SUMMIT FSRT

PROJECT SITE SAFETY PLAN

COMPANY DOCUMENT REVIEW
☐ Code 1 – Approved without comment
☐ Code 2 – Approved with minor comment / work may proceed
☐ Code 3 – Rejected with major comment / revise and resubmit
☐ Code 4 – document shall be cancelled or superseded
Reviewer name:
Signature:
Date:

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COMPANY CONTRACTOR OTHER	468-GE-PJT-PRO-1010

GEOCEAN – QUARTIER DU BREGADAN ZA DU TECHNOPARC CS 60001 13711 CASSIS CEDEX FRANCE

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1. INTRODUCTION

1.1 Project description

SUMMIT LNG TERMINAL CO. (PVT.) LTD. is developing a site off the coast of Maheshkhali island, Bangladesh for the construction of an offshore marine terminal to support continuous offshore re-gasification of liquefied natural gas for onward delivery to the onshore transfer location.
The design should take into account:

- Vessel berthing and mooring arrangements at an offshore marine terminal
- Proximity distances between vessels, shore side facilities, and equipment
- Re-gasification operation, control, and monitoring functions at the offshore marine terminal being provided by the company.
- LNG and boil off gas cargo transfer operation, control and monitoring functions being provided by the FSRU and LNGC operators.
- The offshore marine terminal connection and disconnection and periodic process inspections and maintenance activities will be provided by the operators who will visit marine terminal for these particular tasks.

GEOCEAN and MacGregor, as a consortium, are in charge of the complete design, procurement, construction and installation of the mooring system for the FSRU, and the offloading system to the shore. This system will include:

- A plug system, its mooring lines and anchors, and its submarine landing pad
- The FSRU stern mooring lines and anchors
- A flexible riser from plug to a submarine PLEM
- A submarine PLEM
- A submarine pipeline up to the shore
- An onshore manifold

1.2 Objective of the document

1.3 Change since last revision

None, first issue.

1.4 Definitions

COMPANY	SUMMIT LNG TERMINAL CO. (PVT.) LTD
CONTRACTOR	CONSORTIUM made of Geocean and MacGregor for the project, for which Geocean is the leader

1.5 Abbreviations

API	Anchor Handling Tug
B	American Petroleum Institute
BW	Beam
DB	Breakwater
DL	Draft Ballasted

DMA	Draft Loaded
DSV	Dead man anchor
DNV	Diving Support Vessel
DP	Det Norske Veritas
DWT	Dynamic Positioning
EPCI	Deadweight
FB	Engineering, Procurement, Construction, Installation
FL	Freeboard Ballasted
KP	Kilometric Point
LBP	Length Between Perpendicular
LOA	Length Overall
MBL	Minimum Breaking Load
MHWS	Mean High Water Spring
MSL	Mean Sea Level
MLWS	Mean Low Water Spring
N/A	Not Applicable
NDT	Non Destructive Test
OCIMF	Oil Companies International Maritime Forum
SWL	Safe Working Load
TDP	Touch Down Point
UHC	Ultimate Holding Capacity

1.6 System of units

The calculations for the all design, procurement, and installation activities use the System International (SI) system of units unless otherwise specified. Inches may however be used to quote line pipe and pipeline diameter.

2. REFERENCES

2.1 References of document issued by COMPANY

REF.	DOCUMENT REFERENCE	REVISION / DATE	DOCUMENT TITLE
[A1]			
[A2]			

2.2 References of document issued by GEOCEAN

REF.	DOCUMENT REFERENCE	REVISION / DATE	DOCUMENT TITLE
[B1]	911-HSE-SUP-PRO-01		HSE MANAGEMENT SYSTEM
[B2]	911-HSE-SUP-PRO-02		HSE MANAGEMENT AT CORPORATE SCALE
[B3]	911-HSE-SUP-PRO-03		HSE MANAGEMENT AT PROJECT SCALE
[B4]	911-HSE-SUP-FORM-07		RISK ASSESSMENT GUIDELINES
[B5]	911-HSE-SUP-FORM-15		JOB SAFETY ANALYSIS

2.3 Codes and standards

REF.	DOCUMENT REFERENCE	REVISION / DATE	DOCUMENT TITLE
[C1]	CERTIFICATION	2007	OHSAS 18001
[C2]			INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA (SOLAS)
			MARPOL CONVENTION (MARINE POLLUTION)

3. RESPONSIBILITIES

This section describes the construction team organisation with regard to health, safety and environmental considerations. HSE is the responsibility of everyone. Senior management will have the most important role in ensuring that a proper zero accident culture and suitable working environment exists for this project.

3.1 Construction Manager on site

- Ensure that the PSSP is implemented at site level.
- Ensure that safe working procedures are applied in order to provide a safe place of work.
- Ensure that adequate measures are taken to follow the risk assessment.
- Ensure liaison with the Project Manager / HSE Manager and the Local Authorities on HSE issues.
- Ensure that subcontractors meet the PSSP requirements.
- Promote continuous liaison with Subcontractors in order to promote their HSE awareness and co-ordination for the simultaneous operation.
- Ensure that Corrective Actions are undertaken to follow Non Conformities found during the performance of an Audit.
- Ensure that all Incidents/Accidents and Near Misses are identified and investigated in conformity with Geocean.
- Have competent understanding of Project HSE Requirements.

