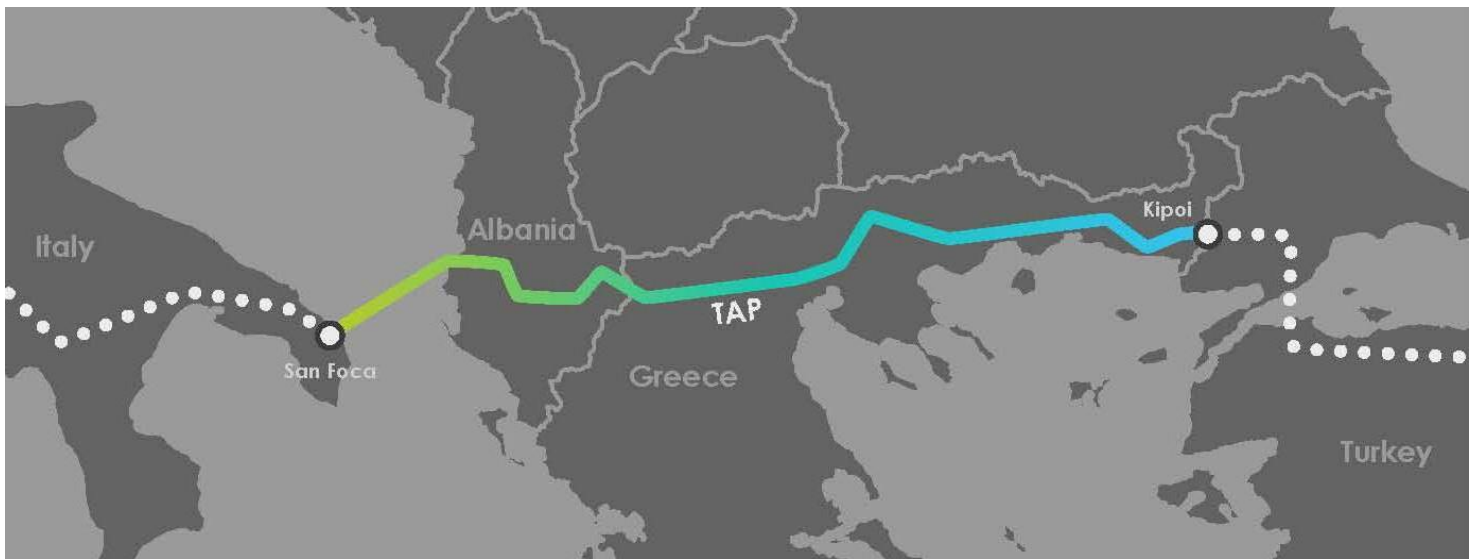




Trans Adriatic
Pipeline



Greece Third Party Grievance Procedure



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Glossary of Terms

| | |
|---|--|
| Complainant | An individual, group or community that submit a Grievance |
| Complaint | Discontent about TAP or Contractor operations or activities expressed by an individual, group or community |
| Concern | An issue arising from TAP's or the Contractor's activities or operations, which has the potential to cause an impact to an individual, group or community |
| Consequence | The direct or indirect outcome of change and the stakeholder's ability to manage this change. The higher the consequence of change, the less likely a stakeholder will be able to manage this change |
| Contractor | Engineering, Procurement and Construction (EPC) contractors and their sub-contractors |
| Contractor Worker Grievance Mechanism | Worker dispute or grievance mechanism implemented by Contractors for their workers and subcontractors. TAP Industrial Relations Function will interface and assist with resolution as required |
| Direct Reporting Line | Employees direct management reporting. In-country Grievance Coordinator shall have direct reporting lines to TAP Greece Project Manager or TAP E&S Manager, whichever is more practicable depending on the project execution phase |
| ESMS | Environmental and Social Management System |
| Functional Reporting Line | Employee's functional management reporting. In-country Grievance Coordinator has a functional reporting line to Social Performance and Grievance Advisor |
| Grievance | A concern or complaint raised by an individual, a group within affected communities or any other stakeholder resulting from either material or perceived impact caused by TAP's or Contractor activities or operations. |
| Grievance Resolution Process | Grievance management steps outlined in Grievance Administration Flow and approved by in-country grievance management procedures. |
| Grievance Task Force | Ad-hoc team tasked with resolving high risk/severity grievances, led by Country Manager or Project Manager. Includes the Community Liaison Coordinators (CLC's), Contractor Liaison Officers (CLO's), Social Field Monitors (SFM's), in-country Grievance Coordinators and Social and Grievance Performance Advisor |
| Incident | An incident is related to Health, Safety and Environment (HSE) and described as "A grievance related to a discrete event which leads to, or had the potential to lead to, injury, and loss of life, damage to assets (including non-TAP assets) or to the environment." Incidents will be handled according to Project ESSH Incident Procedure |
| Procedure | TAP Greece Third Party Grievance Procedure |
| Project | The Trans Adriatic Pipeline Project |
| Request | A request is normally neutral and indicates that the stakeholder is asking for information or possibly some material assistance or a certain precaution action, but implies nothing about their attitude to the Project. |
| Severity | The degree in which a stakeholder or Project will experience change or consequence of an action or activity. The severity rating of a grievance is based on the potential consequence (actual or potential) of the grievance in relation to various impacts. |
| Stakeholder and Grievance Management Tool (SGMT) | An electronic software program that enables TAP to effectively record, track and manage third party grievances as they arise and facilitates real time information flow to relevant TAP and Contractor work-streams |
| TAP Worker Grievance Mechanism | Refers to TAP HR dispute resolution mechanism for TAP employees |


