



INDORAMA
FE Indorama Agro LLC

Stakeholder Engagement Plan

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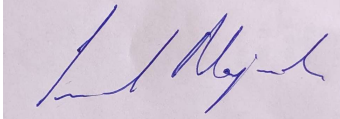
Signature Page

6 July 2023

Stakeholder Engagement Plan

A handwritten signature in black ink that reads "VIVEK". The letters are bold and stylized, with a horizontal line underneath the name.

Reviewed by: Vivek Sadevra
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A handwritten signature in blue ink that reads "Indranil Majumdar". The signature is written in a cursive style.

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ACRONYMS AND ABBREVIATIONS

ACs	Affected Communities
CLO	Community Liaison Officer
CSO	Civil Society Organisation
CSR	Corporate Social Responsibility
E&S	Environment & Social
EBRD	European Bank for Reconstruction and Development
EIA	Environment Impact Assessment
ESAP	Environment Social Action Plan
ESG	Environment Social Governance
ESIA	Environment Social Impact Assessment
ESP	Environment Social Policy
GRM	Grievance Redress Mechanism
GRO	Grievance Redress Officer
GoU	Government of Uzbekistan
HR	Human Resource
HSE	Health, Safety & Environment
HSSE	Health, Safety, Security & Environment
IAL	Indorama Agro LLC
IFC	International Finance Corporation
PS	IFC Performance Standards
ILO	International Labor Organisation
KPI	Key Performance Indicator
LRP	Livelihood Restoration Plan
LLC	Limited Liability Company
MFY	Community Citizen's Assembly (local known as <i>Makhalla Fuqarolar Yigini</i>)
NGO	Non-governmental Organisation
PER	Public Environment Review
PR	EBRD Performance Requirements
RoU	Republic of Uzbekistan
SCEEP	State Committee for Ecology and Environment Protection
SEE	State Environment Expertise
SEP	Stakeholder Engagement Plan
WHO	World Health Organisation

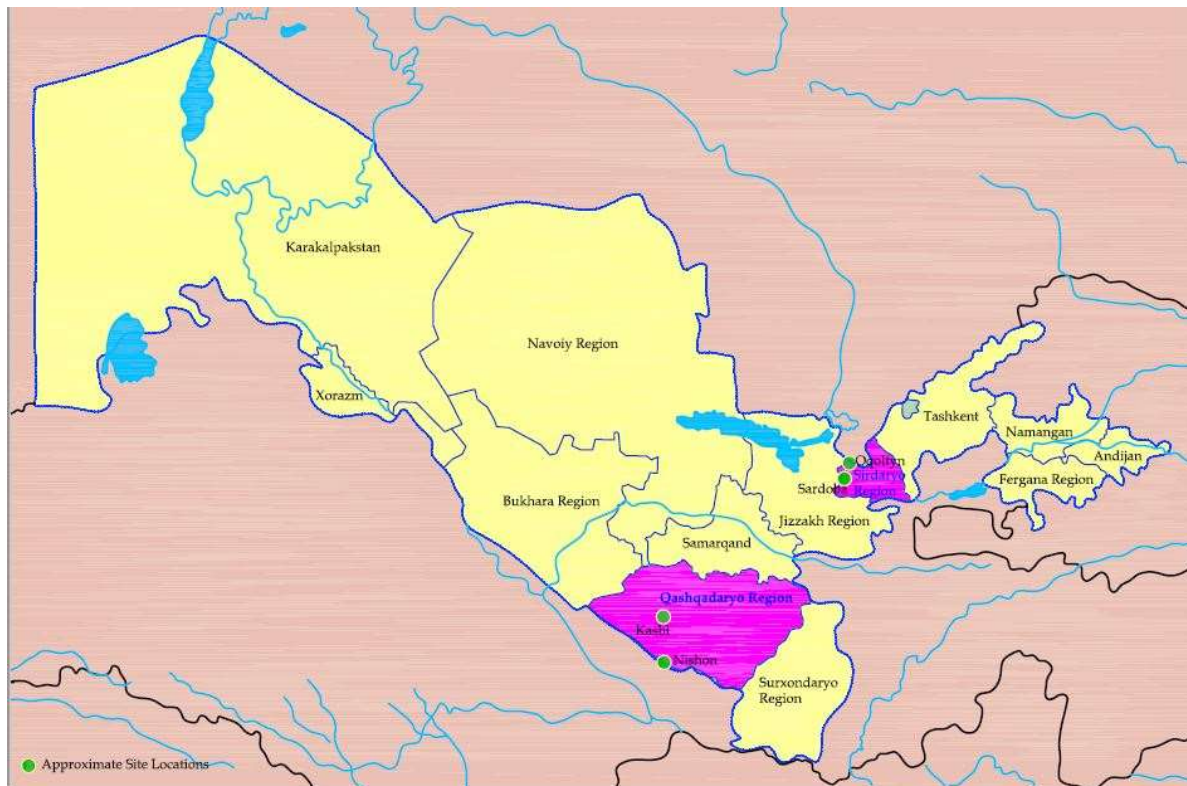
1. INTRODUCTION

Government of Uzbekistan (GoU) launched a program for creation of cotton clusters and optimisation of land use for direct and/or contracted cotton farming in Uzbekistan. To respond to the GoU initiative, Indorama Corporation Pte. Ltd. (the Sponsor) decided to set up a cotton cluster in Uzbekistan and start growing its own cotton (with rotation crops). The Sponsor established a Project company (FE “Indorama Agro” LLC or IAL) in Uzbekistan to develop and implement the cotton farming scheme for the cluster. In August 2018, the GoU made a decision to provide land and farms to the Project through the signing of the Decree of the Cabinet of Ministers of Uzbekistan No.632 of 08.08.2018 on “Measures to Establish a Modern Cotton and Textile Production by Indorama (Singapore) in the Republic of Uzbekistan”. The Project involves two cotton farming schemes: direct farming by Indorama Agro LLC (IAL) and contract farming that engages local farmers to grow and deliver cotton to IAL via supply contracts for processing.

This document outlines the Stakeholder Engagement Plan (SEP), which will guide Indorama Agro in engaging with stakeholders in an effective and culturally appropriate manner as part of the Project operations. The main purpose of this document is to allow stakeholder engagement to be undertaken in a systematic and planned manner that will allow the various stakeholder groups to express their individual views and opinions, and for the Project to appropriately respond to them. The plan is aimed at enabling active and meaningful engagement with the stakeholder groups by identifying different mechanisms for the participation of stakeholder groups, especially vulnerable groups.

The Project is located in Kasbi and Nishon districts of Qashqadaryo region and Sardoba and Oqoltyn districts of Sirdaryo region in the Republic of Uzbekistan (RoU). This SEP is applicable to the Project facilities in both regions.

Figure 1-1: Project Location Map



1.1 Definitions

Key terms and their definitions as applicable in this procedure have been defined in the following table.

Table 1-1: Key Terms and Definitions

Affected Party	Stakeholders who are affected by the Project operations, both positively and negatively. Within this, it is possible to distinguish between those that are directly affected and indirectly affected by the Project operations.
Stakeholder	Persons or groups that are directly or indirectly affected by a Project as well as those that may have interests in a Project and/or the ability to influence its outcome, either positively or negatively. This can refer to shareholders, lenders, employees, communities, industry, governments and international third parties.
Complainant	An individual, group or organization who submits a grievance to the company.
Stakeholder Engagement	<p>An umbrella term encompassing a range of goals, objectives, and activities with the aim of building trust, establishing mutual understanding, and constructive interactions with Project stakeholders throughout the lifetime of a Project that is designed to promote transparent, accountable, positive, and mutually beneficial relationships.</p> <p>Stakeholder engagement includes stakeholder identification and analysis, project-related disclosure of information, communication strategies, problem/conflict anticipation and prevention, on-going consultation, formation of partnerships, establishment of grievance resolution mechanisms, negotiated problem solving, employee (and possibly community) involvement in Project monitoring, regular reporting forums and procedures, and other related management activities.</p>
Nano Unit Contractors (former Nano Unit Workers)	These are small Limited Liability Companies (LLCs) hired and trained by Indorama Agro to manage crop production works and monitoring activities at the Company fields. Each NUC have responsibility to manage about 80 hectares of land, their remuneration includes fixed monthly payment and productivity incentives.
Contract Farms	These are farms (legally registered organizations) who have direct land rent agreement with the GoU for production of cotton and wheat, usually owning about 100 hectares of land on average. Contract farms have agreement for sale of produced crops to Indorama Agro, and the Company supports those farmers with allocation of loans to cover production cost and with provision of agricultural extension services.
Makhallas (Communities)	Makhallas are self-governing communities in Uzbekistan. Makhallas are the lowest administration units bringing together on average about 400-600 households (2,000 – 4,000 pop).
Affected Makhallas (Communities)	Local makhallas located within the operational areas of IAL and its farmlands and/or IAL, and under the impact area of the company activities and source of labour force for IAL.

