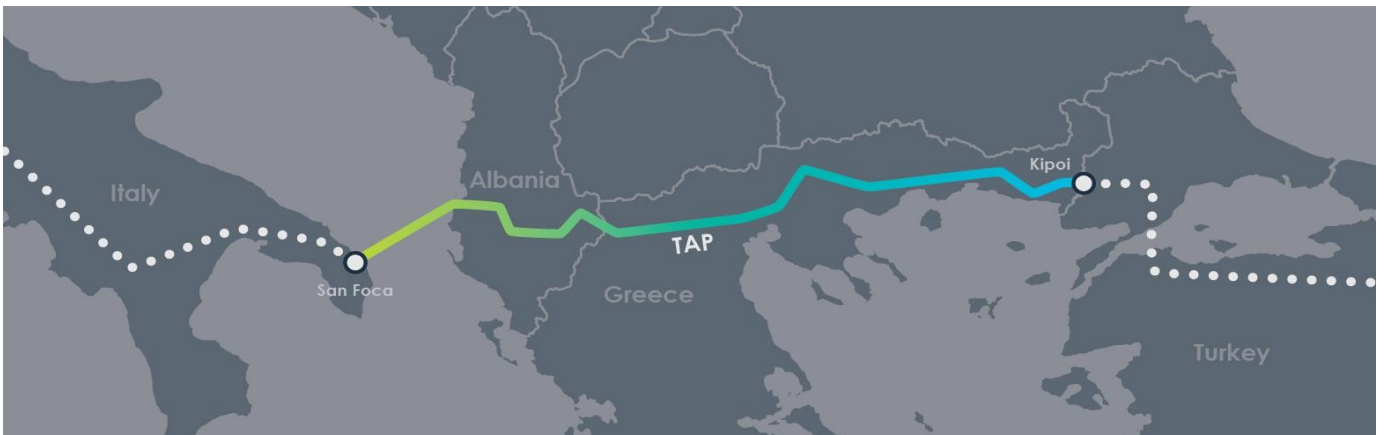




Trans Adriatic
Pipeline



Grievance Management Procedure

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Document No.:	CAL00-TAP-QHSE-Y-TPA-0002	Rev. 2
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1. Introduction

Trans Adriatic Pipeline AG seeks to build strong relationships with stakeholders and to manage potential impacts of its business activities on affected communities via a range of stakeholder engagement and impact avoidance and mitigation processes. This document describes the Grievance Management procedure through which TAP AG addresses public and community concerns, complaints and requests related to TAP Pipeline operations.

This procedure is subordinate to and shall be read in conjunction with TAP AG Environmental and Social Management Manual (Ref. 1) which provides an overview of all TAP AG environmental, socio-economic and cultural heritage aspects and how impacts are identified, avoided, mitigated or managed in accordance with TAP AG commitments.

This document contains requirements in addition to any legal requirements applicable to TAP AG (arising from national and/or EU legislation and the ESIA approvals in place), and therefore no such provision has any effect whatsoever on the fulfilment of these legal obligations by TAP AG. This document includes additional requirements formulated by, and incumbent on, TAP AG and, therefore, does not give any right to third parties and are not enforceable by any third party beyond any legal rights they may have in accordance with applicable laws.

1.1 Scope

This procedure is applicable to the following TAP AG owned and operated facilities in Greece, Albania and Italy:

- Pipeline right of way (550 km) from the border between Greece and Turkey in Kipoi up to the border between Greece and Albania, including the compressor station at Kipoi and 23 block valve stations
- Pipeline right of way (215 km) from Qendër, Bilisht in Korçë to 17 km north-west of Fier, approximately 400 m inland from the shoreline, the compressor station near Fier, the metering station near Bilisht and 9 block valve stations
- Pipeline right of way (119 km) pipeline traversing the Adriatic Sea to the Italian coast, the micro-tunnel site near the town of San Foca, the pipeline right of way (8.2 km), Pipeline Receiving Terminal (PRT) and back-up control centre in Brindisi
- TAP AG offices in Switzerland and TAP pipeline host countries.

This procedure applies to any TAP stakeholder who can submit grievances at any time. TAP O&M Contractors are required to implement the TAP AG's grievance procedure, and to liaise closely with TAP AG to ensure robust and consistent outcomes. All O&M contractors shall be trained in the use and operation of the grievance procedure on induction.

This procedure applies to third party grievances only. Employee related grievances are covered by TAP AG Industrial Relations Procedure (Ref. 2). Grievances that are considered a potential event of a formal allegation concerning a violation of the TAP Code of Conduct, related policies, and procedures and/or the law will be managed by the TAP Speak Up Procedure (Ref. 3).