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|--|---|
| 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 |
| Third Party Grievance Mechanism | The grievance process implemented by TAP for addressing/managing/resolving external stakeholder grievances. "Third Party" definition is inclusive 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. |
| Third Party Worker | All parties who are not direct TAP employees, Secondees or Shareholders and for whom separate contractual obligations, conditions and processes apply |
| Worker | A person who has employment contract with TAP, its Contractor or Sub-Contractor. |
| Work-stream Manager | A work-stream manager is the person responsible for delivering a specific work scope, the work-stream manager is the single point of contact relating to the investigation and resolution of grievances stemming from their work scope. Work-stream managers will be responsible for assigning resources to investigate a grievance and to propose remediation measures to resolve a grievance within GMF timeframes |

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List of Acronyms and Abbreviations

| | |
|----------------------|---|
| CLC | TAP Community Liaison Coordinator |
| CLO | Contractor Community Liaison Officer |
| CSR | Corporate Social Responsibility |
| Contractor GC | Contractor's Grievance Coordinator |
| E&S | Environmental and Social |
| ERP | External Review Panel |
| GC | TAP Grievance Coordinator |
| GM | Grievance Mechanism (include GMF and GP) |
| GMF | TAP Grievance Management Framework |
| GMT | TAP Grievance Management Team |
| GP | Grievance Procedure |
| GRP | Grievance Resolution Process |
| GTF | Grievance Task Force |
| HR | Human Resources |
| HSS | Health, Safety and Security |
| LEA | Land Easement and Acquisition |
| MoM | Minutes of the Meeting |
| PAP | Project Affected People |
| PD | Project Director |
| PEP | Project Execution Plan |
| SEI | Social and Environmental Investment |
| SFM | TAP Social Field Monitor |
| SGMT | Stakeholder and Grievance Management Tool |
| SLA | Securing Land Access |
| TAP | Trans Adriatic Pipeline AG |

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1. Introduction

1.1. Purpose and Objectives

Trans Adriatic Pipeline AG seeks to build strong relationships with stakeholders and manage the impacts of its business activities on affected communities via a range of stakeholder engagement, compliance and impact mitigation processes. However, TAP recognises that a formal grievance management process needs to be in place to address public and community concerns, complaints and requests related to TAP's operations.

The Greece Third Party Grievance Procedure (the "Procedure") provides stakeholders with such opportunity, which is described in this document.

TAP aims to address all grievances and requests received, regardless of whether they stem from material issues or from perceptions, or whether the Complainant is named or anonymous. Any stakeholder who considers himself or herself affected by TAP's activities will have access to this Procedure at no cost or retribution.

The purpose of the Procedure is to address, manage, resolve and document grievances raised by stakeholders in relation to TAP's activities. It describes the scope, specifies roles and responsibilities and details the steps for the Grievance Management Process.

This Procedure has the following objectives:

- Establish a prompt, consistent and fair mechanism for receiving, investigating and responding to grievances from third parties
- Ensure the proper documentation of grievances and any corrective actions taken and
- Contribute to continuous improvement in social performance through the analysis of trends and the preparation and dissemination of lessons learned.


TAP seeks to foster trust in the process and its outcomes. To this end, the Procedure will be communicated in an understandable manner to the affected stakeholder groups. Confidentiality will be respected, and TAP will take all reasonable steps to protect parties to the process from retaliation.

This document is subject to changes and updates based on experience and feedback from stakeholders, audit findings and lessons learned.

1.2. Requests versus Grievances

TAP recognises that its activities will lead to different interaction with stakeholders and as such this procedure is focused on feedback from stakeholders and Project Affected people (PAPs) received in a form of request, concern or complaint. As per this document, the terms 'grievance', 'complaint' and 'concern' are interchangeable and refer not only to negative impact (material issues or perceptions) that have already happened or are happening, but also to future and possible negative impacts.

A request is normally a neutral engagement and indicates that the stakeholder is asking for information or, possibly, some material assistance, but implies nothing about their attitude to the Project. A grievance indicates a negative impact or perception on the part of the Complainant. Requests for information, which are not related to grievances or concerns, will be recorded, tracked and managed by the Community Liaison Coordinator (CLC) and by the Social Field Monitor (SFM) in the SGMT via MoMs.

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The CLCs and SFMs aim to create a better stakeholder experience by providing a timely response to communications with TAP. All requests that are not easily resolved will be directed to the relevant TAP work-streams¹ or the relevant Contractor. The CLC and SFM are responsible for providing feedback to stakeholders about progress with resolution of requests and grievances by the TAP functions or Contractors.

If the CLC or the SFM receive a grievance, this shall be submitted to the Grievance Coordinator who is responsible for managing the grievance resolution process.

Requests for different types of information shall be managed as follows:

- General Project information will be sent to the Country Office/Stakeholder Engagement team
- LEA related information will be sent to the Land Management team
- Payment information will be sent to Finance and Accounting
- Construction information will be sent to the relevant Contractor's CLO
- Government relations related information will be sent to the TAP's Government Affairs or External Communications teams.

Any requests for information which are neither related to grievances, nor captured in the grievance process, will be sent to the relevant TAP work-stream or Contractors to be addressed. The Grievance Coordinator will not follow up on non-grievance related information requests as they are handled by TAP outside of the scope this Procedure.


1.3. Scope

This Procedure is applicable to the Greek section of the TAP Project and complies with the scope, principles, responsibilities and processes provided in TAP's Grievance Management Framework (GMF) (CPL00-PMT-601-Y-TVO-0001). All incoming grievances will be recorded, tracked and managed by the Grievance Coordinator in a centralized grievance management database Stakeholder and Grievance Management Tool (SGMT), that allows an ongoing information flow and enables TAP to understand and monitor its impacts over the course of the Project.