3.2 Medical Doctor on site

- Report directly to the Construction Manager and Group Head Coordinator.
- Co-ordinate locally all medical emergency and liase with the Managers on Site and Group Head Coordinator.
- Apply the disease prevention program.

- Implement the Hygiene surveillance program and assure that the hygiene and sanitary inspection is carried out.
- Know the MEDEVAC plan and having working relationship with hospital, laboratory, local air ambulance service, etc.
- Assure for all medical facilities.
- Assure the heath training and information program is developed and performed.

3.3 HSE Engineer on site

- Report directly to Project HSE Manager.
- Promote PSSP by personal example.
- Implement Environmental Mitigation Measures and Environmental Protection Methods for the project, according with Local and COMPANY requirements.
- Participate in the Incident/Accident investigation along with the construction Manager and issues the relevant monthly reports.
- Conduct regularly scheduled meetings and inspect the work-site periodically.
- Liase regularly with Construction Manager.
- Monitor and enforce safety & environmental requirements for all subcontractors.
- Monitor Waste Management System and maintain control measures in the use of hazardous materials.
- Attend Contractor/Company's HSE Meetings on site.
- Promote implementation of Job Safety Analysis procedure through the workforce.

3.4 HSE Officers

- Ensure that all safety measures included in the PSSP have been carried out.
- Ensure that the safe working and emergency procedures have been carried out.
- Participate in the Incident/Accident investigations along with the Construction Manager and issues the relevant reports.
- Conduct regular inspections of the place of work.
- Provide information, instruction or training to personnel.
- Ensure that permits to work are been carried out properly.
- Organize safety and environmental training courses for the new employees.
- Be familiar with CONTRACTOR/COMPANY and Project HSE Requirements and Work Permit Procedures.

3.5 Supervisors

- Ensure that all HSE procedures are correctly applied.
- Perform regular inspections of the work place.
- Ensure that work permits are been carried out properly.
- Ensure that Non Conformities identified by the inspections are followed-up and relevant corrective actions are completed.
- Monitor that in every working phase all safety measures have been fully considered and that all personnel involved has been properly trained on the operations to be carried out.
- Perform PreStart meetings with the teams involved.
- Report to the Construction Manager all the Incidents/Accidents and the Near Misses and where necessary undertakes immediate Corrective Actions.
- Be familiar with CONTRACTOR/COMPANY and Project HSE Requirements and Work Permit Procedures.

3.6 Workers

- Comply with the instructions issued by CONTRACTOR in order to ensure collective and individual safety.
- Make appropriate use of machinery, equipment, tools, hazardous substances, transportation and working equipment, as well as the use of safety devices.
- Make appropriate use of safety protection equipment and devices.
- Immediately report to HSE or the person in charge any deficiencies of safety devices, as well as any other hazardous conditions which they have knowledge, in order to eliminate or minimise the deficiencies or hazards.
- Not undertake any work/activity for which they have not received adequate training or which can endanger them or colleagues.
- Co-operate with their direct superior to comply with all statutory obligations necessary to protect the employees' health and safety.
- Be familiar with CONTRACTOR/COMPANY and Project HSE Requirements.

