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AMUR GAS PROCESSING PLANT

STAKEHOLDER ENGAGEMENT PLAN



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1. INTRODUCTION

1.1 Introduction to the Amur GPP Project

The Amur Gas Processing Plant (GPP) will be built in the Far Eastern Federal District of Russia, Svobodnensky District of the Amur Region (Figure 1.1). It will be the largest in Russia and one of the world's largest gas processing plants. The design capacity of the plant will reach up to 42 billion cubic meters of gas a year.



Figure 1.1 Location of the Amur GPP Project¹

The Amur GPP is needed for processing of natural gas transported over the "Power of Siberia" gas transmission system from the Yakutsk and Irkutsk gas production hubs created by PAO Gazprom within the framework of the Eastern Gas Programme. This Stakeholder Engagement Plan focuses on the Amur GPP only and does not address the upstream gas fields or the "Power of Siberia" pipeline system.

Gases produced at the Amur GPP will include commercial gas, ethane, propane, butane and pentane-hexane fraction, and helium. The Amur plant's 1.875 million-tonne/year ethane production capacity will be utilised by PAO SIBUR Holding to produce polyethylene at their nearby conversion plant (the construction is being currently discussed). Purified methane will be exported to China via the "Power of Siberia" pipeline. The Amur GPP will also be the world's largest helium production facility with a capacity of up to 60 million cubic meters of helium per year.

¹<http://www.gazprom.com/press/news/2016/april/article271729/>

Gazprom established OOO Gazprom Pererabotka Blagoveshchensk as a special-purpose company dedicated to implement the Amur GPP Project. GPPB and AO NIPIGazpere robotka (NIPIGAZ, a part of SIBUR Group) agreed to form a partnership on coordinating equipment and material supplies as well as managing the construction of the Amur GPP. NIPIGAZ is acting as a general contractor responsible for the Project development.

1.2 Project Implementation Timeframe

Commissioning of the AGPP is scheduled for 2021. The Project will include implementation of the following stages/facilities and works (see Section 2.3 for details):

- Stage 1. Early works facilities (preparatory works);
- Stage 2. Railway infrastructure;
- Stage 3. Project infrastructure and auxiliary facilities;
- Stage 4. Gas Processing Plant;
- Stage 5. Residential district (microdistrict) in Svobodny outside the Project area (it is not funded as part of the Project);
- Stage 6. Solid Domestic and Industrial Waste Landfill.

These stages are not sequential and sometimes overlap or run concurrently, in accordance with the Project implementation schedule.

The start of AGPP construction was officially announced in October 2015. The design development activities were completed in May 2016. The Project design covering the auxiliary production facilities, Gas Processing Plant, and solid domestic and industrial wastes landfill was submitted to Glavgosexpertiza and approved by the authority on July 15, 2016. A positive conclusion was also obtained from Amurgosexpertiza (Regional Board of the State Expert Review) for the railway infrastructure facilities and motor roads.

The preparatory works have been completed by present. Railway line connecting "Zavodskaya-2" and "Zavodskaya" stations has been constructed (including the spur to the AGPP prefabrication yard, as well as railway bridge and overpass across the motorway).

Works on Stage 4 (GPP) were commenced by GPPB in 2017. First it is planned to construct C₂H₆ and natural gas liquids (NGL) (propane, butane, pentane and hexane mixture) extraction and N₂ rejection unit; a helium production unit², two units for gas drying and purification, a gas fractioning unit, and an NGL purification unit. They are scheduled to be commissioned in 2021. Four more similar gas processing units (one gas processing line per year) will be built by 2025.

The design documentation for construction of residential district (microdistrict) for the Project personnel in Svobodny, and for the Solid Domestic and Industrial Waste Landfill (Stages 5 and 6, as discussed above) has been prepared.

1.3 Introduction to the Stakeholder Engagement Plan

This report is the Stakeholder Engagement Plan for the Project and has been prepared as part of the Project's Environmental and Social Impact Assessment (ESIA) process. The ESIA, including this Stakeholder Engagement Plan, is being prepared in addition to the OVOS (environmental assessment) materials developed as part of the RF planning process, and is specifically intended to achieve compliance with international lender requirements, particularly the International Finance Corporation's Performance Standard 1, the European Bank for Reconstruction and Development's Performance Requirement 10, the OECD's Common Approaches, and the AIIB Requirements I, J and L.

In line with above-mentioned standards, this report is structured as follows:

Chapter 2 defines legal requirements relevant to the Project implementation.

²<http://www.gasworld.com/russia-helium-surge-continues-as-linde-contracted-by-gazprom/2009834.article>

Chapter 3 gives a concise description of the Project's socio-economic context.

Chapter 4 provides a description of engagement activities implemented by the Project to-date.

Chapter 5 identifies the Project stakeholders.

Chapter 6 describes the proposed engagement principles and action plan.

Chapter 7 describes the proposed grievance mechanism.

Chapter 8 explains the monitoring and reporting indicators.

Chapter 9 describes implementation arrangements and resources allocated by the Project to stakeholder engagement activities.

1.4 Sources of Information

The following information sources have been used to prepare the original SEP:

- Results of other components of the ESIA process carried out on behalf of GPPB by Ramboll (2016);
- Results of the consultation activities carried out by GPPB before the ESIA process started;
- Results of the consultation activities carried out jointly by GPPB and Ramboll in 2016 as part of the ESIA process.
- Results of the consultation activities carried out by GPPB and contractors over the period 2017-2018.

1.5 Updated SEP (January 2019)

This version of the Stakeholder Engagement Plan provides updated information on the stakeholder engagement arrangements adopted by the Company and contractors. In addition, it contains further details of the stakeholder consultations conducted by GPPB and contractor. In particular, the following information is included in the updated SEP:

- Description and results of the stakeholder engagement activities carried out by GPPB and contractors over the period 2017-2018;
- Updated list of the Project stakeholders;
- Updated description of the actual methods of engagement;
- Updated Engagement Plan;
- Updated description of the grievance mechanism;
- Updated structure of the Company's resources available for the Plan implementation.

2.LEGAL REQUIREMENTS

2.1 National Regulations

In the Russian Federation the stakeholder engagement process applicable to the Project is regulated by the following legislation:

- Federal Law of 23.11.1995 No 174-FZ "On Environmental Review" obliges to consider the public opinion during the environmental review of the Project documentation.
- Federal Law of 10.01.2002 No 7-FZ "On Environmental Protection", which establishes economic and other activities that have environmental impact must involve citizens in decision-making; specifically, decisions on siting of facilities, economic or other activity, which may cause damage to the natural environment, must consider public views.
- Federal Law of 24.04.1995 No. 52-FZ "On animals" establishes the right of individuals and entities, including public associations and religious organizations, to conduct Public Environmental Expert Review, public control, activities for protection of wildlife and habitats, and to support implementation of the respective state programmes. State entities are obliged to account for citizens' and legal entities' propositions and recommendations while performing their duties in the field of wildlife use and protection.
- Urban Planning Code of the Russian Federation of 29.12.2004 No 190-FZ determines that development activities related to territorial planning and construction and upgrade of capital facilities must involve citizens and their associations through "public hearings".
- Order of the State Committee for Ecology of the Russian Federation of 16.05.2000 No 372 "On Approval of Regulations on the Assessment of Environmental Impact (EIA) of the Proposed Economic and Other Activities in the Russian Federation" defines principles and procedures for public participation in the EIA process, including "public discussions".

In accordance with legislation, public discussions are organised by local authorities and supported by the Project initiator. Stakeholder engagement activities that should be conducted as part of the EIA process ("OVOS") are outlined in the figure below:

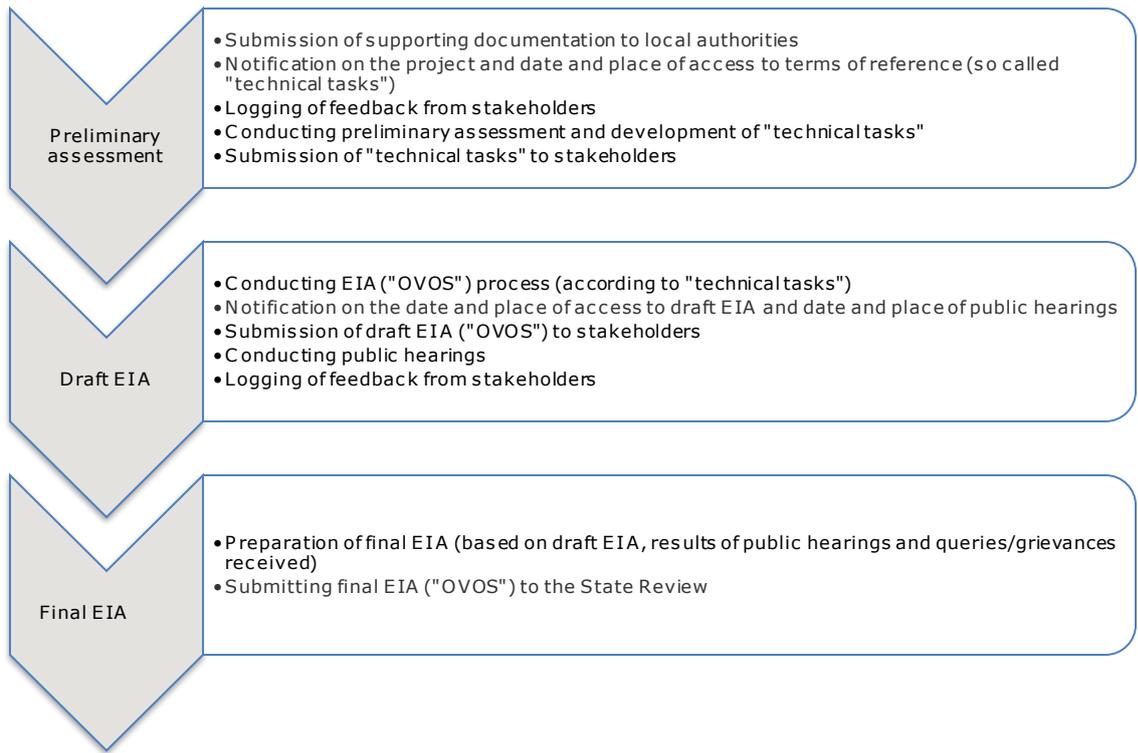


Figure 2.1: Stakeholder engagement activities during EIA ("OVOS") process according to Russian legislation

2.2 International Conventions and IFI Requirements

2.2.1 International Conventions

Public consultation is regulated by two international conventions:

- Convention of the UN European Economic Commission (UNECE), "On Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters" – usually referred to as the "Aarhus Convention" (1998);
- UNECE Convention "On Environmental Impact Assessment in a Transboundary Context" – usually referred to as the "Espoo Convention" (1991).

The Espoo convention does not apply to the AGPP as its impacts are not transboundary. While Russia has not ratified either of these conventions, most Europe-based international lending institutions do apply them.

The objective of the Aarhus Convention is to guarantee the right of the public for information, to facilitate public participation in the decision-making process and to provide access to justice in environmental matters. It sets out two basic principles related to disclosure of information on environmental issues:

- State authorities should disclose environmental information on request and on a non-discriminatory basis;
- Environmental information should be disclosed proactively to any affected party.

The public concerned should be timely and intelligibly informed at the very start of the decision-making process on the following:

- The intended activity and the application under review;
- Decision options and the draft resolution;
- State authority which is responsible for making the decision;
- Established procedure (the beginning of the procedure, forms of possible participation, time and venue of the scheduled public hearings, the state authority which can provide the information,

availability of environmental information, the scope of the intended activity, procedure of environmental impact assessment, including by whom and when such information may be provided).

2.2.2 IFI Requirements

2.2.2.1 The IFC Performance Standards

The IFC Performance Standards (revised in 2012) are internationally recognised standards on social and environmental sustainability, applied by the IFC (the private sector arm of the World Bank Group) and by a number of large commercial banks and Export Credit Agencies within the framework of the Equator Principles. Of particular relevance to the stakeholder engagement process and the ESIA process is Performance Standard 1: "Assessment and Management of Environmental and Social Risks and Impacts".

