



Stakeholder Engagement Plan for the Operational Phase

Adjaristsqali Georgia LLC

Shuakhevi HPP

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Issues and Revision Record

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Abbreviations and Acronyms

ADB	Asian Development Bank
AGL	Adjaristsqali Georgia LLC
AR	Autonomous Republic
BAP	Biodiversity Action Plan
CLO	Community Liaison Officer
CSR	Corporate Social Responsibility
EBRD	European Bank for Reconstruction and Development
ESCO	Electricity Market Operator
ESIA	Environmental and Social Impact Assessment
EU	European Union
GNERC	Georgian National Energy and Water Regulatory Commission
GSE	Georgian State Electrosystem
HPP	Hydropower Plant
IFC	International Finance Corporation
km	kilometer
KPI	Key Performance Indicator
kV	kilovolt
LALRP	Land Acquisition and Livelihood Restoration Plan
MW	megawatt
NGO	non-governmental organization
OTL	Overhead Transmission Line
SEP	Stakeholder Engagement Plan
SES	Stakeholder Engagement Specialist
WHO	World Health Organization

1. Introduction

Adjaristsqali Georgia LLC (AGL or “the Company”) operates a 187MW Shuakhevi Hydropower Scheme (“the Project”) on the Adjaristsqali river and its tributaries in Ajara region, southwest of Georgia. The construction of the Shuakhevi Project was completed in 2019, and in March 2020 the Project started commercial operations.

As the Project is owned by Clean Energy Invest and Tata Power and financed by International Finance Institutions such as International Finance Cooperation (“IFC”), European Bank for Reconstruction and Development (“EBRD”) and Asian Development Bank (“ADB”) (“together referred to as “lenders”), the Project is operated in line with lenders Environmental and Social Standards.

The first Stakeholder Engagement Plan (SEP) was developed in 2011 during the early stages of the project. It outlined the methods for engaging stakeholders, information disclosure activities, and identified key stakeholder groups. Over time, the SEP has been revised several times to reflect changes in the project during the construction, commissioning, and operational phases. The current SEP is an updated version of the previous operational phase plan, incorporating lessons learned from past engagement practices and reflecting the evolving needs of the project. It also includes an updated list of stakeholders, ensuring that the engagement process remains relevant and effective. The updated version now includes engagement efforts for both the Shuakhevi Project and the 35kV Overhead Transmission Line (OTL) connecting the Skhalta Hydropower Plant (HPP) to the Shuakhevi substation. This SEP is a key component of AGL’s Environmental and Social Management System (ESMS). It will be reviewed annually by AGL management to ensure its continued relevance and alignment with the needs of AGL, local communities, and other stakeholders. If any changes that require updates to the ESMS, the SEP will be revised accordingly to reflect those changes.

2. Project Description

The Shuakhevi Scheme Project (Figure 1) was constructed in Shuakhevi and Khulo municipalities with an overall installed capacity of 187MW (comprising a 178MW Shuakhevi HPP on the Adjaristsqali River and a small 9.8 MW Skhalta HPP on the Skhalta River). The Shuakhevi scheme comprises two dams with the reservoirs on the Adjaristsqali and Skhalta rivers and one weir with an intake on Chirukhistskali River. The water is diverted to the powerhouse through underground tunnels with a total length of more than 37km. The Shuakhevi HPP is located on the right bank of the Adjaristsqali river in the Shuakhevi municipality. The generated electricity is connected to national grid at the Shuakhevi HPP through the 220KV Batumi-Shuakhevi-Akhaltsikhe transmission line, which is being built by the Georgian State Electosystem (“GSE”), the Georgian State Transmission Utility. While the Batumi - Shuakhevi segment construction has been completed by

GSE, the construction of the Shuakhevi – Akhaltsikhe segment is yet to be concluded. In addition, AGL constructed a 22.3km 35kV single circuit overhead power line between Skhalta and Shuakhevi HPPs to evacuate power generated by the Skhalta HPP. The combined power generation of the Shuakhevi and Skhalta HPPs is injected into the 220 kV grid owned by GSE at the 220 kV busbars at Shuakhevi.



Figure 1 Project layout map

Shuakhevi and Skhalta HPPs jointly generate around 450GWh electricity on an annual basis and this way contributes to 4-5% to the country's total electricity generation.