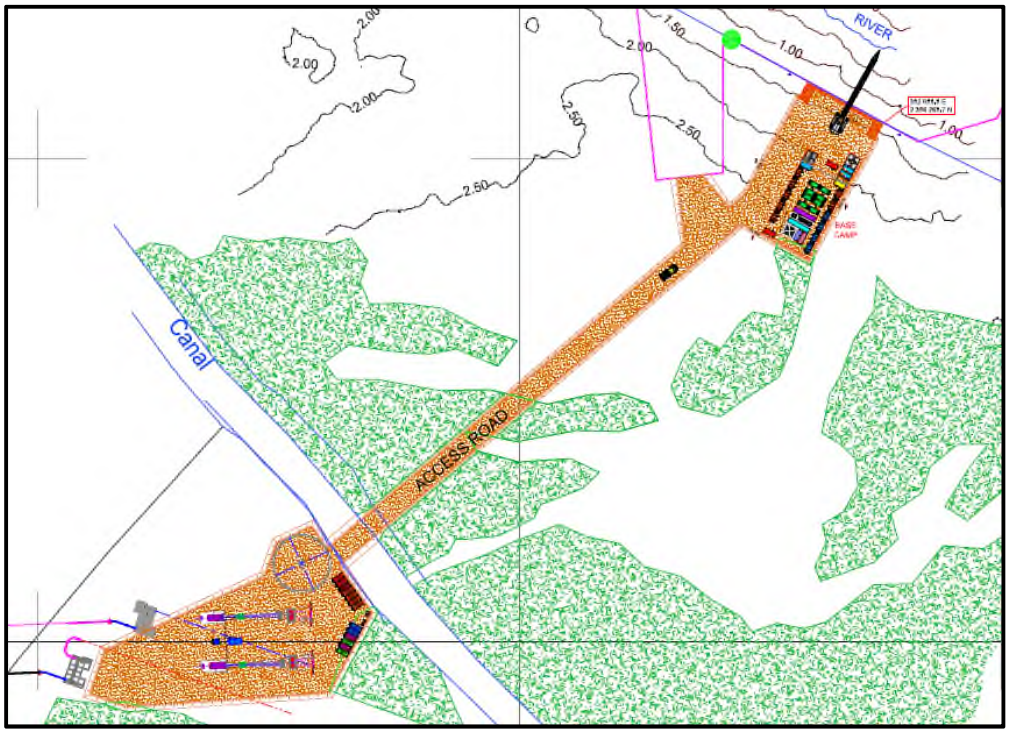
3.7 Subcontractors

- Each Subcontractor appoints personnel and provides adequate resources for the management of their own health, safety and environmental and security systems.
- Should utilize the same strategies for establishment of a safe work site.
- Visible management commitment, leadership and participation in incident prevention efforts.
- High level of worker involvement in safety initiatives, pre-task safety planning, hazard identification and resolution.
- Verification and assessment of the performance of prevention efforts (Leading Indicators).
- Utilization of a competent (well trained) work force.
- Their organisation shall be adapted to the duration and risk of all phases of their work scope. This also applies to their subcontractors.
- All subcontractors shall provide their HSE performance to CONTRACTOR on monthly basis.
- They are responsible for reporting, investigation and reporting of any accident/incident in their work areas.

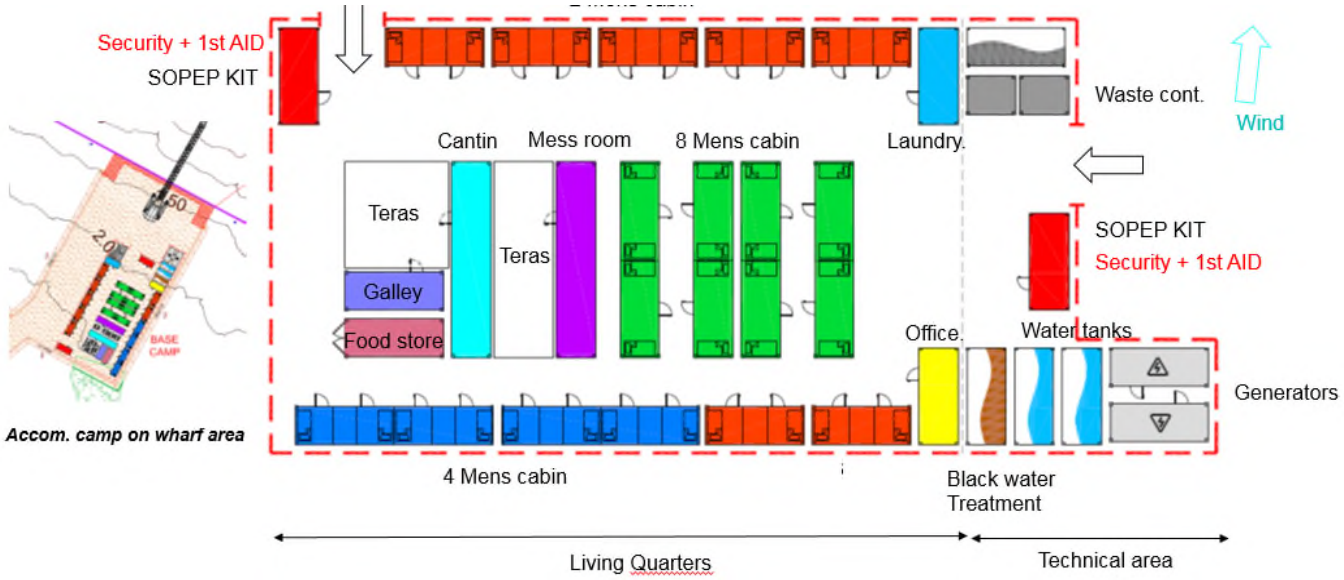
4. GENERAL LAYOUT

The onshore base is set as below:

- Base camp: living area and wharf
- Access road: linking the base camp and the working area
- Working Area: workshop and construction zone



A layout of the proposed camp is proposed here below:



5. ACCESS

Access will be by boat from Cox Bazar. Boat will drop the personnel at the base camp wharf.
The base camp will be guarded 24/7 by armed security guard from ANSAR military force and non armed subcontracted security force. Luggage will be checked on arrival and departure. No alcohol or drug is allowed inside the camp.
The base camp will be elevated by around 2 m which provide a physical protection against intrusion.

All arrival and departure of personnel and material will be supported by a manifest from Logistics Department.

6. HSE COVERAGE

The HSE coverage on site shall consist of the following personnel:

- HSE Engineer (x1)
- HSE Officers (x2)
- Doctor (x1)
- First Aiders (5 to 10% of work force)
- Security guards (2 by shift and by location)

The HSE Engineer will coordinate with HSE Officers and ensure HSE coverage for all fabrication works on a daily bases.