The key requirements of PS 1 pertaining to public engagement are the following:

- Identify and evaluate environmental and social risks and impacts of the project;
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise; and where residual impacts remain, compensate/offset risks and impacts to workers, affected communities and environment;
- Promote improved environmental and social performance through effective use of management systems;
- Ensure grievances from affected individuals, groups, and communities and external communication from other stakeholders are responded to and appropriately managed; and
- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and ensure relevant environmental and social information is disclosed and disseminated.

2.2.2.2 EBRD's Environmental and Social Policy

EBRD's Environmental and Social Policy (revised in 2014) includes Performance Requirement 10 on "Information Disclosure and Stakeholder Engagement", which requires the following:

- Identify people or communities that are or could be affected by the project, as well as other interested parties;
- Ensure that such stakeholders are appropriately engaged in environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation; and
- Maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.

PR 10 requires that during project preparation stakeholders be identified and analysed and that a Stakeholder Engagement Plan be prepared. Resources and materials for public disclosure and engagement should focus on Project 'affected parties', with particular attention to disadvantaged or vulnerable groups and individuals. Engagement should continue through project implementation and a grievance procedure be established to receive and respond to stakeholder complaints.

PR 10 states that stakeholder engagement should:

- Be based on disclosure of relevant and adequate information, including draft documents and plans, to allow comment prior to decisions being taken;
- Begin early in the ESIA process;
- Focus on social and environmental risks and adverse impacts, and proposed measures and actions to address these; and
- Be carried out on an on-going basis as issues, impacts and opportunities evolve.

In addition, the EBRD is bound to abide by both the Aarhus and the Espoo conventions.

2.2.2.3 OECD Common Approaches

The latest version of the '*Recommendation of the Council on Common Approaches for officially supported export credits and environmental and social due diligence (the "Common Approaches")*' was adopted in April 2016. It presents the common approaches to environmental and social issues taken, amongst others, by Export Credit Agencies of OECD member countries. It categorises projects along similar guidelines as those adopted by the IFC, and requires ECAs and other similar finance institutions to benchmark all projects they review for potential finance against the World Bank Environmental and Social Standards, or the IFC's Performance Standards.

In practice ECAs of OECD countries apply IFC's Performance Standards to private sector projects they consider for finance or insurance.

2.2.2.4 AIIB Requirements

The Asian Infrastructure Investment Bank (AIIB) has developed an Environmental and Social Framework (February 2016), which includes three requirements that are relevant to the scope of this Stakeholder Engagement Plan:

- Requirement I: Information Disclosure;
- Requirement H: Consultation and Participation;
- Requirement L: Grievances.

These requirements follow :

- Information Disclosure:
 - AIIB requires the Client to ensure that relevant information about environmental and social risks and impacts of the Operation is made available in a timely and accessible manner, and in a form and language(s) understandable to the affected people, other stakeholders and the general public, so they can provide meaningful inputs into the design and implementation of the Operation. To support this process, AIIB posts the following environmental and social documents, as applicable, on its external website:
 - Draft environmental and social assessment reports, ESMPs, ESMPFs, resettlement plans, RPFs, Indigenous Peoples plans and IPPFs, or other approved forms of documentation, before AIIB's appraisal of the Operation;
 - Final or updated environmental and social assessment reports, ESMPs, ESMPFs, resettlement plans, RPFs, Indigenous Peoples plans and IPPFs, or other approved forms of documentation, upon receipt; and
 - ESMPs, resettlement plans, Indigenous Peoples plans and monitoring reports required to be prepared by Clients during Operation implementation under ESMPs, RPFs, IPPFs, or other approved forms of documentation, upon receipt
- Consultation:
 - The consultation process shall cover discussion of matters like Operation design, mitigation measures, sharing of development benefits and opportunities, and implementation issues. AIIB requires the Client to engage in meaningful consultation with stakeholders in a manner commensurate with the risks to, and impacts on, those affected by the Operation. For each Operation with: (a) significant adverse environmental and social impacts; (b) Involuntary Resettlement; or (c) impacts on Indigenous Peoples, AIIB may participate in consultation activities to understand the concerns of the affected people and to ensure that the Client addresses such concerns in the Operation's design and ESMP.
- Grievances:

- AIIB requires the Client to establish, in accordance with the applicable ESSs, a suitable grievance mechanism to receive and facilitate resolution of the concerns of people who believe they have been adversely affected by the Operation's environmental or social impacts.
- People who believe they have been adversely affected by the Operation's environmental or social impacts may also submit complaints to AIIB's oversight mechanism in accordance with the policies and procedures established by AIIB for such mechanism.

2.2.2.5 Equator Principles III Requirements

Equator Principles III (EPIII) requirements applicable to public engagement are essentially contained in Principles 5 (Stakeholder Engagement), 6 (Grievance Management) and 10 (Reporting and Transparency), and in IFC Performance Standards 1 and 7 (2012), to which the EPIII make an explicit reference. Public involvement is to be considered an essential part of any business venture and a way to improve project quality and delivery.

Equator Principles requirements concerning public consultation are similar to IFC requirements.

3. SUMMARY PRESENTATION OF SOCIO-ECONOMIC BASELINE CONDITIONS

3.1 Introduction

This chapter provides a brief outline of socio-economic conditions in the Project Area of Influence, including a description of key economic and demographic conditions, labour market, land use, social infrastructure, cultural heritage sites, and a number of other aspects.

This chapter was developed based on the following sources:

- information contained in Russian OVOS materials, prepared for different Project facilities/activities;
- accompanying documents, provided by GPPB; socio-economic reports, developed by the local Administration and federal authorities;
- a site visit conducted by Ramboll in August 2016 and associated consultation with local representatives of administrative organs and local population; and
- any other relevant data received from public sources.

The SEP has been updated with latest socio-economic data on the Project area, to reflect the changing demographic situation.

3.2 Administrative Structure

The Project is located in the Amur Region where the regional capital is the city of Blagoveshchensk. Within the Amur region, the Project is situated in the Svobodnensky Administrative District, one of 29 administrative entities of the region.

Svobodnensky Administrative District is located on the right bank of the Zeya River within Amur Region.

The capital city of Svobodnensky District, the city of Svobodny, is a separate administrative entity (Municipal Organisation of Svobodny City). The District (without Svobodny City) covers 7,234.4 km² and includes 42 settlements, which belong to 15 Village Councils (municipal entities).

3.3 Population

Svobodny City is the third largest city in the Amur Region after Blagoveshchensk and Belogorsk. The population of Svobodny City was 53,678 on 1st January, 2018.

The Svobodnensky District (without the City of Svobodny) has a population of 14,186 residents as of 1st January, 2018.

The ethnic composition of the population is largely Russian, with Ukrainians and Belarusians the main ethnic minorities. There are no representatives of Indigenous Groups in the District, although they are present in other districts of Amur Region (Evenki).

Svobodny was founded in 1902 and a significant part of its population, both in imperial and Soviet times, was composed of prisoners brought about to build the Trans-Siberian railway, and later the 'Amur' highway and other infrastructure vital to the development of this territory. Also in Tsarist times, an active resettlement policy was conducted to populate this area with people hailing from European Russia.

Migration statistics in the Svobodnensky Administrative District for the first half of 2016 indicate a negative growth with 243 persons arriving and 307 persons leaving the area³. No disaggregated migration data is available at the level of individual rural settlements.

3.4 Economic Situation

The main employment source in Svobodny City is related to railway operations (State Railway Company RZhD and contractors) as it is a large rail hub on the Trans-Siberian line. The City's establishment, its further development, its structure and its infrastructure are closely linked to the railway. While other

³http://amurstat.gks.ru/wps/wcm/connect/rosstat_ts/amurstat/resources/9b9fb200420bb715af96ef2d59c15b71/07_2_2.htm

activities existed in the Soviet period (maintenance of railway rolling stock, fluvial port, food production), most enterprises have collapsed after the fall of the Soviet Union. Unemployment rate as high as 20% was reported at the interviews back in 2016.

Svobodnensky District is largely agricultural, with agriculture and food production the main activities in rural settlements, together with some other activities (production of building materials production and machinery construction). The economic development of the District is supported by a municipal five-year development programme, which includes support to the medium and small enterprises and the establishment of a tax free zone around the future gas plant, which is to be supported by federal budget resources.

The economy of the area has benefited in recent years from the construction of the new 'Vostochny' spacecraft launching 'cosmodrome' in Ulegorsk, which started in 2009 and is due for completion in 2019. The first spacecraft was launched in April 2015. Although this facility is located in a neighbouring administrative district, it employs large numbers of residents from the City of Svobodny and the Svobodnensky District.

3.5 Land Use

State forestry lands occupy about 323,400 hectares, which accounts for about 44% of the Svobodnensky Administrative District area. The rest of the land is agricultural and a tiny part is residential or industrial. There are no registered areas of traditional land use by indigenous groups in the District.

Most of the Project Area is located on land registered as agricultural. There are no dwellings in the Project footprint.

No part of the Project area is officially designated as forestry land. Agriculture in the Project area is open field agriculture, with soya and wheat the main crops. A number of private landowners were identified and compensated in regards of acquisition or temporary occupation of their private land.

3.6 Social Infrastructure and Services

There is one major hospital in Svobodny, which serves the City of Svobodny, the Svobodnensky District, and a number of settlements of neighbouring districts, for a total population served of about 177,400 people (as of 2016). Some wards are in an inadequate condition, particularly the maternity. District medical services supervise a number of dispensaries ('Feldshersky Punkt') across the Svobodnensky District.

Based on the data reported in 2016, there are 23 educational institutions in Svobodnensky Administrative District including: 5 pre-school kindergartens for 170 children in total; and 18 primary and secondary schools for 1,398 children.

3.7 Infrastructure and Housing

Svobodny is a large transport hub at the crossroads of rail, water and automobile transportation ways. It is a major rail station of the Zabaikalskaya railway, a section of the Trans-Siberian railway. The Trans-Siberian railway is passing through Svobodnensky Administrative District stretching there for about 60 km.

The river port in Svobodny is currently not active in terms of public transportation. The airport in Svobodny has a runway of only 400 metres length and is used only by forestry fire protection aircraft, with no passenger or cargo flights.

The main Siberian federal highway 'Amur' (Chita – Khabarovsk, R297, previously known as M58) crosses the District. In addition, a regional motorway connects Svobodny with Blagoveshchensk and other main cities in Amur Region.

There are 9,224 residential buildings in Svobodny with total living area 1,314,800 m² (as of 2016). The largest municipal housing estate in Svobodnensky Administrative District, Orliniy, is accommodating 1075 people. The engineering infrastructure includes water preparation plant, wastewater treatment facilities, communal supply of heating water, etc.

3.8 Natural Hazards

Natural hazards in the region mainly include flooding and forest fires, which affect both rural and urban areas on a regular basis. The Administration of Svobodnensky Administrative District and Svobodny City are in charge of emergency response, civil defence, and fire protection in the District in their respective territories⁴.

Security issues in Svobodny City include mainly petty crime, with reportedly high occurrence in Svobodny in relation to employment and poverty, an issue that does not affect rural settlements.

⁴https://www.svobregion.ru/index.php?option=com_content&view=article&id=1684&Itemid=204

4. STAKEHOLDER ENGAGEMENT ACTIVITIES TO-DATE

4.1 Key Activities

Stakeholder engagement activities to-date have mainly included:

- Statutory public hearings held as part of regulatory processes related with the ESIA ('OVOS') and amendments to the General Plan (see related minutes in Annex 3);
- Negotiation meetings held with landowners whose land had to be acquired or occupied for Project purposes;
- Community Council meetings;
- Engagement with media;
- Other engagement activities organised by GPPB in 2015-2018 as part of public relations activities, including presence at exhibitions and other forums at regional and inter-regional level (both Amur Region and Far East Federal Province).

