



Stakeholder Engagement Plan

Caspian Sea Desalination Plant

ACWA

Prepared by:

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Acronyms and Abbreviations

Abbreviation	Meaning
CHSS	Community Health Safety and Security
CLO	Community Liaison Officer
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ESIA	Environmental & Social Impact Assessment
ESP	Environmental Social Policy
HSE	Health Safety Environment
HSSE	Health, Safety, Security and Environment
ESMS	Environmental Social Management System
FAQ	Frequently Asked Questions
FGD	Focus Group Discussion
GBVH	Gender Based Violence & Harassment
GRM	Grievance Redress Mechanism
IDPs	Internally displaced persons
IFC	International Finance Corporation
IPAM	Independent Project Accountability Mechanism
KII	Key Informant Interview
KPIs	Key Performance Indicators
MENR	Ministry of Ecology and Natural Resources
MoD	Ministry of Defence
MoE	Ministry of Energy
NGO	Non-Governmental Organizations
NTS	Non-Technical Summary
O&M	Operation & Maintenance
ha	Hectare
PS	Performance Standard
PU	Public Union
TBC	To be confirmed
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SOCAR	State Oil Company of the Republic of Azerbaijan

1.0 Introduction

This document is the Stakeholder Engagement Plan (SEP) for the Caspian Sea Desalination plant (the Project) within the Sumgayit Industrial Area, approximately 30 km northwest of Baku, in the Republic of Azerbaijan. This SEP summarises the stakeholder engagement undertaken during the Environmental and Social Impact Assessment (ESIA) phase and outlines the proposed framework methodology for stakeholder engagement throughout the Project's implementation, including the construction, and operational phases, with specific consideration of the guidelines of the International Lenders and applicable national laws.

1.1 Project Background

On 12 April 2023, the office of the President of Azerbaijan issued a decree authorising a pilot project for producing drinking water through seawater desalination. Building on that, in March 2024 the Ministry of Economy launched a public-private partnership (PPP) competitive tender to design, build, finance, and manage a desalination facility of 100 million m³/year capacity in Sumgayit. The Government of the Republic of Azerbaijan, acting through the Azerbaijan State Water Resources Agency (ADSEA) has appointed ACWA (earlier known as ACWA Power), through the first-ever PPP in Azerbaijan to develop a seawater reverse osmosis (SWRO) plant at Sumgayit Chemical Industrial Park, with a daily capacity of approximately 300,000 m³, which is hereby referred to as "the Project". The Project will be located near the Caspian Sea within the Sumgayit industrial area on a site covering an area of approximately 20 hectares (Ha).

ACWA will be responsible for the design, financing, building, commissioning as well as operation and maintenance of the SWRO desalination plant. ACWA has established a special purpose vehicle (SPV) Project Company called the 'Caspian Sea Azerbaijan Project Company LLC', registered in the Republic of Azerbaijan (with registration no. 1407274281) to develop the Project using reverse osmosis technology on a Build, Own, Operate and Transfer (BOOT) basis under a 25-year water offtake agreement with the ADSEA (the product water off-taker).

5 Capitals – part of SLR (SLR) has been engaged by ACWA to undertake the independent assessment of potential environmental and social impacts, as well as certain other environmental & social related scope during the development process of the desalination plant including preparation of this SEP for the Project.

1.2 Scope of the SEP

The scope of the SEP is to specify the methods to efficiently manage and facilitate engagement with stakeholders during the implementation stage of the Project.

This SEP has been prepared to align with ACWA's HSSE-MS that is applied to ACWA projects globally. The SEP has also been prepared to align with applicable requirements of the International Finance Corporation (IFC), Asian Infrastructure Investment Bank (AIIB), Asian Development Bank (ADB), Japan Bank for International Cooperation (JBIC) and Nippon Export and Investment Insurance (NEXI) that establish requirements for Stakeholders Engagement and a Grievance Mechanism.

The SEP will remain relevant throughout the lifetime of the Project as a 'live document'. It will act as a plan within the Project's construction, commissioning and operational phases of Environmental and Social Management System (ESMS) that will require updating as Project circumstances or stakeholder dynamics evolve; and to ensure continual improvement of the ESMS.

1.3 Objectives of the SEP

The objectives of this SEP, inclusive of the Grievance Redress Mechanism (GRM) include:

- To identify the stakeholders that may be affected by the Project or may influence the outcome of the Project.
- To define tailored processes to inform stakeholders about the Project and to manage stakeholder expectations.
- To define the frequency and timeline for engagement with different stakeholder groups.
- To understand current and potential emerging issues and to capture views and concerns of the relevant stakeholders with regards to the Project.
- To provide a basis for stakeholder participation in environmental and social impact identification, prevention and mitigation, including impacts and risks relating to Gender Based Violence & Harassment (GBVH) and Sexual Exploitation, Abuse and Harassment (SEAH).
- To propose a platform for reporting back on mechanisms to address these impacts.
- To establish a grievance mechanism that will be implemented for the Project during the construction and operation phase.

2.0 Project Information

2.1 Key Project Information

Table 2-1 Key Project Information

Project Title	Caspian Sea Desalination Plant
Project Developer	ACWA (formerly ACWA Power)
Project Company	Caspian Sea Azerbaijan Project Company LLC
Off taker	Azerbaijan State Water Resources Agency
EPC Contractor	HDEC, IWAC, WETICO
Operation & Maintenance Company	ACWA Operations (formerly NOMAC)
Environmental Consultant	5 Capitals – Part of SLR Consulting (SLR)

2.2 Project Location

The proposed Caspian Sea Desalination Plant will be located within the Sumgayit Industrial Area, approximately 30 km northwest of Baku, in the Republic of Azerbaijan. Access to the site is via the southeastern gate, reached by a short gravel road off Samad Vurghun Road in Sumgayit.

The site lies in close proximity to the Caspian Sea shoreline, enabling direct access for seawater intake and brine discharge infrastructure. It is situated within the Sumgayit Chemical Industrial Park, a designated industrial zone under the Ministry of Economy, which hosts a range of manufacturing and processing facilities. The proposed Project site is a brownfield site which used to occupy a former wastewater treatment plant. A photolog of receptors and features can be found in Appendix A.

[Figure 2-1](#) depicts the Project national context, in relation to Baku, the Caspian Sea, and surrounding infrastructure. The local communities within the Project's 5 km Area of Influence (Aol) include Haji Zeynalabdin, Khazar Baghlari, Khazri, and Kimyachilar.

The Project development will also involve works in the Caspian Sea for the installation of seawater intake and outfall pipelines. The length of the offshore pipes will be up to 3,500 meters. [Figure 2-2](#) presents the seawater intake and outfall pipelines.

Although not part of the core Project scope, an approximately 15 km long product water supply pipeline will be constructed to convey treated potable water from the desalination plant to a reservoir located to the south. The pipeline will be implemented by a contractor appointed by ADSEA and is therefore considered an Associated Facility in accordance with IFC Performance Standard (PS) 1. The proposed pipeline corridor passes predominantly through industrial and areas and has been aligned, where practicable, along existing infrastructure corridors parallel to roads and utility lines.

The proposed alignment of the pipeline is shown in [Figure 2-3](#).