This Third-Party Grievance Management Procedure is aimed at providing effective grievance response based on grievance resolution principles outlined in TAP GMF. However, if the Complainant is not satisfied with the outcomes of the internal resolution process, where the grievances are medium to high severity, an additional review by the External Review Panel (ERP) will be considered and offered to the Complainant.

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

¹ For the right identification of each work-stream, please refer to TAP's Grievance Management Framework (CPL00-PMT-601-Y-TVO-0001).


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2. Roles and Responsibilities

The roles and responsibilities of key personnel involved in TAP grievance management are detailed in Table 1 below.

Table 1: Roles and Responsibilities

| Role | Responsibility |
|--|---|
| Project Director (TAP Headquarters) | Overall accountable for Project implementation including grievance management. |
| TAP E&S Manager (TAP Headquarters) | Budget and decision-making support for grievance management work-stream. Review Grievance Framework and Procedural documents. Oversee Expert Review Panel and approve specialist involvement for E&S grievances. |
| In-country E&S Manager | Provides support to grievance management process and technical assistance required during review and verification of grievance resolution outcomes. |
| Social and Grievance Performance Advisor (SGPA) | Facilitate timely resolution of grievances in all project countries. Provide capacity building support to in-country Grievance Coordinators. Advise on specialist engagement for Environmental and Social grievances. Analyse trends and prepare reports on grievance management progress. Initiates External Review process and obtains clearance from TAP E&S Compliance Assurance Manager. |
| In-country Grievance Coordinators (GC) | Responsible for ensuring effective operation of grievance management process including registration, investigation and resolution of grievances. Conduct grievance reporting. Submits proposals for and requests external review process by External Review Panel. |
| TAP Human Resources Department (HR) | Responsible for ensuring transparent employment practices at TAP and ensuring a clear and well communicated complaint/grievance process for TAP employees. |
| Industrial Relations Manager (IR) | Support workers grievance process both within TAP and Contractors. Represent TAP in discussions with Contractors relating to workers grievances which may affect TAP or pose a risk to TAP. |
| Community Liaison Coordinators (CLC) | Public Interface. Communicate Grievance Management Process to communities. Monitor Contractor grievance management. Grievance reporting and resolution monitoring |
| Social Field Monitor (SFM) | Communicate grievance management process to communities. Provide grievance management assistance to GC as required. Monitor Contractor grievance management. Grievance reporting and resolution monitoring. |
| TAP Grievance Management team (GMT) | Tier 1 resolution process, normally comprised of in-country Grievance Coordinator, Social Performance and Grievance Advisor and responsible work streams. |
| Grievance Task Force (GTF) | Tier 1 grievance resolution team established to manage High Severity/Risk grievances and represent TAP in external grievance resolution process initiated by stakeholders known as 3 rd Tier grievance review. |
| LEA Interface Advisors | Responsible for coordinating the resolution of Land Easement and Acquisition specific information requests. |

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| Role | Responsibility |
|------------------------------------|---|
| External Review Panel (ERP) | Tier 2 grievance resolution process involving external expert party to review grievance resolution outcomes of Tier 1 process where complainants are not satisfied or question the outcomes of medium and high severity grievance resolution, requesting additional mediation or arbitration. |


2.1. TAP Grievance vs Contractor Grievances

For the purposes of clarity: TAP has the overall accountability for all its activities and operations in the Project whilst the Contractors have specific responsibilities in relation to managing grievances arising from their activities. The Contractors are therefore required to implement a robust and appropriate Third Party and Worker Grievance Mechanism based on TAP GMF.

TAP also requires the Contractors to liaise closely with TAP's grievance management team to ensure a robust grievance management process.

Contractor related grievances are managed according to the Contractor's Third-Party and Worker Grievance Mechanism. For cases where the Contractor is unable to effectively manage a grievance, TAP's grievance management team provides assistance to the Contractor.

All high and medium severity grievances closed by Contractors without mutually agreed remediation will be reviewed by TAP Grievance Coordinator and external review process triggered as required. Additional information on this is provided in the TAP GMF.