The Doctor on site shall ensure availability of medical facilities and handling emergency cases around the clock (on call at night).

7. INDUCTION

All project new employees (including visitors, subcontractor personnel etc.) shall under go HSE induction training organised by the HSE Department. No employee should carry out site jobs without attending this training. This orientation will be given daily or as required based on the numbers of personnel to be inducted.

Upon arrival, all personnel (no matter of grade or position) will be given this induction program. The program will orient them on basic HSE practices and other HSE requirements of the project.

The common subjects to be detailed during induction training are as follows:

- HSE Policy and HSE Management Structure
- Organisation & responsibilities
- Base/Working site facilities
- Permit to Work system
- Safe working practices
- Personnel Protective Equipment (PPE)
- Environmental Awareness
- Fire prevention/protection/fighting
- Emergency Response procedures
- Medical awareness
- Site Facilities
- Reporting of Incidents/accidents and near misses

At the end, attendees shall sign the attendance sheet for records and a badge with full name, position and picture is issued.

8. POB MANAGEMENT

Each person will receive a T-card after his induction. He is responsible to install it in the right T-card board. 2 T-card will be installed: at base camp and working area.
The number of T-card will allow HSE team to know the number of personnel at each location and make a proper headcount in case of emergency.

9. COMMUNICATION

CONTRACTOR believes effective communication is an important tool for successful HSE management system. Effective communication shall also ensure the objectives; performance requirements and responsibilities are clearly understood at different levels of the project. This will be implemented through:

9.1 HSE notice boards

To inform personnel of project HSE performance, HSE Statistics boards shall be erected at prominent locations at site. These boards shall provide information pertaining to the project's HSE performance like policies, safety bulletins, lessons learned etc.

9.2 PreStart

Before the start of the day's activities on the work site, a PreStart meeting will be hosted by each supervisor with their team.
The topics are related to the job to be performed during the shift. Hazards and preventive measures shall be addressed. A PreStart shall be conducted at the beginning of each shift. Hand over shall be done between day and night shift at the same occasion.
All attendees shall sign the PreStart sheet.

9.3 Tool Box Talk

Tool Box Talk will be hosted weekly by the HSE Department for all the personnel including subcontractors. The topic is related to HSE matters, and their application in the performance of tasks. Safety bulletin, lessons learned, past incidents or specific HSE topics can be used. The topic is unique but the tool box talk can be split in smaller group when the team/crew is too large.
A toolbox attendance sheet must be signed by each attendees.

9.4 Observations cards

CONTRACTOR shall provide Observations cards for its employees, and subcontractors, to encourage proactive participation in Safety matters.
Safety awards will be given weekly to reward the best observations, team spirit, safety behaviours etc.

9.5 Communication means

The primary communication means is radio. Telephone can be used as secondary mean.

10. DISEASE INFORMATION & AWARENESS COURSE

The induction at arrival will be focused on local disease and medical awareness. Many diseases in Bangladesh are transmitted by the mosquito (dengue, malaria, chikungunya etc).

On site, the beds and windows of offices and accommodation will be fitted with mosquito nets. The use of repellent is emphasized inside and on clothes when working outside.

Disease prevention course is structured in a way to provide general information (parasites, presence in the area, world wide distribution, etc), way of transmission, symptoms (both during incubation and during the various stages of disease), primary prophylaxis, chemo prophylaxis (methods, drugs, duration, benefits, risks if not taken, availability on site, etc.), diagnostic procedures and treatment.

Malaria test kits will be available at the clinic and used is case of malaria symptoms. The Doctor on site will have malaria medicine to treat on the spot (paramount in case of Plasmodium Falciparum malaria type).

11. ENVIRONMENT

CONTRACTOR is committed to minimize and/or avoid any negative impact of its activities on the environment and the local communities.
All potential impacts will be assessed and actions shall be taken to avoid or remediate any damage to the environment. Environmental protection includes air, soil and water pollution avoidance, energy savings and natural resources conservation.

11.1 Waste Management

Waste will be segregated on site using skips and labelled containers and collected every 2 days. All necessary precautions are taken during storage, transport and handling of waste to ensure the safety of people and preservation of the environment.

TYPICAL SKIP AND CONTAINERS

Segregation will be made as follows:
Green: Non hazardous waste
Yellow: oily rags and others hazardous waste
Metal and wood will be segregated and proposed to local community for recycling.
The area is set to be prevented from rain and wind.

Waste will be then transported to an approved facility onshore for proper disposal.