Figure 2-1 Project Location

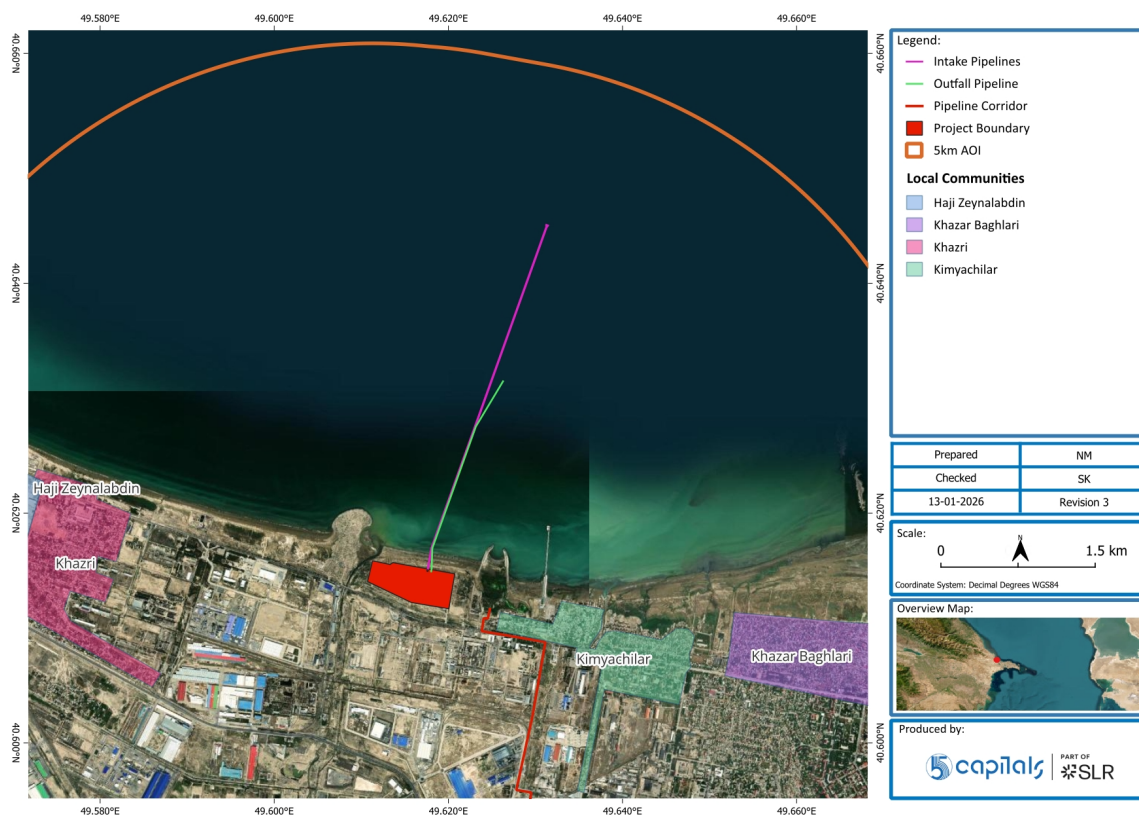


Figure 2-2 Project Offshore intake and outfall pipelines

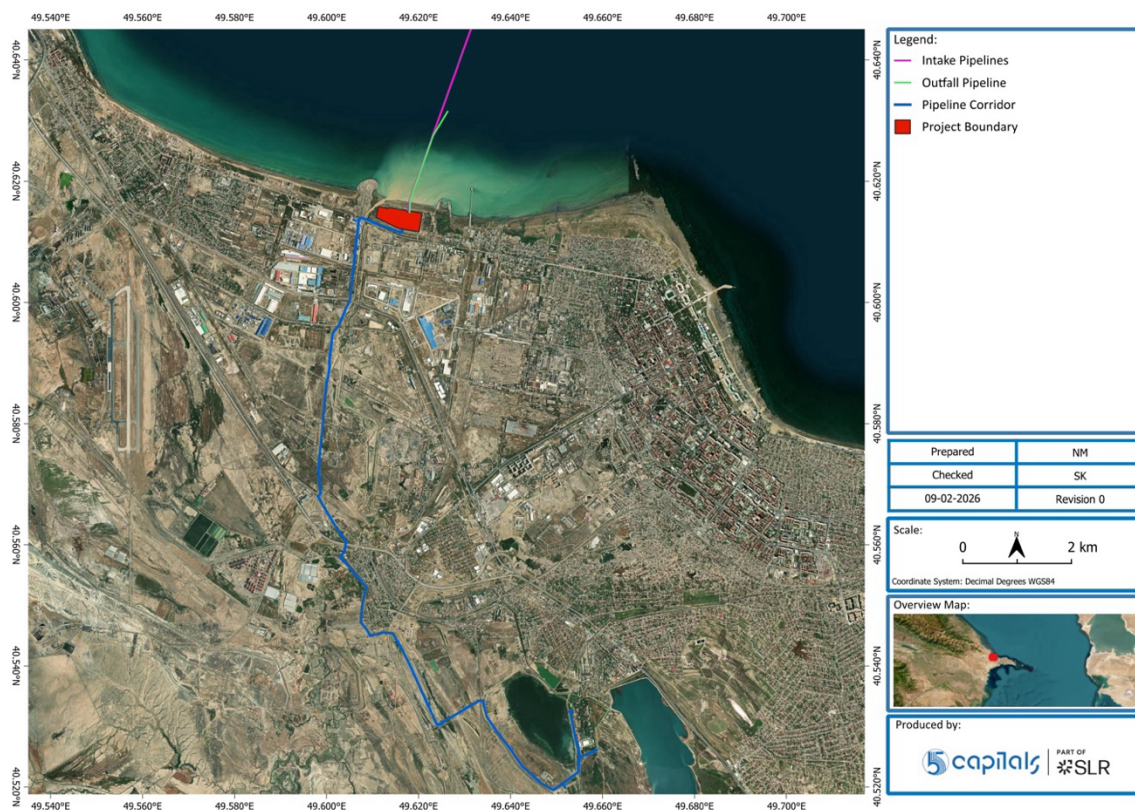


Figure 2-3 Product Water Distribution Pipeline Route

2.3 Project Description

The basic principle of the desalination plant involves the production of potable water by removing salts and impurities from seawater. At its core, the facility consists of intake structures that draw seawater from the Caspian Sea, through offshore pipelines and intakes, which are equipped with screening systems to prevent large debris and marine organisms from entering the process. This is followed by pre-treatment systems, involving filtration and chemical dosing, which condition the raw seawater and protect the membranes from fouling and scaling.

The central component of the plant is the reverse osmosis system, where high-pressure pumps force seawater through semi-permeable membranes, separating freshwater from concentrated brine. The resulting permeate water is then subject to post-treatment, including remineralisation and disinfection, to meet drinking water quality standards and ensure compatibility with distribution networks.

Supporting infrastructure which are essential to the operation of an SWRO plant includes power supply systems, chemical storage and dosing facilities, product water storage and distribution pipelines, as well as brine outfall structures for the controlled discharge of concentrated saline water back into the marine environment. Together, these components form an integrated system designed to reliably produce high-quality freshwater while managing environmental considerations associated with energy use, chemical handling, and marine discharges.

Note: Please refer to the ESIA Report for further details.

2.4 Project Construction Requirements

The Project Company has appointed a consortium led by China-based Powerchina Huadong Engineering Corporation Limited (HDEC), in partnership with Saudi-based companies Innovative Water Application Company (IWAC) and Water & Environment Technologies Company (WETICO), as the Engineering, Procurement, and Construction (EPC) Contractor for the Project. This consortium brings together international expertise in seawater desalination, infrastructure delivery, and water treatment technologies, and will be responsible for the full design, construction, and commissioning of the Project in accordance with national regulations and international best practices.

During peak construction, the project workforce is expected to comprise approximately 1,800 personnel. The construction staff will include a combination of skilled and semi-skilled workers, such as civil, mechanical, electrical, and marine construction workers, equipment operators, welders, divers, surveyors, and general labourers, as well as supervisory and technical personnel.

All construction workers will be accommodated in offsite camps located away from the immediate project area. Subcontractors are responsible for providing their own accommodation facilities, which will also be situated offsite and distanced from local communities to minimise direct interaction. All camps will be designed and managed in accordance with IFC and EBRD Workers' Accommodation Guidelines, ensuring appropriate standards for health, safety, hygiene, and living conditions are maintained throughout the construction period. The exact location of the workers' accommodation facilities is not available at the time of preparing this ESIA.

2.5 Project Operational Requirements

The Operation and Maintenance (O&M) of the desalination plant will be managed by Acwa Operations, a subsidiary of Acwa. Operational activities will include start-up and shutdown of plant systems, regulation of flow and pressure, routine inspection and maintenance of pipelines, pumps, and intake/outfall structures, as well as monitoring of water quality to ensure compliance with environmental requirements. The plant will operate continuously, with a high degree of automation to reduce staffing needs, while relying on highly skilled operators and technicians to manage critical systems. The operational workforce is estimated at approximately 50 employees, including management staff, technical professionals, and maintenance personnel. Local staff will be recruited wherever possible, and a detailed staff plan, including key performance indicators for local hires and gender diversity, will be developed in line with Acwa corporate requirements and the principles of the IFC Performance Standards.

2.6 Local Context and Sensitivities

Note: Full details of receptors, local sensitivities, land users and site baseline are provided in the ESIA Report. A summary of this has been included below to provide context.

2.6.1 Site Access and Location

Access to the site is via the southeastern gate, reached by a short internal road via existing paved internal road (Samad Vurgun street) within Sumgait Industrial Park, which connect to the main road network serving Sumgait city. These roads are currently used for industrial traffic and by nearby settlements.

No evidence of human habitation or semi-permanent use was recorded during the site visits conducted during the ESIA. During the site visit and consultations with the Sumgait Municipality, the Sumgait City EP, and local community members, it was confirmed that no herding or livestock grazing activities are undertaken within the project site. The site is a

previously developed brownfield area characterised by industrial land uses, with no permanent agricultural activity or supporting infrastructure.

A map illustrating the main human receptors within a 5 km radius of the Project site is presented in [Figure 2-4](#). Human receptors include nearby communities, individual residences, commercial and industrial facilities, and other land users that could potentially experience environmental or socio-economic impacts during construction and operation. Further details on each receptor, including descriptions, coordinates, and photographs, are provided in the ESIA.

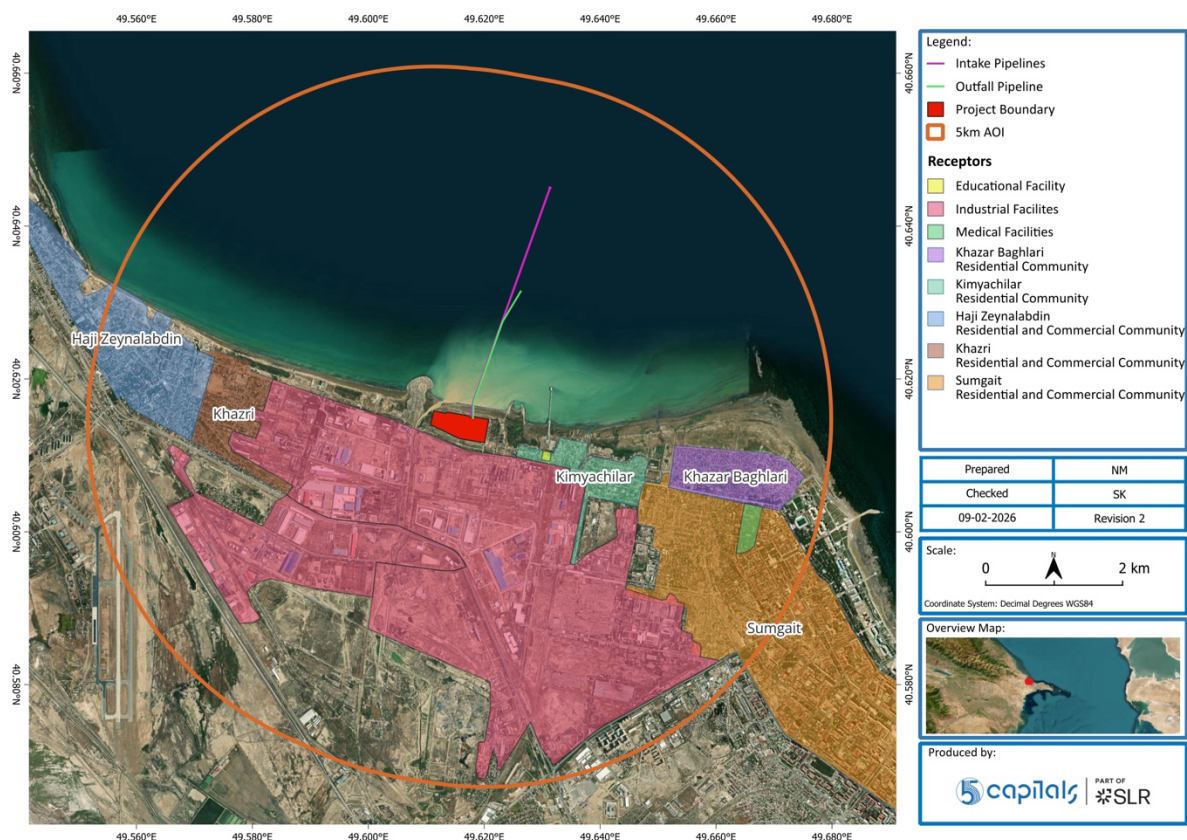


Figure 2-4 Human Receptors Relative to the Project

2.7 Project Timeline

Key milestones under the current project timeline are shown in [Table 2-2](#).