This document shall take effect from the commencement of commercial operations and shall supersede the previous construction phase Grievance Management Framework (Ref. 4) and country specific Third-Party Grievance Procedures (Ref. 5-7). The procedure has been reviewed to ensure appropriateness for the transition from project construction to operations, and the management of TAP AG's operating assets, as well as the ongoing management of livelihood restoration programs. It is subject to change and update based on experience and feedback from stakeholders, audit findings and lessons learned.

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1.2 Purpose

The purpose of this Grievance Management Procedure is to:

- Present a clear framework of tools and processes in place to manage third-party grievances during the operations phase
- To meet TAP AG obligations under the commitments of the approved TAP Environmental and Social Impact Assessments (ESIA) for Greece, Albania and Italy (Ref. 8-10) including subsequent approved amendments as well as the Host Government Agreements (HGA).

This procedure aims to:

- Establish a quick, fair and consistent mechanism for receiving, investigating (when necessary) and responding to grievances from third parties
- Ensure the Grievance Management process is accessible to all TAP stakeholders, who can submit grievances at any time without fear of retribution and at no financial cost
- Respect the confidentiality of complainants
- Ensure grievances, relevant responses and actions taken are documented
- Contribute to continuous improvement in social performance through the analysis of trends and the preparation and dissemination of lessons learned.

This procedure seeks to provide effective grievance management, including through the use of external specialists, as required, to investigate grievances and manage mitigation measures.

This procedure does not replace the statutory rights of complainants to undertake legal proceedings or to approach an independent, objective appeal mechanism. These rights remain unaffected by their participation in the TAP AG grievance management process.

1.3 Abbreviations and Definitions

Abbreviation	Definition
CSR	Corporate Social Responsibility
DPIA	Data Protection Impact Assessment
E&S	Environmental and Social
ESCH	Environmental, Social and Cultural Heritage
ESIA	Environmental and Social Impact Assessment
O&M	Operations and Maintenance
PAP	Project Affected Person
QHSE	Quality, Health, Safety and Environment
SGMT	Stakeholder and Grievance Management Tool
SPC	Single Point of Contact
TAP	Trans Adriatic Pipeline
TAP AG	Trans Adriatic Pipeline AG
LM CTR	Land Management Contractor
SPC	Single point of contact

Term	Definition
Complainant	An individual, group or community that submit a grievance
Complaint	Discontent about TAP AG or O&M Contractor operations or activities expressed by an individual, group or community. Note: The terms 'grievance', 'complaint' and 'concern' are used interchangeably within this Procedure.
Concern	An issue arising from TAP or Contractor operations or activities which has the potential to cause an impact to an individual, group or community Note: The terms 'grievance', 'complaint' and 'concern' are used interchangeably within this Procedure.
Grievance	A concern or complaint raised by an individual, a group within affected communities or any other stakeholder resulted from either real or perceived impact caused by TAP AG or O&M Contractor activities or operations. This procedure considers both concerns and complaints as grievances that are subject to grievance management process Note: The terms 'grievance', 'complaint' and 'concern' are used interchangeably within this Procedure.
Third Party	Includes but not limited to general members of public, residents of impacted communities, project affected people (PAPs), institutional stakeholders and other parties that wish to address their concerns and complaints to TAP and its Contractors in all project locations

1.4 Roles and Responsibilities

TAP AG leadership team, with headquarters in Switzerland, includes roles such as the Operations Director, who shall support the roles and responsibilities presented below.

1.4.1 Operations and Maintenance Country Manager

Operations and Maintenance Country Manager(s) is responsible for ensuring implementation of grievance management process outlined in Section 3.0 of this procedure as well as accountable for:

- Investigating grievances
- Implementation of remediation measures

1.4.2 TAP Land Management Lead

TAP Land Management Lead shall be responsible for:

- Review of Grievance action tracker
- Quarterly grievance management dashboard

Also, Land Management Lead will be accountable for:

- Monthly Grievance Management report
- Periodic review of grievance management process
- Annual review of compensation rates

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1.4.3 Land Management Team (includes LM CTR)

The Country Land Management Team shall be responsible for:

- Receiving the grievance
- Acknowledging reception of the grievance to PAP
- Registering grievance in SGMT and Grievance Action Tracker
- Verifying grievance is related to TAP
- Issuing rejection letter if grievance is not related to TAP
- Assigning grievance category, severity and relevant Workstream
- Communicating grievance to relevant Workstream Single Point of Contact (SPC)
- Obtaining PAP consent for external review if required
- Engagement of independent technical experts where external review is required
- Communicating external review outcomes with PAP and agreeing the resolution
- Development of resolution actions
- Update of SGMT and Grievance Action Tracker with resolution actions
- Monitor implementation of remediation measures
- Seeking PAP satisfaction and closing the grievance in SGMT and Grievance Action Tracker
- Follow up with PAP within 1 month of completion of remediation measures
- Weekly update and internal communication of Grievance Action Tracker
- Monthly Grievance Management Report
- Periodic review of grievance management process
- Annual review of compensation rates

1.4.4 TAP Country Office Representative

The Country Office Representative will support on the issuing rejection letter if grievance is not related to TAP as well as seeking PAP satisfaction and closing the grievance in SGMT and Grievance Action Tracker

1.4.5 O&M Engineers

TAP O & M engineers shall support for:

- Obtaining PAP consent for external review if required.
- Communicating external review outcomes with PAP and agreeing the resolution.
- Development on resolution actions
- Implementation of remediation measures.