4.2 Current Approach to Stakeholder Engagement and Related Resources

In the Project preparation phase and in the current build-up to the construction phase and early works, the Company has been active establishing relationships with all key regional-level and local-level stakeholders. The Company currently maintains a team with offices in Svobodny, Blagoveshchensk and Moscow that frequently visits the Svobodnensky District. The team includes experienced professionals in charge of stakeholder engagement, including liaising with local community organisations, local government agencies, the press and other mass media in Blagoveshchensk, as well as the City of Svobodny and the Svobodnensky District. Other personnel of the Company and contractors involved in stakeholder engagement include:

- General Director of the Company, who is in charge of high-level interaction at federal, regional, and local levels, and frequently visits the Project area (Blagoveshchensk, Svobodny, and Svobodnensky District);
- Deputy General Director on general matters;
- Personnel of the Pre-production and Land Use Unit with responsibility for engagement on the land acquisition issues and related negotiations with users and owners of concerned land plots;
- Main Contractor's Public and Media Relations Officer.

Stakeholder engagement activities started as of the establishment of GPPB, and currently include:

- Monthly meetings of the Work Groups at the administrations of the City of Svobodny and the Svobodnensky District, for discussion of issues of present interest;
- Meetings of the Community Council (refer to Section 4.3);
- Business Missions (on a quarterly basis) to attract small and medium businesses to Svobodny;
- Cooperation with the Center for Conservation of Historical and Cultural Heritage in terms of adopting regular conservation measures for the archaeological monuments identified in the AGPP area;
- Periodic press-releases;
- Participation in business forums and exhibitions such as the Eastern Economic Forum, an international business forum that takes place every year in Vladivostok on the model of the St Petersburg World Economic Forum, and other similar events of regional and inter-regional significance;
- Individual negotiations with landowners in respect of land acquisition and temporary occupation;
- Regular meetings with local administrative organs on issues such as Project construction progress, the development of worker accommodation in Svobodny City, job opportunities, social, environmental and economic impacts;
- Meetings with local businesses on procurement and employment opportunities;
- Meetings with various stakeholders at local and regional levels, including the Association of Hunters and Fishermen;

- Video pictures and reports on the progress of AGPP construction are available on-line (<http://blagoveshchensk-pererabotka.gazprom.ru/press/video> и https://www.youtube.com/channel/UChfMEzeK2V8wFF7OP_BvoNg);
- Charity events;
- Job fairs;
- Project presentations;
- Activities of the Project Information Centre;
- Operating grievance mechanism including the Project Hot Line service.

More details of the activities are provided below.

4.3 Community Council

The Company has supported establishment of a Community Council (see detailed membership of the Council in Annex 1), which includes members of local administration (City of Svobodny and nearby settlements), members of the civil society organisations, and local experts. The main roles of the Council include the following:

- Increasing community awareness in the City of Svobodny and Svobodnensky District about the Project progress, its environmental activities, health and safety arrangements and HR policy;
- Involvement of public in discussion of the Project-related matters with a significant effect on socio-economic development of the City of Svobodny and Svobodnensky District.

The Council Regulations define the following key areas of its activities:

- Preparation of recommendations for disclosure of the Project progress information to community;
- Regular public monitoring of the environmental, health and safety system adopted and used for the Project;
- Preparation of recommendations on the matters concerning the Project environmental, health and safety, and charity activities, considering public views;
- Review of proposals and preparation of recommendations on skills development, training and recruitment of local personnel for the companies engaged for the Project implementation, and for operation of the Amur GPP;
- Review of initiatives of environmental organizations and public associations.

The Council meetings are held regularly, at least once every four months, in the City of Svobodny.

4.4 Detail of Consultation and Disclosure Activities Undertaken To-date

Main consultation and disclosure activities that have been undertaken by the Amur GPP Project to date are summarised in Table 4.1.

Table 4-1. Summary of key concerns and suggestions raised in previous stakeholder engagement activities

Date	Nature of engagement	Location of engagement	Key concerns and suggestions raised
Early 2015 to mid-2016	Interaction with landowners whose land is affected by the Project (about 50 individuals in total) to reach negotiated agreements in respect of land acquisition and/or temporary occupation	<ul style="list-style-type: none"> • Landowners' homes • GPPB offices in Blagoveshchensk and Svobodny • District and city administration offices in Svobodny 	Not all landowners agreed immediately and reaching an agreement sometimes required numerous meetings. Key concerns raised were related to valuation of land and crops. Compulsory acquisition of land per RF legislation had to be triggered in a limited number of cases (about 5) where no amicable agreement could be reached.
Early 2015 to mid-2016	Interaction with State and municipal agencies whose land is affected by the Project	<ul style="list-style-type: none"> • GPPB offices in Blagoveshchensk and Svobodny • District and city administration offices in Svobodny 	No specific concern raised.
30 April – 30 May, 2015	Disclosure of Technical Tasks for preparation of OVOS for Amur GPP. Information about the OVOS procedure and the Technical assignment was published in the local and federal press.	<ul style="list-style-type: none"> • Svobodny District Administration office / webpage www.svobregion.ru; • Nizhnebuzulinsky District Administration office; • Dmitrievsky District Administration office; • VNIPI Gazdobycha office / webpage www.vnipigaz.qazprom.ru. 	No specific concerns or comments were expressed in the registers during the disclosure period.
23.09.2015	Public hearing on preliminary draft of AGPP Project EIA, carried out by VNIPI Gazdobycha jointly with the Svobodnensky District Administration.	Three separate events in Tchernigovka village, Dmitrievka village, and the City of Svobodny	Main questions raised by the attendance were in regards of: <ul style="list-style-type: none"> • Construction schedule • Freshwater pollution prevention • Employment of the local population at the Project
23.09.2015	Public hearing on waste disposal facility project (located close to Tchernigovka village)	Tchernigovka village	Main question was raised by the Head of Svobodnensky District Administration, who suggested that the waste disposal facility designed for the Project should be available for the domestic waste disposal by the local population. The Project representatives promised to consider this option.
11.05.2016	Public hearing in relation to housing estate design project in the Northern part of Svobodny for AGPP staff.	City of Svobodny	Main questions raised by the attendance were in regards of: <ul style="list-style-type: none"> • Who would be responsible for operations and maintenance at this housing estate? GPPB representative noted that this housing estate may be handed over to the Svobodny Administration upon its commissioning. • Local population would like to have opportunity to establish businesses serving this accommodation area, such as kiosks selling gardening fruit and vegetables. <p>Conclusions: The public supported the proposed housing development and answers to questions were deemed satisfactory.</p>

Date	Nature of engagement	Location of engagement	Key concerns and suggestions raised
17.08.2016	Consultative meeting between the Ramboll ESIA team and representatives of Svobodnensky District	Svobodny administrative building	<p>The following points were discussed (with respect to situation and key issues in the Svobodnensky District):</p> <ul style="list-style-type: none"> • Economic situation of the District, including industry and agriculture; • Unemployment and employment expectations at the Project; • Social and economic impacts of cosmodrome construction; • Demographic trends; • Public health (morbidity and services); • Education; • Infrastructure (road, fluvial, air, rail); • Natural hazards and emergency response; • Cultural events and cultural heritage
18.08.2016	Consultative meeting between the Ramboll ESIA team and representatives of the City of Svobodny	Svobodny administrative building	<p>The following points were discussed (with respect to situation and key issues in the City of Svobodny):</p> <ul style="list-style-type: none"> • Economic situation of the city, including industry and agriculture; • Unemployment and employment expectations at the Project; • Social and economic impacts of cosmodrome construction; • Housing and issues with housing; • New micro-rayon meant for GPPB employees in operations phase; • Demographic trends; • Public health (morbidity and level of services, key issues); • Education (pre-school, primary and secondary); • Infrastructure (road, fluvial, air, rail); • Natural hazards and emergency response; • Crime and security issues; • Cultural events and cultural heritage; • Connectivity to Blagoveshchensk and public and private transport issues
19.08.2016	Consultative meeting between the Ramboll ESIA team and the Dean of the Amur State University and his key staff	University campus in Blagoveshchensk	<p>The following points were discussed:</p> <ul style="list-style-type: none"> • Presentation of the University, its past and present achievements, and its current projects and networks at national and international levels • Participation of the University in the Project educational objectives • The University facilities dedicated to training in chemistry supported by the Project • Access to the above training facilities by young students from Svobodny and Svobodnensky District • Discussion of potential further developments and enhancement of current results.
19.08.2016	Consultative meeting between the Ramboll ESIA team and Association of Hunters and Fishermen of Amur Region	Office of the Association in Blagoveshchensk	<p>The following points were discussed:</p> <ul style="list-style-type: none"> • Association current membership; • Issuing hunting and fishing licenses; • Association current activities, particularly in regards of participating to regulation enforcement, illegal poaching, and fauna monitoring (both terrestrial and aquatic); • Role in allocation of hunting quota to local hunters groups and associated monitoring of kills; • Protected areas; • Hunting reserves; • Areas of traditional land use (associated with Indigenous Groups); • Corridor effect (pipeline of the Power of Siberia network)

Date	Nature of engagement	Location of engagement	Key concerns and suggestions raised
			<ul style="list-style-type: none"> Deforestation of the Project area and conversion into industrial area, with associated disruption to fauna Potential for poaching and increased pressure on natural resources from incoming Project workforce.
19.08.2016	Consultative meeting between the Ramboll ESIA team and Head of Historical and Archaeological Museum in Blagoveshchensk	Premises of the Museum in Blagoveshchensk	<p>The following points were discussed:</p> <ul style="list-style-type: none"> Pre-history and history of the Project area; Presence of Indigenous Groups; Current status of cultural heritage in the Project area; Conservation and curation strategy; Role of regional museum in curation of artefacts identified in the Amur Region; Monitoring of on-going construction works and associated chance find procedures; Potential Project role in further support of cultural heritage conservations efforts at regional level; Intangible Cultural Heritage
January-December 2018	Press releases	Corporate website of LLC Gazprom Pererabotka Blagoveshchensk / Amur Region mass media	<p>The total of 12 press releases were prepared on the following topics:</p> <ul style="list-style-type: none"> Construction of bridge across Bolshaya Pera River Construction of a railway line to connect the Amur GPP site with the Zabaikalskaya railway Mounting of one of the world's largest cranes at the Project construction site Ceremonial dispatch of the first batch of heat exchanger equipment for the Amur GPP from Saint Petersburg International certification of the Company's Integrated Management System Delivery of heat exchanger equipment Completion of large-scale loads for the Amur GPP by sea and river during the navigation season 2018 Human Capital Development Cooperation Agreement signed by the Company Environmental safety of construction of the Amur GPP confirmed by analysis of almost 1500 samples Manufacturing and testing of the first gas compression unit (GCU) "Ladoga" for the Amur GPP The Company awarded with the Far East Star prize
January-December 2018	Media coverage of the Amur Gas Processing Plant construction progress	Federal, regional, industry media: Interfax, TASS (information agency), Rossia TV channel, Rossia 24, Amurskaya Pravda, web-based media (AmurMedia, etc.), "Gazovaya Promyshlennost" ("Gas Industry") magazine	2468 press publications and TV news stories were published over the period, some of which can be accessed <i>inter alia</i> at the Company's corporate web-site: http://blagoveshchensk-pererabotka.gazprom.ru/press/video/
January-December 2018	Video clips on the status of development of the Amur GPP Project	Official web-site of the Project	15 publications and TV news stories were published over the period which are accessible from the Project web-site
January-December 2018	Participation in fairs and forums (including as part of exhibition areas of PAO Gazprom)	Sochi, Blagoveshchensk, Saint Petersburg, Vladivostok, Shanghai, Moscow	<p>During the above period, the Project representatives took part in 5 fairs and forums:</p> <ul style="list-style-type: none"> The Russian Investment Forum: Demonstration of a model of the Amur GPP and video presentation of the Project (Sochi, February 2018);