1.2 Purpose

Stakeholder engagement is fundamental for building trust with local communities. The purpose of this SEP is to guide IAL with the process of engaging with stakeholders in a culturally appropriate manner during the entire Project lifecycle and to enable the Project to identify key stakeholders, ensure women and vulnerable people are identified early on and included in consultation activities, have access to information that is disclosed and can provide feedback via the complaints mechanism, understand the sensitivities within each stakeholder group and develop an appropriate engagement mechanism to ensure communities are aware of the Project and its impacts, and are consulted on a regular basis. This SEP has been prepared as per the requirements of the IFC Performance Standards, EBRD's Environmental and Social Policy (ESP) and Performance Requirements and applicable national regulations. Overall, the SEP will enable stakeholder engagement to be undertaken in a systematic and meaningful manner, where the various stakeholder groups are able to express their individual views, opinions and concerns, while allowing the Company to appropriately respond to them.

1.3 Principles of Stakeholder Engagement

The SEP for the Project will be mainly based on the IFC principles of stakeholder engagement as per the IFC Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007). They are presented in **Figure 1-2** below:

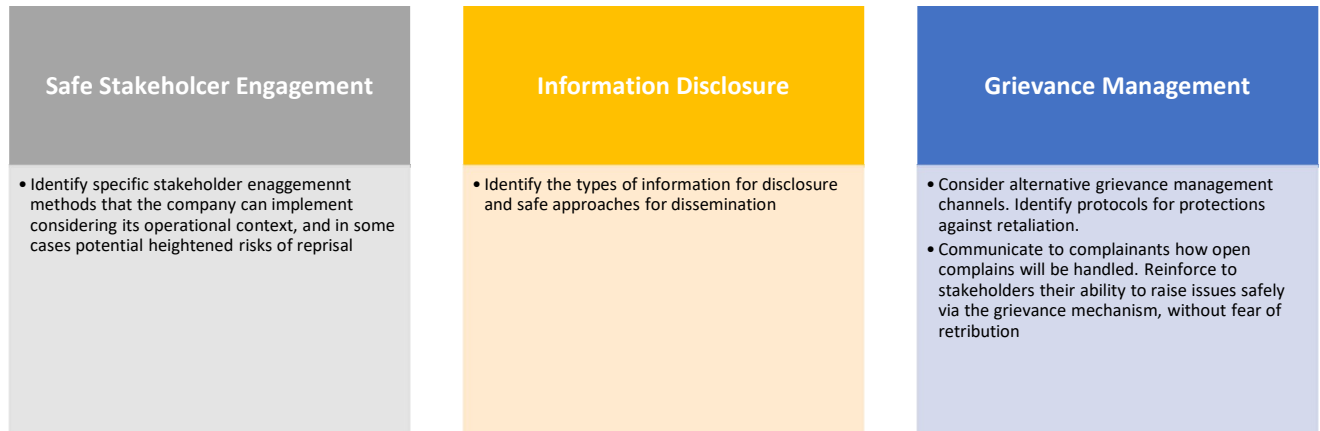
Figure 1-2: Principles of Stakeholder Engagement

Transparency and Fairness	Congruence and Materiality	Cultural Appropriateness and Inclusivity	Consultative and Collaborative	Documenting and Disclosing
<ul style="list-style-type: none"> The process of engagement shall be transparent, in harmony with the local culture and in the appropriate language. This would enable trust to be build amongst the stakeholders towards the project by allowing for a clearer understanding to be developed of the reasoning and motivation behind the activities and thus of the fairness of the process. 	<ul style="list-style-type: none"> The engagement activities undertaken should be aligned to the business objectives, priorities and the identified issues/ impacts/ risks associated with the project. As part of the planning, the engagement activities should be prioritized on the basis of their significance to immediate and long-term interests of the business and/or the stakeholders. The materiality of an issue may be determined based on criteria such as financial implications, sustainability drivers, temporal nature of issues (short, medium or long term) and their impact on stakeholders and JKPL 	<ul style="list-style-type: none"> The engagement activities undertaken should be in cognizance of the cultural norms and practices of the stakeholder groups as well as the differences in social position of the various groups. To the extent possible, the engagement activities should be carried out within the existing institutions and processes of the stakeholders identified, while ensuring participation by all groups, especially the vulnerable groups such as women and economically weaker population. Furthermore, aspects such as individual sub-group cultures, access to knowledge and information across various sub-groups, language and socio-economic status of the stakeholder groups must be kept in mind while undertaking engagement activities. 	<ul style="list-style-type: none"> Stakeholder engagement is a two-way process of communication between the project and the stakeholders. A collaborative engagement process allows for the ideal engagement activities to be identified according to the individual group requirements, while balancing the competing needs and interests of all stakeholders. Such an engagement process also enables for trust to be build amongst the stakeholder groups and assists towards ensuring sustainability of project activities and a 'social license to operate'. Collaboration is viewed as one of the critical differences between information disclosure and engagement with stakeholders 	<ul style="list-style-type: none"> The stakeholder engagement process evolves through the lifecycle of the project, which is informed by the experiences and learnings from engagement activities undertaken in previous stages. It is critical that all engagement activities with the stakeholders are documented and recorded, along with photographic evidence wherever possible. Also, as part of the engagement activities the project should disclose the summary of these activities and the key outcomes of the same on a regular basis to the external stakeholders identified, along with the key project information.

Source: IFC Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007)

The Company should consider the design of an interim stakeholder engagement process.

Figure 1-3: Interim Stakeholder Engagement Process



2. REGULATORY FRAMEWORK AND SAFEGUARDS

The relevant provisions under the following regulations, guidelines and pertinent standards are applicable towards the implementation of this Plan.

Table 2-1: Reference Framework for SEP

Reference	Full Title
Uzbekistan National Environmental Impact Assessment (EIA)	Public Environmental Review (PER)
IFC PS 1	Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
IFC PS 2	Performance Standard 2: Labour and Working Conditions
IFC PS 3	Resource Efficiency and Pollution Prevention
IFC PS 4	Performance Standard 4: Community Health, Safety & Security
IFC PS 5	Land Acquisition and Involuntary Resettlement
EBRD	Environmental and Social Policy ESP (2019)
EBRD PR 1	Assessment and Management of Environmental and Social Risks and Impacts
EBRD PR 2	Labour and Working Conditions
EBRD PR 3	Resource Efficiency and Pollution Prevention and Control
EBRD PR 4	Health, Safety and Security
EBRD PR 5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
EBRD PR 10	Information Disclosure and Stakeholder Engagement
IFC Stakeholder Engagement Handbook	IFC Stakeholder Engagement - A Good Practice Handbook for Companies Doing Business in Emerging Markets

2.1 Background on National Regulations

National legislation in Uzbekistan states that the public should be informed about the Project and have an opportunity to comment on the information provided. Indorama Agro shall report to the State Committee of the Republic of Uzbekistan on Ecology and Environmental Protection (SCEEP) and appropriate Public Authorities about the measures taken.

Requirements to the content, development procedure and examination of Environment Impact Assessment (EIA) documents are governed by the following legislative acts of the Republic of Uzbekistan:

- Law of the Republic of Uzbekistan No 754-XII dated 09.12.1992 «On Environment Protection»
- Law of the Republic of Uzbekistan No 73-II dated 25.05.2000 «On Environmental Impact Audit»
- Regulation «On State Ecological Expertise in the Republic of Uzbekistan», approved by the Decree of the Cabinet of Ministers of the Republic of Uzbekistan No 491 dated 31.12.2001.

- “On the further improvement of the environmental impact assessment mechanism”, approved by the Resolution of the Cabinet of Ministers of Uzbekistan No. 541 (2020).
- Law on Appeals of Individuals and Legal Entities № ZRU-378 dated 03.12.2013 (new edition № ZRU-445 dated 11.09.2017, new edition last amended on 11.03.2020).

The project owner takes all reasonable measures in accordance with these laws and standards in order to minimize any potential violations of general balance of environment, including, but not limited to, land surface, subsoils, air, lakes, rivers, flora and fauna, crops and other natural resources.

Law on Appeals of Individuals and Legal Entities № ZRU-378 dated 03.12.2013 (new edition № ZRU-445 dated 11.09.2017, new edition last amended on 11.03.2020). The purpose of this Law is to regulate relations in the field of appeals of individuals and legal entities (hereinafter referred to as appeals) to state bodies and state institutions (hereinafter referred to as state bodies), as well as to their officials. Article 5 specifies the applications, suggestions and complaints as the types of appeals that can be submitted in verbal, written or electronic forms. An appeal received by a state body, organization or their official is subject to registration on the same day, and in case of receipt after the end of working hours, on the next business day. Refusal to register an appeal is not allowed. Registration of verbal appeals is not required (Article 23). Article 28 states that the application or complaint is considered within fifteen days from the date of receipt by the state body, organization or their official, and within one month in case the additional study and (or) verification is required (in the latter case the information is provided to the individual or legal entity that submitted the appeal within ten days). It was noted, that according to the law anonymous appeals are not considered (Article 29).

