (IFC). IFC Performance Standards require that project proponents engage with Project Affected Peoples (PAPs) through:

- Disclosure of information;
- Consultation; and
- Informed participation.



In addition, guidance has been taken from IPIECA - Stakeholder or members of the public grievance mechanisms: Guidance document for the oil and gas industry (2019).

4.1. Procedure for Receiving and Resolving Grievances

The External Grievance Mechanism provides for External Stakeholders to raise grievances in their own language. In addition, External Stakeholders may raise concerns anonymously (although note that this restricts ability to respond directly).

In order to build trust with the External Stakeholders, the Project Company shall:

- Ensure that the Project's Community Relations Manager and Community Liaison Officers (CLOs) communicate this External Grievance Mechanism to External Stakeholders, Communities and Members of the General Public at each meeting.
- Provide timely feedback to External Stakeholders, Communities and Members of the General Public about grievances raised and the responses of the company.
- Ensure that any External Stakeholder, Communities and Members of the General Public, who submits External Grievances shall under no circumstance be subject to prejudice or any form of victimisation.
- Allow for External Grievances to be submitted in any language – verbally or documented format.
- Where External Grievances are not resolved the matter shall then be issued to the either and further committee as agreed to be the complainant and the Project Company and/or the Project Contractors (as may be applicable).

4.2. Grievance Mechanism Boxes

Grievance Mechanism Boxes shall be made available to External Stakeholders by the Project's Community Relations Manager in nearby communities, and at any other points/localities at the discretion of the Project's Community Relations Manager.



External Grievances in any written format may be placed in the box at any time by any person.

In case where the External Stakeholders may be illiterate, they may engage the Project's Community Relations Manager, Project Company's CLOs, Contractor CLOs or any other trusted person for assistance, to document the grievance. Community-based External Grievance Mechanism shall be opened twice weekly by the Project Company's CLOs.

4.3. External Grievance Mechanism

Upon opening of the community-based External Grievance Mechanism boxes, the Project Company's CLOs shall immediately log the Grievance onto the Grievance Logbook and immediately advise the Project's Community Relations Manager by email (including a copy of the actual Grievance at attachment) and by telephone that a Grievance has been received.

At this point the Project's Community Relations Manager shall, within 1 (one) working day, review the Grievance in order to determine whether the matter should be dealt with by the Project Company or a Contractor. In either case the Project's Community Relations Manager, shall then at a minimum ensure the following is undertaken:

- Within 2 working days of receipt of the grievance, contact the Complainant to discuss the grievance and agree on suitable date and venue for a meeting in order to discuss the grievances raised. Unless otherwise agreed, the meeting (including teleconference) should be held within 2 weeks of receipt of the grievance.
- Draft a letter to be sent to the Complainant acknowledging receipt of the grievance, the name and contact details of Complainant, the nature of the grievance, the date that the grievance was raised, and the date and venue for the meeting (once agreed).
- At any time in this process a competent interpreter must be provided, at no cost to the Complainant, should the Complainant require such.
- Prior to the meeting being held, the Project's Community Relations Manager must contact the Complainant to discuss and agree on the parties who should attend the meeting. The people who will be required to attend the meeting will depend on the nature of the grievance. While the Complainant and or proponent are entitled to invite their legal representatives to attend the



meeting/s, it should be made clear that to all the parties involved in the process that the grievance mechanism process is not a legal process. It is therefore recommended that the involvement of legal representatives be limited.

- The meeting should be chaired by the Project's Community Relations Manager, who shall also ensure that accurate minutes of the meeting are recorded.
- Draft copies of the minutes must be made available to the Complainant within 4 working days of the meeting being held. Unless otherwise agreed, comments on the Draft Minutes must be received by the Project's Community Relations Manager within 4 working days of receipt of the draft minutes.
- In the event of the grievance being resolved to the satisfaction of all the parties concerned, the outcome must be recorded and signed off by the relevant parties. The record should provide details of the date of the meeting(s), the names of the people that attended the meeting(s), the outcome of the meeting(s), and where relevant, the measures identified to address the grievance, the party responsible for implementing the required measures, and the agreed upon timeframes for the measures to be implemented.
- In the event of the grievance not being resolved to the satisfaction of all the parties concerned, the option of appointing an independent mediator to assist with resolving the issue should be discussed. The record of the meeting(s) must note that a dispute has arisen, and that the grievance has not been resolved to the satisfaction of all the parties concerned.
- In the event that the parties agree to appoint a mediator, the Project's Community Relations Manager will identify three (3) mediators and forward the names and CVs to the Complainant within 2 weeks of the dispute being declared. The Complainant, in consultation with the Proponent, must identify the preferred mediator and agree on a date for the next meeting. The cost of the mediator must be borne by the Proponent. Minutes of meetings shall be record.
- In the event of the grievance, with the assistance of the mediator, being resolved to the satisfaction of all the parties concerned, the outcome must be recorded and signed off by the relevant parties, including the mediator. The record should provide details on the date of the meeting(s), the names of the people that attended the meeting(s), the outcome of the meeting(s), and where relevant, the measures identified to address the grievance, the party responsible for



implementing the required measures, and the agreed upon timeframes for the measures to be implemented.