Date	Nature of engagement	Location of engagement	Key concerns and suggestions raised
			<ul style="list-style-type: none"> • AmurExpoForum: Video presentation of the Amur GPP Project (Blagoveshchensk, May 2018); • Saint Petersburg International Economic Forum: Video presentation of the Amur GPP Project (St. Petersburg, May 2018 and October 2018); • The Eastern Economic Forum: Exhibition stand "Amur Gas Processing Plant and gas chemical cluster", jointly with SIBUR (Vladivostok, September 2018); • China International Import Expo: Video presentations of the Amur GPP Project (China, Shanghai, 5-10 November 2018); • The Green Planet Forum: Presentation with a report on the results of environmental monitoring at the construction site of AGPP; • Exhibition "Far East Days in Moscow" (Moscow, 13-15 December 2018, exhibition stand on the Amur GPP, video presentation of the Amur GPP Project, consulting visitors on the available employment opportunities)
February 2017 - December 2018	Community Council at the Amur Gas Processing Plant Project	City of Svobodny	<p>Six meetings of the Community Council were held over the period.</p> <p>Meeting on 17.04.2017 (29 participants)</p> <ul style="list-style-type: none"> • Approval of the membership, regulations and procedures for the Community Council activities. Election of the Council Chair Person. • Disclosure of environmental aspects of the Amur GPP Project construction and operation, including health and safety, environmental protection, operational environmental monitoring, operation of the MSW landfill. <p>Meeting on 03.10.2017 (23 participants)</p> <ul style="list-style-type: none"> • The Council members visited AGPP construction sites; • Information concerning engagement of local professionals and contractors for the construction was disclosed; • The approach to monitoring of (sub)contractors' activities in terms of compliance with labour law, timely payment of wages and salaries, provision of social guarantees, contractual compliance, and occupational safety was clarified; • Comments were provided about situation at the construction site and workforce accommodation facilities. Detailed description of the Project Hot Line service and grievance mechanism was provided; • A task force was established at the Community Council for expedite handling of any issues relating to the Project implementation; • Specific mechanisms were identified for interaction between the Project parties, authorities and communities to prevent potential conflicts between residents of the city and rural communities on the one part and AGPP personnel on the other part. <p>Meeting on 14.12.2017 (27 participants)</p> <ul style="list-style-type: none"> • Status of cooperation of LLC Gazprom Pererabotka Blagoveshchensk with education establishments in the region on the matters relating to training of personnel; • Tax contributions of the companies involved in the Amur GPP Project to the budgets of the City of Svobodny and Svobodnensky District; • Project impact on the crime statistics and development of a system of preventive measures; • Project influence on the environmental situation, including the issue of MSW disposal by contractors involved in the Amur GPP Project; • Decision to implement a joint voluntary environmental project "EcoSvoboda" ("EcoFreedom") was made.

Date	Nature of engagement	Location of engagement	Key concerns and suggestions raised
			<p>Meeting on 11.04.2018</p> <ul style="list-style-type: none"> • Progress of the Amur GPP Project implementation: Availability of berth facilities and fleet for delivery of heavy and oversize equipment, connection of AGPP site to the Zabaikalskaya railway, announcement of the planned mobilization of personnel and delivery of equipment to the site; • Implementation of the Socio-Economic Development Plan of the City of Svobodny; • Results of the strategic session on development of the City of Svobodny, key demographic and economic forecasts, current spatial development planning activities, community ideas sought through the "What does Svobodny want?" platform; • Intermediate results of the "EcoSvoboda" action, announcement of further activities and tasks; • Territorial development of local municipalities in the Svobodnensky District. <p>Meeting on 28.08.2018 attended by Acting Governor of the Amur Region V. A. Orlov (30 participants) The enlarged meeting was also attended by the Minister of Amur Region Economic Development L. S. Starkova, Acting Head of Svobodny City Administration V. A. Konstantinov, Head of Svobodnensky District Administration E. S. Agafonova, Deputy General Director on general matters of Gazprom Pererabotka Blagoveshchensk LLC A. V. Belousov and other. Presentations with the following reports were made at the meeting:</p> <ul style="list-style-type: none"> • Progress of the Amur GPP Project implementation: delivery and installation of heavy and oversize equipment; • Environmental monitoring (construction impact of the Amur GPP sites on the environment); • Implementation of the Socio-Economic Development Plan of the City of Svobodny, 2018; • Development of the Svobodnensky District territories in 2018. <p>Other issues raised at the meeting include: students' teams at AGPP, residence of foreign nationals in the City of Svobodny, employment of graduates of the Amur Technical College, rehabilitation of road paving, etc.</p> <p>Meeting on 18.12.2018 (16 participants) The meeting was focused on discussion of impacts of the construction activities on socio-economic development of Svobodnensky District and the City of Svobodny.</p> <ul style="list-style-type: none"> • Economic impact on the municipalities due to tax contributions to local budgets. The total of 288,812.6 thousand rubles was paid to the city budget during 11 months of year 2018, i.e. 42.1% of the total sum of tax and nontax revenues. • Compliance with legal order by the GPP construction personnel. • Charity support provided by GPPB and NIPIGAZ in the Amur Region (improvements of technical and training facilities of school No.1 in Svobodny and the Amur Technical College, purchase of vehicle for the Regional Baby Home, purchase and installation of children's playgrounds, construction of pound for homeless animals, volunteer clean-up events, restoration fence of kindergarten No.3 in Svobodny following a fire, and other projects of social significance).
January-December 2018	Charity events	City of Svobodny	<ul style="list-style-type: none"> • Environmental Project "EcoSvoboda" • Support for tournament of neighbourhood soccer teams "Amursky Zabivaka" • Purchase of vehicle for transportation of children of 0 to 4 years (including children with disabilities) for PFHI (publicly funded health institution) AO Special Baby Home • Installation of children's playground equipment in Svobodny

Date	Nature of engagement	Location of engagement	Key concerns and suggestions raised
March-December 2018	Job fairs	Tomsk, Moscow, Kazan, Tyumen, Ufa, Ukhta, Vladivostok	<ul style="list-style-type: none"> • Job fair at the Tomsk National Research Polytechnic University, 30.03.2018 • Job fair at the Gubkin Russian State University (National Research University), 26.04.2018 • Job fair at the Kazan National Research Polytechnic University, 18.05.2018 • Meeting of GPPB representatives with students of the Amur State University, 25.05.2018 • Job fair at the Tyumen Industrial University, 13.09.2018 • Job fair at the Gubkin Russian State University (National Research University), 12.10.2018 • Job fair within the scope of the GAZPROM Day at the Ufa State Petroleum Technical University, 02.11.2018 • Job fair. The Day of LLC Gazprom Pererabotka Blagoveshchensk, 06.12.2018 • Job fair at the Ukhta State Technical University 07.12.2018
January-December 2018	Site visits to the construction site of Amur GPP	Project construction site	<ul style="list-style-type: none"> • 19.09.2018 - Site visit for students of the "Gazprom Class" of School No.1 of the City of Svobodny (25 visitors) • 30.10.2018, 08.11.2018, 13.11.2018 - Site visits for students of secondary schools of the cities of Svobodny, Blagoveshchensk, Belogorsk (72 visitors)

4.5 Cooperation and Assistance Agreements

In addition to engagement activities described above, GPPB has signed cooperation agreements with a number of entities in the Amur Region (see Table 4.2). These cooperation agreements reflect the long Corporate Social Responsibility of the Company.

Table Cooperation and Assistance Agreements

Date	Authority/organization	Summary of Agreement
22.04.2011	Government of the Amur Region	<p><u>GAZPROM will cooperate with the Government in following areas:</u></p> <ul style="list-style-type: none"> • Development and implementation of the Amur Region Gasification Programme. • Development and implementation of the energy saving Programmes. • Researching and developing the energy sources projects in the Amur Region. • Development and implementation of a complex system of environmental monitoring of the areas affected by the hydrocarbons transportation. • Registering for the tax purposes in the Amur Region and paying the local taxes and other mandatory payments to the Amur Region budget. <p><u>GPPB and the Government together</u></p> <ul style="list-style-type: none"> • will carry out joint investment projects in the Amur Region in order to improve the local economy. • will ensure safety and security at the Project facilities and develop and implement measures for avoiding any emergency situations. <p><u>The Government promised to</u></p> <ul style="list-style-type: none"> • ensure (as far as the RF legislation allows) that GPPB is paid on time for any gas supplied to the consumers in the Amur Region. • support GPPB in the land allocation process and changing the land categorisation for the selected plots if required. • support GPPB in the process of obtaining approvals and permits required for the Project. • support the engineering surveys carried out for the Project. • provide financial and tax benefits to the investment projects developed for gasification, energy efficiency, and environmental improvements in the Amur Region. • limit payments for renting the land plots used for the gas transportation networks.
06.07.2015	GKU Amuruprador, State Road Authority for the Amur Region	<p><u>GKU Amuruprador agreed to carry out the following:</u></p> <ul style="list-style-type: none"> • Allow GPPB an unobstructed access to the roads according to the RF regulations. • Forward instructions to GPPB to carry out the road repairs according to the Article 31.10 of the Federal Law №253-FZ dated 08.11.2007 "On the Motorways and Road Works in the Russian Federation". <p><u>GPPB agreed to carry out the following:</u></p> <ul style="list-style-type: none"> • Inspect the initial condition of the roads planned for being used for the Project together with GKU Amuruprador representatives. • Carry out monthly inspections of the used roads together with GKU Amuruprador representatives. • Transport any oversized and/or dangerous goods according to the RF regulations. • Organise monitoring and repairs of the roads used for transporting goods to the Project sites. • Pay compensations for repairing the public roads used by the Project, but not exceeding the budget for such compensations allocated within the approved AGPP construction budget.
09.07.2015	The Employment Service of the Amur Region	<p>GPPB agreed a Plan for Cooperation with the Employment Service in 2015-2017 in order to ensure engagement of the local population in the Project. Upon agreement with the regional Department of Employment, it is advisable to extend activities under the Plan for Cooperation to cover the period 2020-2021.</p>

Date	Authority/organization	Summary of Agreement
14.12.2015	Government of the Amur Region	<p><u>The Government promised to</u></p> <ul style="list-style-type: none"> • Provide support to GPPB in developing the Amur GPP Project. • Participate in the Land Allocation Commissions in order to provide information about the local gas infrastructure and help avoiding any incidents with the local gas infrastructure during the Project implementation. <p><u>GPPB will cooperate with the Government in following areas:</u></p> <ul style="list-style-type: none"> • Land allocation for the Project. • Development and implementation of the energy saving Programmes. • Development and implementation of a complex system of environmental monitoring of the areas affected by the Project. • Development of the joint investment programmes together with the Government. • Ensuring involvement of the local businesses and local staff in the Project. • Public engagement activities for updating the local population about the progress of the Project implementation, etc. <p><u>GPPB expressed a wish to participate in the social and economic development of the Amur Region by:</u></p> <ul style="list-style-type: none"> • Registering for the tax purposes in the Amur Region and paying the local taxes and other mandatory payments to the Amur Region budget, and • Investing into the local social and engineering infrastructure projects.
21.12.2015	Ministry of the Amur Region for Education and Science	<p><u>The Ministry agreed to carry out the following:</u></p> <ul style="list-style-type: none"> • Draft a list of the technical professional education bodies which are providing staff training for GPPB and forward it to GPPB for approval (yearly). • Enrol sufficient numbers of students to study for the professions required for AGPP according to the AGPP's requests (yearly). • Carry out presentations of the professions required at GPPB in the local schools (together with GPPB). • Ensure high level of the educational standards in the educational bodies of the Amur Region. <p><u>GPPB agreed to carry out the following:</u></p> <ul style="list-style-type: none"> • Develop a forecast of the vacancies expected at GPPB (yearly). • Sign agreements with the local professional education bodies for training students who would be working at AGPP. • Provide support and training to the teachers of the local professional education bodies. • Gift some teaching materials and equipment to the local professional education bodies.
August 2017	Amur State University	<p>Agreement between Gazprom Pererabotka Blagoveshchensk and Amur State University (AmSU) on cooperation in the sphere of R&D, training, re-training and upgrading of GPPB personnel.</p> <p>The Agreement was made in relation to assignment of partnership category "Base Partner of Gazprom Pererabotka Blagoveshchensk" to AmSU.</p>