11.2 Water Management

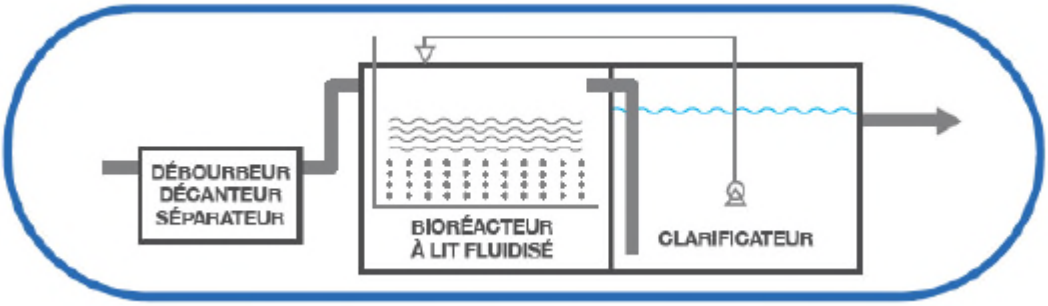
Water is a natural resource that must be preserved and its use must be limited to the minimum required. A fully dedicated water treatment solution has been developed for the camp. This will allow the safe disposal of all used waters without any risk for the environment.

SEWAGE TREATMENT UNIT

The seawage water treatment unit is MBBR type (Moving Bed Biofilm Bioreactor). It makes a separation by settling (water trap) and action of anaerobic bacteria. The waters are then clarified and clean enough to be discharged at site. Generated muds are kept in the container for proper disposal in dumping site later on. Control of water quality will be made regularly at exit point.

This is the best option to limit the impact to the environment (quality of water discharged and footprint).

NO UNDERGROUND SEPTIC TANK IS REQUIRED



SCHEMATIC

11.3 Erosion Control and Soil Conservation

Due to the tidal conditions of the work area some measures of protection against scouring and erosion are required. Current elevation of the natural ground is around +2,5 meters LAT (LOWEST ASTRONOMICAL TIDE). To obtain enough protection against tides and submersion an overall gain of 2 meters in elevation is proposed to a total of 4,5 meters LAT. This elevation will be executed by layers.

Geotubes and bags, filled with dredged sand will be used as mean of protection against erosion and scouring.

Cut in mangrove will be minimized by choosing the sandy and elevated areas to establish the accommodation and work areas.

FIGURE 1 – TYPICAL SHORE PROTECTION WITH GEOTUBES AND BAGS

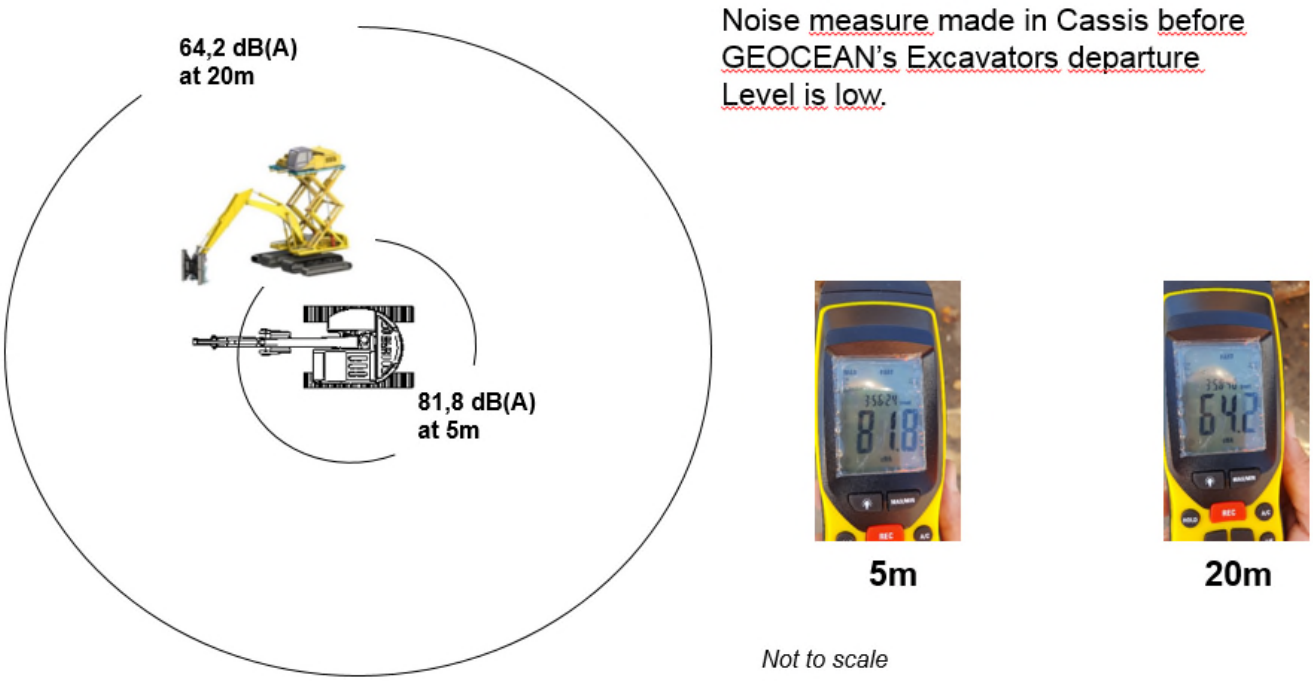
11.4 Noise Reduction and Air Protection

Major sources of noise and emissions should be identified. These are mainly due to motorized equipment and vehicles, dredging equipment, the use of hydraulic hammers, etc.
The folowing measures for noise reduction will be implemented due to the sensitivity of the environment in which we operate. Dust emissions will be controlled during the activity to avoid unsafe or unsuitable conditions for workers or nearby communities.