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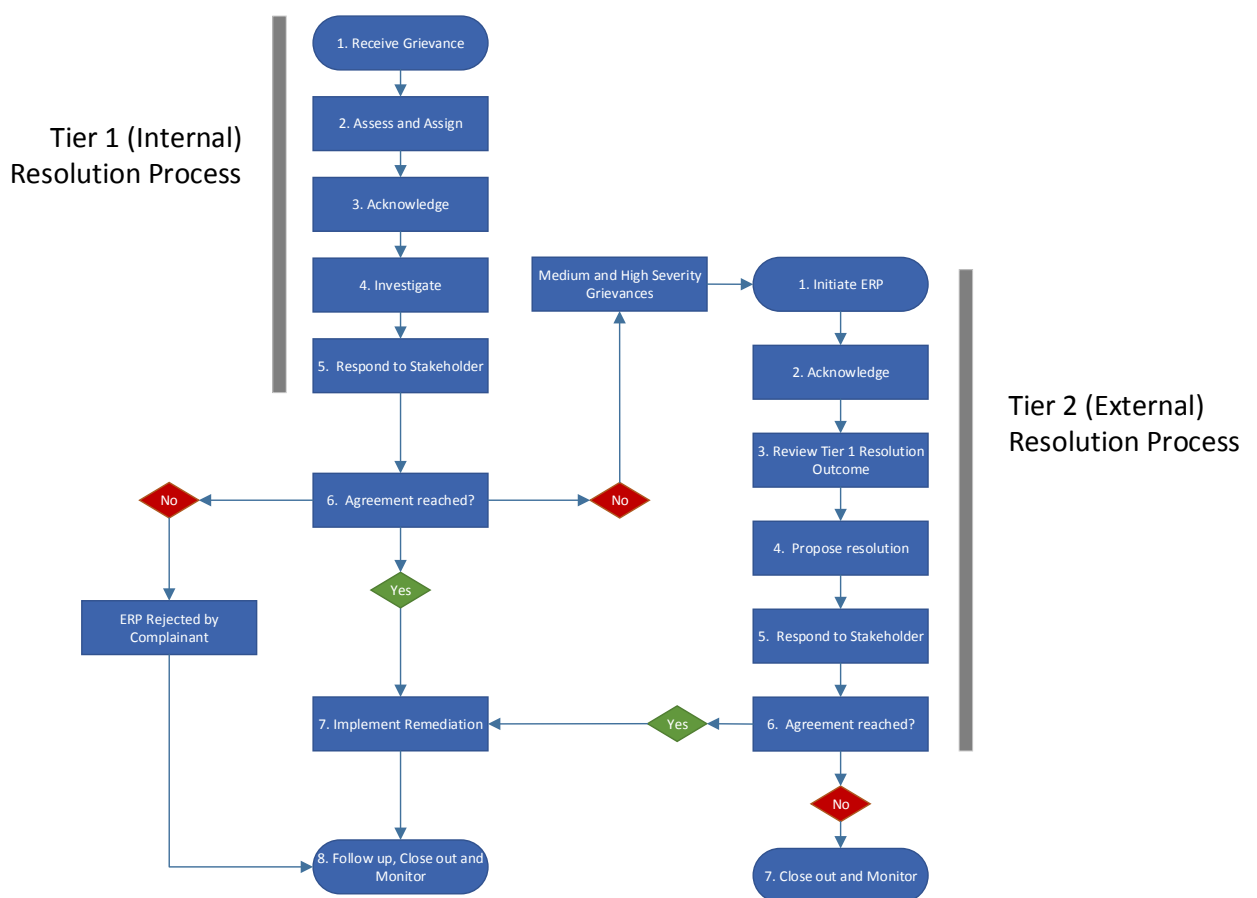
3. TAP Grievance Management Process: Overview


TAP have adopted a two-tier grievance management approach which allows grievances to be resolved as they arise and as effectively as possible. TAP's and its Contractors' internal grievance resolution processes are aimed at effective grievance response based on principles outlines in TAP GMF.

Internal grievance resolution process known as Third Party Grievance process or Tier 1 process is implemented by established in-country grievance management team and ad hoc multi-disciplinary Grievance Task Force.

However, in cases where the Complainant is still not satisfied with the outcomes of the internal resolution process and where the grievances are medium to high severity, the additional external review by an External Review Panel (ERP) called Tier 2 will be considered and offered to the Complainant. Figure 1 below provides the overview of TAP two-tier grievance management approach.

Figure 1: TAP Grievance Management Process: Overview



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4. Third Party Grievance Process: Tier 1

4.1. Channels for submitting and receiving a grievance

Complainants will be able to submit a grievance in the following ways:

- By speaking to a TAP or Contractor employee
- By speaking directly to a TAP CLC, Social Field Monitor or Contractor CLO
- By submitting the online grievance form on TAP's grievance website page
- By submitting a completed grievance form in one of the grievance boxes in TAP's regional offices and/or the Contractors construction camps and/or work areas (Complainant can opt out from signing the carbon copy, which will not affect grievance registration and processing)
- By calling TAP's grievance hotline or
- By sending an e-mail, letter and/or fax to TAP

Where necessary, Complainants will be assisted by the Grievance Coordinator, the TAP CLC or Social Field Monitor to complete and submit grievance forms or to access information on the grievance management process.

Grievances may be submitted in Greek, English, Turkish (for grievances from PAPs living near the Greek-Turkish border) and all minority languages officially recognized by the Greek government and must 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. The request for confidentiality and the reasons for the request must be submitted with the grievance. All reasonable efforts will be made to maintain the confidentiality requested.


TAP will endeavour to resolve any grievances with complainants in good faith, transparently and in a timely manner. It is understood that complainants may refer the 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.

The Grievance hotline is staffed Monday – Friday 09:00 – 18:00 by the Grievance Coordinator, however if a Complainant leaves a grievance (in a voice-message) outside the operating hours or on weekends the Grievance Coordinator will attempt to contact the Complainant the following working day to record the details of the grievance but not later than 3 working days of receiving the original message.

4.2. Assessing and assigning severity

Grievances are defined according to three severity levels: low, medium and high. The severity rating of a grievance is based on the potential consequence (actual or potential) of the grievance in relation to:

- Social and Environmental impact, including:
 - Health
 - Safety
 - Security
 - Livelihoods
 - Income

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- Amenity / Lifestyle
- Access to services
- Social Relations / Community Cohesion
- Environmental quality
- Natural resources
- Impact on TAP corporate reputation
- Impact on Project schedule

Categorization of severity may partially be determined by Complainant vulnerability: similar effects may impact differently on vulnerable and non-vulnerable households. Severity level is determined by the highest level of impact associated with the grievance. Each severity level is described in the Table 2 below:


Table 2: Grievance severity matrix

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

4.3. Assigning grievance category


Grievance Coordinator applies following categories when a new grievance received:

- a) **Technical and Design Assurance and Support:** these grievances will result from engineering design planning activities which have a potentially negative impact on stakeholders
- b) **Construction:** these grievances will result from pipeline construction activities including dust, noise, vibration and any damages caused during construction. In addition, the following sub-categories will be employed:
 - b.1 Nuisance (dust, noise, vibration, light pollution, wastewater, etc.)
 - b.2 Accidental damage
 - b.3 Access roads construction
 - b.4 Reinstatement
- c) **Land Easement and Acquisition (LEA) activities:** these grievances will result from LEA and securing land access (SLA) activities. In addition, the following sub-categories will be employed:

