



NUTAN BIDYUT(BANGLADESH) LIMITED

**220 MW(GAS)/ 212 MW(HSD) COMBINED CYCLE POWER PLANT
BURHANUDDIN, BHOLA**

REVISION	04	RELEASE DATE	September 2022
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GRIEVANCE REDRESS SYSTEM – MANAGING COMPANY AND COMMUNITY GRIEVANCES

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Disclaimer

This report has been developed as a final implementation guide. Any versions or statements issued or approved by the company shall remain superseded by this document, making this document as the final implementable guide for the company. This report should be taken only as a source of information and analysis. It is not given, and should not be taken, as legal advice and the provider of the information will not be held liable for any direct or consequential loss arising from reliance on the information contained herein.

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Chronology of revision and approval of Grievance Redress System

S. no.	Revision Number	Details	Date of Revision	Prepared by	Approved by	Remarks
1	00	ESIA of the project		ERM India Private Limited		
2	01	EHSSMS		NBBL Corporate	NBBL Plant Head	
3	02	Revision of GRC		NBBL		
4	03	Revision of GRC		NBBL		
5	04	Revision of Grievance Redress System	15 Sep 2022	NBBL	NBBL Project Head	

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Definitions

This section lists definitions of the terms/ concepts used in the report.

Term Name	Definition
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 including suppliers, contractors, customers or consumers, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community or other businesses
Stakeholder Engagement	is a process by which an organization involves people who may be affected by the decisions it makes or influence the implementation of its decision. It is a continuous process between the company and those potentially impacted that encompasses a range of activities and approaches and spans the entire life of a project
Grievance	is an issue, concern, problem or claim (perceived or actual) that an individual or community group wants a company to address and resolve
Company-Community Grievance Mechanism	A locally based, formalized way to accept, assess, and resolve community complaints concerning the performance or behavior of a company, its contractors, or employees
Grievance Register	System for logging and monitoring all grievances received, including any records of communication/consultation and details of grievance settlement.



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1. Introduction

Nutan Bidyut (Bangladesh) Limited (hereinafter referred to as 'NBBL') developed Grievance Redressal Mechanism ('GRM') procedure as part of Stakeholder Engagement Plan under Environment and Social Impact Assessment ('ESIA') Study carried out for the project in January 2018, with subsequent revisions in the ESIA.

NBBL also developed Environment Health, Safety & Social Management System (EHSSMS) in August 2017, wherein GRM procedure was also developed (NBBL/SMP/5). In addition to the above-mentioned updates, the NBBL team updated the GRM structure by revising the Grievance Redress Committee (GRC). The GRM update or revision provided in this report has been collated to incorporate elements from the GRM of ESIA, EHSSMS and other updates in GRC so as to have one collated document for implementation on site.

Grievance redressal is one of the most critical components of effective stakeholder engagement. The IFC Good Practice Note on Addressing Grievances from Project Affected Communities (2009) defines a grievance as "a concern or complaint raised by an individual or a group within communities affected by company operations. Both concerns and complaints can result from either real or perceived impacts of a company's operations, and may be filed in the same manner and handled with the same procedure."

This report or plan aims at providing a structure to the GRM for managing community grievances by NBBL and the level of documentation required to ensure effective and structured management of community grievances.

1.1 Principles of GRM

The grievance redressal process for the Project will be based on the following principles:

- Transparency and fairness: The process for grievance resolution shall be transparent, in harmony with the local culture, and in the appropriate language. It should explicitly assure potential users that the mechanism will not impede their access to other judicial or administrative remedies.
- Accessibility and cultural appropriateness: Every member of the community or groups as well as the employees/workers should have access to the grievance procedure. Any individual or group that is directly or indirectly affected by the Project's and its contractors' activities, as well as those who may have an interest in the Project or the ability to influence its outcome, either positively or negatively, can raise a grievance. To allow all stakeholders to have access to the mechanism, the grievance redressal procedure will be made available in the local languages of Bangla and any other language preferred by the community.
- Meaningful Information: As part of the engagement process, meaningful information should be disclosed to the stakeholders to allow for active and informed engagement.
- Openness and communication regularity: There are multiple channels available for individuals and groups to choose their preferred method of lodging grievances.
- Channels of communication are kept open throughout the process of addressing each grievance, and up to 3 months after the situation has been resolved.
- Written records: All grievances are registered on a Grievance Form and tracked through to resolution.
- Dialogue and site visits: All grievances are considered to warrant discussions with the complainant and a site visit, if required, to gain a first-hand understanding of the nature of the concern. The purpose of the visit is to verify the validity and severity of the grievance.
- Timely resolution: The Project aims to resolve all grievances within 15 working days.
- Incorporation of feedback: The feedback received to-date from the engagement and grievance redressal process shall be incorporated into the Project and program design, and the same shall be reported back to the stakeholders.