TAP O & M engineers shall be accountable for Land Entry and Land Exit process, in case of remedial work grievance resolution.

1.4.6 O&M Contractor(s)

TAP O&M Contractors shall be responsible for:

- Acting in accordance with the relevant Maintenance contract and this procedure

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- Ensuring full compliance by all personnel and subcontractors with the provisions of this procedure and applicable national legal requirements.
- Receive the grievances when raised by stakeholders on field and address to O&M Engineers.
- Support for Investigating the grievances.

Also, O&M contractors will support on:

- Receiving and investigate the grievance
- Assessment of grievance information, conclusions and proposed actions.
- Development of resolutions actions and implementation of remediation measures.
- Monitor implementation of remediation measures

1.4.7 Single point of contact (SPC)

The single point of contact shall be responsible for investigating the grievance and implementation of remediation measures. SPC will be also accountable for monitoring the implementation of remediation measures as well as following up with PAP within 1 month of completion of remediation measures.

SPA will also support on:

- Assessment of grievance information, conclusions and proposed actions
- Communicating external review outcomes with PAP and agreeing the resolution
- Development of resolution actions
- Update of SGMT and Grievance Action Tracker with resolution actions
- Seeking PAP satisfaction and closing the grievance in SGMT and Grievance Action Tracker
- Weekly update and internal communication of Grievance Action Tracker



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2. References

No	Document title	Document Number
1	Environmental and Social Management System Manual	CAL00-TAP-QHSE-Y-TMT-0001
2	Industrial Relations Management Procedure	CAL00-TAP-HRE-X-TPA-0004
3	Speak-Up Procedure	CAL00-TAP-COL-X-TPA-0001
4	Grievance Management Framework	CPL00-PMT-601-Y-TVO-0001
5	Albania Third-Party Grievance Procedure	AAL00-PMT-601-Y-TPG-0001
6	Greece Third-Party Grievance Procedure	GAL00-PMT-601-Y-TPG-0001
7	Italy Third-Party Grievance Procedure	IAL00-PMT-601-Y-TPG-0001
8	Environmental and Social Impact Assessment (ESIA) for Greece	GAL00-ENT-642-Y-TAE-0001
9	Environmental and Social Impact Assessment (ESIA) for Albania	AAL00-ENT-641-Y-TAE-0001
10	Environmental and Social Impact Assessment (ESIA) for Italy	IAL00-ERM-643-Y-TAE-1011
11	TAP AG Data Protection Policy	CAL00-TAP-COL-X-TVO-0002
12	Conflict of Interest Policy	CAL00-TAP-COL-X-TVO-0004
13	Record Retention Guidelines	CAL00-TAP-LEG-X-TPA-0001
14	Stakeholder Engagement Procedure	CAL00-TAP-SKE-X-TPA-0001

3. Grievance Management Procedure

TAP AG's grievance management process is presented in Figure 1.