The national environmental impact assessment (EIA) procedure is regulated by the Law "On the Environmental Examination" and the Resolution of the Cabinet of Ministers № 541 "On further improvement of Mechanism of the Environmental Impact Assessment dated 07.09.2020 (last amendment № 774 dated 27.12.2021). The Resolution specifies the requirements for EIA process in Uzbekistan. According to the resolution, the state environmental expertise is a type of environmental examination carried out by specialized expert divisions to set up the compliance of the planned activities with the environmental requirements and determination of the permissibility of the environmental examination implementation.

The law stipulates four categories of projects as follows:

- Category I — “high risk of environmental impact” (state environmental expertise is conducted by the national SCEEP within 20 days, all EIA materials are required);
- Category II — “medium risk of environmental impact” (state environmental expertise is conducted by the national SCEEP within 15 days, all EIA materials are required);
- Category III — “low risk of impact” (state environmental expertise is conducted by regional branches of SCEEP within 10 days, all EIA materials are required);
- Category IV – “local impact” (state environmental expertise is conducted by regional branches of SCEEP within five days, only a draft EIA is required).

In Uzbekistan, public hearings as part of the EIA are mandatory only for the projects belonged to Category I and II. The Resolution No. 541 describes a procedure of conduction of public consultation. The minutes of public consultations have to be attached to the report on EIA. This project belongs to the category II. Therefore, it will require conduction of public consultations in accordance with national legislation as well.

Announcement of public consultation meeting with indication of date, time and venue should be done through local mass media or disseminated any other way among affected stakeholders at least 20 days in

prior the event. During the public consultations at least 10 stakeholders must participate, if less than 10 participants the public consultation should re-scheduled. The project owner should present Non-Technical Summary (NTS) including the key findings of the Environmental and Social Impact Assessment for the solar park, both positive and negative.

2.2 IFC Requirements

The IFC Stakeholder Engagement Handbook defines stakeholder engagement as “a means of describing a broader, more inclusive, and continuous process between a company and those potentially impacted that encompasses a range of activities and approaches and spans the entire life of a Project.” The specific objectives of the SEP are to:

Allow for the identification and categorization of stakeholder groups across the Project lifecycle;

- Develop an understanding of the profile of the stakeholder groups identified, their interests, issues/impacts and concerns relevant to the Project;
- Allow for a relationship to be developed with the stakeholder groups based on ongoing engagement and mutual understanding and trust on issues of common interest;
- Be able to anticipate and address issues and areas of concern of stakeholders, in a timely manner;
- Ensure timely and adequate disclosure of information to the stakeholder groups in a culturally appropriate manner; and
- Allow for learnings to be derived from engagement with stakeholder groups, which in turn would inform any future engagement activities.

2.3 EBRD Requirements

The EBRD’s Environmental and Social Policy (ESP) defines stakeholder engagement as an on-going process which involves the following elements:

- stakeholder identification and analysis;
- stakeholder engagement planning;
- disclosure of information;
- meaningful consultation and participation;
- an effective grievance procedure or mechanism and
- ongoing reporting to relevant stakeholders.

The process of stakeholder engagement should begin at the earliest stage of Project planning and continue throughout the Project life.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

The stakeholder identification is carried out keeping in mind the present understanding of the Project context. This analysis of stakeholders identifies the individuals or groups that are likely to be impacted by and/or have an interest in the Project activities and categorizes them based on the significance of the impact/influence. This information is then used to formulate the engagement plan and assess the manner in which the interests of the stakeholders should be addressed during Project operations.

3.1 Stakeholder Identification

A stakeholder is “a person, group, or organization that has a direct or indirect stake in a Project/organization which can affect or will be affected by the Project/organization's actions, objectives, and policies”. Stakeholders can thus vary in terms of the degree of interest, influence, and control they have over the Project.

The Company divides all identified stakeholders into two main groups: *Internal and External Stakeholders*. Internal Stakeholders include direct and indirect workforce of the Company and Trade Unions, and External Stakeholders include all other stakeholders, mainly local affected communities, government organizations, suppliers, contractors, NGOs and all other stakeholders.

For the operations of IAL, the following list of key stakeholders have been identified and are presented in the **Table 3-1** below:

Table 3-1: Stakeholder Details

Stakeholder Groups	Description of the Stakeholder
Internal Stakeholders	
IAL Employees and Workforce	<p>This stakeholder consists of:</p> <ul style="list-style-type: none"> ■ IAL Management; ■ IAL Employees; ■ Irrigation workers; ■ Seasonal workers. ■ Internal Safety and Emergency Stakeholders
Trade Unions	<ul style="list-style-type: none"> ■ Syrdarya Trade Union Committees; ■ Kashkadarya Trade Union Committees.
External Stakeholders	
Affected Communities including vulnerable groups ¹	<ul style="list-style-type: none"> ■ These stakeholders are the Affected Communities of Kasbi and Nishon districts in Qashqadaryo (21 Makhallas directly affected) and Oqoltyn and Sardoba District in Sirdaryo regions (12 Makhallas directly affected). These are persons affected with economic displacement. ■ This also includes vulnerable group/persons such as Women headed families, families with many children (more than 5), Low-income families, disabled persons, elder people.

¹ As defined in the EBRD's ESP vulnerable groups refer to people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits. Vulnerable individuals and/or groups may also include, but not be limited to, people living below the poverty line, the landless, the elderly, women and children headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national legislation and /or international law.

Stakeholder Groups	Description of the Stakeholder
Mahallas	<ul style="list-style-type: none"> ■ This stakeholder is an institution holding traditional power. It is headed by a chief/ chairman and play an important role in Uzbek community.
Nano Unit Contractors and their workers	<ul style="list-style-type: none"> ■ This stakeholder is supporting to manage cropping in direct farming
Contract Farmer	<ul style="list-style-type: none"> ■ Independent farmers supplying cotton/wheat to the Company.
Local Contractors	<ul style="list-style-type: none"> ■ These stakeholders consist of labour suppliers and contractors that are engaged by IAL.
Government Departments	<ul style="list-style-type: none"> ■ Ministry of Foreign and Trade Affairs ■ Ministry of Agriculture ■ Ministry of Water Resources ■ Ministry of Employment and Labour Relations ■ State Committee on Ecology and Environmental Protection
International Lenders/ International Organisations	<ul style="list-style-type: none"> ■ International Finance Corporation (IFC) ■ European Bank for Reconstruction and Development (EBRD) ■ International Labour Organisation (ILO) ■ Better Cotton Initiative
CSOs/NGOs:	<ul style="list-style-type: none"> ■ Farmers Association; ■ Uzbek-German Forum for Human Rights; ■ Anti-Slavery International; ■ International Labour Rights Forum; ■ Bankwatch; ■ Uzbekistan's Women Committee.
Media	<ul style="list-style-type: none"> ■ This refers to news and information media which could influence public opinion.
Third-Party Helpline Operator <i>Top- Contact</i>	<ul style="list-style-type: none"> ■ Top-Contact is managing the helpline and receives calls from all stakeholders.

3.2 Stakeholder Mapping Analysis

Stakeholder Analysis is the process of identifying the individuals or groups that are likely to affect or be affected by a proposed Project, and sorting them according to their impact on the Project and the impact the Project will have on them. This information is then used to assess the manner in which the interests of the stakeholders should be addressed in the Project plan, policy, program, or other action.

The purpose of a stakeholder mapping is to:

- Study the profile of the stakeholders identified and their roles for the Project;
- Understand each group's specific issues, concerns as well as expectations from the Project that each group retains;
- Gauge their influence on the Project or the impact of the Project on them;
- Understand their vulnerabilities; and
- Understand the most effective means to communicate with the different stakeholder groups.

The significance of a stakeholder group is categorized considering the magnitude of impact of the Project on the stakeholder or degree of influence (power, proximity) of a stakeholder group on the Project

functioning. The significance of the stakeholder group importance for the Project and the requirement for engaging with them is identified as an interaction of the impact and influence. The matrix for significance is depicted in **Table 3-2** and the description the stakeholder analysis and influence is depicted in **Table 3-3** below.

Table 3-2: Stakeholder Significance and Engagement Requirement

		Likelihood of Influence on/ by Stakeholder		
		Low	Medium	High
Magnitude of Influence/ Impact	Negligible	Negligible	Negligible	Negligible
	Small	Negligible	Minor	Moderate
	Medium	Minor	Moderate	Urgent
	Large	Moderate	Urgent	Urgent

Table 3-3: Stakeholder Analysis & Influence

Nature of Influence	Implication
High Influence	High Influence implies a high degree of influence of the stakeholder on the Project in terms of participation and decision making or high priority to engage with the stakeholder.
Medium Influence	Medium Influence implies a moderate level of influence and participation of the stakeholder in the Project as well as a priority level to engage the stakeholder which is neither highly critical nor are insignificant in terms of influence.
Low Influence	Low Influence implies a low degree of influence of the stakeholder on the Project in terms of participation and decision-making or low priority to engage that stakeholder.