Community grievances may cover the following–

- Entitlements identified as part of the other studies and the implementation of the same;
- damage of trees and property;
- further losses to agricultural parcels, water bodies (Dehular Khal, Canals, Ponds, etc.) and community forest;
- issues related to transportation and traffic;
- increase in environment pollution;



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- impact on community health;
- disturbances to locals due to workers in the area;
- Issues arising out of sharing of employment and business opportunity;
- Concerns over the impact on local cultures and customs; etc.

Employee/worker grievances may cover the following–

- Impact on employee health
- Issue with wages/working hours
- Complaint on quality of distributed PPE
- Concern on Industrial work practices
- Complaint on leave facility/labor laws or rules violations by company
- Complaint on environmental pollution etc.

The list of grievances will be regularly updated as and when the new one arises.

1.2 Reference

The normative reference to this document is listed below -

- IFC PS 1: Assessment and Management of Environmental and Social Risks and Impacts
- IFC PS 2: Labour and Working Conditions
- Policy principle 5 of Environmental Safeguards of ADB's Safeguard Policy Statement, 2009
- Policy principle 2 of Involuntary Resettlement Safeguards of ADB's Safeguard Policy Statement, 2009
- AIIB Environment & Social Safeguards (ESF 2)

1.3 Applicability

The GRM applies to the entire NBBL Project, including any new acquisitions such as offices, camps, research and development, and associated facilities. This document is applicable to the entire life cycle of the Project. The GRM is a part of the larger ESMP and EHSSMS and is to be considered as a living document, to be updated regularly based on the emerging needs and patterns for engagement with the various stakeholders.

2. Grievances Redressal Mechanism

2.1 Purpose & Objective

The purpose of the grievance redressal mechanism is to make available a system to reduce risk for projects, offer communities as an effective avenue for expressing concerns, achieving remedies and promoting a mutually constructive relationship. Grievance Redressal mechanism is a locally based, formalized way to accept, assess, and resolve community complaints concerning the performance or behavior of a company, its contractors, or other employees. At the same time, it will help employees/workers to raise any concern or complaint against any issue. The specific objectives of the GRM are as follows:

- To allow stakeholders the opportunity to raise comments/concerns;
- To structure and manage the handling of comments, responses and grievances, and allow monitoring of the effectiveness of the mechanism; and
- To ensure that comments, responses, and grievances are handled in a fair and transparent manner, in line with the applicable reference framework.

2.2 Responsibility

During the project life cycle, the GRM implementation will be the responsibility of the following Grievances Redressal Committee (GRC).

- a. NBBL Project Head – Convener
- b. EHS Manager – NBBL



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- c. Human Resources & Admin (HR& Admin) Manager – NBBL
- d. Community Liaison Officer (CLO)/ Grievances Officer – NBBL

Responsibilities of GRC –

- Review, consider and resolve grievances related to social and environmental aspects received by the Project and its internal stakeholders (including investors, employees, contractors and third-party workers);
- Entertain grievances of indirectly affected persons and/or persons affected during project implementation;
- Resolve grievances within a period of two weeks at the GRC level and communication of the resolution to the aggrieved party;
- The GRC shall not engage in any review of the legal standing of an “awardee” nor shall deal with any matters pending in the court of law;
- The GRC will not prevent or prohibit access to legal redress that is enshrined in the judicial system of Bangladesh;
- Arrive at decisions through consensus, failing which resolution will be based on majority vote. Any decision made by the GRC must be within the purview of Environmental and Social Management Plan, Corporate EHS and Social Policies of NBBL or any such documents of relevance of that matter;
- In case the grievance relates to environmental monitoring results or engineering matters, the GRC will validate the information available to it, as provided by the Project Company’s Project management team/ environmental monitoring team. However, GRC will not be in a position to question the validity of the data provided to it. The GRC team shall meet at least twice a month for review of grievances registered and the resolution vetted out to the concerned parties. The frequency of meeting may increase or decrease depending on the number grievances received;
If needed, may undertake field visits to verify and review the issues, dispute or other relevant matters.