Table 2-2 Anticipated Project Timeline

Milestone	Scheduled Date
Notice to Proceed (NTP) and Financial Close	Q2 2026
Initial Commercial Operation Date (COD)	Q2 2028
Commercial Operation Date (COD)	Q4 2028
Operational Term	25 Years

3.0 Regulations and Requirements

3.1 National Requirements

The Constitution of the Republic of Azerbaijan guarantees citizens' rights to access information related to environmental issues and to seek compensation for any harm to one's health or property as a result of violations of environmental regulations.

The regulatory body within the Cabinet of Azerbaijan responsible for the regulation of the activities within the country that relate to ecology, environmental protection and use of natural resources is the Ministry of Ecology and Natural Resources of the Republic of Azerbaijan (MENR).

The legal, economic and social framework for environmental protection in Azerbaijan is governed by the Environmental Protection Law of 1999 (No. 678-IQ) and its amending Laws (Law No. 1032-IVQD, 932-IVQD, 590-VQD and 553-IVQD).

The rights of people are guaranteed by the Constitution of Azerbaijan under Chapter III 'Basic Rights and Liberties of a Person and Citizen' which lists the main principles of these rights. The Constitution states that "the state guarantees equality of rights and liberties of everyone, irrespective of race, nationality, religion, language, sex, origin, financial position, occupation, political convictions, membership in political parties, trade unions and other public organizations. Rights and liberties of a person, citizen cannot be restricted due to race, nationality, religion, language, sex, origin, conviction, political and social belonging."

Based on the revised Law on EIA (2018), public consultations in the form of hearings should be carried out during the development of EIA study in line with Law of the Republic of Azerbaijan "On Public Participation". The participants should include 'individuals living in the area of intended activity and legal entities operating in that area, as well as with the real estate owner'. The final document of public hearings conducted pursuant to article 4.10 of this Law shall be reviewed in accordance with the Law of the Republic of Azerbaijan on Citizens' Appeals'.

According to Azerbaijan's Law on Public Participation, forms of public participation can be carried out as follows:

- Public council,
- Public discussion,
- Public hearing,
- Studying public opinion,
- Public discussion of draft legal acts,
- Written consultation, and
- Information Disclosure.

3.2 Lenders Requirements

ACWA are seeking finance for the Project. At this stage, the IFC has expressed interest in providing financing support, while the AIIB, ADB, JBIC and NEXI are being considered for potential financial support. IFC, AIIB and ADB, as Development Finance Institutions (DFIs), each apply their own Environmental and Social (E&S) requirements as part of their due diligence processes. The environmental and social requirements of AIIB and ADB are broadly aligned with the IFC Performance Standards, with additional lender-specific requirements addressed through their respective Environmental and Social Frameworks. JBIC and NEXI, as Export Credit Agencies (ECAs), are expected to align with the OECD Common

Approaches, which require compliance with the IFC Performance Standards and the World Bank Group/IFC Environmental, Health, and Safety (EHS) Guidelines. Accordingly, the Project will be developed in consideration of these applicable international standards and lender requirements.

3.2.1 IFC Performance Standards

All of the IFC Performance Standards (PS) include requirements for an amount of stakeholder consultation/engagement (either in the ESIA, or as part of the future ESMS) and therefore the Project will require a level of engagement. In particular, IFC Performance Standard 1 on “Social and Environmental Assessment and Management Systems” describes the stakeholder engagement requirements in more depth. It states the following:

“Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project’s environmental and social impacts. Stakeholder engagement is an on-going process that may involve, in varying degrees, the following elements:

- Stakeholder analysis and planning;
- Disclosure and dissemination of information;
- Consultation and participation;
- Grievance mechanism; and
- On-going reporting to Affected Communities.

The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project’s risks and adverse impacts, and the project’s phase of development.”

The IFC Performance Standards indicate that when Affected Communities are subject to identified risks and adverse impacts from a project, the developer/client will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them. Effective consultation is a two-way process that will:

- Begin early in the process of identification of environmental and social risks and impacts and continue on an on-going basis as risks and impacts arise;
- Be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities;
- Focus inclusive engagement on those directly affected as opposed to those not directly affected;
- Be free of external manipulation, interference, coercion, or intimidation;
- Enable meaningful participation, where applicable; and be documented.

In addition to the IFC Performance Standards, the Project will also align with the OECD Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (OECD Common Approaches), where applicable. The OECD Common Approaches provide a framework for environmental and social risk assessment and due diligence for projects receiving export credit support and are broadly harmonised with the IFC Performance Standards and the World Bank Group Environmental, Health, and Safety (EHS) Guidelines. These approaches reinforce the requirement for robust stakeholder engagement, transparency, and disclosure, ensuring that projects are assessed and implemented in a manner consistent with international good practice.

The OECD Common Approaches complement the IFC PS by promoting consistency in the classification of project risks, the application of environmental and social standards, and the implementation of stakeholder engagement processes. Together with the IFC Performance Standards and the World Bank Group/IFC EHS Guidelines, they form an integrated framework guiding the Project's approach to environmental and social assessment, stakeholder engagement, and impact management.

4.0 Stakeholder Identification & Analysis

Stakeholder engagement is a systematic approach to understanding and involving stakeholders and their concerns in project activities and decision-making processes. It supports the identification of appropriate methods for consultation, information disclosure, and feedback incorporation. The stakeholders identified in this plan include persons or groups that may be directly or indirectly affected by the Project, as well as those that may have interest in the Project and/or those that may influence the Project's outcomes either positively or negatively. Since stakeholder dynamics may change over time, this SEP will be updated to reflect newly identified stakeholders or changes in stakeholder circumstances.

Stakeholders and their interests may change over time, in terms of their level of relevance to the Project and the required level of engagement at different phases. Therefore, this plan will need to be regularly updated as new stakeholders are identified, or if circumstances relating to stakeholders evolve.

4.1 Approach to Stakeholder Identification

In line with good international practice, this SEP ensures that relevant stakeholders are identified, and appropriate engagement methods are proposed.

The stakeholders identified have been classified into the following three categories:

Stakeholders identified have been classified into the following categories:

- **Affected Stakeholders (A)** – individuals or groups who may be affected by one or more of the potential impacts¹ of the project, directly² or indirectly³.
- **Interest-based Stakeholders (I)** – Stakeholders concerned with any of the procedures set by the Project, the Project's beneficiaries, national and international non-governmental organizations, and interested parties of civil society, even if they are not located in the impacted area and are not adversely affected.
- **Decision Making Stakeholders (D)** – entities involved in Project development, financing or oversight, this includes the regulator, the Ministry of Ecology and Natural Resources (MENR).

4.1.1 Vulnerable Groups

Most lenders consider the individuals or groups that may be directly and differentially or disproportionately affected by project impacts because of their vulnerability status. Vulnerability status stems from individual's or group's characteristics such as race, gender, religion, language, ethnicity, and age (including children, youths and the elderly). Vulnerability also stems from other factors including physical or mental disability, literacy, political views or social status, and dependence on natural resources.

¹ The potential environmental and social impacts of the Project have been identified and assessed in the ESIA. These impacts cover air quality, noise, soil and groundwater, marine and terrestrial ecology, landscape and visual impacts, solid waste and wastewater management, socioeconomics, community health, safety and security, human rights, labour and working conditions, and climate-related considerations.

² Directly affected stakeholder and/or groups refers to those who are affected and clearly need on-going attention, taking into consideration other cross-cutting analysis such as vulnerability, project stages, cultural and social context and events, etc.

³ Indirect affected stakeholders refer to individuals, groups, or communities who may not experience direct impacts from the Project. These stakeholders may include neighbouring communities, businesses, or industries that rely on resources or services indirectly impacted by the Project. Their interests, concerns, and perspectives should still be considered by the Project during the planning and implementation stages.

Based on the above and the results of the ESIA phase socioeconomic household surveys and consultations undertaken in communities within the Project AoI, the following groups residing within the communities near the Project site are considered vulnerable:

- Households with a monthly income that is below the national minimum wage of AZN 400.
- Households with female headship.
- Households with one or more members living with physical and/or mental disability.
- Households with one or more chronically ill members.
- Households with child headship.
- Elderly members (aged 50 and above) living without immediate family support.
- Households with Internally Displaced Peoples (IDPs).
- Households with war veterans (Gazi).

Households whose primary or significant source of livelihood is dependent on marine resources, including small-scale fishermen and fishing-dependent households, may also be considered vulnerable where Project-related marine activities have the potential to affect access to fishing areas, fishing productivity, or income sources. Vulnerability screening will consider dependency on fishing activities, household income diversification, availability of alternative livelihood opportunities, and the capacity of affected households to adapt to temporary or permanent changes.

4.1.2 Targeted Engagement Approach for Vulnerable Groups

The Project recognises that certain individuals and groups may experience project-related risks and impacts differently due to their social, economic, physical, or institutional vulnerabilities. In accordance with lender requirements and international good practice, stakeholder engagement will therefore adopt a differentiated approach to ensure that vulnerable and disadvantaged groups have equitable opportunities to access project information, participate in consultations, raise concerns, and benefit from project opportunities.

The Project will not rely solely on general public consultations to engage vulnerable groups. Targeted engagement activities will be undertaken using culturally appropriate approaches, including smaller group discussions, individual consultations, engagement through trusted community representatives, and accessible communication methods where required.