- In the event of the dispute not being resolved, the mediator must prepare a draft report that summaries the nature of the grievance and the dispute. The report should include a recommendation by the mediator on the proposed way forward with regard to the addressing the grievance.
- The draft report must be made available to the Complainant for comment before being finalised and signed by all parties. Unless otherwise agreed, comments on the draft report must be forwarded to the company representative appointed to manage the grievance mechanism within 4 working days. The way forward will be informed by the recommendations of the mediator and the nature of the grievance.

A Grievance is closed out when no further action can be or needs to be taken. Closure status will be classified in the Complaints Register as follows:

Resolved: Grievances where a resolution has been agreed and implemented and the Complainant has signed the Confirmation Form.

Unresolved: Grievances where it has not been possible to reach an agreed resolution and the case has been authorised for close out by the Appeals Committee.

Abandoned: Grievances where the Complainant is not contactable after one month following receipt of a Grievances and efforts to trace his or her whereabouts have been unsuccessful.

The Grievance Mechanism does not replace the right of an individual, community, group or organization to take legal action should they so wish. In the event of the grievance not being resolved to the satisfaction of Complainant and or the Proponent, either party may be of the opinion that legal action may be the most appropriate option.

4.4. Grievance Categorization, Analysis & Reporting

Grievances are categorised according to Table 3.

Table 3: Grievance categorisation matrix.

Impact	Consequence/ Severity		
	Low	Medium	High
Social and Environmental	Minimal impact, likely to have little real effect. Mitigation is easily achieved; compensation unlikely to be necessary.	Impact is real but not substantial or long-lasting. Mitigation is both feasible and easily achieved; compensation likely to be moderate.	Significant impact and potentially long-lasting. Mitigation is likely to be difficult: expensive, time consuming and requiring difficult negotiation; compensation may be significant.
Corporate reputation	No Impact	Local or Moderate Reputation Damage	Significant Loss of Shareholder/ Public Trust
Project schedule	No Delay	Moderate Delays	Significant Disruption
Input required for resolution	Local: frequently in-field discussion with complainant	Local/ National: may require technical input from relevant work stream and Project Manager decision	Project: may require Board level input and decision-making
Effect on construction and operations	No effect	May require some limited or local adjustment in construction planning and operations	May require substantial or widespread change in construction planning and operations



The Project's Community Relations Manager shall, on a monthly basis, prepare and maintain an analysis of Grievances inclusive of:

- Frequency of Grievances Received;
- Categorisation of Grievances - Environmental, Social, Health, Safety, Security, Community, Stakeholder or members of the public, other;
- Consequence/Severity rating of Grievances;
- Service Functions/Contractors involved;
- Origin of Grievances are received (Internal/Communities);
- Repetitive Grievance;
- Route Cause Analysis of Grievances;
- Description of Outcomes (Corrective and Preventive Actions); and
- Grievance Outstanding/Resolved.

The Project's Economic Development & Community Manager shall report the following to the Project Company and Shareholders on a monthly basis:

- Frequency of Grievances Received;
- Categorisation of Grievances - Environmental, Social, Health, Safety, Security, Community, Stakeholder or members of the public, other;
- Consequence/Severity rating of Grievances;
- Service Functions/Contractors involved;
- Origin of Grievances are received (Internal/Communities);
- Repetitive Grievance;
- Route Cause Analysis of Grievances;
- Description of Outcomes (Corrective and Preventive Actions); and
- Grievance Outstanding/Resolved.



4.5. Reprisals

Overberg Wind Farm has zero tolerance for reprisals for legitimate whistle-blowers or grievances reported in good faith.

4.6. Community Reporting

The Project's Community Relations Manager shall report to the community with regards to external grievances in accordance with the Project's Stakeholder Engagement Plan.

4.7. Swedfund Grievance Portal

Swedfund has provided a portal for individuals and communities to lodge a grievance directly to Swedfund. The official communication in this regard is attached as an annexure to this procedure.

5. Referenced Documents

N/A

6. Normative References & Guidelines

- IFC Performance Standard 1 - Assessment and Management of Environmental and Social Risks and Impacts
- IFC Performance Standard 3 - Resource Efficiency and Pollution Prevention
- IFC Performance Standard 4 - Community Health, Safety, and Security
- IFC Performance Standard 5 - Land Acquisition and Involuntary Resettlement
- IFC Performance Standard 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources



Grievance Mechanism for Project Stakeholders & Communities

FE Overberg Wind Farm

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- IFC Performance Standard 7 - Indigenous Peoples
- IFC Performance Standard 8 - Cultural Heritage

External Good International Industry Practice

- IFC - GPN - Grievance Mechanisms Addressing in Project Affected Communities