3. Regulations and Requirements

3.1 Overview

As part of AGL's on-going commitment to good corporate governance and to communicating with the Project stakeholders, this SEP is designed to meet international best practices and the laws of Georgia. Georgia has signed and ratified the United Nations Economic Commission for Europe's Aarhus Convention on access to information, public participation in decision-making, and access to justice in environmental matters (1998¹). Therefore, the laws of Georgia are broadly aligned with the lenders' stakeholder engagement requirements.

3.2 National Requirements

The Constitution of Georgia (1995) guarantees public access to information and states the right of an individual to obtain full, unbiased, and timely information regarding his/her working and living environment. Prior to January 1, 2018 the environmental permitting system was governed by the Law of Georgia on Environmental Impact Permit (2007); Law of Georgia on Protection of Environment (1996); Law of Georgia on Licenses and Permits (2005); and Law of Georgia on Ecological Expertise (2007).

On January 1, 2018, the Laws on Environmental Impact Permit and Ecological Expertise were superseded by the Environmental Assessment Code (EAC). The new EAC sets out provisions of public participation and engagement. It provides detailed requirements and procedures for conducting public consultations and established timeframes for information disclosure and discussion. The responsibility for the public disclosure now rests with the Ministry of Environmental Protection and Agriculture ("MEPA") during screening, scoping, Environmental Impact Assessment ("EIA") preparation, and environmental decision-making stages. The MEPA is responsible for public notification, conducting public hearings, and documenting the minutes of meetings. Stakeholders are encouraged to submit their opinions and/or comments, and the MEPA is obliged to consider public opinions and comments.

The Shuakhevi Hydropower Project obtained its environmental permit on June 30, 2013. As per the Law on Environmental Impact Permit applicable at that time, the Project developer prepared the EIA and carried out public consultations according to the national requirements. The Georgian legislation requires stakeholder engagement activities only during the environmental permitting process (there are no requirements applicable to the construction and operation phases). Thus, none of the above-mentioned Georgian laws apply to the Project operations.

¹ <https://unece.org/environment-policy/public-participation/aarhus-convention/introduction>

3.3 International Finance Corporation requirements

Public consultation, disclosure and stakeholder engagement are key requirements of the IFC's Policy on Social and Environmental Sustainability (2012) embodied within the Performance Standards ("PS"). The requirements for stakeholder engagement in projects are:

- Start as early as possible in the project cycle;
- Continue throughout the life of the project;
- Be free of external manipulation, interference, coercion, or intimidation;
- Where applicable enable meaningful community participation; and
- Be conducted on the basis of timely, relevant, understandable, and accessible information in a culturally appropriate format.

IFC seeks to provide accurate and timely information regarding its investment and advisory activities as well as more general institutional information in accordance with its Access to Information Policy. IFC's Access to Information Policy states that for all Category A projects, such as this one, a summary of its review findings and recommendations will be disclosed and include as a minimum the following information:

- Reference to the performance standards and any applicable grievance mechanisms, including the compliance advisor/ombudsman;
- The rationale for IFC's categorization of the project;
- A description of the main social and environmental risks and impacts of the project;
- Key measures identified to mitigate those risks and impacts, specifying any supplemental measures and actions that will need to be implemented to undertake the project in a manner consistent with the Performance Standards.
- Electronic copies or web links to any relevant environmental and social impact assessment documents prepared by the developer
- Any additional documents such as Action Plans, Stakeholder engagement plans, Resettlement action plans, etc.

3.4 European Bank for Reconstruction and Development

The Environmental and Social Policy (2024) and Access to Information Policy (2024) documents outline EBRD's key policies with regards to information disclosure and stakeholder engagement. Similarly to the IFC, EBRD requires the project sponsor to provide the public, including NGOs, with information about the project commencing from the scoping stage and to prepare an SEP. The EBRD policy requires project sponsors to engage with stakeholders from the earliest stages of the project throughout the life of the project. Stakeholder engagement must be open, meaningful, and

in an appropriate manner acceptable to the potentially affected communities. The engagement program must actively address the needs of vulnerable populations who may be affected by the project. The EIA documents must remain in the public domain for the life of the project, and if changes to project plans are necessary, these have to be made public as well.