The Project will maintain a vulnerability-sensitive stakeholder engagement approach throughout the Project lifecycle. The identification of vulnerable groups will be updated during construction and operation based on stakeholder feedback, grievance trends, socioeconomic changes, and consultations with local authorities and community representatives.

The following targeted engagement measures will be implemented for identified vulnerable groups:

Table 4-1 Vulnerable Groups Identification and Targeted Stakeholder Engagement Measures

Vulnerable Group	Potential Vulnerability / Project Related Risks	Targeted Engagement Measures
Internally Displaced Persons (IDPs)	IDPs may have historical displacement-related vulnerabilities, including insecurity of tenure, limited access to formal information channels, reduced social networks, economic constraints, and potential challenges in accessing project benefits and grievance mechanisms.	• Conduct dedicated consultations with IDP households and relevant community representatives to understand their specific concerns, tenure arrangements, livelihood conditions, and access to services. • Coordinate with local authorities responsible for IDP affairs to identify affected or vulnerable IDP households and ensure appropriate communication channels. • Ensure project information, employment opportunities, and grievance mechanisms are communicated through accessible channels, including local authorities and community representatives. • Monitor whether IDP households experience disproportionate impacts from construction activities, traffic, environmental changes, or restrictions on access.
Female-headed households and women in nearby communities	Women may face barriers in accessing consultation processes due to household responsibilities, social norms, mobility constraints, or limited participation in public meetings. Women may also face increased risks associated with labour influx, including GBV, SEA/SH, and harassment.	• Conduct separate women-only consultations where appropriate and ensure engagement is facilitated by trained female representatives/social specialists. • Schedule meetings at times and locations accessible to women, considering household responsibilities and mobility constraints. • Provide confidential and survivor-centred channels for reporting GBV/SEA/SH concerns, including anonymous grievance options where appropriate. • Disclose information on worker Code of Conduct, community protection measures, and available support services. • Monitor women's participation in consultations through gender-disaggregated attendance records.

Vulnerable Group	Potential Vulnerability / Project Related Risks	Targeted Engagement Measures
Persons with disabilities and households with disabled members	Persons with disabilities may experience barriers in accessing project information, consultations, employment opportunities, or grievance mechanisms due to physical, communication, or social constraints.	• Ensure consultation venues are physically accessible where possible. • Provide information in accessible formats and explain project information verbally where required. • Engage with disability organisations and local representatives to understand specific needs. • Ensure grievance mechanisms provide accessible submission options, including assisted registration of grievances.
Elderly persons living without family support	Elderly individuals may experience reduced mobility, limited access to digital communication channels, and difficulty participating in conventional consultation processes.	• Conduct targeted household-level consultations where required. • Use community representatives and local authorities to facilitate communication. • Ensure grievance mechanisms allow verbal submission of concerns through designated representatives.
Low-income households	Households with limited income may have reduced ability to absorb temporary disruptions, increased costs, or changes associated with construction activities.	• Identify households requiring additional communication support during consultations. • Provide clear information on employment opportunities, project-related restrictions, and mitigation measures. • Monitor whether project activities create disproportionate economic impacts.
Households with chronically ill members	Such households may have increased sensitivity to environmental changes, access restrictions, noise, dust, traffic, and emergency situations.	• Include health-related concerns during community consultations. • Provide advance notification of activities that may affect access or local conditions. • Coordinate with local authorities regarding emergency preparedness and communication needs.

Vulnerable Group	Potential Vulnerability / Project Related Risks	Targeted Engagement Measures
Fishermen and marine resource-dependent households	Fishermen may depend on marine resources for income and may be vulnerable to potential changes in fishing access, marine environmental conditions, construction activities, or perceived impacts on fish availability.	• Conduct targeted livelihood consultations with fishermen, fishing associations, and marine resource users. • Document fishing patterns, seasonal activities, fishing locations, and dependency on affected marine areas. • Provide information on marine construction activities, exclusion zones, monitoring results, and mitigation measures. • Establish communication channels for fishermen to report concerns related to access restrictions or perceived impacts on fisheries. • Consider livelihood-related mitigation measures if impacts are identified through monitoring.
Veterans and vulnerable social groups	Veterans and socially disadvantaged groups may require specific communication approaches to ensure their concerns are captured.	• Engage through relevant community organisations and local authorities. • Ensure access to project information and grievance mechanisms. • Consider their concerns during community engagement planning.

Table 4-2 presents the identified stakeholder groups, relevant stakeholder bodies, and their relationship to the Project based on their potential to be affected by, interested in, or involved in decision-making related to the Caspian Sea Desalination Plant.

Table 4-2 Stakeholder Identification

Stakeholder Group	Stakeholder Bodies	Relevance to project: affected (A), Interest-based (I), or decision maker (D)
Directly Affected Stakeholders	Workers of firms located in Sumgait Chemical Industrial Plant	A: May be directly affected by cumulative environmental risks, shared infrastructure constraints, traffic, emergency response arrangements, and occupational health and safety considerations associated with construction and operation of the Project within the industrial park.
	Communities near the project site: • Haji Zeynalabdin • Khazar Baghlari • Khazri • Kimyachilar	A: Local communities may be directly affected by the Project E&S impacts, including those related to worker influx, community health & safety, and noise etc.
	Vulnerable groups in the communities near the Project site (meeting the criteria outlined above)	A: These groups may face disproportionate risks and impacts from the Project, including worker influx, GBVH and SEAH, ability to benefit from the Project opportunities, discrimination.
Indirectly Affected Stakeholders	Fishermen and marine resource users located within and adjacent to the Project Area of Influence	A: Fishermen and marine resource users may have an interest in the Project due to the associated marine infrastructure. The ESIA assessment has concluded that no significant impacts on fishing activities, access to fishing areas, or fishing-dependent livelihoods are anticipated. Engagement will be undertaken to disclose Project information, communicate assessment findings, understand existing fishing practices, and address any concerns related to marine activities during construction and operation.
	Wider Population (Communities beyond the immediate Project Aol)	A: May be indirectly affected through cumulative impacts, increased demand on public services, traffic movements, or changes in marine and coastal use patterns.
	Sumgait City Executive Power	

Stakeholder Group	Stakeholder Bodies	Relevance to project: affected (A), Interest-based (I), or decision maker (D)
Local Government Authorities	Sumgait Municipality	D: The land allocated to the project is found within these jurisdictions. Additionally, these government bodies will support the project in organising consultation and disclosure meetings and providing applicable E&S data.
	Haji Zeynalabdin Tagiyev Municipality	D: This body will support the project in organising consultation and disclosure meetings and providing applicable E&S data.
	Jorat Municipality	D: This body will support the project in organising consultation and disclosure meetings and providing applicable E&S data.
	Sumgait city Housing and Communal Management Union	I: These departments fall under and report to Sumgait City Executive Power.
	Sumgait city Water Department	
	Sumgait city Energy Supply and Sales Department	
	Sumgait city Gas Exploitation Area	
	Gender Commission representative in the Local Municipalities	I: Will potentially be interested in the social risks and impacts of the Project on nearby communities. These include issues such as GBVH/SEA/SH, human rights, employment opportunities, community health & safety.
	Sumgait police station and police representatives in local communities	I: This stakeholder will be potentially interested in the safety and security of nearby communities and any safety risks from the project.
Ministries & Government Agencies	Ministry of Ecology and Natural Resources (MENR)	D: Will be responsible for approving the national EIA and ensuring the project construction and operational phases comply with the Azerbaijan requirements.
	Economic Zones Development Agency (EZDA), Ministry of Economy	I: Has a direct oversight and coordination role in Sumgait Industrial Park in addressing cumulative issues and impacts affecting the Project, i.e. emergency response.
	Azerbaijan State Water Resources Agency (ADSEA)	I: Will be interested in the Project's intake and outfall pipeline design of the Project, including brine discharge arrangements, as well as the associated social and environmental impacts related to water quality.
	Fisheries and Aquaculture Centre - Aquaculture Organization Department	I: Will be interested in the impact of the Project's intake, brine discharge and construction activities on fish stocks and spawning grounds, aquaculture resources, and fishing livelihoods.

Stakeholder Group	Stakeholder Bodies	Relevance to project: affected (A), Interest-based (I), or decision maker (D)
	State Labour Inspectorate Service, Ministry of Labour and Social Protection of Population of the Republic of Azerbaijan	I: Will be potentially interested in the labour and working conditions, workers' occupational health & safety, and compliance of national labour legislation throughout the construction and operation of the Project.
	State Border Service	I: This stakeholder ensures maritime security in the Azerbaijani sector of the Caspian Sea and will play a role in providing information on fishing permits, quotas, protected species measures near the Project area.
	Sumgait Regional Center, Ministry of Emergency Situations of the Republic of Azerbaijan	D: Responsible for emergency preparedness, industrial accident response, and coordination of disaster risk management within the Project area.
	Ministry of Culture and Tourism of Republic of Azerbaijan	I: Oversees the protection of cultural heritage and archaeological sites and features of Azerbaijan. It plays a key role in providing information on the location of cultural heritage sites near the Project site.
	Institute of Archaeology and Ethnography, Azerbaijan National Academy of Sciences (ANAS)	I: Mandated to protect archaeological and cultural heritage, with a role of confirming the presence of cultural heritage resources that may be directly or indirectly affected by construction activities associated with the Project.
NGOs/PUs	Public Union of Disabled	I: Will potentially be interested in the Project's environmental and social risks and impacts to local communities and vulnerable groups including the identified mitigation and monitoring measures.
	Veterans and Martyrs' Families "Ruzigar" Society	
	Bankwatch	I: Interested how the Project will manage the social and environmental impacts. Has high international influence which can influence public perception at a global scale.
Media	Regional and local mass media	I: Will potentially be involved in reporting and disseminating information about the Project during the Project ESIA disclosure.
Financial Institutions	Lenders – IFC, AIIB, JBIC, NEXI	D: Will provide the financing to the project.