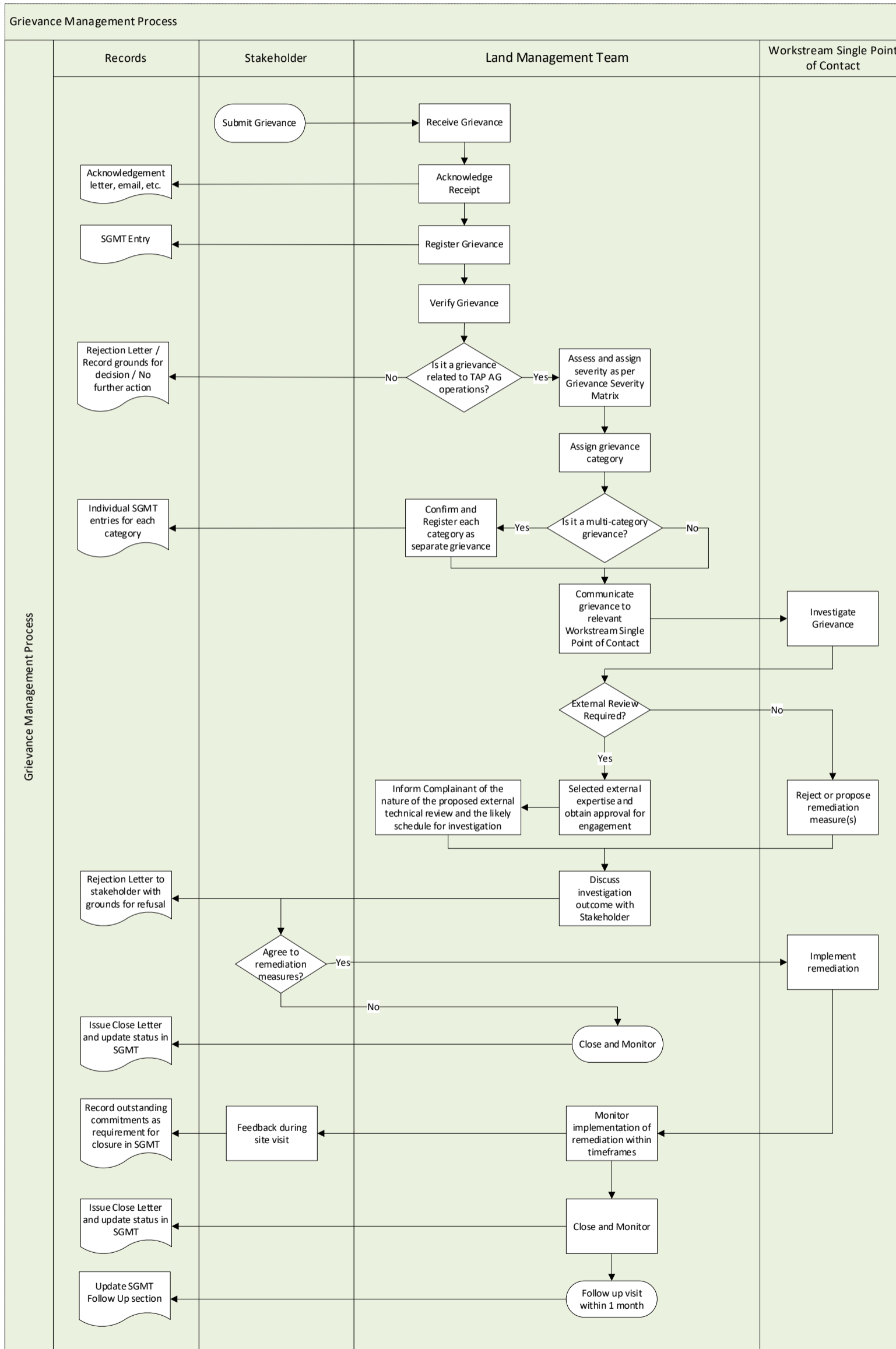


Figure 1 Grievance Management Process

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3.1 Grievance Resolution Process

3.1.1 Channels for Submitting a Grievance

Complainants may submit a grievance in the following ways:

- By speaking to a TAP AG or contractor employee
- By submitting the online grievance form on TAP AG's website
- By submitting a completed grievance form in one of the grievance boxes in TAP AG's regional offices and/or facilities (complainant can opt out from signing the carbon copy, which shall not affect grievance registration and processing)
- By sending an e-mail, letter and/or fax to TAP AG.
- By calling TAP's grievance hotline.

Where necessary, complainants can be assisted by the Land Management team / O&M Team to complete and submit grievance forms or to access information on the grievance management process.

Grievances may be submitted in any of the official languages of TAP AG's host countries, in minority languages officially recognized by those countries, or in English.

Grievances shall identify the individual(s) or organisation(s) submitting the grievance. A complainant submitting a grievance may request that their identity is kept confidential, unless they represent an organisation in which case, the organisation name will be visible/apparent (and not the one of the individuals submitting the form). The request for confidentiality and the reasons for the request shall be submitted with the grievance. TAP AG shall make all reasonable efforts to maintain the confidentiality requested (See Section 3.3.2).

TAP AG shall seek to address any grievances with complainants in good faith, transparently and in a timely manner. It is understood that complainants may refer their grievance to an alternative third-party body (the national judicial system, an arbitrator or other available mechanisms of alternative dispute resolution) at any point in the process.

3.1.2 Requests vs. Grievances

The Grievance Management Procedure distinguishes between requests and grievances:

- A request normally indicates that the stakeholder is asking for information or, possibly, some material assistance. It implies nothing about their attitude to the Project. Requests that cannot be addressed by the Land Management / O&M team, the person that received the request shall be transferred to the appropriate TAP AG employee who shall lead the response process.
- A grievance indicates that the complainant is seeking redress of an alleged negative impact (material or perceived) that allegedly has occurred, is occurring or may potentially occur in the future. It generally implies a negative perception on the part of the complainant.

The terms 'grievance', 'complaint' and 'concern' are used interchangeably within this Procedure.