The intermediary categories of low to medium or medium to high primarily imply that their influence and importance could vary in that particular range subject to context specific conditions or also based on the responses of the Project towards the community.

The coverage of stakeholders includes any person, group, institution or organization that is likely to be impacted (directly or indirectly) or may have interest/influence over Project. Though this document has attempted to be inclusive of all categories of stakeholders across the entire Project cycle, it is difficult to identify all potential stakeholders and gauge their level of influence over the entire Project cycle. It should be noted that this SEP has been updated to cover the operational phase of the Project. Therefore, Indorama Agro will revise this SEP in a timely manner to ensure applicability for any given period of the Project cycle.

Table 3-4: Stakeholder Profiles and Influence Mapping

Stakeholder Group	Brief Profile of the Stakeholder	Interest of the Stakeholders	Impact of the Project on the Stakeholders	Influence of the stakeholder on the Project	Magnitude of Impact/ Influence	Stakeholder Significance
Affected Communities	<ul style="list-style-type: none"> This stakeholder comprises communities residing in the vicinity of the Project area and impacted directly by IAL operations. 	<ul style="list-style-type: none"> Information about the IAL site and its potential impacts; Access to quality public services and other community development services; Employment opportunities at IAL; Emergency response in place in case of any accidents; Minimum impacts to the community in case of noise, air and water pollution; and Mechanism for raising grievances or concerns. 	<ul style="list-style-type: none"> The stakeholders have been affected by economic displacement as a result of Project activities. The Project may also lead to an increase in job opportunities and subsequently increase in incomes. Employment opportunities are openly displayed and accessible to local community members, in order to avoid potential competition or kinship which could be easily escalated in such communities. 	<ul style="list-style-type: none"> This stakeholder plays a critical role in the formation of public opinion towards the Project and allowing for the smooth functioning of the Project. The stakeholder group may potentially be engaged as local resources such as skilled/ semi-skilled jobs in the Project facilities, as well as agricultural and seasonal workers during Project. This stakeholder group can also provide services as contractors and suppliers for the IAL. 	<ul style="list-style-type: none"> Impact of Project on Stakeholder: Large Influence of Stakeholder on Project: Medium 	Urgent
<i>Mahalla</i> Leaders	<ul style="list-style-type: none"> This stakeholder is an institution holding traditional power. It is headed by a chief/ chairman and play an important role in 	<ul style="list-style-type: none"> Having access to relevant information on the Project (e.g., grievances, emergency procedure and management measures); 	<ul style="list-style-type: none"> The impacts of the Project on this stakeholder group will be in case of potential for social disruptions, between local inhabitants and the working population 	<ul style="list-style-type: none"> This group thus has the ability to influence the perception of the community in regard to the Project and its activities. 	<ul style="list-style-type: none"> Impact of Project on Stakeholder: Medium Influence of Stakeholder on Project: Medium 	Moderate

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder Group	Brief Profile of the Stakeholder	Interest of the Stakeholders	Impact of the Project on the Stakeholders	Influence of the stakeholder on the Project	Magnitude of Impact/ Influence	Stakeholder Significance
	Uzbek community.	<ul style="list-style-type: none"> Benefiting from social investment; Training of local population on skill enhancement, in case of opportunities. 	migrating into the area creates a potential for social disruption.;			
Other Local Communities	<ul style="list-style-type: none"> This stakeholder group comprises of the communities residing in the districts of the IAL area. 	<ul style="list-style-type: none"> Information about the IAL site and its potential impacts; Access to quality public services and other community development services; Employment opportunities; Emergency response in place in case of any accidents; and Mechanism for raising grievances or concerns. 	<ul style="list-style-type: none"> Considering the Project is in the operational phase, limited disturbance to the local community is expected. The Project may also lead to an increase in job opportunities and subsequently increase in incomes. 	<ul style="list-style-type: none"> This stakeholder plays a critical role in the formation of public opinion towards the Project and allowing for the smooth functioning of the Project. The stakeholder group may potentially be engaged as local resources such as skilled/ semi-skilled workers. This stakeholder group can also provide services as contractors and suppliers for the Plant. 	<ul style="list-style-type: none"> Impact of Project on Stakeholder: Medium Influence of Stakeholder on Project: Medium 	Moderate
Vulnerable people	<ul style="list-style-type: none"> This stakeholder group refers to the vulnerable group such as Women headed families, families with many children (more than 5), Low- 	<ul style="list-style-type: none"> Information about the IAL site and its potential impacts; Access to quality public services and other community 	<ul style="list-style-type: none"> In view of the poor social and economic conditions of the Vulnerable people, the Unit may have to provide engagement avenues for the group; 	<ul style="list-style-type: none"> The influence of this stakeholder group on the Unit is limited. 	<ul style="list-style-type: none"> Impact of Project on Stakeholder: Medium Influence of Stakeholder on Project: Medium 	Moderate

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder Group	Brief Profile of the Stakeholder	Interest of the Stakeholders	Impact of the Project on the Stakeholders	Influence of the stakeholder on the Project	Magnitude of Impact/ Influence	Stakeholder Significance
	income families, disabled persons, elderly people with nobody to care etc.	development services; <ul style="list-style-type: none"> ■ Employment opportunities; ■ Emergency response in place in case of any accidents; and ■ Mechanism for raising grievances or concerns. 	<ul style="list-style-type: none"> ■ This stakeholder group can benefit from potential employment opportunities at the existing Unit, or in the event of expansion of the Unit. 			
Workforce	<ul style="list-style-type: none"> ■ This stakeholder comprised of IAL employees, contracted farmers, irrigation workers, chipper leaders, and seasonal workers. ■ Vulnerable workers such as disabled workers, women workers with children at pre-school age (up to 6 years). 	<ul style="list-style-type: none"> ■ Opportunities for direct employment; ■ Economic benefits such as payment of minimum wages; ■ Training and induction programs; ■ Receiving relevant information on the Project; ■ Working in a safe environment, free of conditions that foster inequality. 	<ul style="list-style-type: none"> ■ The Project provides employment opportunity to this group as IAL employees and contracted workers/ farmers. ■ The Project may pose health and safety concerns if proper safety measures are not adopted by the workers. 	<ul style="list-style-type: none"> ■ This stakeholder engagement is critical for the smooth implementation of the Project. ■ This group has an important role in formation of public opinion. ■ In case the labour requirements and health and safety measures are not complied with, there may be a risk of conflict and protest which may affect the image of the Project. 	<ul style="list-style-type: none"> ■ Impact of Project on Stakeholder: Medium ■ Influence of Stakeholder on Project: High 	Urgent
Supplier & Contractors	<ul style="list-style-type: none"> ■ This stakeholder group comprised of the contractors involved in the Project such as 	<ul style="list-style-type: none"> ■ Economic benefits due to dynamism of regional and municipal economic activity; 	<ul style="list-style-type: none"> ■ The Project provides a sustained business opportunity to this group in the area. 	<ul style="list-style-type: none"> ■ This stakeholder group is critical for the smooth functioning and timely 	<ul style="list-style-type: none"> ■ Impact of Project on Stakeholder: Small ■ Influence of Stakeholder on Project: Medium 	Minor

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder Group	Brief Profile of the Stakeholder	Interest of the Stakeholders	Impact of the Project on the Stakeholders	Influence of the stakeholder on the Project	Magnitude of Impact/ Influence	Stakeholder Significance
	those supplying materials.	<ul style="list-style-type: none"> ■ Receiving information on relevant business opportunities; ■ Sharing of Emergency response and Compliance to E&S requirements; ■ Response to grievance and emergencies raised by the suppliers and contractor; ■ Increased of opportunities for indirect employment. 		<p>implementation of the Project;</p> <ul style="list-style-type: none"> ■ This group may also play an important role in the formation of public opinion towards the Project. ■ This group will be a stakeholder in the implementation of the benefit sharing plans formulated for the Project. 		
Internal Safety and Emergency Stakeholders	<p>This stakeholder groups comprised:</p> <ul style="list-style-type: none"> ■ Security Personnel; ■ Fire Service; ■ Health Institutions 	<ul style="list-style-type: none"> ■ Continuous safety related measures and sharing of emergency plan and procedures; ■ Ensure minimum traffic disruption, accidents and emergency situations; ■ Complying to safety rules and cooperation from all workers and community on safety and 	<ul style="list-style-type: none"> ■ The Project provides employment opportunity to this group; ■ The Project may pose health and safety concern if proper safety measures are not adopted. 	<ul style="list-style-type: none"> ■ This stakeholder is critical for the smooth implementation of the Project. ■ This group has an important role to protect, mitigate any sorts of emergency situations. 	<ul style="list-style-type: none"> ■ Impact of Project on Stakeholder: Small ■ Influence of Stakeholder on Project: High 	Moderate