4.2 Stakeholder Analysis

Following the identification of stakeholders, a stakeholder analysis exercise has been undertaken to determine the level of priority and type of engagement appropriate for each stakeholder and/or stakeholder group. The purpose of the stakeholder analysis is to understand the extent of influence and degree of impact that each stakeholder has, or experiences in relation to the Project. This allows for the development of a targeted and proportionate engagement strategy consistent with the lenders' requirements.

4.2.1 Assessing Stakeholder Impact

Stakeholder impact is defined as the extent to which the interests of a stakeholder are affected by a project. These impacts can be either positive or negative and lead to either an improvement or deterioration in their conditions. For the purposes of this exercise, all stakeholders will be assigned into one of three impact significance categories to help inform the stakeholder mapping process: high, medium, and low. These terms are defined as follows:

- **High Impact**
 - The Project potentially has a significant beneficial or adverse impact on the interests of a stakeholder. The impact is generally considered to be high when the number of people affected is large (e.g. greater than 50), the duration of the impact is over the long-term (perceived for over a year), extends over a large area (i.e. regional, international and transboundary), and/or the stakeholders are highly sensitive to the impact.
- **Medium Impact**
 - The Project potentially has a moderate beneficial or adverse impact on the interests of a stakeholder. The impact is considered to be medium when a small number of people are affected (e.g. greater than 10, less than 50), the duration of the impact is over the medium-term (perceived for a few months), is experienced on a regional scale, and/or the affected stakeholders are moderately sensitive to the impacts.
- **Low Impact**
 - The Project potentially has a minor beneficial or adverse impact on the interests of a stakeholder. The impact is minor when the number of people affected is relatively small (e.g. less than 10), the impact is temporary, short term (perceived from few days and up to 2-3 months), or can be fully mitigated, scale of impact is local or on-site, and/or the stakeholders are not considered sensitive to the impact.

4.2.2 Assessing Stakeholder Influence

Influence in the stakeholder mapping context refers to the extent to which the stakeholder or group of stakeholders is/are able to influence the Project (including impacts to the Project parties and Sponsor's reputations) through affecting aspects such as design and permitting decisions. Influence may be formal or informal, for example, informal influence through a personal connection to a political or formal influence through the issue of government approvals and determinations.

All stakeholders will be assigned to one of three influence categories to help inform the stakeholder mapping process: high, medium and low. This categorisation is based on an analysis of three key elements of influence: power, capacity and legitimacy.

These categories are by their nature subjective. However, through analysis, it is possible to establish the following broad definitions and classifications of influence:

- **High Influence**

- The stakeholder or group is considered highly influential when it has the capacity to halt the Project or significantly influence Acwa's reputation, such as powerful civil society groups and individuals who can affect Project-related decision-making.

- **Medium Influence**

- The stakeholder or group has a moderate capacity to exert influence over the Project or Acwa's reputation, such as a lobby group, small associations, national, and international NGOs.

- **Low Influence**

- The stakeholder or group is isolated and has limited capacity to exert influence over the Project or Acwa's reputation. For example, stakeholders who may lack the institutional legitimacy or social capacity to affect the Project such as elderly, children, vulnerable, and disadvantaged members of the community. Isolated communities that are geographically distant are considered to have low influence, but a group of these communities connected through social media or associations can be considered as having moderate influence.

4.2.3 Levels of Engagement

There are five levels of engagement ranging from basic disclosure of information through to on-going, in-depth engagement and discussion (classified from Tier 1 to Tier 5). Each level of engagement identified helps to capture the appropriate engagement needs of individual stakeholders. A description of each level of engagement is provided below:

- **Information Disclosure (Tier 5)**

- Stakeholders within this category typically are not required to be presented with feedback mechanisms and are unlikely to be involved in project decision making. Information is provided to these stakeholders in order to give them basic awareness of the Project and help avoid escalation of any concerns they have.

- **Opportunity to Comment (Tier 4)**

- Stakeholders within this category typically have a low-to-medium impact from the project, and influence over, the project. While holding little decision-making power individually, collective opinion within this category can be highly influential and as such it is important to consider this opinion.

- **Informed Engagement (Tier 3)**

- Stakeholders within this category would generally have a low-level impact from, but high-level ability to influence, the project. Such stakeholders should be kept informed about the projects development as they may have much potential to affect project outcomes significantly.

- **Focused Engagement (Tier 2)**

- Stakeholders within this category are recognised as potentially being moderately impacted by the project, with low – medium influence levels. As such, they are typically provided with detailed information and the opportunity to respond regarding specific aspects of the project about which they are concerned.

- **In-depth Engagement (Tier 1)**

- Consultation with stakeholders within this category is for those likely to be highly impacted by the project or considered to be critical in terms of the project success

and obtaining 'social license' to operate. Stakeholder engagement with this group would typically be in-detail and on-going as the project develops.

Table 4-3 presents an assessment of each stakeholder and/or stakeholder group in terms of their relationship and potential impact to, and from the Project, as well as their influence over outcomes. This assessment informs the appropriate level of engagement (Tier 1-5) required to ensure meaningful engagement, effective risk management, and alignment with lenders and regulatory expectations.

Table 4-3 Stakeholder Impact – Influence Matrix and Engagement Tier

Stakeholder Group	Impact	Influence	Engagement Tier	Rationale
Directly Affected Stakeholders				
Workers of firms located in Sumgait Chemical Industrial Plant	Medium	Low	Tier 2	Workers may experience indirect impacts such as traffic, safety risks, and operational disturbances during construction. Their influence over project decisions is limited.
Communities near the project site - Haji Zeynalabdin - Khazar Baghlari - Khazri - Kimyachilar	High	Medium	Tier 1	These communities are located within the immediate Project AoI and may experience impacts related to noise, traffic, environmental changes, or employment opportunities. Their acceptance is critical for maintaining social licence.
Vulnerable groups in the communities near the Project site	High	Low	Tier 1	Vulnerable groups which include the IDPs may be disproportionately affected by project impacts and require dedicated and inclusive engagement despite their limited influence.
Sumgait Municipality	Medium	Medium	Tier 2	Responsible for local governance and community-level coordination relevant to project implementation.
Haji Zeynalabdin Tagiyev Municipality	Medium	Medium	Tier 2	Represents one of the municipalities closest to the Project area and plays a role in community liaison and local oversight.
Jorat Municipality	Medium	Medium	Tier 2	May represent residents potentially affected by project activities in the wider AoI.
Sumgait city Water Department	Medium	High	Tier 3	Responsible for water supply infrastructure that may be linked to project operations or utilities.
Sumgait city Energy Supply and Sales Department	Medium	High	Tier 3	Relevant to energy supply and distribution infrastructure required during project implementation.
Sumgait city Gas Exploitation Area	Medium	Medium	Tier 2	Responsible for gas distribution infrastructure potentially interacting with project facilities.

Stakeholder Group	Impact	Influence	Engagement Tier	Rationale
Gender Commission representative in the Local Municipalities	Medium	Medium	Tier 2	Ensures gender considerations are integrated into project planning and community engagement processes.
Indirectly Affected Stakeholders				
Fishermen and marine resource users located within and adjacent to the Project Area of Influence	Medium	Low	Tier 1	Fishermen and marine resource users have been identified as relevant stakeholders due to their use of marine resources and proximity to the Project area. However, targeted engagement will be undertaken to understand existing fishing practices, address any concerns, and maintain communication regarding marine activities during construction and operation.
Wider Population (Communities beyond the immediate Project Aol)	Low	Low	Tier 5	These stakeholders have limited direct interaction with the Project and are unlikely to experience significant impacts. Basic information disclosure is generally sufficient.
Sumgait City Executive Power	Medium	High	Tier 3	Holds administrative authority over local development and may influence project implementation through local approvals and coordination.
Sumgait city Housing and Communal Management Union	Medium	Medium	Tier 2	Responsible for municipal infrastructure and services potentially interacting with project utilities and construction works.
Sumgait police station and police representatives in local communities	Medium	High	Tier 3	Responsible for maintaining security, public order, and traffic management associated with project activities.
Ministry of Ecology and Natural Resources (MENR)	Medium	High	Tier 3	Key regulatory authority responsible for environmental oversight, compliance, and monitoring.
Economic Zones Development Agency (EZDA), Ministry of Economy	High	High	Tier 1	Directly responsible for the management of the Sumgait Chemical Industrial Park and plays a key role in project approvals and coordination.
Azerbaijan State Water Resources Agency (ADSEA)	Medium	High	Tier 3	Responsible for water resource management and permitting related to water use.
Fisheries and Aquaculture Centre - Aquaculture Organization Department	Medium	Medium	Tier 2	Responsible for fisheries management and potential impacts to aquatic resources.

Stakeholder Group	Impact	Influence	Engagement Tier	Rationale
State Labour Inspectorate Service, Ministry of Labour and Social Protection of Population of the Republic of Azerbaijan	Medium	High	Tier 3	Responsible for labour conditions and occupational safety compliance relevant to project workforce.
State Border Service	Low	Medium	Tier 4	May have oversight responsibilities depending on site proximity to restricted areas but limited direct involvement in project operations.
Sumgait Regional Center, Ministry of Emergency Situations of the Republic of Azerbaijan	Medium	High	Tier 3	Responsible for emergency preparedness and response coordination.
Ministry of Culture and Tourism of Republic of Azerbaijan	Low	Medium	Tier 4	Relevant only if cultural heritage resources are identified during project implementation.
Institute of Archaeology and Ethnography, Azerbaijan National Academy of Sciences (ANAS)	Low	Medium	Tier 4	May be involved if archaeological resources are discovered during construction works.
Public Union of Disabled	Medium	Low	Tier 2	Represents interests of persons with disabilities who may require inclusive consultation and accessible information.
Veterans and Martyrs' Families "Ruzigar" Society	Low	Medium	Tier 4	Community-based organisation with social influence but limited direct project impact.
Bankwatch	Low	High	Tier 3	International NGO capable of influencing lender perception and project reputation despite limited direct project impact.
Regional and local mass media	Low	High	Tier 3	Media can significantly influence public perception and project reputation.
Lenders – IFC, JBIC, NEXI	High	High	Tier 1	Key project financiers with strong influence over project standards, compliance, and implementation requirements.