HR & Admin Manager (NBBL): He shall be responsible for ensuring implementation of the grievance redressal procedure at site. He shall review the records pertaining to grievances received during construction phase and inform the Community Liaison Officer (NBBL). He shall also be a member of the Grievance Redressal Committee at site level.

Community Liaison Officer (NBBL): He shall be nominated as the Grievance Officer and will report directly to the HR & Admin Manager (NBBL). He shall be responsible for communicating with the community on resolved grievances and shall maintain records on grievances received and actions taken during construction phase of the project.

2.3 Disclosure & Communication

Information disclosure is an important activity not just as a form of engagement but for also enabling the other project related activities to be undertaken in an informed and participatory manner. This section outlines the process to be followed for the disclosure and participation as part of the GRM implementation.

2.3.1 Disclosure Mechanism

The process of information disclosure can be undertaken in two manners, either voluntary disclosure or disclosure as part of the EIA/ESIA process (in the form of public hearing and also referred to as ‘regulatory disclosure’). While regulatory disclosure involves the provisioning of information as required by the authorities and agencies involved in the project, voluntary disclosure refers to the process of disclosing information to the various stakeholders in a voluntary manner.

This disclosure not only allows for trust to be built amongst the stakeholders through the sharing of information but also allow for more constructive participation in the other processes of consultation and resolution of grievances due to availability of accurate and timely information.



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The process of disclosure involves the provisioning of information in a timely and accessible manner to the various stakeholders in a project.

The information disclosure shall be undertaken in Bangla. Furthermore, the literacy level amongst the community is generally low, with formal education only gaining importance with the present generation. In keeping with these aspects, it is essential to ensure that any disclosure undertaken is done in a manner that allows maximum stakeholders to comprehend the information being shared and participate in the feedback process.

Some of the disclosure related activities proposed for the future are as follows:

- GRM process to be disclosed at key locations in the community (readily accessible by community members such as temples, mosques, schools, business centres/kiosks, etc.), outside power plant complex.
- The meetings and discussions to be undertaken for the local community in the villages in and surrounding the project area and will be held at various levels, such as the district headquarters, village levels, wards and camps. The venue and timings of the meetings and discussions will be finalized in consultation with the stakeholder groups and communicated to larger stakeholder group using public addressal systems and pamphlets.
- In addition to these meetings being undertaken across the local community as a whole, specific meetings will be undertaken across critical stakeholder groups such as the vulnerable groups and PAFs. Through these meetings an attempt will be made to allow these groups to give their unique viewpoints and feedbacks for the project while ensuring that these groups are involved in the implementation, review and monitoring of the ESMP in general.
- The proceedings of these meetings and discussions will be properly documented, as minutes and in photographs and copies of the same will be shared with the stakeholders for their records.
- As a part of the disclosure, the stakeholder reports or the key public consultation findings or the grievance related records can also be made available on the NBBL website.
- Stakeholders including employees, contractors, village heads, government agencies, etc. will be informed of the GRM and will be advised to route any complaints received to them, to the CLO/ Grievances Officer of NBBL.

This method has been identified as the most suitable approach for information disclosure keeping in mind the literacy levels in the area. In order to ensure that the opinions of the sections of the community who don't have access to the reports are also considered, public consultations are recommended. These public consultations can be done on six monthly basis or as and when the urgency of the situation warrants having such public consultations.

Also, while undertaking the process of disclosure it is important that the project makes an attempt to refrain from creating false expectations. Also, when possible, an attempt shall be made to disclose actual numbers, even estimates, wherever available.

GRM shall be disclosed with other management plans, as and when developed/modified including stakeholder engagement plan.

2.4 GRM Procedure

- i) The grievance redressal mechanism for community/employee is presented in the picture below.