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- c.1 Land entry process
- c.2 Compensation rate/methodology dispute
- c.3 Compensation payment delay
- c.4 Land exit process
- c.5 Boundary marking or boundary dispute
- c.6 Land titling and ownership disputes
- d) **Livelihood Restoration activities:** these grievances will result from a failure to deliver livelihood restoration activities or from a failure of TAP affected stakeholders to restore their livelihoods. In addition, the following sub-categories will be employed:
 - d.1 LATS program acceptance / qualification
 - d.2 LATS – Farm support
 - d.3 LATS – Business support
 - d.4 Vulnerable assistance
 - d.5 Construction impact on agricultural productivity or animal welfare
 - d.6 Other livelihood impacts
- e) **Legal and Compliance:** Grievances with legal ramifications for TAP and those alleging breaches of TAP’s Code of Conduct, Anti-Bribery and Ethical behaviour commitments
- f) **Social Conduct in the Communities:** these grievances will result from unfavourable interactions between TAP or Contractor employees in the community environment
- g) **Community safety and security:**
 - g.1 Transport: these grievances will result from transport related activities
 - g.2 Accommodation: these grievances will result from activities taking place around the Contractor camps or Contractor accommodation
 - g.3 Pipeline: these grievances will result from safety concerns expressed by individuals and communities located near pipeline construction sites.
- h) **Cultural Heritage:** these grievances will result from the failure to protect cultural heritage areas
- i) **HSSE 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 will be managed directly by TAP’s In-country HSSE Function
- j) **Environment:** these grievances will result from activities deemed detrimental to the local environment and biodiversity
- k) **Employment:** these grievances will result from unclear employment practices either by TAP or the Contractors or alleged breaches in employment and Human Rights Practices. Employment grievances directed at TAP will be dealt with by the TAP Industrial Relations and Human Resources Department. The following sub-categories will apply:
 - k.1 Recruitment
 - k.2 Retrenchment
 - k.3 Welfare
 - k.4 General HR
 - k.5 Remuneration and working hours
- l) **Stakeholder Engagement:** these grievances will result from a lack of stakeholder consultation or a general lack of information for community stakeholders
- m) **Corporate Social Responsibility²:** these grievances will result from the implementation of TAP’s CSR or Community Investment activities

² Questions or recommendations relating to strategic investment or TAP’s broader Corporate Social responsibility (CSR) activities will be managed directly by the Commercial Department.

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- n) **Multi-category grievances:** these grievances will result in two or more categories and require several work streams to address them
- o) **Extra-judicial letters:** these are formal letters submitted to TAP or Contractor by complainant's lawyers requesting immediate remediation actions before Complainant decides to use other legal or judicial channels. Such letters can relate to any of the Project execution activities and fall into any of the above described categories and are normally dealt by TAP's and/or Contractor's Legal functions.

If during the assessment process the Grievance Coordinator determines that a particular grievance fits into more than one grievance category, these additional assessment steps will be followed:


- Double check the assessment with another Grievance Management team member
- 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 PAPID Number³
- Re-assess the severity and consequence of each grievance (separately) and
- Follow the standard grievance resolution process.

By clearly identifying all affected categories, the Grievance Coordinator ensures that each grievance is appropriately investigated by the relevant work-stream.

4.4. Tier 1 Grievance Resolution Process: administrative steps

1. **Confirmation of receipt:** For grievances received in the field, the CLC will verbally acknowledge the receipt of the grievance. For grievances received through a phone call, email, post and fax, the Grievance Coordinator will issue an acknowledgement receipt form within 7 working days of receiving the grievance, via the same channel that the grievance was received (e.g. if grievance was received via an email, the acknowledgment will be via an email). The acknowledgment receipt will explain the appropriate process to be followed to resolve the grievance and the expected timeframe for the resolution. If possible, the Grievance Coordinator will make a follow up calls to ensure the Complainants understand the grievance process to be followed.
2. **Register grievances in grievance database (SGMT):** The Grievance Coordinator will register all grievances. Each case will receive a unique registration number in the grievance database to enable tracking. A brief description of the case will be translated into the English language to allow internal work-stream managers to investigate the grievance. The English translation is also needed for reporting purposes.
3. **Verification:** The Grievance Coordinator will verify that the grievance is related to the TAP project. If the grievance is not related to the TAP Project or the Construction activities, the Grievance Coordinator will send a rejection letter to the Complainant indicating this point. The Grievance Coordinator will also verify the severity of the grievance and register the grievance appropriately.
4. **Categorizing:** The Grievance Coordinator will categorize each grievance according to:
 - geographical region
 - the work-stream responsible for resolving the grievance

³ The PAPID Number is a unique identifying number associated with each stakeholder.

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- the type of aggrieved party (individual, group, Non-Governmental Organization) etc.
- the category of grievance and indicate frequency of the grievance (first time or repetitive)
- the severity and consequence⁴.

The severity and consequence of a grievance will determine the resolution process to be followed. Therefore, it is imperative that the Grievance Coordinator ensures that grievances are appropriately categorized. Medium and high severity grievances have a specific resolution process which will be triggered by the severity rating.