5.0 Project Related Engagement

This section provides an overview of the stakeholder engagement undertaken to date during the ESIA phase. The ESIA phase consultations were undertaken in December 2025 and January 2026 and a tabulated summary of the conducted engagement is presented in Appendix E.

5.1 ESIA Stage Consultations

During the ESIA stage, stakeholder consultations were conducted in accordance with the stakeholder identification provided in Chapter 4. Prior to holding public consultation meetings in communities near the Project site, consultations with state and local authorities were consulted through phone calls, formal correspondence, and key informant interviews (KIIs). The objective of these engagements was to gather secondary data and obtain permission and support during the planning of public meetings. Project information brochures were distributed to stakeholders during the public meetings, KIIs, focus group discussions (FGDS), and through door-to-door consultations.

A summary of consultations is provided in Appendix E.

6.0 Stakeholder Engagement Programme

This section outlines the forward-looking programme for stakeholder engagement during construction and operations. This includes specific actions with the scope of information to be disclosed, the formats for its dissemination, the communication methods to be applied, and the consultation approaches designated for each stakeholder and/or stakeholder group identified in the preceding sections.

6.1 Engagement Methods

6.1.1 Key Principles for Engagement

The following measures will be considered and implemented for all consultation and engagement processes under the SEP:

- Engagement will be inclusive and not be selective (e.g. avoiding stakeholders who may not be supportive of the project).
- Arrangements will be made to ensure that engagement sessions are accessible to the target stakeholder(s).
- Engagement sessions will be conducted in a culturally appropriate and sensitive manner for the relevant topic or target stakeholder(s).
- All engagement sessions will ensure confidentiality of information and consent from stakeholders to take part.
- Participants will be informed about the purpose of the consultation and how the information gathered would be used.
- Consent to signing attendance sheets (if applicable) will be sought. Participants will be informed about how this information will be used and to be given the option not to have their names disclosed.
- If meetings are to be recorded, participants will be informed in advance and their consent obtained. They will also be told how the recordings will be used and offered the option to decline being recorded.
- At the start of the meetings stakeholders will be encouraged to express their opinions without fear of retaliation.
- Engagement will be free of manipulation and coercion.
- If required, consultations for sensitive groups such as women will be conducted separately (and by a female social specialist) to allow them to voice their concerns and give feedback without fear of retaliation.
- Allegations of reprisals will be taken seriously, investigated and addressed. Personal information will be kept confidential.
- Participants will be given the opportunity to provide written feedback at the end of the meetings if they are not comfortable sharing their views verbally.
- As applicable for documents or minutes that may be made public, personal or identifiable information in documents will be redacted.

6.1.2 Stakeholder Engagement Methods

Based on the stakeholder groups identified in, a combination of the following methods will be used as best suited to the stakeholder(s), on a case-by-case basis.

- **Letters, Phone calls and email** – These channels are suitable for engaging decision makers and interest-based stakeholders, primarily to notify them of the engagement and disclosure mechanisms.
- **Bilateral meetings** – Suitable to engage impacted and interest-based stakeholders as identified, to allow these stakeholders provide their views and opinions, and to notify them of the engagement and disclosure mechanisms.
- **Meetings with community leaders** – These can be informal meetings held with community leaders to foster positive relations and promptly address any concerns raised by the communities.
- **Online** – This method is useful for Interest-based Stakeholders for dissemination of broader information. For example, the engagement and disclosure mechanisms for the ESIA package. Similar information will also be made available on the websites of the lenders.
- **Training** – Dedicated training sessions for the workforce covering topics such as occupational health and safety, the Project's grievance mechanism committee, gender-based violence and related issues.

6.1.3 Stakeholder Engagement for Associated Facilities (Water Pipeline Corridor)

In accordance with the lender requirements and international good practice, stakeholder engagement for the Project extends to Associated Facilities that are directly and significantly related to the Project and are necessary for its operation.

The Project includes an approximately 15 km treated water pipeline connecting the desalination plant to the end-user infrastructure. Although the pipeline forms part of an Associated Facility, it may generate temporary environmental and social impacts during construction, including temporary disruption of land access, traffic, utility crossings, construction nuisance, and temporary restrictions on adjacent land users. The exact alignment and detailed engineering design will determine the extent of any temporary or permanent land requirements.

At the time of preparation of this SEP, the preliminary engineering design indicates that the pipeline will, to the extent practicable, be routed within existing road corridors, utility corridors and industrial land to minimise environmental and social impacts. Consequently:

- no physical displacement is currently anticipated;
- permanent land acquisition is not currently expected, subject to final detailed design;
- temporary land occupation, temporary access restrictions and construction easements may be required in certain locations;
- temporary use of existing public roads and access tracks by construction vehicles is anticipated.

Should detailed design identify any permanent land acquisition, economic displacement, restriction of access or impacts on private land users, these impacts will be assessed in accordance with relevant lender requirements.

6.1.4 Measures to Avoid Reprisal

In line with the requirements of IFC Performance Standard 1 (PS1), the Project will implement clear measures to ensure that stakeholders can provide feedback, express opinions, and raise concerns without fear of retaliation. Preventing reprisals such as threats, intimidation,

harassment, or violence is essential to uphold meaningful and inclusive engagement. The following measures will be applied throughout the Project's stakeholder engagement process:

- Confidential and Accessible Grievance Mechanism
 - A project-level grievance mechanism will be available to all stakeholders, allowing for concerns to be raised safely, confidentially, and anonymously if preferred. This process will be clearly communicated to stakeholders and accessible in local languages.
- Non-Retaliation Commitment
 - The Project parties will communicate and enforce a strict policy of non-retaliation, ensuring that stakeholders who participate in consultations or raise grievances will not face negative consequences.
- Safe Engagement Spaces
 - Meetings and engagement sessions will be conducted in neutral, inclusive, and safe environments to minimize the risk of undue pressure or coercion.
- Capacity Building and Training
 - Project staff will be trained on IFC PS1 requirements, the principle of non-retaliation, and respectful engagement practices.
- Monitoring and Oversight
 - Stakeholder feedback will be monitored on an on-going basis and any indications of intimidation or reprisals will be investigated and addressed promptly with corrective actions.
- Transparent Communication
 - Stakeholders will be informed that their feedback is valued, that it will be considered in project decision-making and that their participation is entirely voluntary.

6.1.5 Risk-Based Stakeholder Engagement Approach and Impact-Stakeholder Engagement Matrix

The Project's stakeholder engagement programme has been designed based on the identification of key environmental and social risks and impacts associated with the Project lifecycle. In accordance with the requirements of AIIB Environmental and Social Framework (ESF) and IFC PS 1, and international good practice, engagement activities will be proportionate to the nature, scale, and significance of potential risks and impacts.

The Project will adopt a risk-based engagement approach whereby stakeholders are prioritised according to their potential exposure to Project impacts, their ability to influence Project outcomes, and their vulnerability to adverse effects. Particular attention will be given to potentially affected communities, livelihood groups, vulnerable groups, workers, and stakeholders associated with marine resource use.

The engagement programme will focus on proactive disclosure of Project-related risks, consultation on mitigation measures, incorporation of stakeholder feedback into Project decision-making, and continuous communication throughout construction and operation. High-risk topics, including marine environmental impacts, brine discharge management, fisheries and livelihood impacts, labour influx, worker-community interactions, gender-based violence (GBV), sexual exploitation, abuse and harassment (SEA/SH), community health and safety (CHSS), and emergency preparedness, will receive targeted engagement.

The Project will implement targeted engagement measures for vulnerable and disadvantaged groups identified through the ESIA process. Engagement activities will be tailored to address specific barriers faced by different groups, including access constraints, limited representation in public meetings, language or literacy barriers, social exclusion, livelihood dependency, and concerns related to safety and security. Particular attention will be given to IDPs, female-headed households, women and girls, persons with disabilities, elderly persons without family support, low-income households, and fishermen dependent on marine resources. The effectiveness of targeted engagement will be monitored through participation records, stakeholder feedback, grievance trends, and periodic review of vulnerability conditions.

Table 6-2 on impact-stakeholder-engagement matrix establishes the linkage between identified risks, potentially affected stakeholders, stakeholder concerns, and the proposed engagement response.

6.1.6 Targeted Engagement Approach for Fishermen and Marine Resource Users

Considering the potential interaction between Project marine infrastructure and fishing activities, fishermen and marine resource users will be treated as potentially affected rights holders requiring targeted and sustained engagement throughout the Project lifecycle. Engagement will extend beyond information disclosure and will include participatory consultation, livelihood assessment, monitoring of potential impacts, and involvement in the development of practical mitigation measures.

The Project Company will undertake early engagement with fishermen and relevant fisheries authorities to establish baseline information on fishing practices, fishing locations, seasonal variations, navigation routes, fishing intensity, and dependency on marine resources. This information will inform marine construction planning, vessel movement arrangements, exclusion zone management, and measures to minimise disruption to fishing activities.

6.1.7 Coordination Platform for Cumulative Impact Management within Sumgait Chemical Industrial Park

The Project is located within the existing Sumgait Chemical Industrial Park, which comprises multiple industrial facilities and associated infrastructure users. Given the concentration of industrial activities within the Project area, certain environmental and social risks may arise from cumulative activities, including air emissions, water resource use, wastewater management, traffic movements, emergency response preparedness, industrial safety risks, and shared infrastructure constraints.

The Project will establish and participate in a stakeholder coordination platform to facilitate information sharing, coordination of mitigation measures, and management of cumulative environmental and social risks among relevant stakeholders.

The coordination platform will provide a structured mechanism for engagement between the Project Company, Sumgait Chemical Industrial Park management authority, neighbouring industrial operators, relevant government authorities, utility providers, and emergency response agencies. The platform will support proactive identification of shared risks, coordination of mitigation measures, and timely communication of issues that may affect multiple stakeholders.