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder Group	Brief Profile of the Stakeholder	Interest of the Stakeholders	Impact of the Project on the Stakeholders	Influence of the stakeholder on the Project	Magnitude of Impact/ Influence	Stakeholder Significance
		emergency protocol; <ul style="list-style-type: none"> Working in a safe environment free of conditions that foster inequality; Sharing of emergencies. 				
Lenders & Investors	<ul style="list-style-type: none"> This stakeholder group includes investors who may be evaluating investment opportunities into the Project. 	<ul style="list-style-type: none"> E&S compliances; Providing a safe environment for all workers; Adherence to safety protocol; Regular monitoring and reporting. 	<ul style="list-style-type: none"> The impact of the Project on this stakeholder group will primarily pertain to Project's performance. 	<ul style="list-style-type: none"> This stakeholder group's influence on the Project will primarily pertain to the determination of the Project's financial feasibility. In addition to the national rules and regulations, the Project is required to comply with the internal standards of these financial institutions. 	<ul style="list-style-type: none"> Impact of Project on Stakeholder: Small Influence of Stakeholder on Project: High 	Moderate
Government and Regulatory Authorities	<ul style="list-style-type: none"> This stakeholder group comprised regulatory authorities at the district, state and national level that are responsible for various permits and licenses pertaining to the Project. This includes government 	<ul style="list-style-type: none"> Receiving information on Projects (timeline, potential impacts, benefits) Promoting economic development Establishing clear channels of communication Compliance to national laws and requirements. 	<ul style="list-style-type: none"> The impact of the Project on this stakeholder group will be negligible. However, it is expected that IAL will abide with all applicable national guidelines, policies and laws. 	<ul style="list-style-type: none"> This stakeholder group is high in priority as this group provides the permits and licenses essential for the functioning of the Project. This stakeholder group can result in Project shut down or stop-work for a few days and/ or penalties and fines 	<ul style="list-style-type: none"> Impact of Project on Stakeholder: Small Influence of Stakeholder on Project: High 	Urgent

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder Group	Brief Profile of the Stakeholder	Interest of the Stakeholders	Impact of the Project on the Stakeholders	Influence of the stakeholder on the Project	Magnitude of Impact/ Influence	Stakeholder Significance
	agencies such as: <ul style="list-style-type: none"> ■ Hokimiyats ■ Ministry of Foreign and Trade Affairs ■ Ministry of Agriculture ■ Ministry of Water Resources ■ Ministry of Employment and Labour Relations ■ State Committee on Ecology and Environmental Protection. 			being levied on the Project.		
Media	<ul style="list-style-type: none"> ■ This stakeholder group is comprised of the regional and national press (both print and audio-visual). ■ This stakeholder group can play an extremely important role in the generation of awareness and public opinion towards the Project. 	<ul style="list-style-type: none"> ■ Receiving relevant information on the Project (timeline, potential impacts, benefits) to inform the population; ■ Disseminating relevant and attractive information for their audience on Project development. 	<ul style="list-style-type: none"> ■ The impact of the Project on the stakeholder is likely to be extremely limited due to the nature of the Project activities. 	<ul style="list-style-type: none"> ■ The influence of the stakeholder group on the Project is likely to pertain to the opinion formation amongst the local, national and potentially international stakeholders towards the Project. ■ Reporting on the Project's poor environmental and social performance. 	<ul style="list-style-type: none"> ■ Impact of Project on Stakeholder: Small ■ Influence of Stakeholder on Project: High 	Moderate
NGOs/CSOs operating in the area	<ul style="list-style-type: none"> ■ This stakeholder group comprises of regional, 	<ul style="list-style-type: none"> ■ Receiving information on Projects status; 	<ul style="list-style-type: none"> ■ The impact of the Project on the stakeholder is likely 	<ul style="list-style-type: none"> ■ The influence of the stakeholder group on the Project is 	<ul style="list-style-type: none"> ■ Impact of Project on Stakeholder: Small 	Moderate

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder Group	Brief Profile of the Stakeholder	Interest of the Stakeholders	Impact of the Project on the Stakeholders	Influence of the stakeholder on the Project	Magnitude of Impact/ Influence	Stakeholder Significance
	<p>national operating in the sphere of human rights, advocacy and community development. These include the following:</p> <ul style="list-style-type: none"> ■ Farmers Association; ■ Uzbek-German Forum for Human Rights; ■ Anti-Slavery International; ■ International Labour Rights Forum; ■ Bankwatch; ■ Uzbekistan’s Women Committee. 	<ul style="list-style-type: none"> ■ Potential adverse environmental and social impacts; ■ Improvement of public service and economic development. 	<p>to be limited due to the nature of the Project activities;</p> <ul style="list-style-type: none"> ■ Establishment of strategic social investment alliances. 	<p>likely to pertain to the opinion formation amongst the local, national and potentially international stakeholders towards the Project.</p>	<ul style="list-style-type: none"> ■ Influence of Stakeholder on Project: Medium 	
Trade Union	<p>This stakeholder group comprises of</p> <ul style="list-style-type: none"> ■ Syrdarya Trade Union Committee; ■ Kashkadarya Trade Union Committee. 	<ul style="list-style-type: none"> ■ Interests of workers with regard to working conditions, terms of employment, welfare, collective bargaining, freedom of association. 	<ul style="list-style-type: none"> ■ The impacts of the Project on this stakeholder group will be in case of potential strike or any grievances between management and workers in demand, through trade union. 	<ul style="list-style-type: none"> ■ The influence of the stakeholder group on the Project is likely to pertain to the opinion formation amongst the workers towards the Project. 	<ul style="list-style-type: none"> ■ Impact of Project on Stakeholder: Medium ■ Influence of Stakeholder on Project: Medium 	Moderate

4. PREVIOUS ENGAGEMENT ACTIVITIES AT IAL

IAL has been engaging with the *Makhalla Fuqarolar Yig'ini (MFY)* or *Mahallas* located in the vicinity of the Project sites. The purpose of the meetings has been to introduce the Project CLOs for each region, provide an overview of the company's operations and intentions to collaborate with the Mahallas. The Grievance Redressal Mechanism (GRM) is also shared during these meetings. In both Sirdaryo and Qashqadaryo, introductory meetings have been conducted with the following *Mahallas*:

Table 4-1: Makhalla (MFY) Meetings

	Location	MFY
Sirdaryo Region	Sardoba District	Kurgontepa, Dustlik, Yurtdosh, Otayurt, Birlik
	Oqoltyn District	Shodlik, Yangi Toshkent, A.Navoiy, Sahovat, Kurkam diyor, Yangi davr, Ahillik
Qashqadaryo Region	Kasbi District	Nazartepa, Cho'lquvar, Qamashi, Xo'jaki, Mushqqoqi, Nurobod, Jarko'ja, Paxtakor, Fazli, Muglon
	Nishon District	Kaptarli, Oydin, Balxiyak, Katta anhor, Qirqquloch, Samarqand, Shirinobod, Ko'ksoy, A.Qodiriy, Istiqbol, Yangiobod

The following is the summary of the stakeholder's engagement activities undertaken by IAL after disclosure of final ESIA report in the company's website;

- ESG department along with field level officers of IAL (like zone manager, regional agronomist, regional foreman etc.) had a number of meetings with representatives of ACs around the Project footprint located across multiple districts. Key stakeholders engaged in this process were the Chairman of MFY, women activists, youth leaders, deputy mayors, religious leaders, street leaders, etc. The key topics covered in the engagement meetings pertained were pertaining to awareness on IAL's policy and GRM, required community support for project, receiving grievances of community, Project activities related health & safety discussion etc. Refer **Appendix D** for details on engagement activities undertaken with community representatives;
- As part of a community welfare measure, IAL distributes cotton stalks to the residents of the neighbourhood community where cotton harvesting is complete. List of beneficiaries for this benefit are selected in consultation with the chairman of the concerned Mahalla and they come from a vulnerable group of the community like needy & low-income families, disabled persons, bereaved families, etc.
- IAL undertook Better Cotton Initiative (BCI) Audit successfully in 2022 where consultation with all key stakeholders (like Mahalla chairpersons & other community leaders, different categories of workers engaged in the field operations etc.) were organised for BCI auditors.
- IAL had engagement programs with school teachers & directors in the month of October 2022 in 10 different *Makhallas* of *Nishan* district on the theme of '*Encourage secondary schools of Nishan district to dedicate 1st October to the day of teachers and coaches*. School teachers were also sensitised on the significance of preventing schoolchildren from going to cotton field and avoiding any potential issues of child labour and/or forced in the cotton field;
- ESG and HR department representatives of IAL organised several meetings with different categories of manpower engaged in IAL operations across different locations in multiple districts, with the purpose of awareness generation on IAL's new policies and GRM function. Similar programs were also organised with other stakeholder groups like Development Finance Institutions (World Bank, ADB),

Trade Union representatives, cotton pickers etc. A total 18 programs were organised in September-December 2022.