3.1.3 Confirming Receipt of Grievance / Information Requests

For grievances and requests received in the field, the person that received the grievance/request shall verbally acknowledge the receipt of the grievance/request. For grievances and requests received through an email, post and fax, the Land Management team shall issue an acknowledgement receipt

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within seven (7) working days of receiving the grievance / request, via the same channel that the grievance was received (e.g. if grievance / request was received via an email, the acknowledgment shall be via an email). The date and method of acknowledgement shall be recorded in the SGMT by the Land Management Team.

The acknowledgment receipt shall explain the process to be followed to address the grievance / request and the expected timeframe for the process. If possible, the Land Management Team shall make a follow up call to ensure the complainant understands the process.

3.1.4 Registering Grievance

All incoming grievances shall be recorded, tracked and managed by the relevant in- Land Management team in the Stakeholder and Grievance Management Tool (SGMT). The SGMT is the centralised grievance management database that allows instant visibility of grievance records and their status, required for timely resolution of requests and grievances. It enables TAP to understand and monitor potential impact of its operations and to take further action where necessary. Access to SGMT database shall be restricted to users authorised by the TAP Land Management Lead.

The Land Management Team shall register all grievances and upload all originals into SGMT if received via grievance forms, letter, emails or field verbally. Each case shall receive a unique registration number in the grievance database to enable tracking. A brief description of the case shall be translated into English to allow internal work-stream single point of contacts to investigate the grievance. The English translation is also required for reporting purposes.

3.1.5 Verifying Grievances

The Land Management team shall verify that the grievance is related to the TAP AG operations. If the grievance is not related to the TAP AG operations or activities over which TAP AG has direct control, the Land Management team shall send a rejection letter to the complainant indicating this point. Land Management team shall, however, verify the severity of the grievance and register the grievance in the SGMT.

The Land Management team shall record the following for each grievance:

- Geographical region
- The work-stream responsible for resolving the grievance
- The type of complaining party (individual, group, non-Governmental organization etc.)
- Frequency of the grievance (first time or repeating grievance)
- Severity¹ of the grievance
- Category of the grievance

3.1.6 Assessing and Assigning Severity

Grievances shall be classified according to three severity levels (low, medium and high) in line with the Grievance Severity Matrix (Table 1). The severity rating of a grievance shall be based on the potential consequence of the grievance in relation to:

¹ As it may be premature and not always possible to classify a case prior to investigation, the Land Management team shall give a first recommendation, and re-classify after the investigation.

- Social and/or environmental impact
- Impact on TAP AG corporate reputation
- Likely level of input required for resolution
- Impact on Project operations / continuity.

Table 1: Grievance Severity Matrix

Impact	Consequence/ Severity		
	Low	Medium	High
Social and Environmental	Impact is not substantial or long-lasting (affecting an individual household and restoration will take <1 month)	Moderate impact (affecting an individual household for >1 month or 2-10 households for >1 week and <8 weeks)	Significant impact, potentially long-lasting (affecting > 10 households or duration of any impact is > 8 weeks)
Corporate reputation	Insignificant criticism (credibility not challenged) or no news item limited to a few persons	Substantiated, minor criticism (credibility challenged), low news profile in local/regional media	Substantiated criticism (credibility challenged), public embarrassment, media attention (national and/or international), potential government involvement
Input required for resolution	Can be investigated / resolved within 2 months with technical input from relevant work-stream	Can be investigated / resolved through coordination of a number of work streams taking > than 2 months	Requires Corporate level input and decision-making and/or inputs by external experts

Following initial field investigation of the grievance by the Land Management team, the severity shall be reassessed, and adjusted if required.

3.1.7 Assigning Grievance Categories

The Land Management team shall apply the following categories when a new grievance is received on the basis of each complaint content/allegations included in a complaint. The first three categories (a-c) largely relate to the TAP Project construction and restoration phase and are likely to reduce during the operations phase.

- a) Operations and Maintenance: these grievances may result from pipeline operations and maintenance activities. The following sub-categories shall be employed:
 - a.1 Nuisance (dust, noise, light pollution, wastewater, etc.)
 - a.2 Accidental damage