All the equipment to be used on site is carefully selected in order to minimize the noise pollution

11.4.1 GEOCEAN Excavators

A dedicated sound study shows the following values



11.4.2 Generators

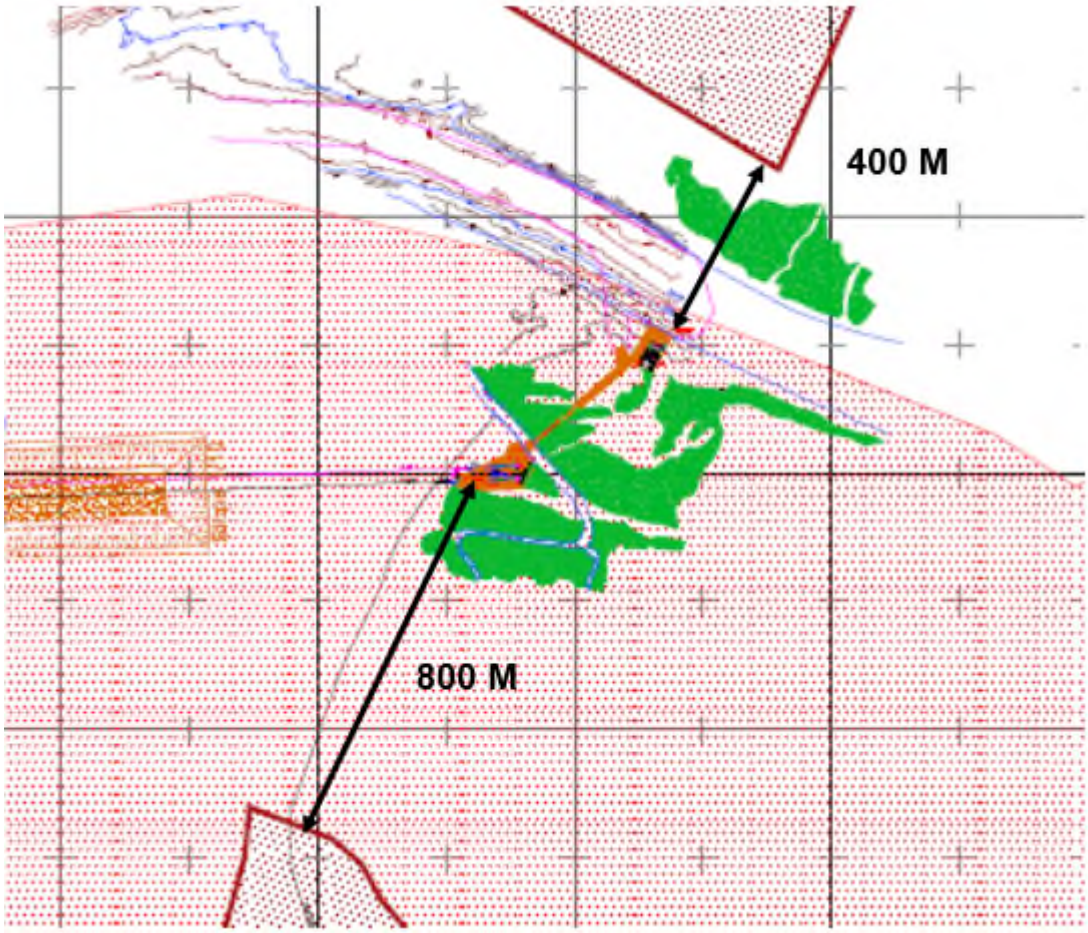
Fully enclosed and sound proof generators will be used on site. According to supplier these generators are rated for **68 dB at 7 meters' distance**

11.4.3 Sheet Pile Driving Equipment

Sheet piles driving vibratory equipment has been selected over the shock piling equipment as the generated noise is much lower with the vibratory option.

11.4.4 Safe Distance from critical habitats (Dark Orange Shading)

According to the provided ESIA document, all critical habitats are at least 400 m away from the closest activity areas on site.



EARTHWORK ESTIMATED DISTANCE

12. FUEL STORAGE AREA AND REFUELLING

Estimated daily consumption for accommodation camp is around 3.000 liters of fuel, a total of 20.000 liters of fuel will be stored in dedicated containers inside the camp. Fuel tanks are kept away from generators for safety reasons. Storage area will be properly labeled. Fire fighting equipment will be available.

Specific and dedicated double wall retention tank will be used. (Chassis for physical impact protection. pump with nozzle, easy access) -> **NO RISK OF SPILLAGE.**

TYPICAL FUEL CONTAINER

COSHH goods are listed and declared to site HSE officer and site Medic.
All MSDS are available at the clinic and HSE office.

12.1 Refueling

Fuel tank will be situated on Sea Side of camp to reduce distance to Supply Vessel.
Fuel will be supplied by vessel with dedicated Fuel Nozzle and specific hose for Fuel delivery

In case of spill, SOPEP kit will be available in the vicinity areas of refueling.