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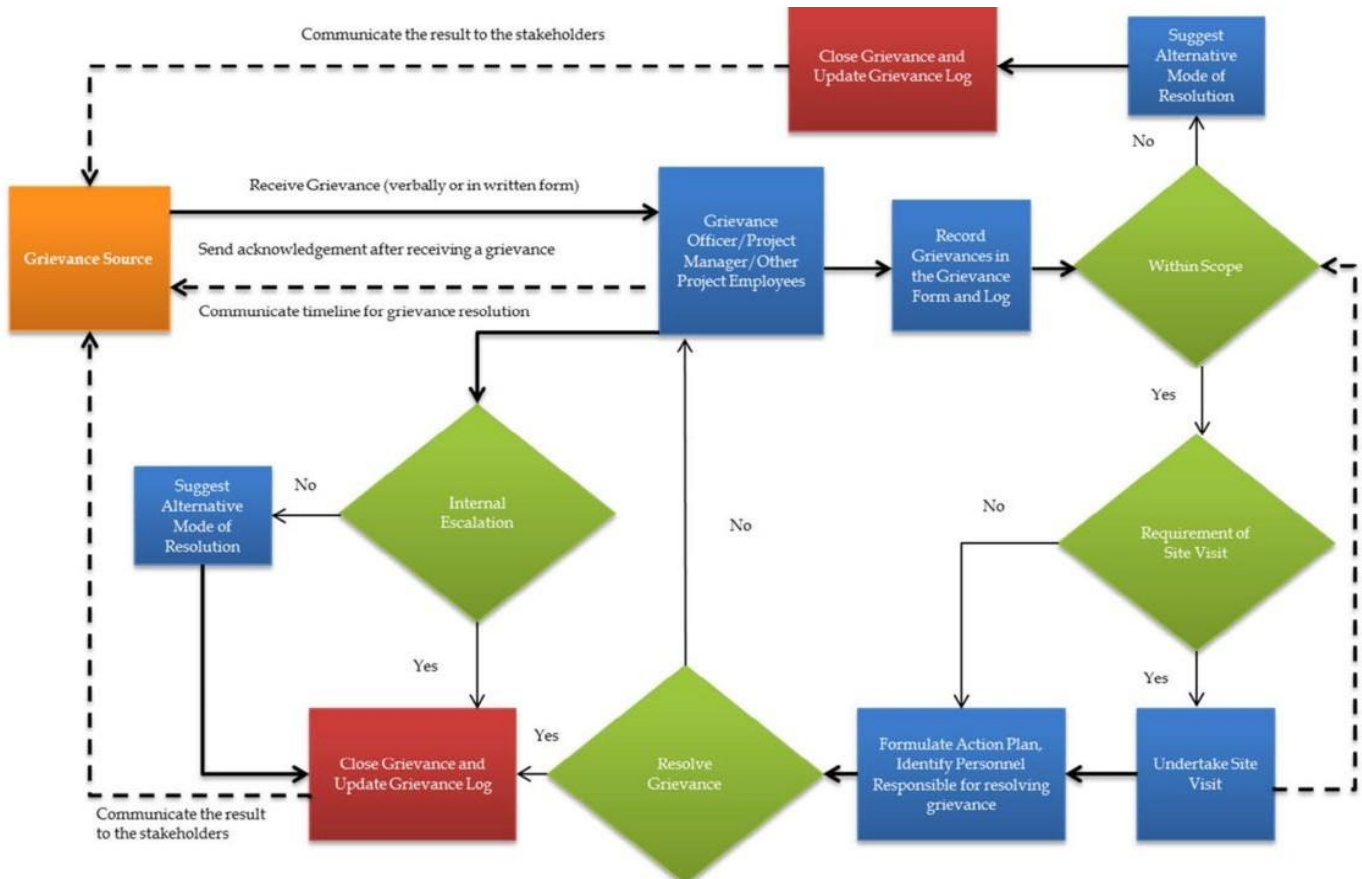


Figure 1 Community/Employees Grievance Redressal Mechanism

- ii) All project staff will be informed that they must pass all grievances, communications to the Grievance Officer (discussed in the following section) on site as soon as possible after they are received. Details of the person lodging the grievance shall be noted and passed along with the grievance. The Grievance Officer in turn will communicate all grievances to the HR & Admin Manager for the project.
- iii) For assisting the communication of grievances, GRM flow chart with communication phone numbers are displayed in different places of villages. Community may raise verbal grievance over phone.