5. **Assigning cases to the appropriate work-streams:** The Grievance Coordinator will send the grievance to the relevant work-stream Managers (or Contractor) for investigation and resolution. The work-stream Managers will be informed of the applicable timeframes for resolving the type of grievance and the format of the official response required. The Contractor will inform TAP of the investigation process and resolution outcome of all grievances it addresses. This information will form part of the Grievance monthly, quarterly and annual reporting requirements.
6. **Investigating Grievances:** The in-country Grievance Coordinator will provide the full grievance file (evidence trail) to the relevant work-stream manager to aid the investigation process. If appropriate, the in-country Grievance Coordinator will provide the relevant work-stream manager practical advice on how to manage the grievance. Figure 2 below outlines the generic administrative flow for handling grievances and Table 4 describes the key steps.
7. **Logging and Communicating Grievance Outcomes:** Once a resolution or remediation measure to a grievance has been agreed by the relevant TAP work-stream, the work-stream Manager will send the detail of the remediation measure to the Grievance Coordinator to be recorded in the database. The Grievance Coordinator will:
 - Immediately discuss the proposed resolution/remediation with the Complainant and agree the timing of the remediation process
 - Send a rejection letter in cases when a grievance has been assessed as unjustified or not related to TAP or its Contractors, or has been rejected for any other sound reason. The letter will explain the grounds for rejection
 - If the case is complex and the resolution will 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 Grievance management team to trigger appropriate actions to prevent further similar grievances.

For more complex cases the Grievance Task Force, supported by external parties, may engage with the stakeholder.

8. **Implementing Remediation Measures and Close out:** The implementation of remediation measures will start immediately after the Complainant has been consulted about the proposed remediation measure and has agreed that they are appropriate. The remediation measures will be implemented by the TAP work-stream or Contractors responsible for addressing the grievance and will be completed within agreed timeframes. If financial compensation is part of remediating the grievance, payments will be made within a maximum 30-day period⁵. The Grievance Coordinator will monitor the implementation process by requesting

⁴ As it may be risky and not always possible to classify a case prior to investigation, the Grievance Coordinator will give a first recommendation, and if needed, re-classify after the investigation.

⁵ Example: Payment to farmers for buying seedlings or crops which were destroyed accidentally by project trucks

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regional CLC or Social Field Monitor to visit the site and obtaining the feedback from the Complainant on the implemented remediation measures. When the Complainant is satisfied with the remediation measure implemented, the TAP CLC or Social Field Monitor will confirm the closure of the grievance with the stakeholder. The TAP CLC or Social Field Monitor must record this confirmation for reporting and audit purposes and provide the documented feedback to the Grievance Coordinator for archiving in the Grievance database.

9. **Closing the Grievance Resolution Process:** When the stakeholder has accepted the proposed resolution, and is satisfied with the remediation measure implemented, the TAP CLC or Social Field Monitor will request the stakeholder to sign a grievance close out form. The Grievance Coordinator will upload the signed agreement as an attachment into the grievance system and the case will be marked as resolved/closed. The TAP CLC or Social Field Monitor will 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.
10. **Referral to External Review Process by ERP:** If after internal grievance resolution process parties did not come to mutually acceptable remediation on grievances with medium and high severity, grievance coordinator proposes External Review Process by ERP. This would require additional internal approvals and acceptance by the complainant. More details on the process provided in relevant section of the Procedure.

Table 3 below summarises grievance management steps under Tier 1 Third Party Grievance Procedure.

Table 3: Tier 1 Grievance Management Steps

| Step | Grievance Activity | Description |
|------|---|---|
| 1 | Receive | Receive grievances through all available avenues (phone, text, email, grievance forms, websites, Contractor, CLC, SFM's etc) |
| 2 | Assess & Assign | Assess whether grievance is related to TAP. Assess severity (check for Stakeholder Engagement evidence). Assign to relevant work-stream |
| 3 | Acknowledge | Send Acknowledgement to stakeholder/complainant. Provide outline of grievance resolution process |
| 4 | Investigate | Relevant work-stream investigates grievance and proposes remediation measures |
| 5 | Respond to stakeholder | Discuss grievance remediation proposal with Stakeholder and detail implementation plan |
| 6 | Reach agreement with stakeholder | <p>Stakeholder agrees - TAP & stakeholder agree terms of resolution. TAP implement remediation actions or pays grievance compensation if remediation is not feasible.</p> <p>Stakeholder disagrees – trigger Tier 2 External Review Process for medium and high severity grievances upon agreement with the Complainant</p> |
| 7 | Remediation | Implement remediation actions and where remediation is not feasible compensate |

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| Step | Grievance Activity | Description |
|------|---|---|
| 8 | Follow up, close out and monitor | Follow up on remediation, document closure and continue monitor as required |