3.5 Public Consultations under the European Union

The European Union's EIA Directive 85/337/EEC, as superseded by Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment, describes the impact assessment process that their member states must follow. The EIA Directive requires significant public consultation throughout project development, impact assessment, and project implementation. It also includes the tenets for public participation that are incorporated in the Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters.

The Directive requires that public participation in projects, which may have environmental and/or social impacts, take place early in the decision-making process and alternatives are presented. As the project develops, the public is to be provided with relevant information. Public comments must be taken into account, and any rejection or disregard of the comments needs to be clearly justified. The public is to be notified of decisions made and the reasons for the decisions. The Directive provides members of the public with the right to challenge decisions or actions based on substantive or procedural legality. EU Directive 2003/4/EC on Public Access to Environmental Information also grants right to the public to access information either held by public authorities or for public authorities and incorporates the provisions and requirements of the Aarhus Convention, with a wider remit than that applicable under the EIA Directive.

3.6 Asian Development Bank

ADB has similar requirements to EBRD and IFC with regards to consultation and disclosure for category A projects such as this. The ADB's 2018 Access to Information Policy outlines the need to disclose impact assessment results and allow stakeholders to provide comments during a disclosure period. The Policy supports the right of people to seek, receive, and impart information and ideas about ADB-assisted activities. Through the Policy, ADB seeks to provide information in a timely, clear, and relevant manner and to share information with project-affected people early enough to allow them to provide meaningful input into project design. The requirements are reaffirmed in the ADB's Safeguard Policy Statement (SPS) of 2009, which defines 'meaningful consultation' in the following way: "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”.

Within the SPS, the Safeguard Requirements require borrower/client to carry out meaningful consultation with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation in project development, mitigation measures, the sharing of development benefits and opportunities, and implementation issues. Safeguard Requirements 2: Involuntary resettlement requires the borrower/client to provide relevant resettlement information, including information resettlement plans in a timely manner, in an accessible place and in a form and language(s) understandable to affected persons and other stakeholders. For illiterate people, suitable other communication methods will be used.

ADB’s policies apply to the Shuakhevi HPP scheme, which was approved by ADB’s Board of Directors on 19 May 2014.

4. Stakeholder Analysis and Engagement Program

Stakeholders are people or groups who are directly or indirectly affected by a project as well as those who may have interests in a project or the ability to influence its outcome, either positively or negatively.

For the Shuakhevi Project, stakeholder engagement began early in the project development phase. It is important to note that the communities impacted by the construction activities may differ from those affected by the ongoing operations of the HPP. As such, prior to the operational phase, stakeholders were reassessed to accurately reflect those affected in this stage and the results were documented in the first operations SEP. This SEP continues addressing the needs and concerns of stakeholders relevant to the operational phase of the Project.

The Project’s stakeholders have been categorized in relation to their proximity to the Shuakhevi Project facilities and the nature of the operational impact on them. This has been done to ensure that the most directly impacted stakeholders are prioritized during engagement and consultation activities. The following criteria have been applied to prioritize them:

- Likelihood of experiencing environmental and/or social impacts either positively and/or negatively, classifying them as affected parties.
- Likelihood of having an interest/influence on the operational process, categorizing them as interested parties.

The Company grouped them into two categories: direct (including internal and external) and indirect stakeholders.

Direct stakeholders (affected parties)

Direct stakeholders are those stakeholders who are likely to be directly impacted by the operational activities of the Shuakhevi Scheme, both negatively and positively. These include:

- People living in communities close to the power plant facilities (mainly downstream the dams and reservoirs)
- Company employees
- Regional government authorities, etc.