Some of the main concerns or requests received through the GRM channel and action taken by IAL in past few months are summarised below:

Table 4-2: Key concerns/feedback received and action taken by IAL

S. No	Key concerns/feedback of stakeholders	Action taken by IAL
1	Complaints about dust generation due to movement of heavy machineries in Shodlik and Yangi Toshkent in Oqoltyn district.	Dust was generated during the laser leveling works under land development project. The problem was taken into consideration, and works were not implemented during the windy days, and drivers instructed to work on lower speed.
2	Complaints with regard to under payment of seasonal workers in A Navoiy in Oqoltyn district and complaints about payment to irrigation workers in Buston, also in Oqoltyn district.	Completed works were checked with accountants. For approved works, payments were done. Volume based works were negotiated and agreed.
3	Assistance with regard to cleaning waste dumps in Nazartepa in Kasbi district, Kaptarli and Qirqquloch in Nishon district, Kurgontepa and Yurtdosh in Sardoba district.	The Company have been helping to clean wastes dumped by local population. The community leaders took responsibility for keeping those cleaned places clean and not to allow to dump more wastes.
4	Renovation/building of Kindergartens in Syrdarya region.	Two kindergartens were repaired fully in Syrdarya region.
5	Repair/levelling of village roads in Mushqqoqi and Paxtakor in Kasbi district, Kaptarli, Shirinobod, Ko'ksoy, Yangiobod and Istiqbol in Nishon district, and Kurkam diyor in Sardoba district.	The Company supports the local communities with road levelling providing machinery.
6	Support creation of local businesses through renovations of empty building into a sewing factory or provision of equipment such as sewing machines, development of enterprises such as traditional carpeting.	The project is under the discussion.
7	Creation of job opportunities for unemployed youth, men and women in Yurtdosh and Jarkova in Kasbi district.	It is agreed that each makhalla leader will prepare and send the list of persons interested to work with IAL, and their skills. The list is then sent to HR for further selection for open positions, if any.
8	Repairing of houses in Kaptarli, greenhouses in Oydin in Nishon district, and repair of old buildings in Otayurt in Sardoba district.	Houses damaged by heavy rains and fire in both regions were supported by the Company for repair and renovation.

5. STAKEHOLDER ENGAGEMENT PLAN

The Project will undertake regular engagement with the key stakeholder groups identified through the life of the Project. The primary objective of these engagement activities is to allow the stakeholders to interact with IAL in an effective and culturally appropriate manner.

Table 5-1: Stakeholder Engagement Plan

PERIOD	STAKEHOLDER GROUP(S)	OBJECTIVE	ENGAGEMENT METHOD	IAL Responsible Departments
JANUARY – MARCH	Nano Unit Contractors	<ul style="list-style-type: none"> • Discussion of new contracts for 2023 agricultural year; • Negotiations of new working terms and conditions with NUCs. 	Group Meetings, Posting Information in Local Working Telegram Groups, Distribution of Information Sheets.	Production Units, HR, GR
	Regional and District Khokimiyats	<ul style="list-style-type: none"> • Planning for 2023 Agricultural Year; • Discussions of resource allotment for 2023 (water, land, and agricultural inputs.); • Discussion of production plans (expected yields, taxes, and etc.) 	Meetings	GR
	Contract Farmers	<ul style="list-style-type: none"> • Discussions and negotiations of new contracts for 2023 agricultural year 	Meetings; Posting Information in Local Working Telegram Groups.	Commercial Department, Contract Farming Units, GR.
	Basin Authority Irrigation Systems; District Irrigation Departments	<ul style="list-style-type: none"> • Discussions of water stewardship for 2023 	Meetings	GR, Irrigation Department
	Trade Unions	<ul style="list-style-type: none"> • Discussion of new contracts, new working terms for NUCs; 	Monthly Meeting; Urgent Meetings when needed;	ESG, GR, HR

STAKEHOLDER ENGAGEMENT PLAN

PERIOD	STAKEHOLDER GROUP(S)	OBJECTIVE	ENGAGEMENT METHOD	IAL Responsible Departments
		<ul style="list-style-type: none"> Other pending issues 	E-mail Correspondence.	
	Direct Workers	<ul style="list-style-type: none"> Regular weekly meetings on the work progress and pending issues; GRM awareness meetings, collecting of main concerns and recommendations on work relation improvement, Quantitative survey on GRM and work satisfaction. 	Group Meetings, Face to face meetings, Information Boards, GRM Survey, GRM Boxes, Call Centre, Letters, e-mails.	ESG, HR, HSE, Relevant Departments
	NGOs and CSOs	<ul style="list-style-type: none"> Discussion of NGO concerns and issues related with the Company performance and activities. Public Disclosure of the Company policies and procedures, and news. 	Meetings, E-mail correspondence	COO, ESG
	Lenders (IFC, EBRD, ADB)	<ul style="list-style-type: none"> Regular fortnightly meetings on the ESAP accomplishments; Recommendations on improvement of ESMS; Public disclosure discussions. 	Meetings, Video conferences, E-mail correspondence	DG, CFO, COO, ESG, HSE
	Local Communities	<ul style="list-style-type: none"> Regular monthly meetings with the Community leaders; Focus Group Discussions on GRM Feedback and the Company performance; Request related meetings and discussions; Grievance related meetings and discussions; Information about land preparation activities to be started in adjacent areas to the fields; 	Regular Monthly meetings, Ad-hoc meetings based on the community requests and grievances; Focus Group Discussions; Letters, Telegram messages; Call Centre and GRM Boxes.	ESG, GR, HSE, Production units, Nano Unit Contractors

STAKEHOLDER ENGAGEMENT PLAN

PERIOD	STAKEHOLDER GROUP(S)	OBJECTIVE	ENGAGEMENT METHOD	IAL Responsible Departments
		<ul style="list-style-type: none"> Information about the traffic activation due to land preparation activities to be started in mid-March. 		
April – June	Nano Unit Contractors	<ul style="list-style-type: none"> Working terms and relations training, including payment procedures and distribution of incentives (HR); GRM awareness training (ESG); Health and Safety Training (HSE); Third party working terms and conditions training (ESG, HSE); Communication and ethics training (ESG). On the job support during agricultural activities. 	Training sessions, Meetings, Information materials.	ESG, HR, HSE, Production Unit Managers
	Regional and District Khokimiyats	<ul style="list-style-type: none"> Regular weekly meetings on the progress of agricultural development and production; Discussion of CSR activities proposed by local Khokimiyats, preparation of road map for implementation; Discussion of other urgent issues. 	Meetings, Letter correspondence	GR, ESG
	Contract Farmers	<ul style="list-style-type: none"> Working terms and relations training, including payment procedures and distribution of incentives (HR); GRM awareness training (ESG); Third party working terms and conditions training (ESG, HSE); 	Training sessions, Meetings, Distribution of information materials.	Contract Farming Unit, Dedicated gender specialist at Contract Farming Unit, ESG, HR, HSE

STAKEHOLDER ENGAGEMENT PLAN

PERIOD	STAKEHOLDER GROUP(S)	OBJECTIVE	ENGAGEMENT METHOD	IAL Responsible Departments
		<ul style="list-style-type: none"> • Support in mobilization of seasonal workers, and training on new working terms to third party workers; • Gender sensitivity training for seasonal workers, including prevention of GBVH. • On the job support during agricultural activities. 		
	Trade Unions	<ul style="list-style-type: none"> • Discussion of TU plans and pending issues for resolving. • Main concerns and recommendations of TU. 	Monthly Meetings; Urgent Meetings when needed; E-mail Correspondence.	ESG, GR, HR
	Direct Workers	<ul style="list-style-type: none"> • Regular weekly meetings on the work progress and pending issues; • GRM awareness meetings, collecting of main concerns and recommendations on work relation improvement; • HR and HSE trainings. 	Group Meetings, Face to face meetings Information Boards, GRM Survey, GRM Boxes, Call Centre, Letters, e-mails.	ESG, HR, HSE, Relevant Departments
	NGOs and CSOs	<ul style="list-style-type: none"> • Discussion of NGO concerns and issues related with the Company performance and activities. 	Quarterly Meeting, E-mail correspondence	COO, ESG
	Lenders (IFC, EBRD, ADB)	<ul style="list-style-type: none"> • Regular fortnightly meetings on the ESAP implementation; • Recommendations on improvement of ESMS; • Third Monitoring Visit of Independent Audit Consultant (WSP) together with IFC and EBRD members. 	Site visits, Meetings, Video conferences, E-mail correspondence	DG, CFO, COO, ESG, HSE, Production Units, Contract Farming Unit
	Local Communities	<ul style="list-style-type: none"> • Regular monthly meetings with the Community leaders; 	Regular Monthly meetings,	ESG, GR,

STAKEHOLDER ENGAGEMENT PLAN

PERIOD	STAKEHOLDER GROUP(S)	OBJECTIVE	ENGAGEMENT METHOD	IAL Responsible Departments
		<ul style="list-style-type: none"> • Information about Annual ESG Reporting Results; • Crop Damage prevention meetings; • Seasonal workers mobilization announcements and information of working terms and conditions offered; • Discussions of CSR requests and implementation; • Discussions of activities for the celebration of spring holidays in 2023 (International Women Day 8 March, Navruz 21 March, Eid Al Fitr – Ramadan Hayit on 21 April), and support of vulnerable group of Households due to holidays in spring; • Grievance related meetings and discussions; • Information about land preparation activities to be started in adjacent areas to the fields; • Preparation and Discussion of temporary land allocation for grazing and crop residue distribution (hay press). 	<p>Ad-hoc meetings based on the community requests and grievances; Letters, Telegram messages; Call Centre and GRM Boxes.</p>	<p>HSE, Production units, Nano Unit Contractors</p>