Date	Authority/organization	Summary of Agreement
August 2017	School No.1 of the City of Svobodny, Amur Technical College, Amur State University	<p>Agreement between Gazprom Pererabotka Blagoveshchensk, School No.1 of the City of Svobodny, Amur Technical College, Amur State University on cooperation in the sphere of organization and functioning of specialized "Gazprom Classes" at the school.</p> <p>Under the Agreement, GPPB is involved in organization of a "Gazprom Class".</p> <p>Further information on cooperation with educational institutions is provided in Section 4.6.</p>
September 2017	Far East Development Corporation	<p>At the Eastern Economic Forum (EEF 2017), Gazprom Pererabotka Blagoveshchensk and the Far East Development Corporation signed an agreement on activities within the PSEDA (Priority Social and Economic Development Area).</p>
November 2017	Amur Technical College	<p>Agreement on cooperation in the sphere of secondary vocational education to meet the demand for professional personnel, and to enhance joint activities for career guidance and development of young people.</p> <p>Under the Agreement, GPPB takes part in career guidance events, organizes student internship programs, contributes to development of the college facilities.</p> <p>The College is in charge of providing the necessary facilities and resources to facilitate apprehension of education programs by the students, and supporting organization of the training process.</p> <p>Further information on cooperation with educational institutions is provided in Section 4.6.</p>
September 2018	Amur Region Government, Far Eastern Federal University and Agency for Human Capital Development in the Russian Far East	<p>Agreement made at the EEF-2018 between GPPB, Amur Region Government, Far Eastern Federal University and Agency for Human Capital Development in the Russian Far East on cooperation in the sphere of human capital development and human resources support.</p> <p>Under the Agreement, GPPB in particular participates in the activities intended to provide career guidance to students of secondary, vocational education institutions, and higher education establishments in the Russian Far East.</p>

Date	Authority/organization	Summary of Agreement
October 2018	Gubkin Russian State University (National Research University) and Amur State University	Agreement between GPPB, Gubkin Russian State University (National Research University) and Amur State University on cooperation in the sphere of professional workforce provision to meet the demand of the Amur Gas Processing Plant. Under the Agreement GPPB updates its personnel demand information on annual basis, provides employment opportunities (whenever vacancies are available) for best graduating students, and participates in development of education programs.

4.6 Engagement with Education Institutions

Facilities of the Amur Technical College were upgraded in 2015 under a Charitable Donation Agreement, in relation to introduction to new vocational training programs - "Environmental laboratory assistant", "Operator of process pumps and compressors", and "Refinery operator". The Project Information Centre was equipped in cooperation with the Amur Technical College.

Amur State University has been training students for the Amur GPP since 2015 under employer-sponsored education contracts for the following professional profiles: "Process and plant automation" and "Information systems and technology".

In 2016 AmSU started training students on the high-demand "Chemical engineering" specialization. In 2015 GPPB allocated 3 million rubles for equipment of dedicated "Chemical engineering" classroom.

On 01 September 2017 GPPB jointly with the Amur Technical College and Amur State University embarked a unique project of PAO Gazprom - "Gazprom Class" at School No.1 aiming to provide specialized training of students to facilitate subsequent education in engineering domain. Having finished the "Gazprom Class", students can join a profession-oriented university under employer-sponsored education contract, in which case GPPB would follow-up his/her progress and provide support throughout the term of education. Good students are entitled to predegree practice and subsequent employment in the Company. GPPB provided charitable grant funding for the "Gazprom Class" project which was used for rehabilitation of the science classroom, and to cover recurring costs related to functioning and equipment of the "Gazprom Class": participation in the "Stupeni" competition of R&D projects by students of "Gazprom Classes", in annual forum of "Gazprom Classes" students.

Regular site visits to the construction sites of the Amur Gas Processing Plant are arranged to raise awareness of students in Amur Region about construction of the largest gas processing facility, its technical parameters and operating performance, technical and social infrastructure, HR needs, and education opportunities offered by institutions in Amur Region and Russian Far East.

In 2018 the Company participated in job fairs to give the future graduates a guidance about the actual HR needs of GPPB.

4.7 Operation of the Project Grievance Mechanism

The most common channel used by internal and external stakeholders to lodge a grievance about the Company or contractors is the Hot Line which started functioning in April 2017. Stakeholders are kept informed about the Hot Line Operation through

- Regular publications in media,
- Community Council meetings,
- Outdoor advertising banner with the Hot Line telephone number in the centre of Svobodny,
- Information leaflets available in the premises commonly visited by contractor and subcontractor personnel: canteens, dormitories, smoking areas, information boards, offices, entry control points, etc.

662 grievances have been received since the start of Hot Line functioning. Most grievances were lodged by the Project personnel concerned by the following issues:

- Late payment of wages to (sub)contractor personnel;
- Social and living conditions in the shift camps;
- Access to construction sites;
- Nonfull payment of sick pay, leave allowance, advance money, etc.;
- Provision of working clothes and footwear.

The Company has arranged for processing of all grievances by the Hot Line operators who communicate grievances to dedicated work groups. Work group membership depends on the topic of grievance. Feedback is communicated via a representative of the work group or through operator of the call centre. Most grievances are lodged anonymously (i.e. complainants do not provide their contact details for feedback). However, this practice does not impair effective functioning of the Hot Line. In most cases (85% of acknowledged grievances) the issues of concern are resolved within 3-5 work days. Most

grievances are related to compliance with labour law, and the Hot Line service is seen as an effective tool to control contractors' performance of their obligations to personnel.

Besides the grievances communicated through the Hot Line service, four grievances from local communities were received during the reporting period via media company "Amur News Service", PAO "Gazprom", or were lodged directly to the Company. The above grievances raised the following concerns:

- Land acquisition and compensation (1 grievance): the necessary clarification were provided in the feedback letter;
- Assistance to a resident of the City of Svobodny seeking employment (1 grievance): the necessary clarification were provided in the feedback letter;
- Behaviour of Project personnel (2 grievances): measures were taken to reinforce control of personnel behaviour and prevent nuisance to local communities, including arrangement of a security post, additional briefing on respectful approach to contacts with local residents, and disciplinary sanctions against the concerned Project employee.

5. KEY STAKEHOLDERS

5.1 Definitions and Overview

Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.

In line with usual guidance pertaining to stakeholder identification, stakeholders are categorised as follows:

- Affected parties including those exposed to direct and indirect impacts;
- Interested parties.

5.2 Affected Parties

5.2.1 Affected Landowners and Land Users

Landowners and land users, whose land has been acquired or will be temporarily occupied for Project purposes, are stakeholders in the Project. 50 private land plots (total surface area:

528 hectares) have been purchased from as many landowners (with co-owners in a few cases). Landowners are usually local farmers that were using this land for agriculture (with some plots unused), crops being mostly soya, wheat, and barley. Most plots have been acquired in 'willing buyer – willing seller' amicable transactions with compensation based on regional values. Compulsory acquisition procedures, based on the federal interest declared for the Project, have been used in a small number of cases where landowners were unwilling to reach an amicable transaction. The compensation process is currently complete. Some land plots did have private land users, usually under a formalised rental agreement with the landowner.

In addition, 113 plots were also acquired from State and municipal property for a total surface area of 1,088 hectares. No private land users have been identified on these plots.

5.2.2 Rural Communities in the Project Area of Influence

Within the territory of Svobodnensky District, and not including the City of Svobodny, which is addressed in the following section, the Project Area of Influence interfere with the territory of three adjacent Village Councils (refer to the Table below):

- Dmitrievka, within which the settlements of Dmitrievka, Ust'-Pera, Yukhta and Yukhta-3 are part of the Project Area of Influence;
- Zheltoyarovo, within which the settlement of Chernigovka is part of the Project Area of Influence;
- Nizhniye Buzuli, which includes land that is affected by the Project but no close-by settlement.

Key characteristics of settlements in the Project area of influence are described in Table 5.1 below.

Table 5.1. Key Characteristics of Settlements in the Area of Influence

Settlement	Village council	Current population (number of residents, 2016)	Distance to AGPP facilities(km)
Dmitrievka	Dmitrievka	406	1.6 km to construction camp
Ust' - Pera	Dmitrievka	439	0.5 km to railway station and storage yard
Yukhta	Dmitrievka	388	2.2 km to plant
Yukhta 3	Dmitrievka	127	2.5 km to construction village
Chernigovka	Zheltoyarovo	460	5.2 km to port on Zeya River

5.2.3 City of Svobodny

The current population of the City of Svobodny is about 53,700 residents. The Project impacts are expected to affect the following groups, with essentially positive effects:

- Persons employed directly or indirectly by the Project in the construction or operations phases, including sub-contractors and local supply chain such as the catering and other businesses;
- Persons that will benefit from construction of a worker accommodation micro-district, to be built for the operations phase in the northern part of the city;
- Persons that will benefit indirectly from the improved tax basis of the city, with expected positive impacts on local infrastructure, social facilities, and delivery of social services.

In interaction with Project representatives, local community is represented by the City Administration and the Project Community Council. More details of the positive and negative impacts of the Projects on this stakeholder group are provided in the Environmental and Social Impact Assessment (ESIA) report.

5.2.4 Hunters and Fishermen

In 2016 the Ramboll team met with the chairman of the Association of Hunters and Fishermen, which is the Amur Region branch of the Russian Association of Community Societies of Hunters and Fishermen, an officially recognised NGO in the Russian Federation. The representative of hunters and fishermen indicated that the Association has an active membership of about 600 people, explained the role of the organisation and identified the main concerns related to the Project and associated facilities, namely:

- The linear facilities construction and operation may cause a "corridor" effect which will be detrimental to fauna movements; on the other hand, the gas processing plant is not seen as a likely source of such negative consequences; it is also feared that the deforested corridor of linear facilities, probably including a vehicular track for pipeline maintenance purposes, may increase induced access to areas that are essentially inaccessible at the moment, thereby facilitating hunters' and poachers' access, and associated negative effects to fauna.
- However, the deforestation of the Project area itself will also be detrimental to local fauna, both from a habitat and from a migration perspective.
- Noise and light from the construction site may also be disruptive to local fauna.
- Lastly, a specific concern was raised in respect of influx of construction and operations workforce to the Project area and to the Svobodny area: it is feared that this will increase the pressure on natural resources in general, but also more specifically that this workforce, which will mostly be male, will include a number of hunters and fishermen, which may significantly increase the pressure on terrestrial and aquatic fauna.

The above concerns have been considered by the ESIA studies, particularly at the stage of development of mitigation measures.

5.2.5 Project Contractors and Sub-contractors

The key contractor for the Project is currently NIPIGAZ, a Russian Company, part of the SIBUR Holding group, which plays an overall role of EPC Contractor, and a contractor for the objects that are not under proprietary license. Other contract agreements have been made with a consortium of Tecnimont – Sinopec, CGGC, VNIPI Gazdobycha (general design development services), Linde AG, a German Company, which will provide specific gas processing equipment under a proprietary license, etc.

In accordance with usual modalities on such objects, these direct contractors may employ sub-contractors for certain specific construction activities, transport and logistics, or tasks such as provision of security, catering, and cleaning services.

5.2.6 Project Workers

Project workers are stakeholders in the Project. In the peak of the construction phase (2019 to 2021), it is anticipated that up to 25,000 workers will be involved. These can be categorised as follows:

- Direct GPPB employees, a compact team essentially dedicated to construction supervision, stakeholder engagement, occupational health and safety supervision, social and environmental impact management tasks. It is anticipated that a team of about 500 individuals will be involved in the construction phase as direct GPPB employees.
- Employees of the main EPSS Contractor NIPIGAZ.
- Employees of contractors tasked with specific construction lots such as road or railway construction.
- Employees of sub-contractors in the sub-contracting chain that is usual on similar major construction projects, for example security services, cleaning, catering, transport, as well as specific construction activities.
- Off-site employees in the supply chain of the Project that work exclusively for the Project (for instance drivers of transport companies that would work exclusively for the Project during the construction period).