The coordination platform will include, but not be limited to, the following stakeholders:

Table 6-1 Key Stakeholders for Cumulative Environmental and Social Risk Coordination within Sumgait Chemical Industrial Park

STAKEHOLDER CATEGORY	STAKEHOLDERS
Industrial Park Management	Economic Zones Development Agency (EZDA), Ministry of Economy
Neighbouring Industrial Facilities	Existing industries operating within Sumgait Chemical Industrial Park
Government Authorities	Ministry of Ecology and Natural Resources (MENR), Ministry of Emergency Situations, State Labour Inspectorate Service
Utility and Infrastructure Providers	Sumgait City Water Department, Energy Supply and Sales Department, Gas Exploitation Area, Housing and Communal Management Union
Emergency and Security Services	Sumgait Regional Centre of the Ministry of Emergency Situations, Police representatives
Project Parties	Project Company, EPC Contractor (during construction), O&M Company (during operation)

The coordination platform will undertake the following activities:

- Periodic coordination meetings to discuss cumulative environmental and social risks, upcoming activities, and potential interfaces between industrial facilities;
- Sharing relevant information on planned construction and operational activities that may affect neighbouring facilities or communities;
- Coordination of emergency preparedness and response arrangements, including communication protocols, emergency drills, and incident notification procedures;
- Discussion of shared infrastructure issues, including traffic management, utility availability, water supply, wastewater management, and access arrangements;
- Review of environmental monitoring trends where relevant, including air quality, water quality, and other parameters associated with cumulative impacts;
- Identification of corrective actions and responsibilities where cumulative impacts or shared risks are identified;
- Maintaining records of meetings, decisions, action items, and follow-up measures.

During construction, the platform will meet at least quarterly, or more frequently during periods of intensive construction activity or when significant interface risks are identified. During operation, meetings will be conducted at least annually, or as required based on operational risks, monitoring results, incidents, or stakeholder concerns.

The Project Company will maintain a stakeholder coordination register documenting participants, key discussion points, identified risks, agreed actions, responsible parties, and completion status. Issues that cannot be resolved through the coordination platform will be escalated through the Project grievance mechanism or relevant regulatory channels.

The stakeholder engagement programme has been developed based on the key environmental and social risks and impacts identified for the Project during the construction and operational phases. In accordance with the requirements of the lender requirements on Stakeholder Engagement and Information Disclosure and international good practice, stakeholder engagement will be proportionate to the nature, scale, and significance of potential risks and impacts. The following matrix establishes the linkage between the key environmental and social risks, potentially affected stakeholders, anticipated concerns, and the corresponding engagement measures.

Table 6-2 Risk-Based Stakeholder Engagement Matrix

Key E&S Risk / Impact	Potentially Affected Stakeholders / Rights Holders	Potential Stakeholder Concerns and Issues	Targeted Engagement Strategy and Response Measures	Project Phase	Responsible Party
Marine ecology impacts including impacts from seawater intake, marine construction activities, underwater noise, sediment disturbance and operational activities	Fishermen operating within the Project Area of Influence, fishing associations, coastal communities; marine resource users, environmental NGOs, relevant marine authorities	Concerns regarding impacts on fish populations, fishing grounds, marine biodiversity, access restrictions, changes in fishing practices and long-term impacts on livelihoods	Conduct detailed consultations with fishermen and fishing-dependent households to document fishing practices, fishing grounds, seasonal patterns, navigation routes and livelihood dependency. Engage fishermen in the review of marine construction schedules, vessel movement arrangements, exclusion zone management and mitigation measures. Establish livelihood monitoring indicators and maintain communication channels throughout construction and operation.	• Prior to construction. • During marine construction activities. • Periodic consultations during operations	Project Company / ESIA Consultant
Brine discharge and potential impacts on marine water quality and aquatic ecosystems	Fishermen, nearby coastal communities, marine environmental authorities, NGOs, scientific institutions	Concerns regarding increased salinity, impacts on fisheries, marine organisms, cumulative impacts with existing industrial activities and effectiveness	Disclose information on brine dispersion modelling, discharge characteristics, monitoring results and adaptive management measures. Engage stakeholders through technical briefings and community-level consultations using non-technical information materials.	• Before commissioning. • During operation through monitoring updates	Project Company

Key E&S Risk / Impact	Potentially Affected Stakeholders / Rights Holders	Potential Stakeholder Concerns and Issues	Targeted Engagement Strategy and Response Measures	Project Phase	Responsible Party
		of discharge controls	Establish mechanisms for reporting concerns related to marine impacts.		
Community Health and Safety (CHSS) risks including construction traffic, marine activities, emergency events, occupational interfaces and accidental releases	Nearby communities (Haji Zeynalabdin, Khazar Baghlari, Khazri, Kimyachilar), road users, local authorities, emergency services	Concerns regarding increased traffic, safety risks, emergency preparedness, construction disturbance, access restrictions and potential impacts on daily activities	Implement community health and safety awareness sessions, disclose construction schedules, communicate emergency response procedures, provide contact points for reporting concerns and coordinate with municipalities and emergency services. Particular attention will be given to vulnerable households and persons requiring additional support.	• Prior to construction. • Throughout construction. • Annually during operations or following significant changes/incidents	Project Company / EPC Contractor / O&M Company
Labour influx and worker-community interactions	Nearby communities; local authorities, workers, vulnerable groups including women and children, community leaders	Concerns regarding increased pressure on local services, worker behaviour, social disruption, communicable diseases and community-worker conflicts	Provide information on workforce arrangements, worker accommodation, code of conduct requirements and community protection measures. Conduct awareness sessions on worker behaviour, communicable disease prevention, GBV/SEA/SH prevention and reporting mechanisms. Monitor community concerns through the GRM and stakeholder feedback channels.	• Prior to workforce mobilisation. • During peak construction. • Periodically throughout construction	Project Company / EPC Contractor
Gender-Based Violence (GBV), Sexual Exploitation, Abuse and Harassment (SEA/SH) risks associated with	Women and girls in nearby communities, female workers, vulnerable households,	Concerns regarding harassment, inappropriate worker behaviour, lack of confidential reporting	Conduct confidential and culturally appropriate consultations with women and vulnerable groups. Ensure separate engagement sessions where required and facilitated by appropriately trained	Before workforce mobilisation, throughout construction, refresher	Project Company / EPC Contractor / O&M Company

Key E&S Risk / Impact	Potentially Affected Stakeholders / Rights Holders	Potential Stakeholder Concerns and Issues	Targeted Engagement Strategy and Response Measures	Project Phase	Responsible Party
workforce presence and community interaction	community organisations, local authorities	mechanisms and fear of retaliation	personnel. Disclose confidential reporting channels, survivor-centred grievance procedures and non-retaliation commitments. Provide workforce training on GBV/SEA/SH prevention and Code of Conduct obligations.	engagement during operations	
Risks of disproportionate impacts on vulnerable groups, including IDPs, female-headed households, elderly persons, persons with disabilities, and low-income households	Vulnerable households within nearby communities, IDP households, disability organisations, community representatives, local authorities	Limited access to project information, difficulty participating in consultations, barriers to employment opportunities, concerns regarding discrimination or exclusion	Conduct targeted consultations through appropriate representatives and smaller group meetings. Provide accessible information and grievance channels. Monitor participation using vulnerability and gender-disaggregated data. Ensure vulnerable groups are considered during mitigation planning and community support measures.	Pre-construction, construction, and operation	Project Company / EPC Contractor
Employment opportunities and labour management	Local communities, local municipalities; employment offices, workers, contractors and subcontractors	Concerns regarding fairness of recruitment, access to employment opportunities, transparency of selection processes and working conditions	Engage municipalities and communities regarding recruitment procedures, skills requirements and available opportunities. Provide transparent information regarding employment processes. Establish worker grievance mechanisms and ensure compliance with labour standards.	During recruitment periods and throughout construction	Project Company / EPC Contractor
Occupational Health and Safety (OHS) risks	Project workers, contractors, subcontractors	Concerns regarding workplace hazards, training, personal protective	Conduct worker induction, toolbox talks, safety training and regular consultation with workers. Maintain worker grievance mechanisms and	Continuous throughout construction and operation	EPC Contractor / Project Company / O&M Company

Key E&S Risk / Impact	Potentially Affected Stakeholders / Rights Holders	Potential Stakeholder Concerns and Issues	Targeted Engagement Strategy and Response Measures	Project Phase	Responsible Party
	and O&M personnel	equipment, incident management and worker rights	communicate incident reporting procedures.		
Emergency preparedness and response	Nearby communities; local authorities; emergency services; neighbouring industries within Sumgait Chemical Industrial Park	Concerns regarding preparedness for accidental events, communication during emergencies and coordination responsibilities	Conduct emergency preparedness consultations with authorities and communities. Communicate emergency response procedures in accessible formats. Conduct drills involving relevant stakeholders where appropriate.	Prior to construction; commissioning; periodically during operations	Project Company / O&M Company
Environmental performance monitoring and transparency	Communities, NGOs, regulatory authorities, lenders and interested stakeholders	Concerns regarding whether mitigation commitments are implemented and whether environmental performance is monitored effectively	Share relevant monitoring information, environmental performance updates and corrective actions through appropriate disclosure channels. Maintain ongoing communication through the SEP and GRM.	During construction and operation	Project Company

6.2 ESIA Disclosure

The Environmental and Social Impact Assessment (ESIA) disclosure is a key step in ensuring that stakeholders are informed about the anticipated impacts of the Project and have the opportunity to provide input prior to project implementation. ESIA disclosure is not required under Azerbaijan law but is required to an extent in line with the IFC Performance Standard 1 (PS1) and other good industry practices guidelines.

Information pertaining to the Project's ESIA documentation will be disclosed in an accessible and transparent manner to ensure that stakeholders can review and understand the potential impacts and proposed mitigation measures. The disclosure will also provide details on the GRM for the Project. Documents will be made available on the client's official website and in appropriate public locations near the Project area. This will include an Azerbaijani translation of the ESIA Non-Technical Summary at the Municipalities.