All these stakeholders are considered to be ‘impact-based’. The relevance of each stakeholder group to the Project is summarized in **Error! Reference source not found.**

Table 4-1 Direct stakeholder (affected parties)

Stakeholder Groups	Stakeholder Bodies	Relevance to the Project
Internal		
Company employees	Operational team	Will benefit from employment

Stakeholder Groups	Stakeholder Bodies	Relevance to the Project
	Service providers / Contractors, sub-contractors	opportunities but also face potential health and safety risks. The Company will safeguard the welfare and rights of employees.
Company owners	Clean Energy Invest Tata Power	Interested in the ongoing operational activities and their compliance with the E&S and health and safety regulations
External		
People living upstream the reservoirs	Didachara dam: Gurta, lakobadzeebi, Didachara Skhalta: Kvatia Chirukhi weir: Makhalakidzeebi	Affected by water fluctuation, due to safety concerns they require fencing some sections of the reservoir where slopes are found to be steep. Interested in the safety of HPP structures and premises, slope stability, flow conditions, they should be aware of the community health and safety restrictions. They may also benefit from employment and indirect economic opportunities, as well as the Project's Corporate Social Responsibility ("CSR") activities
Communities located downstream the reservoirs, HPPs and weir	Didachara dam: Diakonidzeebi, Elelidzeebi, Ganakhleba Skhalta dam: Kinchauri, Cheri, Dzmagula (some houses located close to the riverbed) Chirukhi weir: Makhalakidzebi Shuakhevi HPP: Khichauri	Affected by flushing activities and environmental flow /low flow conditions, flash floods. Interested in dam safety, they should be aware of community health and safety restrictions. They may also benefit from employment and indirect economic opportunities, as well as the Project's CSR activities
Communities located in the corridor of the 35kV OTL	Shuakhevi municipality: Okropilauri, Dabadzveli, Daba Shuakhevi, Nenia, Furtio, Beselashvilebi, Nigazeuli, Chanchkhalo Khulo municipality: Tsablana, Kinchauri, Cheri, Gurdzauli, Dzmagula	Affected by land use restrictions within the safety buffer along the line. Interested in E&S impact of the transmission line. Included in informational meetings during tree trimming and/or transmission line maintenance works.

Stakeholder Groups	Stakeholder Bodies	Relevance to the Project
Communities benefiting from the CSR activities	Various settlements ²	Interested in CSR projects. Communication about joint public relations activities.
Vulnerable groups / persons living in the above listed affected villages	Pensioners, female headed households, people with disabilities, people living under poverty level, single-parent families, families with multiple children.	They might have difficulties in accessing the Project related information. Interested in Project activities in general. Might need to be reached at their residences to receive the relevant information. Including safety.
Local governmental bodies	Khulo Municipality Shuakhevi Municipality Keda Municipality	Affected by the operations of the HPP. Involved in safety awareness campaigns. Khulo and Shuakhevi Municipalities benefiting from the property tax paid by the Company. Expectations for improved socio-economic conditions of the municipalities. Involved in some of the CSR activities / joint co-funding.
Industry and Businesses	Atsi HPP – JSC “Energo Pro Georgia” Kirnati and Khelvachauri HPPs - Adjar Energy LLC	Possible impact on the operating regime of the existing HPPs during the operation of the Project.
Fishermen	Amateur fishermen in Khulo and Shuakhevi	Might be affected during flushing, so shall be engaged in and informed during pre-flushing awareness raising meetings

Indirect stakeholders / other interested parties

Indirect stakeholders are defined as those persons or organisations that are not directly affected by the Project but may be interested in it or able to influence its outcomes. Such stakeholders are considered to be ‘interest-based’.

Table 4-2 Indirect Stakeholders (other interested parties)

Stakeholder Groups	Stakeholder bodies	Relevance to the Project
National Governmental Entities	Ministry of Economy and Sustainable Development / Energy Department	Interested in the Company’s compliance with the national legislation and regulations.

² AGL has been expanding its Corporate Social Responsibility (CSR) initiatives to benefit communities outside its immediate Area of Influence.