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- a.3 Reinstatement (e.g., following land entry for maintenance purposes)
- b) Land Easement and Acquisition (LEA) activities: these grievances may result from LEA and securing land access (SLA) activities. In addition, the following sub-categories shall be employed:
 - b.1 Land entry process
 - b.2 Compensation rate/methodology dispute
 - b.3 Compensation payment delay
 - b.4 Land exit process
 - b.5 Boundary marking or boundary dispute
 - b.6 Land titling and ownership disputes between landowners
- c) Livelihood Restoration activities: these grievances may result from complaints in relation to livelihood restoration. In addition, the following sub-categories shall be employed:
 - c.1 LATS program acceptance / qualification
 - c.2 LATS – Farm support
 - c.3 LATS – Business support
 - c.4 Additional assistance
 - c.5 Impact on agricultural productivity or animal welfare
 - c.6 Other livelihood impacts
- d) Compliance: grievances alleging breaches of TAP's Code of Conduct, Anti-Bribery and Ethical behaviour commitments, or breaches of Lender policies or the law
- e) Community safety and security:
 - e.1 Transport: these grievances result from transport related activities
 - e.2 Accommodation: these grievances may result from activities taking place around the Contractor accommodation
 - e.3 Pipeline: these grievances may result from safety concerns expressed by individuals and communities located near pipeline maintenance and repair sites.
- f) Cultural Heritage: these grievances may result from repair and maintenance activities in cultural heritage areas
- g) HSE Incidents: any event which leads to or has the potential to lead to injury, loss of life, damage to assets (including non-TAP assets) or to the environment. These incidents shall be managed directly by TAP's In-country QHSE Functions
- h) Environment: these grievances may result from activities that may be deemed to impact the local environment
- i) Stakeholder Engagement: these grievances may result from a perceived lack of stakeholder consultation or a general perceived lack of information for community stakeholders
- j) Corporate Social Responsibility: these grievances may result from the implementation of TAP's CSR or Community Investment activities

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- k) Extra-judicial letters: these are formal letters served on TAP by complainants via a court-bailiff requesting immediate remediation actions before Complainant decides to use legal or judicial channels. Such letters can relate to any of the Project execution activities and fall into any of the above-described categories.

If during the assessment process the Land Management team determines that a particular grievance fits into more than one grievance category, these additional assessment steps shall be followed:

- Clearly identify the different categories involved and outline the reasons
- Register each grievance category as separate grievance (each with its own grievance number) but with the same PAP ID Number²
- Re-assess the severity and consequence of each grievance (separately) and
- Follow the standard grievance resolution process.

By clearly identifying all affected categories, the Land Management team shall ensure that each grievance is appropriately investigated by the relevant work-stream.

3.1.8 Assigning Work Stream Single Point of Contact

To ensure management of the grievances is appropriate to the TAP AG teams' responsibilities, the Land Management team shall review the grievance and confirm the single points of contact (SPC) within TAP AG and/or the O&M Contractor(s) that shall support the internal assessment and further actions necessary. The Land Management team shall remain the primary point of contact with the complainant.

The Land Management team shall send the grievance to the relevant work-stream SPC for investigation and resolution. Depending on the case, the Land Management team shall communicate the applicable timeframes for addressing the grievance and the format of the official response required to the relevant work-stream SPC.

The work-stream SPC(s) shall update the Management team of the grievance investigation progress and outcomes of all grievances assigned the work-stream. This information shall be incorporated in monthly, quarterly and annual grievance reports generated by the Management team.

3.1.9 Investigating Grievances

The Land Management team shall provide the full grievance file (evidence trail) to the relevant work-stream SPC(s) to aid the investigation process. Where necessary, the Land Management team shall provide the relevant work-stream SPC(s) practical advice on how to manage the grievance.

Where initial investigation recommends additional investigation by external experts, the Land Management team shall obtain approval from TAP Land Management Lead to engage the external technical review. The Land Management team shall shortlist independent technical experts and shall select the appropriate external technical expertise in consultation with the TAP Land Management Lead and the relevant work stream SPC(s).

3.1.10 External review

The Land Management team shall confirm with the complainant their consent to the external review process, either verbally or in a written form and shall update the SGMT accordingly. The complainant

² The PAP ID Number is a unique identifying number associated with each stakeholder in SGMT.

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shall be informed of the nature of the proposed external technical review and the likely schedule for investigation.

The external technical expert shall assess information associated the grievance and determine whether the conclusions and proposed actions, if any, had been appropriate, given the evidence provided. During this process, the external technical expert may conduct in-field technical investigations and consult with TAP AG personnel, the complainant and other relevant stakeholders in coordination with the Land Management team. The external technical expertise shall document the outcomes of the review in a report to the Land Management team.

The Land Management team shall meet with the complainant to discuss the external technical review, associated recommendations and agree a grievance resolution.

3.1.11 Logging and Communicating Investigation Outcomes

Once the relevant TAP AG work-stream has developed a response / potentially resolution of a grievance request, the work-stream SPC(s) shall send the detail of the proposal/proposed action to Land Management team to be recorded in the SGMT database. Land Management team shall:

- Immediately discuss the proposal with the complainant and agree the timing of any proposed actions
- Send a rejection letter in cases when a grievance has been assessed as unjustified or not related to TAP AG operations or has been rejected for any other reason. The letter shall explain the grounds for rejection
- If the case is complex and the resolution is to take longer than anticipated, inform the stakeholder of the reasons for the delay and indicate when the resolution is expected
- Analyse whether it is a repetitive grievance and if it is, inform the relevant work stream, where possible, implement appropriate actions to deter/prevent further similar grievances.
- Log grievance resolution outcomes in the SGMT and highlight any pending commitments or outstanding actions required for final closure and post-closure monitoring.