6. ROLES AND RESPONSIBILITIES

Project CLOs are to be designated at the Project-level will be responsible for implementation of the SEP. The Project CLOs will provide regular reports to the Senior Manager ESG. The responsibilities of the relevant personnel have been specified below:

Community Liaison Officer, IAL- Regional level

- Project CLOs are the first point of contact for the community and thus responsible for establishing community connect, especially the ACs and maintaining good relations with them;
- Lead day-to-day implementation of the SEP and manage the day-to-day working, implementation of SEP by all parties/departments engaged on the Project;
- Developing and providing welfare services, including organization of counselling and trainings to communities around IAL operations;
- Registration of complaints received from external stakeholders. GRM channels description is provided in **Appendix C**;
- Solving of specific grievance cases related to external stakeholders;
- Ensure continued engagement among all the stakeholders through public meetings, distribution of pamphlets, booklets and brochures;
- Maintain records of engagement with the stakeholders through documented meeting minutes;
- Proactively maintain regular contact with affected communities in and around IAL operations, especially through regular community visits and engagement with *Mahallas*. Monitor opinions and provide updates on Project activities, and ensuring communication with vulnerable groups, if any;
- Supervise/monitor and coordinate activities ensuring that all contractors/suppliers comply with the SEP;
- Maintaining the records for stakeholder consultation and engagement (refer **Appendix A & B**).
- Engage with ESG Team in fulfilling the activities as defined in the SEP, especially with regard to Grievance Redressal Mechanism;
- Ensure grievances received through the engagement activities are documented into the centralised GRM log for Redressal.
- Receive and record CSR requests from the affected communities and monitor implementation once approval received from the management.
- Disseminate awareness on GRM and CSR policies of the Company among the affected communities.

ESG Senior Manager

- Spearhead the implementation of the SEP for IAL operations;
- Ensure that the IAL employees, contractual workforce and relevant departments are informed and trained on the SEP;
- Reporting to the COO, IAL on a monthly basis regarding engagement activities;

ESG Manager (SEP & GRM Specialist)

- Interfacing with National, Regional and District Authorities, Traditional Authorities and local Community;
- Coordinate with the CLO and GRO for progress on SEP and CSR projects;
- Provide feedback and insight towards the formulation and implementation of CSR Plan and LRP.

Human Resources Regional Manager

- Engage with ESG Team and Project CLOs in fulfilling the activities as defined in the SEP, especially with regard to provision of induction and refreshing trainings on Human Resource policies and procedures;
- Ensure coordination with ESG Team, especially the Project CLOs in the assessment of skills of local youth, for potential employment at IAL.

Head Health Safety and Environment (HSE):

- Ensuring compliance in terms of environment health & safety requirements and provide feedback to COO.

Chief Operating Officer (COO)

- Review and approve SEP before its implementation;
- Ensure that entire IAL workforce are informed and trained on SEP;
- Provide appropriate resources to ensure that the SEP can be effectively implemented in coordination within the team;
- Report progress on SEP implementation alongside Projects aspects and maintain and update Project reporting and checkpoints to a required standard.

7. DOCUMENTATION, MONITORING AND REPORTING PROCESS

The SEP is a *'live document'* and requires yearly regular reviews keeping in mind attributes such as the stakeholders, the engagement process for each stakeholder and the reporting time for each.

7.1 Monitoring

The SEP online excel logbook (**Appendix A**) will keep record of all key engagements and the outcomes derived from it which will further serve as guiding notes for future engagement. This will enable the Project to keep tracks of its engagement, contacts and build upon them to deliver the most effective relationships with the stakeholders. Documenting the engagement process will enable to measure the progress of the plan and accordingly revise and redefine the actions when needed. Some of the Key Performance Indicators (KPI) set for monitoring the process is presented in **Table 7-1** below:

Table 7-1: Monitoring of Key Performance Indicators (KPIs)

Stakeholder Engagement	Key Performance Indicators	Frequency
Stakeholder Mapping	<ul style="list-style-type: none"> ■ Number of updated versions 	<ul style="list-style-type: none"> ■ Bi-annual
Information Disclosure and Communication	<ul style="list-style-type: none"> ■ Number of reports shared with the stakeholders; ■ Number of engagement activities carried out; and ■ List of attendees with gender breakdown. 	<ul style="list-style-type: none"> ■ Monthly/Quarterly
Grievances	<ul style="list-style-type: none"> ■ Level of awareness on GRM to be captured basis of community feedback survey that will be conducted by CLOs; ■ Number of grievances lodged; ■ Number of grievances addressed/pending; and ■ Percentage of grievances being addressed in stipulated time frame. For grievances that are opened for more than a month/or stipulated time frame, an explanation for the delay in closure of such open grievances should be provided. 	<ul style="list-style-type: none"> ■ Monthly

7.2 Reporting

For regular reporting, IAL will produce reports at regular interval (Monthly/Quarterly) through specific communication as mentioned in **Table 5-1** of this SEP. Reports such as Environmental Monitoring Report, E&S report will be reviewed and reported to various stakeholders. A sample *Stakeholder Engagement Activities Log* format for recording the SEP engagement is provided in **Appendix A**.

The format for recording minutes of meetings on stakeholder engagement undertaken by various Project staff can be found in **Appendix B**. The modes of reporting shall be as outlined in **Table 7-2** below:

Table 7-2: Outline Reports to Stakeholders

Report	Stakeholder	Frequency
E&S Annual Reporting	International Lenders	Yearly
E&S Performance Report	IAL Management	Monthly/Quarterly
Contractor HSE performance Report	IAL Management	Monthly
Community Engagement Report	IAL Management	Monthly

7.3 Budget Allocation

The Project will ensure that the budget formulated for the purpose of the stakeholder engagement process and grievance Redressal is sufficient to meet the expenses of the same. In case of grievances requiring monetary compensation, the amount for the same will be provided through the dedicated account set up for the Project.

8. GRIEVANCE REDRESS MECHANISM

The purpose of the Grievance Redress Mechanism (GRM) is to provide an easily accessible, transparent, and consistent process for submitting and processing complaints, in a confidential manner. The procedure has been developed in compliance with IFC and EBRD Performance Standard and national regulatory requirements.

The GRM is designed to provide a system for managing grievances and all complaints received under this procedure and shall be tracked until agreed closure.

The Company GRM is available both for internal and external stakeholders. The GRM officers designated at each region are responsible for implementation and functioning of Internal Redressal Mechanism. The designated Community Liaison Officers at each region are responsible for implementation and functioning of External Redressal Mechanism and designated Grievance Redressal Officers are responsible for Internal Redressal Mechanism. Both GRM officers and CLOs will provide regular (bi-monthly reports to the ESG Manager). To ensure that all persons lodging grievances are protected against any inappropriate behaviour or actions, such as retaliation, all information shall be treated with confidentiality. Stakeholders can submit their grievances through a number of methods, (but not limited to) as indicated in the Table 8-1.




Table 8-1: GRM Channels

Internal Stakeholders:	Syrdarya	Kashkadarya
<i>Direct workers Seasonal Workers Nano Unit Contractors²</i>	Grievance Redressal Officer Mr. Sanjar Dehkonov	Grievance Redressal Officer Ms. Gulchekhira Khonkulova
External Stakeholders	Syrdarya Region	Kashkadarya Region
<i>Community Members & Administration (MFY) Contracted Farmers NGOs Other Farmers Contractors Third party workers Government Organization Suppliers All other concerned organizations and individuals</i>	Community Liaison Officer Ms. Shohista Satibaldieva	Community Liaison Officer Ms. Shakhnoza Imomova
	Mailing address in Gulistan, Syrdarya: INDORAMA AGRO GULISTON Talabalar street 17, Guliston, Syrdarya Region, 120100	Mailing address in Karshi, Kashkadarya: INDORAMA AGRO KARSHI Buyuk Turon street, Karshi City, Karshi MFY, Kashkadarya Region, 18011
All Stakeholders	Call Center 24/7	+ 998 99 010 39 39
	E-mail for Grievances	murojaat.ial@uz.indorama.com

For anonymous grievances and in place of written grievances sufficient GRM boxes are installed throughout the company wide operation premises.

² Nano Unit Contractors (NUC) are legal entities and external stakeholders for the Company, however due to even work distribution between GROs and CLOs, handling of grievances received from NUCs under the responsibility of GROs.