	<u>Ministry of Environmental Protection and Agriculture</u> <u>Georgian State Electro System (GSE)</u> <u>Water Regulatory Commission (GNERC)</u> <u>Georgian National Energy and Electricity Market Operator (ESCO)</u>	Have expectation for an increased energy security in the country.
Regional governmental bodies	<u>Government of Ajara AR</u> <u>Emergency Management Agency</u> <u>Forestry Agency of Ajara AR</u> <u>Police Departments of Khulo and Shuakhevi</u>	Interested in operations of the HPP, possible cooperation
Financial Institutions	<u>IFC</u> <u>EBRD</u> <u>ADB</u>	Financiers interested in the Project's / Company's compliance with E&S requirements
Industry and businesses	<u>Sanalia HPP</u> <u>Techno Georgia Ltd</u>	<p>Located upstream the Chirukhi weir, possible cooperation</p> <p>Collecting data about local employment, ensuring leasing payment on time.</p>
Environmental NGOs	<u>Environmental association "PSOVI"</u> <u>Association "Mta-Bari"</u> <u>Black See Eco Academy</u> <u>Association "Flora and Fauna"</u> <u>The wildlife protection society "Chaobi"</u> <u>Green Alternative</u> <u>Greens Movement of Georgia / Friend of Earth</u> <u>Caucasus Environmental NGO Network CENN</u>	<p>Protection of local environment during the operational phase.</p> <p>Minimizing the possible negative impact on natural environment during operations.</p>
Civil Society Organizations (CSOs)	<u>Georgian Renewable Energy Development Association (GREDA)</u> <u>Institute of Democracy</u> <u>Independent Journalists' House</u> <u>Women's' rooms in Khulo and Shuakhevi</u>	<p>Sharing knowledge and information about renewables. Cooperation opportunities.</p> <p>Protecting the rights and interests of local residents. Cooperation opportunities.</p>
International NGOs	<u>CEE Bankwatch</u> <u>WWF Caucasus</u>	

	Transparency International Georgia	Interested in the protection of local environment and human rights
	USAID	Cooperation opportunities within the CSR programs
	UN Global Compact Georgia	Annual reporting on ESG factors
Educational institutions	Georgian Technical University	Interested in cooperating with AGL in terms of internship for their students.
	Batumi Shota Rustaveli State University	Share information about the recruitment program, provide opportunities for internship and skills development.
	Vocational college “Akhali Talga” (Khulo office)	
	Vocational college “Black Sea” (Shuakhevi office)	
General public	High school teachers	Interested in the operations of the HPP. Its environment, safety measures, etc. Involved in various awareness raising activities.
	Students	
	HPP visitors	
Media³	Adjara TV	Covering HPPs’ operation, informing the population about the planned Project activities.
	TV1	
	Rustavi 2	
	Mtavari	Promoting and informing about the Project’s CSR activities.
	Obiektivi	
	TV 25	
	Imedi TV	

Vulnerable People

In the context of this SEP, vulnerable groups refer to those who by virtue of particular characteristics (ethnicity, age, disability, gender identity, economic disadvantage etc.) may be more adversely affected by project impacts and more limited in their ability to claim or take part in project benefits. When implementing the project, AGL has been ensuring that these people are given a full opportunity to be informed of the Project activities. Engagement activities are designed to enable full participation of these groups.

4.1 Engagement program

AGL strives to ensure that stakeholders are well informed about the Project and use various methods of engagement. The stakeholders have an opportunity to express their opinion, including complaints, about the Project and about the Company’s performance. The Table 4-3 below

³ AGL has developed a Communication Strategy/Media Plan which details the engagement with relevant media outlets and provides the full list of all media to whom AGL cooperates.

outlines the information to be disclosed to the stakeholders and authorities and the methods for communication.

Table 4-3 Stakeholder Engagement Program

Activity	Stakeholder to be engaged	Schedule / Location	Purpose of Engagement	Information to be disclosed	Communication tool
1. Engagement with internal stakeholders	Company employees, (sub)contractors, and suppliers	Continuously	Provide up to date information about ongoing activities, engagement in various skills development, awareness raising, corporate spirit building via other extra-work / corporate activities.	<ul style="list-style-type: none"> ➤ Workers' grievance mechanism ➤ Human resources, E&S, health and safety procedures ➤ AGL Code of Conduct ➤ AGL procurement policy ➤ Notifications / discussion about capacity building / training opportunities / extra- extra-work / corporate activities 	Meetings, emails, inductions, video conferencing Employee trainings Excursions / corporate events
2. Engagement with local villages	Affected villages as listed in Table 4-1	Continuously Prior to reservoir flushing	To understand project impacts and how to handle mitigation measures. Plan and coordinate CSR projects jointly.	<ul style="list-style-type: none"> ➤ Provision of information about the operational activities, including this SEP ➤ E&S performance ➤ Community Grievance Procedure ➤ CSR activities ➤ Community health and safety awareness raising ➤ Dam safety 	<ul style="list-style-type: none"> ➤ Public meetings in each village. ➤ Informational leaflets ➤ Outreach to households, with particular attention to delivering briefings to women and children (and other potentially vulnerable groups, such as pensioners and persons with disabilities). ➤ Company's website