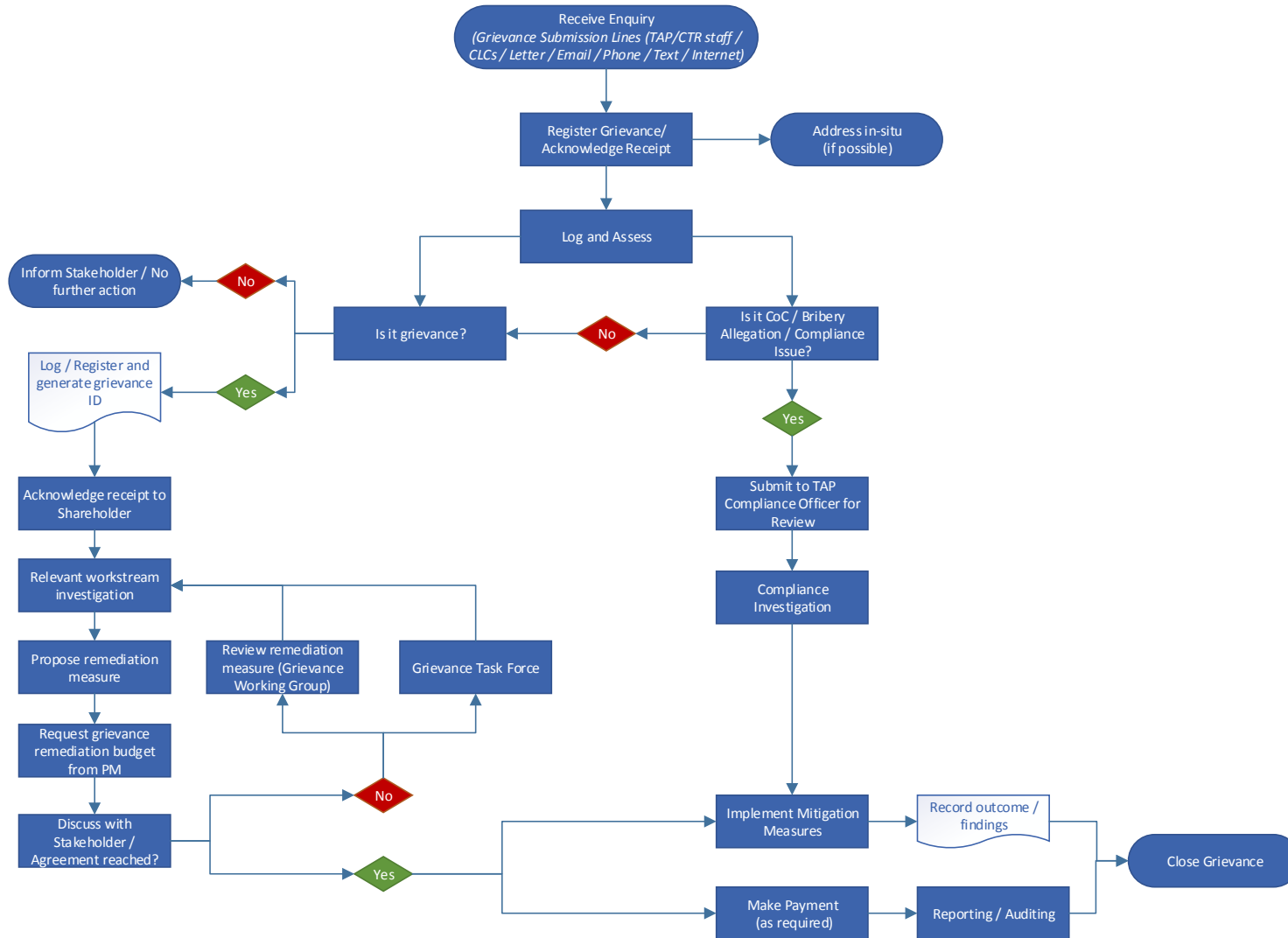

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Figure 2: Tier 1 Administrative Steps



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4.5. Tier 1 Grievance Resolution Process: applicable timeframes


Below timeframes are associated with TAP Tier 1 Third Party Grievance Management procedure. It is important to note that these timeframes are indicative and will be better defined once the grievance investigation process has begun. The in-country Grievance Coordinator will also inform the work-stream manager or GTF of the applicable timeframes in which a response and remediation measure needs to be defined to resolve a grievance. These timeframes are commensurate with the severity and consequence level of the submitted grievances.

Table 4: Tier 1 Applicable Timeframes

| Action | Timeframe | Responsible Party |
|---|---|--|
| Register grievance in SGMT | Within 7 working days | Grievance Coordinator |
| Acknowledge Grievance | Within 7 working days | Grievance Coordinator |
| Issue grievance rejection letter (if required) | Within 30 calendar days | Grievance Coordinator |
| Issue grievance feedback explaining time required for resolution and on-going progress (if not yet resolved) | After 30 calendar days | Grievance Coordinator |
| Issue grievance resolution letter | On agreement of grievance remediation action | Grievance Coordinator |
| Issue grievance feedback when mitigation established within the assigned timeframes | 30/60/90 days (see case and severity levels) | Grievance Coordinator (with support of the CLC and/or the SFM) |
| Approve and issue compensation payments | 30 days after signing agreement | In-country Project Manager and responsible work-stream |
| Post resolution monitoring | Within 30 days after resolution closure | Grievance Coordinator (with support of the CLC and/or the SFM) |

Table 5: Links between Severity and Timeframe

| Grievance Severity | Timeframe | Responsible |
|--------------------|--|---|
| Low | Up to 30 days | Grievance Coordinator |
| Medium | Up to 60 days | Grievance Coordinator and Responsible Work Stream |
| High | Up to 90 days (depending on complexity) | Grievance Task Force |

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5. External Review Process: Tier 2

5.1. Tier 2: External Review Panel (ERP)

TAP Grievance Coordinator will have visibility and monitor outcomes of internal resolution process (Tier 1) and ensure that the External Review Panel (ERP) arbitration is initiated for:

- high and medium severity grievances that could not be resolved through internal Tier 1 grievance resolution process
- grievances where mutually acceptable resolution could not be reached.

The ERP is known as Tier 2 grievance management process supported by TAP with involvement of external expert party, the Complainant and TAP grievance management team. The composition of the ERP is decided on case by case basis depending on nature of the grievance requiring involvement of specialist advisors and endorsement of TAP management.


5.2. Tier 2: Initiation of ERP

TAP Grievance Coordinator submits grievances eligible for ERP to TAP Social Performance and Grievance Advisor requesting to initiate the external review process and obtain all required internal approvals before setting up ERP. All grievances proposed for external review shall be cleared with the complainants to confirm their consent for external mediation or arbitration. During external review process, the Complainant will be actively involved into review together with external expert specialised in the subject of the grievance.