In the construction phase, GPPB direct employees includes a limited number of professionals tasked with supervision activities. During transition to the operation stage, GPPB will employ both personnel with the investment project management functions and AGPP operating personnel. The planned number of GPPB staff by end of year 2019 is 763 FTE, including 274 FTE for operation of the Amur GPP. The number of personnel is expected to increase to 2589 FTE by year 2025, for operation of all process trains of the Amur GPP.

GPPB has partnered with the Amur State University to develop chemical engineering trainings at graduate and post-graduate levels. The University, with GPPB's financial support, purchased specific technical equipment to enable these trainings. Training of the first cohort of students under the program (including several young people from Svobodnensky District and the City of Svobodny) started in 2016. These students are potential Project employees, hence also stakeholders.

5.2.7 Vulnerable Groups

Vulnerable individuals or groups are those who could experience adverse impacts from the Plant construction and operation more severely than others based on their vulnerable status.

This status may stem from ethnicity, property, level of income, economic situation, gender, language, religion, national or social origin, age, culture, literacy, physical or mental disability, and dependence on unique natural resources.

The following tentative list has been prepared based on definition of this stakeholder category within the social area of influence of the Plant project:

- Low-income individuals and families whose welfare depends on public social support;
- Junior and senior individuals;
- Individuals with ill health, disabilities and/or diagnosed socially sensitive diseases (tuberculosis, HIV/AIDS, etc.).

One vulnerable group which may be affected by the Project has been clearly identified so far - students of the boarding school located close by the construction site of the residential quarters for the Project operation personnel. Detailed description of this vulnerable group is provided below. Other potential vulnerable groups are described in general terms. In the process of regular review, this section will be updated with details of other representatives of vulnerable groups which may be identified at later stages.

5.2.7.1 Low-income Individuals and Families

Well-being of low-income individuals and families may heavily depend on the status of public social support. There is a risk that this category may experience difficulties if they have to adapt themselves to the changes associated with the Project, and their ability to protect their rights and interests may be limited.

5.2.7.2 Junior and Senior Individuals

Junior and senior individuals may be highly sensitive to various impacts of projects, in particular those with health effects.

In close vicinity of the planned residential quarters, there is a special (correction) boarding school (Department #2) located in the north of the City of Svobodny. The school was established in 1986 and is designated for kids experiencing difficulties to fit into the conventional educational process. As was reported by Svobodny City Administration, these difficulties are by most part related to absence of parents, physical disabilities of children and poor parenting caused by a range of problems of parents including alcoholism.

The group of school's students is considered as vulnerable based on their family income, education opportunities and, potentially, health and general well-being status.

The administration noted that some of the school's utilities (e.g., the heating system) may be deficient. It is also an understanding that upon completion of the Project's residential quarters, the adjacent areas of the city including the boarding school, will get advantage of using new utilities and will be connected to the new heating and water supply systems.

The Company will implement the following activities.

- Monitoring of potential negative impacts on well-being of the boarding school students.
- Specific attention will be paid to refraining from the informal contacts between the Project's residential quarters construction workers and the students.
- Sufficient check-in/check-out and fencing system at the Project's residential quarters construction site.
- After commissioning of the Project's residential quarters, the Company will initiate connection of the boarding school to the new utility systems of the Project's residential quarters.

The Company may also develop other measures as part of its corporate social responsibility practices in order to support educational activities of the boarding school.

5.2.7.3 Individuals with ill health, disabilities and/or diagnosed socially sensitive diseases

Persons with ill health, disabilities and/or diagnosed socially sensitive diseases are also categorized as a separate vulnerable group. The socially sensitive diseases are tuberculosis, HIV/AIDS, etc.

5.3 Interested Parties

5.3.1 Government Authorities

5.3.1.1 Federal level

Federal ministries and agencies potentially involved or interested in the Project are the following:

- Ministries of the Russian Federation:
 - The Ministry of Natural Resources and Environment;
 - The Ministry of Civil Defence, Emergencies and Disaster Relief;
 - The Ministry of Healthcare;
 - The Ministry for Industry and Trade;
 - The Ministry of Labour and Social Protection;
 - The Ministry of Transport;
 - The Ministry of Energy;
 - The Ministry of Construction, Housing and Utilities;
- Federal Supervision Agencies:
 - The Federal Service for the Oversight of Consumer Protection and Welfare;
 - The Federal Service for Hydrometeorology and Environmental Monitoring;
 - The Federal Service for Supervision of Natural Resources;
 - The Federal Agency for Water Resources;
 - The Federal Agency for Mineral Resources;
 - The Federal Agency for Technical Regulations and Metrology;

- The Federal Agency for Fishery;
- The Federal Service for Environmental, Technological, and Nuclear Supervision;
- The Federal Agency for Forestry.

5.3.1.2 Regional level

Regional level agencies involved in the Project include all regional branches of the Federal ministries and agencies mentioned in Section 5.3.1.1 above.

- Regional Ministries/Departments of the Amur Region:
 - The Ministry of Social Security of the Amur Region;
 - The Amur Region Department of Employment;
 - The Amur Region Department of Water Resources of Amur Basin Water Affairs Authority of the Federal Agency of Water Resources;
 - The Amur Region Department for Subsoil Resources' Use;
 - The Ministry for Natural Resources of the Amur Region;
 - The Ministry of Healthcare of the Amur Region;
 - The Ministry of Transport and Construction of the Amur Region;
 - The Ministry of Agriculture of the Amur Region;
 - The Ministry of Housing and Utilities of the Amur Region;
 - The Ministry of Economic Development of the Amur Region.
- Representations at the regional level of federal supervision agencies:
 - The Amur Region Authority of the Ministry of Civil Defence, Emergencies and Disaster Relief
 - The Amur Region Authority of the Federal Service for Supervision in the sphere of Consumer Rights and Human Welfare Protection (Rospotrebnadzor);
 - The Amur Region Authority of the Federal Service for Supervision in the sphere of Natural Resources (Rospirodnadzor);
 - The Amur Region Authority of the Federal Service for Supervision in the sphere of Veterinary and Phytosanitary (Rossel'khoznadzor);
 - The Amur Region Authority of the Federal Service for Ecological, Technological and Nuclear Supervision (Rostekhnadzor);
- Regional level agencies:
 - The Amur Region Department of Forestry Affairs;
 - The Amur Region Department of State Road-transport Supervision (Rostransnadzor);
 - The Amur Region Inspectorate of the State Construction Supervision Authority;
 - FGBU Department for Hydrometeorology and Environmental Monitoring;
 - The Amur Region Fire Fighting Service;
 - The Amur Region Department of Hunting Sector.

5.3.1.3 District level

At the District level, two Municipal Organisations are interested in the Project:

- Municipal Organisation 'Svobodnensky District', which corresponds to the rural part of the territory of the District and administers all rural villages in the District and associated infrastructure;
- Municipal Organisation 'City of Svobodny', which administers the urban territory of the City.

Both Municipal Organisations have similar structures, as follows:

- Heads of Administrations of the City of Svobodny Svobodnensky District, and their deputies;
- A number of departments, including, amongst others, economy, education, public health, emergency situations, culture, sport, security;
- A council of deputies, which approves certain executive decisions and is formed of area deputies elected from party lists.

5.3.1.4 Local level

As was mentioned in Section 5.2.2 above, at the local level, three rural councils ('selsovet') have interest in the Project, two of which were met by the Ramboll team for discussion and were able to express their concerns.

5.3.2 Businesses

Local businesses are interested parties. At present, a limited number of local businesses (based in Svobodny District) are used by the Project for services including catering, accommodation, cleaning and security. Other businesses from Blagoveshchensk are also involved in the Project. The business base in Svobodnensky District and the City of Svobodny is currently limited but local companies could play a role in the Project as sub-contractors to larger contractors. The Project provides support for development of local businesses, in particular through so called "business missions". 9 events of this sort were conducted during 2017-2019 and attracted over 80 representatives of small and medium businesses from Blagoveshchensk, Svobodny, Belogorsk and Shymanovsk in Amur Region.

5.3.3 Religious Authorities

The Company has been liaising with the ecclesiastic jurisdiction of the Orthodox Church of Russia based in Blagoveshchensk in respect of the potential construction of a new church in the City of Svobodny. The church was initially intended for the Project workers residential quarters but following negotiations with both the Orthodox Church and the Municipal Administration, it was decided that the new church would be built for the whole city in a central location rather than in the new residential quarters.

5.3.4 Civil Society Organisations

At this point in time, no local or regional non-governmental organisations with a specific interest in the Project have been identified, with the exception of the Hunters Association described in Section 5.2.4 above.

5.3.5 Press and Mass Media

The following mass media are active in the Svobodny area:

- Newspapers:
 - "Zejskie Ognj", based in the City of Svobodny with a local editorial team, which has existed under various names since pre-Revolution times;
 - "Svobodnensky Vestnik";
 - "Svobodnaya Gazeta";
 - "Amurskaya Pravda"
- Press agencies:
 - "Amur-info";
 - "Port-Amur";
 - "ASN 24";
 - "Interfax DV"
 - "Rossiya Segonya DV"
 - "Vostok Rossii"
- Radio:
 - "Russkoe Radio", Svobodny, 101.9 FM;
- TV channels:
 - "GTRK-Amur" ("Vesti-24", "Rossiya-1" and "Rossiya-24");
 - "Alfa-Kanal";
 - "Gorod";
 - "Pervy Oblastnoy Kanal";
 - Channel "Region 28", which partners with the national network "REN TV";
- Websites:
 - "gzt-sv.ru", which is the on-line version of newspaper "Zejskie Ognj", and includes daily news, forums for citizens, and has a dedicated link to information related to the Project;
 - "svobnews.amur.ru", which is the official website of the Municipal Organisation of the City of Svobodny;
 - "svobregion.ru", which is the official website of the Municipal Organisation "Svobodnensky District";
 - "svb28.ru";
 - the regional website "ampravda.ru", which provides a news service at regional level.
 - "alekseevsk.ru/", city news site (the City of Svobodny).
 -

5.3.6 Education Institutions

The Company cooperates with a number of education institutions in the City of Svobodny, Amur Region and other regions of Russia. Summary of the joint activities is provided in the table below.

Table 5.2. Engagement with the education institutions

Education institution	Nature of engagement
Amur Technical College	GPPB supports the College through charitable donations. Functioning of the Project Information Centre.
Amur State University	Students training for the Amur GPP under employer-sponsored education contracts. Support for equipment of dedicated "Chemical engineering" classroom.
School No.1	"Gazprom Class" (in cooperation with AmSU and Amur Technical College).

Regular site visits to the construction sites of the Amur Gas Processing Plant are arranged for students of the above institutions, including students from the cities of Blagoveshchensk and Belogorsk.

6. ENGAGEMENT PLAN

6.1 Principles

Principles that will be used by the company in devising its stakeholder engagement methods derive from PS1 of the IFC and PR10 of the EBRD. They include the following:

- Engagement will aim at providing local communities that are directly affected by the project and interested stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.
- Stakeholder engagement will involve the following elements: stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism, and ongoing reporting to relevant stakeholders.
- The requirements of Russian national law with respect to public information and consultation will be met.

6.2 Engagement Methods

This section describes the principles of methods that could be potentially used for stakeholder engagement in the context of the Project. The plan presented in Section 6.4 identifies methods that will be used actually.

6.2.1 General Community Meetings

Community level meetings gather different local stakeholders usually in the presence of the local authority and within a formal framework (such as a public hearing, which is chaired by the local authority and duly minuted). The downside of this type of meetings is that only the most confident and active people will express their opinion freely or easily and they do not provide a very conducive consultation avenue. These meetings are nonetheless useful for the following reasons:

- They reassure the local public about the support the Project has from the authorities;
- They are appreciated as an effort of transparency and information sharing;
- They provide an opportunity to convey information to a large number of people and they complement smaller meetings by reassuring the local public that communication exchanged in smaller meetings corresponds to the "official" one.

6.2.2 Focus Groups

Focus group meetings allow grouping people interested in the same issues (e.g. land compensation, or business development, or female employment) for consultation purposes. Focus groups can be established by age category, by gender, by type of activity, etc. They provide a very useful method to obtain the views of a group of people on certain specific issues. In holding focus groups, it is important to ensure that (i) all different opinions are all expressed; (ii) the discussion is kept focused on the issue for discussion; and (iii) to wrap up with concrete proposals made and next steps if relevant.