Grievances will be screened by the responsible staff depending on the level of severity to determine who the grievance owner will be and how the grievance will have approached. If a more complex investigation is required, the complainant should receive an update explaining the actions required to resolve the complaint, and the likely timeline. Three levels of screening shall be followed for this purpose:

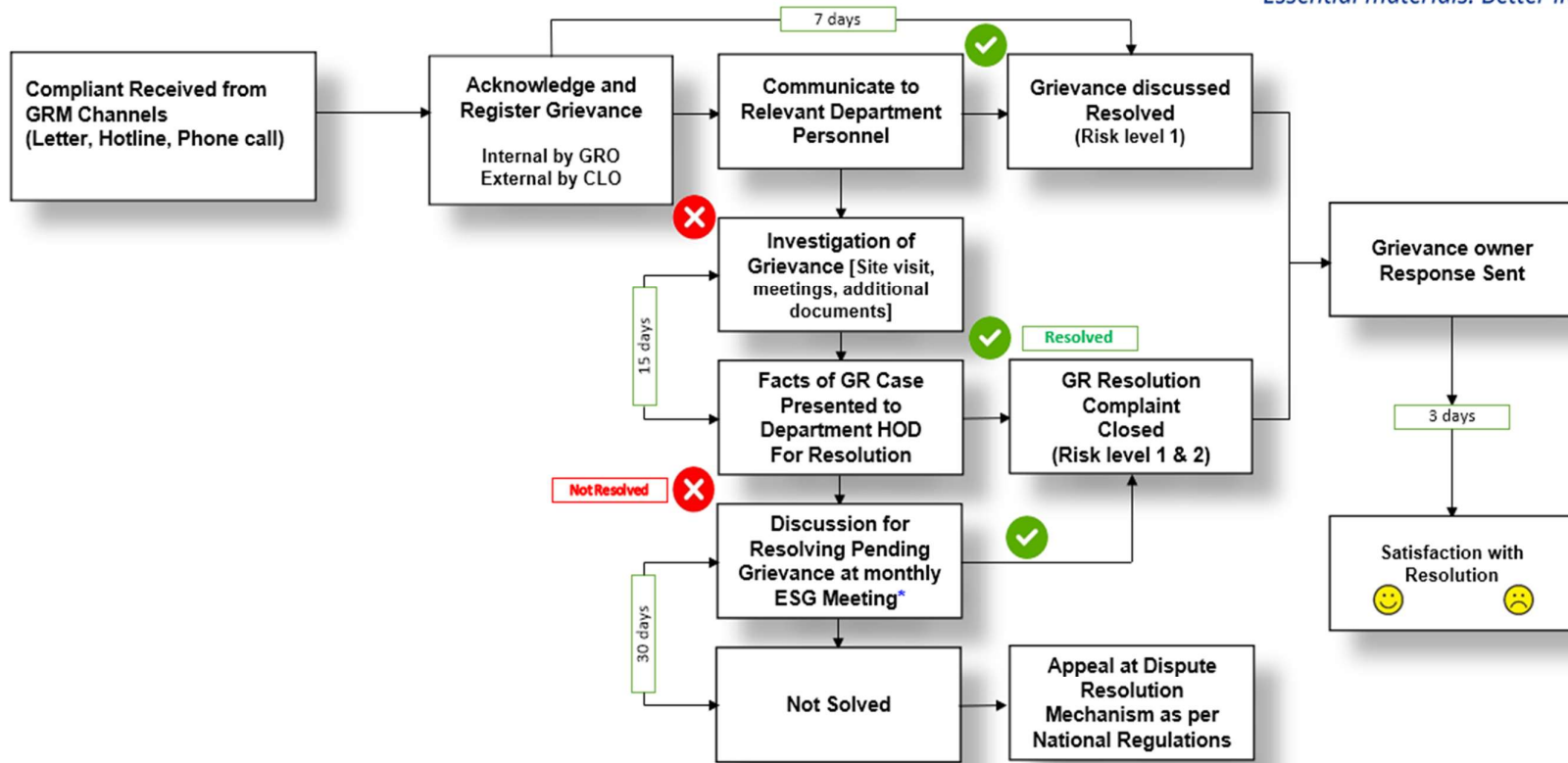
	<p>Level 1: Grievances that pose no risk to the company and no risk to stakeholders and environment. The grievances can be resolved at the level of the local officers. Such grievances require minimum or no investigation and should be resolved within 15 days.</p>
	<p>Level 2: Grievances that require investigation and may pose minor threat to any stakeholders, environment, and Company, but still needs the attention of the established Regional Grievance Redress Committee. Such grievances should be resolved within 30 days.</p>
	<p>Level 3: Potentially high-risk grievances and need the intervention of the higher management and the formulation of Grievance Redressal Committee. Such grievances may cause serious impact for the health & safety of the personnel, environment, livelihood of people and reputation of the Company. The level 3 grievances will to the extent be resolved within 30 days.</p>

The responsible staff will contact the complainant after the grievance has been resolved. If the complainant accepts the proposed resolution, the agreed actions are implemented. Such resolutions are recorded in the Grievance Register with supporting documentation and evidence, if any. Hence, the resolution of the grievance will be formally closed out.

The GRO and CLO will contact the complainant after the grievance has been resolved. If the complainant accepts the proposed resolution, the agreed actions are implemented. Such resolutions are recorded in the Grievance Register with supporting documentation. Hence, the resolution of the grievance will be formally closed out. This includes details, reference to documents and dates from the complainant that will be documented in the Grievance Register.

After the closing of the grievance complainants will be asked to rate the grievance handling from excellent to very poor (from 1 to 5). If the complainant is not satisfied, he will be asked the reason, and the data will be collected for further GRM improvement as possible. In case of any dissatisfaction with the grievance redressal process the complainant may also appeal to the court of law. The grievance redress flow chart has been presented in **Figure 8.1** below.

Grievance Redressal Mechanism Flowchart



*Concerned depts are invited in monthly ESG meeting to suggest for resolution of pending grievances for Risk Level 2 and Risk Level 3

Figure 8-1: Grievance Redressal Mechanism Flowchart

The procedure is disclosed to stakeholders through written and verbal communication. Channels used for this purpose are staff meetings, written communication, and one-on-one meetings. Each worker and employee shall be made aware of the grievance procedure at the time of joining, as part of the induction process.

The GRM procedure is being communicated by CLOs during the regular meetings in affected communities. The information boards are installed in the centre of communities vividly displaying GRM Policy and brief version of procedure. During the major intense agricultural activities GRM channels are widely distributed among seasonal workers, cotton pickers and all local communities and residents.

To ensure that the procedure is functioning effectively, the GROs and CLOs will perform a monthly review of the following key performance indicators (KPI) presented in the **Table 8.2** to be featuring in the monthly ESG performance report. This report will be shared with the ESG Sr. Manager/Manager.

Table 8-2: GRM Key Performance Indicators (KPI)

INTERNAL GRM KPI	EXTERNAL GRM KPI
<ul style="list-style-type: none"> • Number of pending grievances by risk level • Number of grievances resolved within the reported period • Number of grievances by region and district • Number of grievances by gender and by locations • Number of grievances by Grievance Category • Number of Grievances by Sources • Number of Grievances by Risk Levels • Number of Grievances by Stakeholders • Number of Grievances referred from Trade Unions • Number of grievances pending by Category • Number of Grievances received and resolved by days • Number of Grievances not resolved • Number of Grievances escalated to Regulatory Bodies after non resolution. 	<ul style="list-style-type: none"> • Number of pending grievances by Risk level • Number of grievances resolved within the reported period • Number of grievances by region and district • Number of grievances by Communities • Number of grievances by gender and by locations • Number of grievances by Grievance Category • Number of Grievances by Sources • Number of Grievances by Risk Levels • Number of Grievances by Stakeholders • Number of grievances pending by Category • Number of Grievances received and resolved by days • Number of Grievances not resolved • Number of Grievances escalated to Regulatory Bodies after non resolution.

**APPENDIX A STAKEHOLDER LOG FOR DOCUMENTING STAKEHOLDER
ENGAGEMENT ACTIVITIES**

Stakeholder Log for Documenting Stakeholder Engagement Activities

Sr. No.	Stakeholder Groups	Date	Location and Venue	Name of Key Representatives	Purpose of Engagement	Key outcomes and Actions	Status of actions identified in previous consultations	Reference to records

**APPENDIX B MINUTES OF MEETING FORMAT FOR RECORDING
STAKEHOLDER ENGAGEMENT ACTIVITIES**

Format for Reporting Minutes of Meeting

MINUTES OF THE STAKEHOLDER CONSULTATION		
A	Project Title:	
B	Stakeholder Title:	
<p>Note: This document provides a working summary of the main facts captured during the consultation/ key informant interview held and should not be treated as formal minutes. It is therefore deliberately not exhaustive or chronological. Its purpose is to record significant information/ feedback and not intended for official review or approval.</p>		
C	Basic details:	
	Location:	
	Date:	
D	Attended By (List attached):	
	Sr.	Name
		Designation
E	Purpose of Consultation	
F	Key Points Discussed:	
	Key concern and suggestion expressed by Stakeholder:	