Activity	Stakeholder to be engaged	Schedule / Location	Purpose of Engagement	Information to be disclosed	Communication tool
	Affected villagers downstream the reservoirs, HPPs and weir.			<ul style="list-style-type: none"> ➤ Awareness raising on biodiversity ➤ Information about the schedule for reservoir flushing ➤ Information about the environmental flow ➤ Information about community safety and emergency response activities ➤ Information about the impact of flushing on river ecology 	
3. Open days	General public High school children	Yearly Shuakhevi Powerhouse	Provide the public with an opportunity to learn about the operations of the plant, its environment, safety measures and benefits it brings to the region.	<ul style="list-style-type: none"> ➤ Project design and facilities ➤ E&S commitments and all the mitigation measures ➤ Safety measures ➤ Q&A session 	Visit to the powerhouse Presentations
4. Meetings and communication (including disclosure of information) with interested parties	Interested CSOs, NGOs, research bodies, educational institutions, state bodies, businesses	As required Tbilisi / Batumi	Provide information about ongoing operations, results of mitigation measures, CSR projects, etc.	Presentation of the observed environmental and social effect relating to the Project operation	Seminars Workshop Power Plant tour Company website

Activity	Stakeholder to be engaged	Schedule / Location	Purpose of Engagement	Information to be disclosed	Communication tool
				Discussion and action plan on issues reported by the CSOs, NGOs, research bodies, educational institutions or businesses.	
5. Annual meetings and communication with other HPP operators	Operators of other HPPs in the Adjara valley and in Georgia	Yearly Tbilisi / Batumi	Discussion and action plan for managing any cumulative environmental or social issues that may arise from operation activities, including flushing.	Plans about communication and awareness campaigns on dam safety and emergency preparedness exercises. Hydrological data to better understand inflow and optimize operations on the rivers.	Private meetings Emails Phone calls
6. Engagement with Financial institutions	EBRD, ADB and IFC	Biannually	Provide information about operational performance, E&S compliances, etc.	Annual E & S monitoring report	Reports Site visit Videoconferencing, emailing
7. Engagement with national and local government entities	All ministries and governmental entities as listed in Table 4-1Table 4-2	As required Tbilisi / Batumi	Ensuring that the company follows all applicable laws and regulations. Provide information about power generation, the number of employed people, ensure fulfillment of E&S requirements.	Operational processes E&S activities Result of CSR projects	Reports Letters Site visit Presentations
8. Engagement with the CSR beneficiaries	Various settlements	Monthly Need based	Plan activities together Plan PR activities Monitor and evaluate implemented projects	Results of the implemented projects Corrective actions to improve the outcome Set joint future plans and CSR	Meetings Phone calls Website Emails Social media



Activity	Stakeholder to be engaged	Schedule / Location	Purpose of Engagement	Information to be disclosed	Communication tool
				activities	
9. Engagement with media	Local and national media	As per AGL Communication Strategy and Media Plan Tbilisi / Batumi	Provide information about project status, generation, CSR projects	Ongoing operational activities E&S Commitments CSR Projects	Meetings Social media Media tours Interviews Leaflets Press Releases Newspaper articles Company website

4.2 Information Disclosure

AGL runs a bi-lingual (Georgian and English) website www.agl.com.ge which is being updated on a regular basis and all public documentations, such as Environmental and Social Management Plans (ESMS), Environmental and Social Impact Assessment (ESIA), Stakeholder Engagement Plan (SEP), Land Acquisition and Livelihood Restoration Plan (LALRP), Biodiversity Action Plan (BAP), etc. are disclosed, including a geological report, environmental flow monitoring reports, Frequently Asked Questions, etc. The website also features news, articles, and video stories. It contains information about the Grievance Redress Mechanism along with the contact information of AGL offices. In case of need, printed documents are also available in AGL offices.