6.2.3 Face-to-face Meetings

Face-to-face meetings are a good way to build personal relationships, and are often used in engaging local authorities and community leaders.

6.2.4 Opinion Polls

Opinion polls are a cost-efficient way to gain input from a large number of people. They have been used in the land acquisition process. To become an effective consultation tool, surveys need to be followed up with mechanisms for dialogue and consensus building.

6.2.5 Mass Media

Mass-media at national, regional and local levels (see identification in Section 5.3.5 above) provide opportunities for information disseminations via the following methods:

- Press releases to keep the press updated of key milestones in the Project development;
- Interviews with Company management;

- Organised site visits for journalists.

These methods are already widely used by GPPB, which has developed a good relationship with mass-media active in the region.

6.2.6 Community Council

Community councils can be established at local, regional, national and even international level in order to monitor some sensitive activity (for example, local recruitment). Such community councils mixing Project representatives, local authorities, communities and civil society can allow regular and effective engagement with stakeholders.

As mentioned in Section 4.3 above (with details in Appendix 1), the Project has established a Community Council which functions well and holds regular meetings on various issues, such as local hiring and employment policy, significant environmental and social impacts, etc. Such approach is based on the existing international good practice on similar projects.

6.2.7 Information Centre (Reading Room)

Information centres are a good way (i) to ensure continuing presence at local level; (ii) to keep relevant documentation available for the public; and (iii) to give the public a physical place where they can express their queries or opinion and bring their complaints. The centres can have a post-box where the public can leave messages or complaints.

The Project Information Centre (Reading Room) (Figure 6.1) has been established in Svobodny, in the premises of the Amur Technical College. The Centre opening hours are aligned with those of the College



Figure 6.1 Project Information Centre (Reading Room)

library. The Centre is designed to provide Project information and consultations, and to ensure that stakeholder consultations are held in comfortable environment. A grievance box is located at the Information Centre where people can leave their grievances (refer to Section 7).

6.2.8 Forums, Workshops, Exhibitions

Forums and workshops (for example at the Region level) bring together various stakeholders and are powerful tools for sharing ideas, building consensus and developing commitment. Thematic workshops can be organised around a specific topic of broad interest where stakeholders at local and national levels are involved. Details of the Company’s participation of forums, conferences and exhibitions are provided in Section 4.

6.2.9 Project Leaflet and Newsletter

The Project has developed a simple Project presentation leaflet presenting the following information:

- Project objectives and key characteristics, including exact location and main objects to be built;
- Project main environmental and social impacts;
- Project consultation mechanism;
- Project grievance mechanism;
- Availability of documentation;
- Contact information.

This leaflet is available at the Information Centre and at local administration offices (districts and selsovet).

The Project also publishes a brochure which is regularly updated to provide the following information:

- Key Project achievements in the last quarter (construction of new objects, safety of employees, community investment or others), with relevant illustrations and photographs;
- Key consultation activities in the last quarter;
- Important event (like participation of the Project in any fairs or exhibitions);
- Any humanitarian or other activities;
- New documents available (if any);
- Contact information, including contact details for logging of grievances.

6.2.10 Project Website

The Project website (<http://blagoveshchensk-pererabotka.gazprom.ru>) has been developed and functions well. The website provides information on the Project and is regularly updated with new informative postings, press releases, news, employment vacancies, etc. The impact assessment documents (Non-Technical Summary and SEP) are available on the website.

The Project website contains contact details and feedback sheet where any stakeholder can lodge a query or grievance.

6.2.11 Site Visits

Site visits consist in taking small groups of stakeholders (representatives of administration, journalists, representatives of civil society organisations) to visit Project sites and can be very effective in demonstrating the progress of the Project construction and conveying information on environmental and social impacts and mitigation measures (for example, to show how the reinstatement of the disturbed areas is done), etc.

The visit of Project facilities and offices by groups of students and school children can also be effective as it can give an idea of the broad purpose of the Project, develop interest and local ownership, and provide information on higher education trainings supported by the Project.

6.3 Documentation Disclosure

The following documents will be publicly disclosed by the Project:

- The Project leaflet and quarterly brochure (refer to Section 6.2.8) are available at the following locations:
 - Project website;
 - Local administration offices (City of Svobodny, Svobodnensky District, Dmitrievka, Chernigovka, Nizhniye Buzuli);
 - Project Information Centre (in the City of Svobodny);
 - Project offices in Blagoveshchensk and Moscow;
 - Local primary schools in rural communities of the Project Area of Influence (if relevant);
 - Secondary school of Svobodny (if relevant);
 - Amur State University;
- The ESIA Report will be disclosed through the following channels:
 - Project website;
 - Information centre and reading room (Svobodny);

- The Non-Technical Summary will be disclosed as follows:
 - Project website;
 - Local administration offices (City of Svobodny, Svobodnensky District, Dmitrievka, Chernigovka, Nizhniye Buzuli);
 - Project Information Centre (in the City of Svobodny);
 - Project offices in Blagoveshchensk and Moscow;
 - Amur State University.
- All Project press releases will be disclosed on the Project dedicated website (in addition to being communicated to mass media). Project employment vacancies will be disclosed on the Project website.

6.4 Consultation and Disclosure Action Plan

The following table presents the proposed Consultation and Disclosure Action Plan.

Table 6.1 Consultation and Disclosure Action Plan

N°	Stakeholder	Consultations	Information Disclosure	Indicative Timeline	Responsibility
1	All stakeholders	Functioning of the Project website (see section 6.2.10) during the whole life of the Project (Construction and Operations phases).	Disclosure of information on Project website per details in section 6.3.	The Project website has been created and functions since 2017	GPPB
2	All stakeholders	Functioning of the Project Information Centre and reading room in Svobodny (see section 6.2.7) during the whole life of the Project (Construction and Operations phase).	Disclosure of information at Project information centre and reading room per details in section 6.3.	Project information centre was established in 2017.	GPPB
3	All stakeholders	Functioning of the feedback and grievance mechanism per details presented in Chapter 8 during the whole life of the Project (Construction and Operations phase).	Project leaflets with description of the grievance mechanism. Feedback sheet in the Project website.	The mechanism was introduced in 2017.	GPPB
4	All stakeholders	Participation in national and regional events including exhibitions, forums and fairs (such as the Eastern Economic Forum held every year in Vladivostok).	Information disclosure through the Project leaflet/brochures and website, in combination with ad hoc videos, photographs and other ad-hoc material prepared for specific events.	Throughout construction and operations.	GPPB
5	Affected landowners and land users	Negotiation of land acquisition agreements , in view of reaching an amicable sale-purchase agreement with each and every landowner in face-to-face meetings, with participation of federal and local authorities (as appropriate).	Disclosure of the Project objectives and timeline, land acquisition regulations, and text of proposed sale-purchase agreement.	Already complete as of September 2016.	GPPB
6	Rural communities in the Project Area of Influence (Dmitrievka, Ust'-Pera, Yukhta, Yukhta 3, Chernigovka)	Regular consultation and information , as follows: <u>In Construction phase:</u> <ul style="list-style-type: none"> Public meetings on a six-monthly basis to present Project progress and note any queries or grievances from communities; Regular visits (quarterly) to settlements and face to face meetings with village administration; Consultation via the Community Council; Information via press releases and TV/radio as appropriate; Focus Groups (as appropriate) <u>In Operations phase:</u> <ul style="list-style-type: none"> Annual public meetings to present Project progress and note any queries or grievances from communities; Regular visits (twice a year) to settlements and face to face meetings with village administration; Consultation via the Community Council; Information via press releases and TV/radio as appropriate. 	Disclosure of Project leaflet (see section 6.2.9) in offices of Selsovet administration and Svobodnensky District administration. Disclosure of all relevant Project documentation on Project website (see section 6.3).	From end 2016 and throughout Project life (construction and operations).	GPPB

N°	Stakeholder	Consultations	Information Disclosure	Indicative Timeline	Responsibility
7	Residents of the City of Svobodny	<p>Regular consultation and information, as follows:</p> <p><u>In Construction phase:</u></p> <ul style="list-style-type: none"> Regular visits (at least monthly) to City Administration and face to face meetings to discuss Project progress and any issues; Consultation via the Community Council; Information via press releases and TV/radio as appropriate; Focus Groups (as appropriate) <p><u>In Operations phase:</u></p> <ul style="list-style-type: none"> Regular visits (quarterly) to City Administration and face to face meetings to discuss Project progress and any issues; Consultation via the Community Council; Information via press releases and TV/radio as appropriate. 	Disclosure of Project leaflet (see section 6.2.9) in offices of City administration. Disclosure of all relevant Project documentation on Project website (see section 6.3).	From end 2016 and throughout Project life (construction and operations).	GPPB
8	Project contractors and sub-contractors (current and future)	<p>Information for potential contractors on cooperation opportunities offered by the Project:</p> <p><u>In both Construction and Operations phase:</u></p> <ul style="list-style-type: none"> Information for potential contractors at dedicated meetings (e.g. within the scope of business missions) with local businesses in Svobodny and Blagoveshchensk, including meetings with participation of the Presidential Commissioner for the Rights of Entrepreneurs of Amur Region and relevant sector ministries; Dissemination of the Project procurement policies via the Presidential Commissioner for the Rights of Entrepreneurs of Amur Region and relevant sector ministries. 	Dissemination of the relevant Project documents (refer to Section 6.2.9) via the Presidential Commissioner for the Rights of Entrepreneurs of Amur Region and relevant sector ministries. Disclosure of all relevant Project documentation on Project website (see section 6.3). Creation of a page on the website about procurement opportunities and Project procurement policies and rules.	From end 2016 and throughout Project life (construction and operations).	GPPB
9	Project workers (current and future)	<p>Information for current workers on the Project grievance mechanism and Project employment and environmental and social policies; provision of grievance boxes.</p> <p>Information for potential workers about job opportunities and recruitment procedures.</p>	Distribution of the Project leaflet and disclosure of recruitment procedures to regional and local Recruitment Agencies and Employment Centre. Information on regional and local TV, radio, and websites about work opportunities (what qualifications are needed).	From end 2016 and throughout Project life (construction and operations).	GPPB
10	Government authorities at the Federal level	Face to face meetings with individuals in charge on specific issues, when warranted.	Documentation to be provided per specific request of officers in charge.	Throughout the Project life.	GPPB
11	Government authorities at the Regional level	Face to face meetings with individuals in charge on specific issues, when warranted.	Documentation to be provided per specific request of officers in charge.	Throughout the Project life.	GPPB
12	Administration of Svobodnensky District	<p>Regular meetings on a quarterly basis.</p> <p>Face to face meetings with individuals in charge on specific issues, when warranted.</p>	Documentation to be provided per specific request of officers in charge.	Throughout the Project life.	GPPB

N°	Stakeholder	Consultations	Information Disclosure	Indicative Timeline	Responsibility
13	Administration of the City of Svobodny	Regular meetings on a quarterly basis. Face to face meetings with individuals in charge on specific issues, when warranted.	Documentation to be provided per specific request of officers in charge.	Throughout the Project life.	GPPB
14	Regional and local mass media	Press releases for further publication in mass-media. Yearly site visits with journalists.	Press-releases.	Throughout the Project life.	GPPB
15	Orthodox of Russia, Blagoveshchensk Diocese	Face to face meetings with individuals in charge on specific issues, when warranted.	Documentation to be provided per specific request of officers in charge.	Throughout the Project life.	GPPB
16	Civil society organisations	Yearly site visits with representatives of civil society organisations that have expressed interest in the Project.	Press-releases. Documentation available on web-site.	Throughout the Project life.	GPPB
17	Education institutions	Regular site visits for students Engagement through charity activities and social investments (cooperation agreements, contribution to development of education programs, job fairs, provision of training facilities at the Amur GPP, etc.)	Documentation to be provided per specific request of officers in charge.	Throughout the Project life.	GPPB

7. GRIEVANCE MECHANISM

7.1 Key Principles

IFC, EBRD, Equator Principles, OECD Common Approaches and other similar international standards require the establishment and maintenance of a grievance management procedure open to external and internal stakeholders. This procedure shall be established as of early stages and maintained throughout the Project lifecycle.