3.1.12 Implementing Remediation

The implementation of the remediation measures, where applicable, shall start immediately after the proposed remediation measures have been agreed with the complainant. The remediation measures shall be implemented by the TAP AG work-stream(s) responsible for addressing the grievance and shall be completed within the agreed timeframes. Where financial compensation is a part of the remediation, the payments against compensation agreements shall be made after signing compensation agreement.

The Land Management /O&M team shall monitor the implementation of remediation by visiting the site and obtaining feedback from the complainant on the implemented measures. Any outstanding closure commitments shall be checked at this stage and any pending actions documented by the Land Management team as requirements for the final closure.

3.1.13 Closing the Grievance Resolution Process

When the grievance response is provided or the remediation measure implemented, if any, the Land Management team shall formally confirm the closure of the grievance notifying the complainant via letter.

The Land Management team shall update the SGMT, including status of closure commitments and details of any additional communications. The case shall be marked as resolved/closed within the SGMT.

In those cases where complainant is not satisfied with resolution, Land Management team will evaluate and consider the need of additional interventions. If it is not the case and complainant decides to go to court this process will not be treated as grievance being managed under Legal issue by Legal Function.

3.1.14 Following up Grievance Closure

The Land Management team shall visit or call the complainant (as appropriate) within 1 month of the completion of the remediation measure to obtain feedback on the success of the remediation measures in addressing the grievance and record the received feedback into a 'follow-up' section within SGMT.

3.1.15 Timeframes

The target timeframes for resolution of grievances are provided in Table 2. These timeframes are indicative; they may vary depending on individual case influenced by factors such as coordination of various work streams or discussion with the complainant; and may be adjusted once the severity and consequence level of the submitted grievance has been determined. The Land Management team shall inform the complainant and work-stream SPC(s) of the applicable timeframes.

Table 2: Timeframes

Action	Timeframe	Responsible Party
Register grievance in SGMT	Within 7 working days	Land Management team
Acknowledge Grievance receipt	Within 7 working days	Land Management team
Issue grievance feedback explaining time required for resolution and on-going progress (if not yet resolved)	After 30 calendar days	Land Management team
Issue grievance resolution letter	On agreement of grievance remediation action	Land Management team
Post resolution monitoring	Within 30 days after closure	Land Management team

3.1.16 Dealing with Vexatious Complainants

The Grievance Management Procedure generally assumes that complainants act in good faith. It treats all complainants with respect and seeks to provide a fair and accessible means of addressing their concerns. In some cases, however, vexatious complainants may raise grievances (or series of grievances) which are unsubstantiated and may be pursued in bad faith.

In such cases, where, according to the Land Management team assessment, a complainant is acting in bad faith, their grievance has no serious purpose and investigation would be disproportionate in terms of time and cost, the Land Management team may reject the complaint without further investigation. In all such cases, the Land Management team shall consult with the TAP Land Management Lead, fully document their decision within the SGMT and issue a rejection letter to the complainant, including the reasons for the rejection

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3.2 Grievance Monitoring, Reporting and Review

Monthly internal reviews of grievances shall be completed by the Land Management team and TAP Land Management Lead to review the monthly report and assess resolution progress.

The Land Management team shall periodically review the grievance management process to eliminate systemic issues and to ensure that the resolution process is working efficiently and produces effective outcomes.

Grievance management compliance indicators listed in Appendix 1 shall be reported in accordance with Section 3.4.4 of the ESMM (Ref. 1).

3.3 Confidentiality

3.3.1 Duty of Confidentiality

TAP AG shall protect the identity of complainants and shall handle personal information in accordance with legal requirements. This duty extends to all employees and contractors, who participate in the grievance management process.

Information about a complainant shall be shared within TAP AG on a need-to-know basis and only to the extent necessary to comply with the requirements of this procedure. TAP AG shall not share personal information with third parties unless required by law or authorised by the complainant or in accordance with relevant data protection legislation and documentation on this matter.

3.3.2 Personal Data

With regards to the personal data being processed for the purposes of grievance management during construction and, in particular, the function and use of the SGMT TAP AG has concluded a relevant Data Protection Impact Assessment (DPIA). This DPIA does not need to be amended in light of the latest amendments to this procedural document provided herein.

Further, the persons submitting their grievances, the data subjects, are provided with relevant information on the processing of their data via the relevant privacy notice published on TAP website (to which they are directed when submitting a grievance online), or via other ways, when submitting a grievance (e.g. privacy notice included in the form given to people to submit a grievance).