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- iv) In order to implement the Grievance Redressal Mechanism, NBBL shall nominate the Community Liaison Officer as the Grievance Officer at site level for registering the grievances received from community/employee and action taken thereon for the resolution of the grievance, the timeline required in each step and criteria in escalation of the case to the higher level. The contact details of the Grievance Officer shall be maintained and updated in the following format displayed at prominent places available to community. The same should be updated on the company's website as well.
- v) Receive and Register a Grievance
- Any stakeholder from the surrounding communities with concerns pertaining to the company's social and environmental performances may register their grievance in writing to Grievance Officer at site ;
 - Secured grievance boxes shall be placed, one at the outside of main gate of the facility and second at the project gate entrance.
 - Once a grievance has been received from an external party, it shall be recorded in the External Grievance Log Register or data system maintained by the Grievance Officer at the site level.
 - Details of grievance received shall be maintained by the Grievance Officer in a register as per the format provided in Appendix.
- vi) Assessment and Addressal of Grievance
- The Grievance Officer shall open the grievance boxes every seven (07) days and forward the grievances to the HR & Admin Manager for further action;
 - The grievance shall be assessed to determine if the issues raised by the complainant fall within the mandate of the grievance mechanism or not;
 - During the assessment of grievances, the GRC shall gather information about the key issues and concerns and helps determine whether and how the grievance might be resolved;
 - The issues will be registered by CLO who will take 2 days to screen and assess the grievance by the supervision of HR & Admin Manager. If the complaint seems to require intervention, then it will be considered for further action, otherwise it will be rejected and the same will be communicated to the concerned complainant by Grievance Officer;
 - Community grievances will be redressed at the site level through the HR & Admin Manager with the support of Grievance Officer within 15 working days.
 - For the purpose of verifying and resolving the grievances received, site inspection may not be required in all the cases. Depending upon the sensitivity of the issue, requirement of a site inspection will be identified.
 - A site inspection will be undertaken by the site level community liaison officer or the project member assigned by the HR & Admin manager NBBL. The purpose of the site inspection will be to check the validity and severity of the grievance. For this purpose, the personnel may also undertake discussions with the concerned external stakeholder. The inspection will be undertaken within ten days of receiving the grievance. The assigned individual will then work with other relevant members of the Project team to investigate the problem and identify measures to resolve the grievance as appropriate. The personnel to be involved in the grievance resolution shall be dependent upon the nature of the grievance, as discussed in the table below.



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Nature of grievance	Responsible Person for Addressal	Remarks
Loss of livelihood	HR& Admin Manager (NBBL)	In consultation with NBBL GRC
ESMP/ LRP/ Management Plans implementation related	EHS Manager (NBBL) HR& Admin Manager (NBBL)	In consultation with NBBL GRC
Compensation on account of damage	HR& Admin Manager (NBBL) & CLO	In consultation with NBBL GRC
Environmental impact, Community health, EHS	EHS Manager (NBBL)	EHS Manager (NBBL)
Workers related issues	HR& Admin Manager (NBBL)	In consultation with NBBL GRC



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- h. Depending on the extent of project impacts, volume of grievances and complexity of the nature of grievances, monitoring measures like internal and external audits on annual basis shall be adopted by NBBL. Grievance records maintained shall provide the background information for these regular monitoring exercises.
- i. The Project Head of NBBL(Convener) shall try to address the grievance in conjunction with the community. If necessary, meetings shall be conducted with the complainant and evidence shall be examined. The grievance shall be closed at the earliest.
- j. The complainant shall have the opportunity to be present at the committee meetings and discuss the grievance. If the grievance remains unresolved, the complainant shall have the option to approach the appropriate court of laws for redressal.
- k. Through the review of each grievance and analysis of its effectiveness and efficiency, NBBL shall draw on the grievances to evaluate systematic deficiencies. In addition, monitoring of the grievance mechanism helps to ensure that the design and implementation of the mechanism is adequately responding to stakeholder's/ employee's grievances in a cost-effective manner.
- l. In addition, all grievances shall be analyzed to find out the root cause of the frequent grievances in any particular area and matters shall be taken up with the competent authority for necessary modification in the policy/rules and regulations to prevent the same. The following format shall be used for root cause analysis of grievance prone areas by every Grievance Officer.

2.5 Recordkeeping

- i) Appendix A – Format for Recording Grievance
- ii) Appendix B - Format for Grievance Register



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Appendix A - Format for Recording Grievance

Grievance Check and Solution Form	
Department	
Date & Time	
Name	
Grievance	
Place	
Contact	
Action Taken	
Inform to applicant	
Comments	
Closing Date	

Prepared By

Checked By

Approved By



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Appendix B - Format for Grievance Register

Grievance Number	Date	Complaint Method	Description of Grievance	Location	Raised by	Action Taken	Was the complainant satisfied	Status of grievance and closing date	Any follow up action required?