Apart from the website, in order to reach a broader audience, AGL uses social media platforms, mainly LinkedIn and Instagram⁴ where updates on the Company's activities and performances are posted.

On an annual basis AGL publishes a magazine which summarizes activities of the Company over the year, the magazine is distributed among governmental officials at the central and regional levels. Informational leaflets are printed on a need base and distributed during safety awareness briefings to local residents in affected villages.

Combination of various methods of information disclosure ensures that different stakeholder groups are reached effectively and informed about the Company's activities.

4.3 Roles and responsibilities

AGL has a social team that has been implementing stakeholder engagement activities during the operational phase. AGL's Social Department is led by the Head of CSR and is in charge of managing social issues and stakeholder engagement. AGL has two Community Liaison Officers (CLOs) working in Didachara and Skhalta valleys (Khulo municipality), and a Stakeholder Engagement Specialist responsible for registering and managing grievances, as well as working with the stakeholders around the Shuakhevi HPP and Chirukhi weir in Shuakhevi municipality. The Shuakhevi Powerhouse also serves as a Public Information Center.

Roles and responsibilities for the implementation of this SEP are given in Table 4-4 below:

⁴ <https://www.linkedin.com/company/adjaristsqali-georgia-llc>
<https://www.instagram.com/shuakhevihpp/>

Table 4-4 Roles and Responsibilities

Title	Responsibility
AGL Chief Executive Officer	<ul style="list-style-type: none"> ➤ Approval of this plan and provision of all resources which are required for the implementation of this plan.
Head of CSR	<ul style="list-style-type: none"> ➤ Ensuring that Company’s operation is in line with IFIs social compliance requirements and SEP commitments ➤ Overall responsibility for successful delivery of this plan ➤ Developing strategies for engagement, information disclosure and CSR activities ➤ Liaison with the Mayors’ Offices of municipalities, community heads, lenders, NGOs, and other state agencies; ➤ Supervising development and implementation of the CSR activities ➤ Monitoring, evaluating and reporting on social (including the SEP) performance to AGL management and lenders
SES	<ul style="list-style-type: none"> ➤ Carrying out regular field trips to communities and holding meetings with local residents and focus groups, prepare minutes of meetings; ➤ Providing stakeholders (communities, Shuakhevi Mayor’s office) with project related information; participating in safety awareness raising activities for the operational phase; ➤ Administering and managing community grievance log registering grievances and ensuring timely response and solution to the complaints; ➤ Assisting social team to organize different events related to CSR activities; ➤ Developing monthly reports to the CSR Manager. Registering community and municipality applications/requests on infrastructural projects and/or other requests;
CLOs in Skhalta and Didachara areas	<ul style="list-style-type: none"> ➤ Undertaking field trips communities and holding meetings with local residents and focus groups, preparing minutes of meetings; ➤ Providing stakeholders (communities, Khulo Mayor’s office) with project related information; participating in awareness raising activities during reservoir flushing; ➤ Providing written and/or verbal complaints to the Stakeholder Engagement Specialist for registration; ➤ Conducting field trips based on received grievances, studying the problem and preparing letter of notification; ➤ Assisting social team to organize different events related to CSR activities; ➤ Developing monthly reports to the CSR Manager.

5. Grievance Redress Mechanism

The Company established a grievance redress mechanism early in the preparatory stage prior to construction activities (2011), and AGL social team members have been effectively applying it. The grievance mechanism will continue to be maintained by AGL during the whole operation stage.

Grievance can be defined as an actual or perceived problem that might give grounds for complaint. As a general policy, AGL works proactively towards preventing grievances through the implementation of impact mitigation measures and community liaison. AGL's SES work primarily to keep the grievance log updated, to receive grievances / inquiries and respond to them, as well as to ensure that AGL's responses are delivered in a timely manner to the complainants. Anyone can submit a grievance to the Company if he/she believes that the operation activity is having a detrimental impact on the community, the environment, or their quality of life. Anyone may also submit comments and suggestions.

Any comments or concerns can be brought to the attention of the Company verbally or in writing (by post or e-mail) or by filling in a grievance form (Annex A: Grievance Form). Grievance forms can then be submitted to the Company representative whose contact details are provided below. All grievances will be acknowledged within 10 days. If immediate corrective action is available, it will be taken in the shortest period. If no immediate corrective action is required, a written response will be provided within 21 days.