TYPICAL SOPEP KIT

Oils and others chemicals will be stored on drip tray.
Any contaminated sands are collected and disposed for proper treatment.

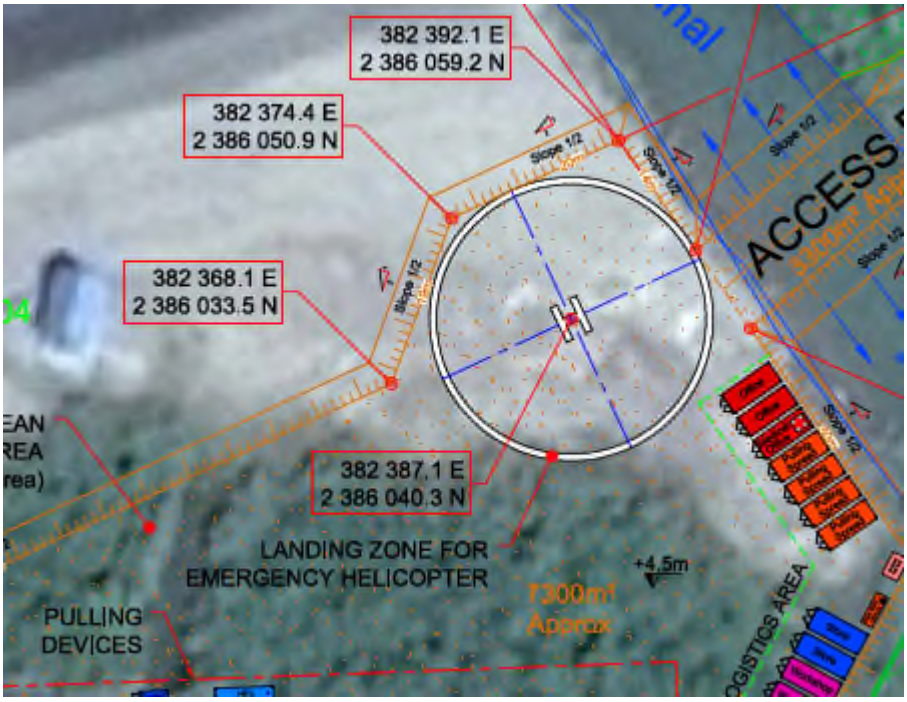
13. MEDICAL SERVICE ORGANISATION

The onshore base is equipped with a clinic and a doctor located at the working area. A container is dedicated to the clinic for consultation and treatment. The Doctor has the necessary equipment to handle severe emergency situation.
Medical personnel will subcontracted and qualified in primary care, handling major emergencies, preventing and curing of infectious diseases.

14. MEDICAL EMERGENCIES

A medical emergency is a situation in which, due to illness or an accident, there is the danger of loss of limb, organ or life. An important part of the health organization is represented by MEDEVAC Plan that shall be in place before any operational activity is performed. For more details, please refer to the Project Emergency Response Plan – 466-GE-PJT-1007.

An helipad will be fabricated at work site to receive a helicopter in case of emergency.



HELIPAD LAYOUT

15. MUSTER POINTS

Two muster points will be installed onshore. One on the base camp and a second one on the working area.
Foghorns will be used in case of emergency requesting mustering and if needed the evacuation.
All personnel will proceed to the muster station and turn his T-card. Headcount will be done.

16. ALCOHOL AND DRUGS POLICY

Prevention and management of alcohol and drugs use and abuse involve all Employees and all others who visit or work in the work site.

This policy must be supported by the prohibition of:

- Possession, use, distribution and sale of any alcoholic beverage and substances prohibited by locally and internationally applicable laws.
- Use of any solvent or glue or other products for the purpose of intoxication;
- Use of prescription drugs not for their originally intended purpose.

Drugs for medical use will be stored in a closed cupboard in the clinic.

17. PERMIT TO WORK

A permit to work system is in place at site for non-routine works only (confined space, diving, bunkering…).

There are 6 types of PTW in GEOCEAN System:

- General work permit
- Hot work permit
- Entry into enclosed space permit
- Work at height permit

- Electrical operations permit
- Divers underwater permit

Day to day operations are scheduled and managed during the PreStart meeting and authorised verbally. Non-routine operations, lifting operation which requires engineering by their complexity for weather limits and for rigging design (usually over 50 t), pressure test, X-ray, diving are requesting a permit to work.

18. LIFTING EQUIPMENT

Lifting gears are labelled with SWL, ID and colour coded. The project colour code is dark blue.
Certificates will be with store keeper at site.
All damaged equipment will segregated and either color coded red for quarantine or destroyed.

19. DRINKING WATER

Bottle of water will be provided and sufficient quantity of bottle is maintained to allow one week back up.
Drinking of tap water is prohibited.

20. DRILLS

A schedule of drills to periodically test the effectiveness of the Emergency Response team will be planned. The following emergencies should be covered:

- Fire
- Medical emergency
- Spill Response
- Evacuation

A drill report will be issued by the HSE Engineer.