5.3. Tier 2 Grievance Resolution Process: grievance management steps

Table 6: Tier 2 Grievance Management Steps

| Step | Grievance Activity | Description |
|------|--|--|
| 1 | Initiate External Review | External Review process is initiated by Grievance Coordinator via TAP Social Performance and Grievance Advisor. All required approvals received and documentation on the process and outcomes of the Tier 1 resolution for external review prepared. |
| 2 | Acknowledge | Complainant is informed about additional mediation or arbitration process with their involvement and with support of external expert on the subject of the grievance agreed with the complainant. |
| 3 | External review of Tier 1 resolution outcomes | ERP will assess the investigation of the initial grievance and determine whether the Tier 1 outcome or proposed actions were appropriate, given the evidence provided. |
| 4 | Propose resolution | The ERP will issue results of verification process by external expert party either confirming outcomes of Tier 1 process or proposing alternative resolution where it finds that TAP has failed to redress the grievance. |
| 5 | Respond to stakeholder | ERP notifies the stakeholder via in-country Grievance Coordinator about the outcomes of Tier 2 review |

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| Step | Grievance Activity | Description |
|------|---|---|
| 6 | External review resolution agreement | The process of required engagement and approvals in case of new proposed resolution accepted by all parties |
| 7 | Close out and Follow up | Implement remediation, document closure, follow up and monitor |

5.4. Tier 2 Grievance Resolution Process: applicable timeframes

Timeframes associated with the External Review Process (Tier 2) are provided below. It is important to note that these timeframes are indicative and will be better defined once the grievance investigation process has begun. It is also important to note that these timeframes will also vary according to the availability of external expert party and complexity of the grievance. In any case Grievance Coordinator will keep Complainant updated on the progress and timeframes.

Table 7: Timeframes applicable to Tier 2

| Action | Timeframe | Responsible |
|--|--|--|
| Initiate external review process and obtain all required internal approvals | Within 30 calendar days since grievance closure by Tier 1 process | Grievance Coordinator and Social Performance and Grievance Advisor |
| Confirm Complainant's consent on external review process | | Grievance Coordinator |
| Set Up External Review Panel (ERP) | Within 30 calendar days upon obtaining consent from the Complainant | Grievance Coordinator and Social Performance and Grievance Advisor |
| Issue external review resolution decision | Within 10 working days upon completion of external review | External Expert with support of Social Performance and Grievance Advisor and Grievance Coordinator |
| Implement agreed remediation measures | Dependent on the type of remediation and terms of agreement reached with the complainant | Responsible work stream within TAP or Contractor |

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6. Monitoring, Reporting and Reviews


TAP is committed to preventing the recurrence of grievances. Therefore, the TAP Grievance Coordinator will periodically review the grievance management process to eliminate systemic problems and to ensure that the resolution process is working efficiently and produces effective outcomes.

Biannual external reviews of TAP GMF will take place. The overall grievance management performance will be monitored and evaluated against the indicators below.

Table 8: Grievance reporting indicators

| Commitment | Indicator (the target is 100%) |
|--|---|
| Efficiency (Timely resolution) | <ul style="list-style-type: none"> ▪ Total number and percentage of grievances received, logged, acknowledged, processed, resolved and closed within set time frame of 30 days (low severity) and 60-90 days (medium and high severity) ▪ Number and percentage of grievances closed versus open ▪ Number and percentage of outstanding non-resolved grievances |
| Trends (Qualitative data) | <ul style="list-style-type: none"> ▪ Number and percentage of grievances received per categories ▪ 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 ▪ Number and percentage of grievances per receiving organization (TAP and Contractors) |
| Effectiveness (Awareness, usage, satisfaction of complainants) | <ul style="list-style-type: none"> ▪ Number and percentage of stakeholders satisfied with solution ▪ Number and percentage of stakeholders satisfied with level and timing of information they received during a grievance process ▪ Number and percentage of cases requesting external review or alternative third-party arbitration |
| Contentious improvement (Commitment to integrate procedural lessons learned) | <ul style="list-style-type: none"> ▪ Qualitative indicators shall be reported monthly and include root cause analysis, specific case examples and lessons learned. |

The above indicators will be used by TAP Grievance management teams in preparation of weekly and monthly reports. The regular grievance reporting, and analysis will inform revisions to the grievance mechanism and TAP's Grievance Framework more broadly. TAP will also monitor the efficacy and relevance of the Third-Party Grievance Mechanism and adjust the procedures and the grievance management tool, as required.

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7. Confidentiality


7.1. Duty of Confidentiality

TAP is committed to protecting the identity of the Complainant and to handling personal information in accordance with legal requirements. This duty extends to all employees or representatives of TAP and its Contractors who participate in the Grievance management process.

Information about a Complainant will be shared within TAP on a need-to-know basis and only to the extent necessary to complete a step under this Procedure. TAP will not share personal information with third parties unless required by law or authorised and by the Complainant.

7.2. Personal Data


Personal data contained in the Grievance register will be kept only as long as necessary to investigate the complaint and implement a resolution. Personal data will then be either deleted or modified and transferred to an archive for a reasonable period pursuant to TAP's Data Privacy Policy.

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8. Conflicts of Interests

A conflict of interests exists where there is a divergence between the interests of a TAP 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.

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 specific TAP or Contractor employee, that person will not play a role in the Grievance managing process.

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9. Publishing Grievance Procedure

To ensure that all our stakeholders (including TAP's own employees and Contractors) are aware of how to access project related information or have the knowledge of how to submit grievances (if required), the following grievance submission information is available and published on TAP's website: <https://www.tap-ag.gr/Υποβολή-αναφορών>

Grievance Submission: Greece


Email: grievancegreece@tap-ag.com

Postal address:

C/O TAP Grievance Coordinator
Cosmos Offices 5 Agiou Georgiou 57001 Pylea

Telephone: +30 213 0104 563

SMS: +30 69 360 506 76

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10. Changes since last versions