The SES will explain in writing (or verbally if needed) the manner in which the review of a grievance / issue was carried out, the results of the review, any changes to the activities that will be undertaken to address the grievance and how the issue is being managed in line with the Project's environmental and social management systems and requirements. Grievance information will be recorded in the grievance log. This information will include:

- Stakeholder name and contact details (unless requesting anonymity)
- Details of the nature of grievance
- Date received, responded to and closed out.

The Company aims to protect a person's confidentiality when requested and will guarantee anonymity. If a complainant prefers to submit a grievance anonymously or through a third party, this will be accepted, and the Company will respond to the extent feasible.

It is important to note that this mechanism does not replace the legal rights that people have. Even if a person submits grievance, he or she may use other legal avenues to achieve his/her goals.

AGL's SES will be the point of contact for grievances and comments during the operation phase. The SES is responsible for registering the grievances. As for CLOs, once they receive grievances, they transfer them to the SES for recording. Grievances and comments can be sent to AGL using the contact details below:

Name: Inguli Davitadze

Position: Stakeholder Engagement Specialist

Address: Shuakhevi HPP (Shuakhevi municipality) 1, Rustaveli street

E-mail: inguli.davitadze@agl.com.ge

Mob: + 995 577 20 34 15

Or can be submitted by mail to the following mailing address:

129, Bagrationi Street

Batumi 6010, Georgia

A Grievance log is monitored through the Key Performance Indicator (KPI) tracker where a number of grievances received and responded, number of days needed to resolve them, and other data are being logged. AGL undertakes periodic assessment to evaluate the effectiveness and efficiency of the grievance management system.

6. Monitoring & Reporting

To understand how effective SEP implementation is, AGL will undertake regular monitoring and reporting. In particular, AGL will perform the following:

- Keep the operation-stage SEP in place, up to date and disclosed to the public.
- Document the events held by the CLOs and SES: minutes of meetings (Appendix B. Meeting Memo Example) are produced, and all original written consultation correspondence are retained as evidence of the process and outcomes.
- Maintaining grievance logging and tracking: each grievance is logged by the SES, given an identification number and followed through by recording details and timing for its resolution and closing out;
- Annually reporting to the EBRD, IFC and ADB on the delivery of this SEP.
- Update the SEP when needed (tentatively, in about two years following the commissioning and then in case of any changes to the Project operational regime or structure).

Monitoring, evaluation, and reporting are key components of stakeholder engagement. Ops SEP activities are subject to internal monitoring which is conducted by AGL. The Company social staff comprises of four full-team members who follow the effectiveness and progress on:

- Information disclosure and consultation with stakeholders
- Grievance recording and resolution
- Engagement with local communities on various topics of concern/interest.

Internal monitoring to assess the effectiveness of AGL interaction will be conducted on a semiannual basis (performance of SEP implementation, CLO activities, effectiveness of grievance closure, etc.) and be reported to the AGL management. Internal monitoring reports will also be included in reports to lenders. As for the third-party verification, social monitoring will be a part of the overall ESMS audit.

Annex A: Grievance Form

Grievance Form

Grievance reference number (to be filled by AGL)

Contact details:

Name:

Address:

Telephone:

E-mail:

Please state whether you wish your details to remain confidential:

[Note that we may need to contact you regarding your grievance but will not share your details with a third party without your permission.]

How would you prefer

By Post

By Phone

By E-mail

To be contacted

Please tick a box

Name and identification information (from the identity card).

[This field is not mandatory]

Please provide details of your grievance, include description of the problem, who it happened to, when, where and how many times, as relevant.

What is your suggested resolution for the grievance, if you have one?

How to submit this form to AGL

By post to:

AGL Batumi Office
129, Bagrationi Street
Batumi 6010
Georgia

By hand:

Shuakhevi Powerhouse
1, Rustaveli street
Akhdaba Village
Shuakhevi

by e-mail: please email your grievance, suggested resolution and preferred contact

details to: inguli.davitadze@agl.com.ge or info@agl.com.ge

Signature

Date