Personal data contained in grievance management documentation and SGMT shall be kept only as long as necessary to investigate the complaint and implement a resolution. Personal data shall then be either deleted or modified and transferred to an archive for a reasonable period pursuant to TAP AG Data Protection Policy (Ref. 11).

3.4 Conflicts of Interest

A conflict of interest exists where there is a divergence between the interests of a TAP AG employee or contractor and his or her responsibilities under this procedure, such that an independent observer might reasonably question whether the actions of that person are influenced by his or her own interests. Further detail is available in TAP AG Conflict of Interest Policy (Ref. 12).

This procedure seeks to manage potential conflicts of interest by segregating the roles and responsibilities of individuals involved in the grievance management process and avoiding placing individuals in a position where conflicts could be perceived to arise. When a grievance relates to a

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specific TAP AG or Contractor employee, that person shall not play a role in the grievance management process.

3.5 Publishing Grievance Procedure

To ensure that all our stakeholders (including TAP AG's own employees and contractors) are aware of how to access grievance management related information and know how to submit grievances if required, the grievance submission information shall be published on TAP AG's website.

TAP AG shall also publish an annual summary of grievance performance, which shall include summary of annual stakeholder engagement.

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4. Risk Assessment

N/A

5. Records

Record	Document Code/Number	Generated By	Resp To Store	Storage Method	Location	Storage Period Prior to Disposition
Received grievances with details of stakeholder	As generated into SGTM	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
Receipt acknowledgement records	As generated into SGTM	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
Decisions on rejected grievances	As generated into SGTM	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
Log of all formal and informal communications with stakeholder in relation to grievance	As generated into SGTM	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
Grievance investigation support material	As generated into SGTM	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
Resolution outcomes for all grievances	As generated into SGTM	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
Register of actions and commitments required for closure	As generated into SGTM	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
Compensation records for grievances where compensation was made	As generated into SGTM	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)



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Record	Document Code/Number	Generated By	Resp To Store	Storage Method	Location	Storage Period Prior to Disposition
Grievance Closure Forms signed by stakeholder	As generated into SGTm	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
Record of Stakeholder consent to External Review process	As generated into SGTm	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
External Review reports	As generated into SGTm	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
Post closure follow up visit evidence and outcome records	As generated into SGTm	Land Management team	Land Management team	Electronic	SGMT	In line with TAP Record Retention Guidelines (Ref. 13)
Grievance Management Report	In accordance with TAP corporate procedures	Land Management team	Land Management team	Electronic	TAP Facility	In line with TAP Record Retention Guidelines (Ref. 13)

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7. Appendices

Appendix 1 – Grievance Management Compliance Indicators

Appendix 1 Grievance Management Compliance Indicators

Compliance Task		Compliance Indicator		Internal Reporting Frequency			Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Albania	Greece	Italy	
GM-CT-01	Monitor efficiency of grievance resolution process	GM-CI-01	<ul style="list-style-type: none"> - Number and percentage of grievances received and closed within set time frame of 30 days (low severity), 60 (medium severity) and 90 days (high severity) - Number and percentage of grievances closed versus open - Number and percentage of outstanding non-resolved grievances 	Quarterly	Quarterly	Quarterly	Trending indicator
GM-CT-02	Monitor trends in received grievances	GM-CI-02	<ul style="list-style-type: none"> - Number and percentage of grievances received per category - Number and percentage of grievances received per severity level - Number and percentage of grievances resolved versus rejected - Number and percentage of grievances per region/location 	Quarterly	Quarterly	Quarterly	Trending indicator
GM-CT-03	Monitor effectiveness (awareness, usage, satisfaction of complainants) of grievance resolution process	GM-CI-03	<ul style="list-style-type: none"> - Number and percentage of stakeholders satisfied with resolution - Number of repeat grievances 	Quarterly	Quarterly	Quarterly	Trending indicator
GM-CT-04	Ensure continuous improvement (integration procedural lessons learned)	GM-CI-04	Qualitative indicators shall be reported monthly and include root cause analysis, specific case examples and lessons learned.	Quarterly	Quarterly	Quarterly	Trending indicator
GM-CT-05	Submit Monthly Grievance Management Report to TAP AG Management (confirming grievance management and resolution performance)	GM-CI-05	Monthly Grievance Report submitted (100% yes, 0% no)	Monthly	Monthly	Monthly	100% compliance with internal grievance reporting requirement
GM-CT-06	Publish TAP AG annual summary of grievance performance	GM-CI-06	Annual Grievance Performance Summary Report published on TAP AG website (100% yes, 0% no)	Annually	Annually	Annually	Annual Grievance Summary Report disclosed on TAP AG website (including annual summary of stakeholder engagement)