21. HSE AUDITS & INSPECTIONS

CONTRACTOR will continuously assess the project HSE management performance with the following tools:

- Monthly follow up of key performance indicators
- Carrying regular HSE Inspections
- Conducting regular HSE Audits

CONTRACTOR shall ensure that a systematic planned inspection program through out the life cycle of project by using standard checklists. The HSE inspections shall be planned for pre-mob activities as well as during execution of project activates. CONTRACTOR HSE department shall develop HSE checklists based on approved PSSP and other HSE documentation. Standard checklist shall encompass all camp facilities, site facilities, equipment, tools, equipment, materials, and employees' practices in using them. HSE Department will perform HSE inspections on various site works regularly. The actions identified during the inspection will be systematically recorded and followed by HSE Engineer in the action plan.

The inspections shall be planned on daily/weekly/monthly basis covering all types of ongoing construction work. These inspections/audits shall demonstrate the adequacy of the plant and equipment and the skills of operators as per the standard practices and local regulations. This is particularly important with respect to HSE and security.

The following shall be considered as minimum requirements for any inspection:

- Personnel informed about the operations to be carried out (PreStart meeting, following JSA);
- Personnel qualified and skilled equipment adequate for the type of job;
- Personnel Protective Equipment adequate for the type of job;
- List of operations personnel available;
- Procedures and work instruction are communicated and well known by the personnel;
- For critical operations, no change in equipment and well known by the personnel;
- Equipment capacity shall be displayed on each peace equipment for operator checking
- Crane certification fit for heavy lift operations
- Rigging Equipment shall be colour coded and have current certification.

The Corporate HSE Manager shall carry out internal HSE audits and reviews in order to evaluate the effectiveness of the project HSE policy, PSSP, and procedures and the implementation of the recommended corrective actions. The site shall provide necessary preparations (and make the necessary personnel available) for such audits to be performed. Audits shall cover Subcontractors activities.

22. VIOLATIONS & DISCIPLINARY MEASURES

Violations are cases of disregard for Health, Safety and Environment procedures and behaviour, which could have caused an accident, but which by good fortune did not. CONTRACTOR Project Management is convinced that safety considerations override normal work practices depending on the degree of potential risk to either persons on a job or to the general public.

Project employees who engage in horseplay, fighting, or any other activity that can be classed as gross misconduct, will be subject to disciplinary action up to and including their instant removal from the site.

The process will include a structured analysis of the event to determine if there are system failures, unintended messages (priority of schedule, cost, etc. over safety), obstacles created by management that resist safe behaviours.

23. COMMUNITY MANAGEMENT

For the overall project duration (during both onshore and offshore operations) SUB-CONTRACTOR shall manage the interfaces with the local communities living in the surroundings of the Moheshkhali Site on behalf of CONTRACTOR. SUB-CONTRACTOR shall represent the CONTRACTOR interests in order to make sure that CONTRACTOR'S operations run smoothly and do not suffer any delay.

SUB-CONTRACTOR shall maintain good communication with the local authorities (including but not limited to local Union, Coast Guard, Ansar, Fishermen's community, civil union etc…), to inform them about CONTRACTOR forthcoming / ongoing operations, to be receptive of the local communities communications and requests, to prevent any issue by analyzing the local context. SUB-CONTRACTOR activity is not related to the start or progress of the site preparation.

All the communication and meetings between SUB-CONTRACTOR and local authorities shall be subject to ad-hoc reports to CONTRACTOR sent within 24 hours pursuant to the event by email.

SUB-CONTRACTOR shall liaise with the different authorities in order to solve the issues that may arise during the daily operations. SUB-CONTRACTOR shall be responsible to provide proof and records (email, minute of meeting, phone call minute) that they have taken all reasonable steps to resolve or prevent issues related to local community disturbances, blockade or sabotage.

SUB-CONTRACTOR shall maintain CONTRACTOR informed about the on-going processes and SUB-CONTRACTOR shall not commit on behalf of CONTRACTOR to the local community or any other authorities without receiving a formal delegation.

SUB-CONTRACTOR shall have a representative able to be on Moheshkhali site in 30 minutes if any issues with local communities arise. CONTRACTOR shall provide proper support to SUB-CONTRACTOR and remain available for providing information about the progress of the activities.

24. WORKER GRIEVANCE MECHANISM

CONTRACTOR shall implement a grievance mechanism for workers. The mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned.

The following define the procedure for managing worker concerns and complaints (referred to as “grievance”) in a planned, timely, and respectful manner. It is also meant to ensure consistency with best practices in stakeholder and community engagement (see paragraph about community management above), including the IFC Performance Standards.

CONTRACTOR endeavors to effectively and proactively manage its local workers feedback, grievances or concerns by being receptive of their communications and requests, and to encourage its subcontractors to apply the same level of care. A grievance mechanism using two way dialogue can enhance outcomes by giving people satisfaction that their voices are being heard and that their issue was subject to formal consideration within CONTRACTOR.

CONTRACTOR will administer the local workers grievances and concerns by providing sufficient appointing authority to the Manager on site to solve workplace concerns. He shall pay a close attention to workers concerns and take appropriate measures in case problem arise, always in proportion with the observed local customs and habits.