The grievance management procedure is meant to providing a fair and prompt registration and redress system for any complaint related to the Project. One of its key objectives is to avoid resorting to the judiciary and to seek amicable resolution in as many situations as possible, thereby safeguarding both complainants' and Company's interest and limiting risks unavoidably associated to legal action.

The grievance mechanism has been adopted by a specific regulation which is published on the Project website. This Section provides description of a simplified grievance management procedure including the following steps:

- Filing and registration;
- Allocation for review and resolution;
- Review and resolution;
- Providing feedback on the proposed solution;
- Appeal (if applicable);
- Closing out.

7.2 Filing and Registration

Complaints and queries in regards of the AGPP project may be lodged to GPPB using any of the following channels:

By e-mail:	pr@amurgpz.ru
Website	http://blagoveshchensk-pererabotka.gazprom.ru/contacts (feedback form)
Postal mail	Public relations department, "Gazprom Pererabotka Blagoveshchensk" LLC, 657000, 227 Zeyskaya street, Blagoveshchensk, Amur region, Russia
Hot Line	Tel: 8-800-222-04-84 (10.00 to 22.00)
Direct contact with the Public and Media Relations Officer	During community meetings
Grievance box (for external stakeholders)	Project Information Centre (Reading Room) at: Main building of the Amur Technical College, 1 Mekhanichesky lane, Svobodny
Visit to Company offices and direct interaction with a Company staff	
Grievance box (only for internal stakeholders, i.e. Project personnel)	

Any individual is free to write a complaint in any format and retain anonymity if needed. It is however important to specify an address that can be used by the Company to send a reply.

Grievance boxes for the Company's employees will be provided in various buildings which may be visited by workforce, including the Company's offices, canteens, shift camps, etc. The boxes

locations will be selected to facilitate confidential lodging of complaints. The internal grievance form which is included in Appendix 2 will be available in designated locations near the grievance boxes.

The Company will register all received grievances in two dedicated logbooks which will be maintained in its office, for logging of external and internal grievances. Receipt of each grievance will be acknowledged in writing. Each grievance will be registered within one day from submission (in case of submission personally or by telephone). Grievants will be informed about acceptance of grievance and tentative time when feedback will be provided.

The logbook (electronic or paper) will also allow the filing of the following information:

- The reference number, date and signatory of the acknowledgement of receipt letter;
- The individual within the company to whom the complaint is allocated for review and resolution;
- The reference number, date and signatory of the letter proposing a resolution or any other mail exchanges with the grievant;
- Categorisation of the grievance, according to one of the following categories:
 - For external stakeholders:
 - Land acquisition and applicable compensations;
 - Remediation of land (upon completion of construction);
 - Recruitment and employment;
 - Nuisances (dust, noise, vibration);
 - Water resource issues (water quality, waste water, etc.);
 - Biodiversity issues (impacts on flora and fauna);
 - Issues of access to information (lack of available information);
 - Other.
 - For internal stakeholders:
 - Living and/or working conditions;
 - Breach of contract;
 - Discrimination;
 - Conflicts with other workers;
 - Other.

7.3 Allocation for Review

Each grievance is allocated by the grievance officer to a designated individual within the Company (or the EPC Contractor), depending on the technical issues that the grievance raises (for example principal engineer in charge of supervision of construction for a given lot of work, officer in charge of land acquisition and compensation, environmental officer, etc.).

If the resolution of the complaint is deemed to be within the responsibility of one of the construction contractors, a responsible individual should still be designated within GPPB to monitor the satisfactory resolution of the problem by the contractor in question.

7.4 Review and Resolution, and Notification of the Proposed Resolution

Each complaint is reviewed within a maximum 30 days after its receipt. The reply is communicated in writing using the postal address or e-mail address specified by the grievant. The Company keeps copies of all complaints and replies within a dedicated paper or electronic directory, where grievance files are organised by date.

If the grievance form does not provide sufficient information for appropriate processing and response, the responsible officer shall request the missing information from the grievant (provided that contact details are available). In case of such information request, the review period may be extended.

If any missing information which is critical for further review cannot be requested due to absence of the grievants contact details, such grievance is dismissed with appropriate record of grounds of such dismissal.

The Grievance Officer is in charge of ensuring that a response is given within the above timeframe, and further monitors agreement of the grievant on the proposed resolution. Further, implementation of the proposed resolution is also monitored under the responsibility of the Grievance Officer.

7.5 Appeal

If a grievant is not satisfied with the proposed resolution, further negotiations can take place until the matter of the complaint is resolved. If negotiations between the Company and grievant do not achieve a satisfactory result leading to the closure of the grievance, the parties may take the dispute to court (if relevant). While the objective of the amicable grievance management mechanism is to avoid legal action in so far as possible, the aggrieved party may resort to competent judiciary organs at any point in the grievance management process. In case if one of the parties takes a legal action in court the procedure stipulated in this document ceases to be effective in the particular case.

7.6 Closure of Grievance

A grievance can be registered as closed in the grievance logbook if:

- the grievant has agreed to the proposed resolution (if possible in writing, using the form provided in Annex 1), and this resolution has been implemented to the grievant's satisfaction;
- no repeated grievance was lodged by the same grievant on the same matter within 30 calendar days;
- Company, while taking all the efforts possible to resolve the issue, does not manage to reach consensus with the grievant; in this case the grievant has the right to take legal actions in court in order to dispute the Company's decision.

7.7 Grievance Monitoring and Reporting

Grievance statistics will be prepared on a regular basis using the following indicators:

- Number of grievances opened in the reporting period;
- Number of grievances closed out in the quarter;
- Number of outstanding grievances and comparison with past period;
- Categorisation of new grievances (per categories listed above in Section 7.2).

8. MONITORING AND REPORTING

The following indicators will be used to monitor and assess the efficiency of the stakeholder engagement activities:

- Number of meetings of various kinds (public hearings, workshops, face to face meetings with local leaders, etc.) held with each category of stakeholders and number of participants;
- Number of suggestions and recommendations received by the Company using various feedback mechanisms;
- Number of publications covering the Project in the local, regional and national mass media;
- Grievances per statistics detailed in Section 7 above.

Indicators pertaining to grievances will be gathered on a quarterly basis. Other indicators above will be gathered on a yearly basis.

This SEP will be updated on a yearly basis during the construction phases, and every two years during operations.

9. IMPLEMENTATION AND RESOURCES

The team in charge of stakeholder engagement will be based in the offices in Svobodny, Blagoveshchensk and Moscow. The team includes experienced professionals in charge of stakeholder engagement, including liaising with local community organisations, local government agencies, the press and other mass media in Blagoveshchensk, as well as the City of Svobodny and the Svobodnensky District. Other Company specialists will be involved on as needed basis, including the General Director, Deputy General Director on general matters, and other officers.

The Company's HR Unit will be responsible for engagement with internal stakeholders (i.e. with the Project personnel).

**APPENDIX 1
COMMUNITY COUNCIL MEMBERSHIP**

Ivan V. Bombela - Deputy Chairperson of the Entrepreneurs Council of the City of Svobodny

Galina V. Tkachenko - Individual entrepreneur (Chairperson of the Community Council)

Nikita O. Khoroshailov - Manager of the Delta Utility Company, Member of Public Organization "Youth Centre "Vizit"

Natalya Yeroshevich - Acting Chief Editor of newspaper "Zejskie Ognny"

Sergey A. Ustyugov - Entrepreneur, President of the Svobodny Boxing Federation

Nina S. Kizilova - Chairperson of the Veteran Council of Svobodnensky District

Ivan M. Uchen - Deputy of Svobodnensky District Council of People's Deputies

Ali Tagiyev - Blogger, author of the most popular public page in Svobodny - "Neprosto Svobodny"

Pavel S. Chirikalov - Leader of voluntary movement in Svobodny, member of the Amur Region Youth Parliament

Olesya V. Yazykova - Individual entrepreneur

Marina N. Belyaeva - Head of Community Council of Svobodnensky District

Vitaly P. Vatulin - Deputy Chairperson of the Council of People's Deputies of the City of Svobodny, member of the Veteran Council of armed forces, MIA, WWII

Victoria Senopalnikova - Technical Expert of Construction Supervision Group, OOO Stroytransneftegaz Vostok

Olga Gromova - Teacher at Kindergarten No.16, head of voluntary movement "GROM"

Vladimir A. Kazimirov - Chairperson of Entrepreneurs Council of Svobodnensky District

Svetlana V. Mikholaп - Head of the rural Cultural Centre in Novoivanovka settlement

Alexander Kotlyarenko - Principal of the Yukhtinskaya secondary school

Galina P. Zarihkta - Head of the library in Nizhniye Buzuli

Sergey V. Belousov - Deputy Head of the City of Svobodny

Oksana Yu. Chirikova - Chairperson of Kostyukovsky Women's Council

APPENDIX 2
EXTERNAL GRIEVANCE FORM

Form to be used by external stakeholders			
Reference Number <i>[to be filled in by responsible person at "Gazprom Pererabotka Blagoveshchensk" LLC]:</i>			
Full Name <i>Note: If you prefer so, you could keep this field anonymous or request non-disclosure of your identity information to a third party (tick an appropriate box)</i>	I request non-disclosure of my identity information. <input type="checkbox"/> I would like to submit an ANONYMOUS enquiry <input type="checkbox"/>		
Contact details	Address:		
	Tel:		
	e-mail:		
How would you prefer to be contacted? <i>Please tick a box</i>	By post <input type="checkbox"/>	By phone <input type="checkbox"/>	By e-mail <input type="checkbox"/>
Details of your grievance: <i>[Please describe the problem, whom it happened to, when, where and how many times, as relevant]</i>			
What is your suggested resolution for the grievance, if you have one:			
How to submit this form to "Gazprom Pererabotka Blagoveshchensk" LLC	By post: Public relations department, "Gazprom Pererabotka Blagoveshchensk" LLC, 227 Zeyskaya street, Blagoveshchensk, Amur region, 657000 Russia <i>Or to:</i> Feedback box in the Project Information Centre at the Main building of the Amur Technical College, 1 Mekhanicheskyy lane, Svobodny		
	By hand: please drop this form at the addresses specified above		
Signature		Date	

**APPENDIX 3
INTERNAL GRIEVANCE FORM**

Form to be used by internal stakeholders			
Reference Number <i>[to be filled in by responsible person at "Gazprom Pererabotka Blagoveshchensk" LLC]:</i>			
Full Name <i>Note: If you prefer so, you could keep this field anonymous or request non-disclosure of your identity information to a third party (tick an appropriate box)</i>	I request non-disclosure of my identity information. <input type="checkbox"/> I would like to submit an ANONYMOUS enquiry. <input type="checkbox"/>		
Contact details	Address:		
	Tel:		
	e-mail:		
How would you prefer to be contacted? <i>Please tick a box</i>	By post <input type="checkbox"/>	By phone <input type="checkbox"/>	By e-mail <input type="checkbox"/>
Details of your grievance: <i>[Please describe the problem, whom it happened to, when, where and how many times, as relevant]</i>			
What is your suggested resolution for the grievance, if you have one:			
How to submit this form to "Gazprom Pererabotka Blagoveshchensk" LLC	By post: HR Unit, "Gazprom Pererabotka Blagoveshchensk" LLC, 227 Zeyskaya street, Blagoveshchensk, Amur region, 657000 Russia		
	By hand: please drop this form at the following address: HR Unit, "Gazprom Pererabotka Blagoveshchensk" LLC, street, Blagoveshchensk, Amur region, 657000 Russia Or drop the form to one of the grievance boxes located at: <ul style="list-style-type: none"> • Administrative and Service Building, 27 Chekhov St., Svobodny • 65/1 Provsoyuznaya St., Moscow 		
Signature		Date	