In person disclosure will be carried out in a culturally appropriate and gender-sensitive manner, reflecting the social norms of Azerbaijan. Information for disclosure will be available in both Azerbaijani (the national and local language) and English to ensure accessibility for all stakeholder groups. The Non-Technical Summaries (NTS) will be provided in Azerbaijani and English.

The risk-based stakeholder engagement approach presented in Table 6-1 provides the framework for identifying priority engagement topics and stakeholder groups. Table 6-2 presents the specific activities that will be implemented during the ESIA disclosure process to address these engagement priorities.

The ESIA Disclosure programme is outlined below.

Table 6-3 ESIA Disclosure

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
Specific ESIA Disclosure	Communities near the Project site (Haji Zeynalabdin, Khazar Baghlari, Khazri, Kimyachilar)	Public consultation meetings and community briefings, including presentation of ESIA findings and provision of Azerbaijani NTS and project information leaflets	During ESIA disclosure period following lender approval of the ESIA	ESIA consultants with support from ACWA
	Vulnerable groups within the nearby communities	Targeted small group meetings and provision of accessible information materials in Azerbaijani	During ESIA disclosure period	ESIA consultants with support from ACWA
	Fishermen located in nearby settlements within the Project Aol	Bilateral meetings and discussion of potential marine and livelihood impacts (if any), including provision of NTS and project information leaflet	During ESIA disclosure period	ESIA consultants with support from ACWA
	Sumgait City Executive Power and relevant Municipalities	Bilateral meetings with local authorities, including provision of ESIA NTS (Azerbaijani language) and project information materials	During ESIA disclosure period	ESIA consultants with support from ACWA
	Ministries & Government Agencies	Official meetings and provision of ESIA information materials relevant to infrastructure coordination	During ESIA disclosure period	ESIA consultants with support from ACWA
	Economic Zones Development Agency (EZDA), Ministry of Economy	Formal submission and coordination meetings regarding project development within the Sumgait Chemical Industrial Park	During ESIA disclosure and permitting process	ESIA consultants with support from ACWA
	NGOs and Public Unions (e.g., Public Union of Disabled, Veterans and Martyrs' Families "Ruzigar" Society)	Email communication and stakeholder meetings to notify stakeholders of ESIA disclosure and provide access to NTS	During ESIA disclosure period	ESIA consultants with support from ACWA
	Regional and local media	Press releases and information sharing to notify the public about the ESIA disclosure and consultation process	During ESIA disclosure period	ESIA consultants with support from ACWA
	Lenders – Financial Institutions (IFC, AIIB, JBIC, NEXI)	ESIA submission to lenders and review by lenders' Environmental and Social Advisors	Ongoing until financial close	ESIA consultants with support from ACWA

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
Online ESIA Disclosure	All identified stakeholders and other interested parties	Online disclosure of the ESIA Non-Technical Summary (Azerbaijani and English) and relevant ESIA documentation on the Project Sponsor's website	As agreed with lenders and expected prior to financial close	Project Company

6.3 Stakeholder Engagement During Construction and Commissioning

The construction-phase engagement programme will be implemented in accordance with the risk-based engagement approach presented in Section 6.1.4. Engagement activities will be prioritised based on the significance of potential impacts and the stakeholder groups most likely to experience or raise concerns regarding those impacts. The planned construction and commissioning-related engagement processes are outlined below.

Table 6-4 Construction Phase SEP Timetable

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
Notify stakeholders of construction and commissioning activities including the timelines.	Directly Impacted Stakeholders: Communities near the Project site (Haji Zeynalabdin, Khazar Baghlari, Khazri, Kimyachilar), workers of firms located in the Sumgait Chemical Industrial Park, road users accessing the industrial zone	Official notices posted at the site entrance and access roads to the Project site advising of construction commencement and key activities. Community notice boards and distribution of information leaflets may also be used. If required, bilateral meetings or phone calls will be conducted with directly affected stakeholders to discuss specific construction activities that may affect them.	Prior to the start of construction and commissioning phases. This will be updated as necessary within the construction and commissioning phases if there are changes to the planned activities or processes.	Project Company
	Indirectly Impacted Stakeholders: Fishermen located within the Project Area of Influence, wider communities in Sumgait, workers of nearby industrial facilities within the Sumgait Chemical Industrial Park	Informational briefings, distribution of project information materials, and notification through local municipalities and community representatives.	Meetings to be undertaken throughout construction phase of the project and/or if there are any significant changes to	

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
			construction activities or processes.	
Communication of emergency preparedness and action plan	Project workers (including contractor and subcontractor personnel)	Engagement through worker induction training, toolbox talks, safety briefings, and site-specific training sessions explaining the emergency preparedness and response procedures.	At the start of employment and periodically throughout the construction phase. Updated if significant changes to emergency procedures occur.	EPC Contractor and Project Company
	Communities near the Project site	Community briefings and face-to-face meetings explaining relevant emergency procedures and safety measures. Information materials will be provided in Azerbaijani language.	Prior to commencement of construction and updated if emergency response procedures are revised.	
	Sumgait Regional Center- Ministry of Emergency Situations, Sumgait police representatives, local municipal authorities	Official correspondence (letters/emails) informing relevant agencies about emergency response procedures and coordination mechanisms. Bilateral meetings may be conducted if required.	Prior to construction and periodically as required throughout construction.	
Coordination of cumulative environmental and social risks within Sumgait	Economic Zones Development Agency (EZDA), neighbouring industrial facilities, MENR, Ministry of Emergency Situations, utility	Establishment of a cumulative impact coordination platform. Quarterly coordination meetings, information sharing on planned activities, discussion of shared infrastructure constraints, emergency preparedness, traffic	Prior to construction commencement and quarterly throughout construction. Additional meetings following significant incidents or	Project Company with support from EPC Contractor

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
Chemical Industrial Park	providers, police representatives, local authorities	management, environmental monitoring trends, and corrective actions. Meeting minutes and action trackers will be maintained.	changes in Project activities.	
Project Employment Opportunities	Local municipalities (Sumgait Municipality, Haji Zeynalabdin Tagiyev Municipality, Jorat Municipality), nearby communities	Meetings, emails, and phone calls to discuss local employment opportunities and communicate recruitment procedures for qualified local workers.	As required during recruitment phases throughout construction.	Project Company and EPC Contractor
Marine works coordination and fisheries engagement	Fishermen, fishing-dependent households, fisheries authorities, coastal communities	Targeted meetings, participatory mapping exercises, disclosure of marine construction schedules, discussion of navigation routes, safety zones and mitigation measures. Feedback from fishermen will be incorporated into marine construction planning where feasible.	• Before commencement of marine works. • Monthly during intensive marine construction activities • As required following changes to marine activities	Project Company / EPC Contractor
Implementation of grievance mechanism	All identified stakeholders including communities, workers, local authorities, and NGOs	Operation of the grievance mechanism as described in the SEP, including submission channels such as phone, email, community meetings, and grievance boxes where appropriate.	Grievance mechanism established prior to construction and maintained throughout the construction phase to allow timely resolution of concerns.	Project Company
Environmental and social performance reporting	Ministry of Ecology and Natural Resources (MENR), relevant government authorities	Submission of environmental monitoring and compliance reports in accordance with regulatory approval conditions.	As defined by regulatory approval requirements and lender reporting obligations.	Project Company
Coordination with utilities and local service providers	Sumgait City Water Department, Energy Supply and Sales Department, Gas Exploitation Area,	Official meetings, coordination meetings, and written correspondence to discuss infrastructure connections and potential	As required during the construction phase.	Project Company

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
	Housing and Communal Management Union	service disruptions during construction activities.		
Reporting in case of a chance find	Institute of Archaeology and Ethnography (Azerbaijan National Academy of Sciences), Ministry of Culture	Notification via phone calls and official correspondence if suspected archaeological or cultural heritage findings are identified during construction activities.	Immediately following discovery of a potential chance find.	Project Company

6.4 Stakeholder Engagement During Operation

During operations, stakeholder engagement will continue to focus on the management of key residual risks, particularly marine environmental performance, brine discharge monitoring, community health and safety, emergency preparedness, fisheries-related concerns, and the effectiveness of grievance management mechanisms. The planned operational phase stakeholder engagement activities are outlined in the table below.

Table 6-5 Operational Phase SEP Timetable

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
Notify stakeholders of the transition from construction to operations	Communities near the Project site (Haji Zeynalabdin, Khazar Baghlari, Khazri, Kimyachilar) Local municipalities and Sumgait City Executive Power Neighbouring industries within the Sumgait Chemical Industrial Park	Information boards at site entrance points. Community meetings and briefings supported with visual aids and printed materials. Official emails/letters to neighbouring industries and authorities.	At the start of operations.	Project Company
Monitoring of fisheries activities	Fishermen, fishing households, fisheries authorities	Periodic consultations, review of fishing activity trends, discussion of concerns through grievance mechanism and stakeholder meetings	Annually during operation or more frequently if monitoring identifies concerns	Project Company

Activity	Stakeholders	Engagement Method	Timing and Frequency	Responsible Parties for Implementation
Communication of Emergency Preparedness & Action Plan	O&M staff and Project Company staff. Local communities near the Project site. Relevant local authorities (Sumgait City Executive Power, police, emergency services) Nearby industries within the Sumgait Chemical Industrial Park	Staff training sessions, toolbox talks and safety briefings. Face-to-face meetings with local communities supported by visual materials. Official emails/letters and coordination meetings with relevant authorities and neighbouring industries.	At start of operations. Refresher sessions periodically (e.g., annually). Immediately following updates to the emergency plan or after significant incidents.	Project Company & O&M Company
Engagement with local authorities and government agencies	Sumgait City Executive Power Relevant municipal authorities MENR and other regulatory authorities	Formal meetings and coordination meetings. Submission of monitoring reports where required. Official correspondence.	Periodically during operations and as required by regulatory obligations.	Project Company
Communication with neighbouring industries and industrial park management	Economic Zones Development Agency (EZDA). Neighbouring facilities within Sumgait Chemical Industrial Park	Coordination meetings. Emails and official letters. Information sharing on operational activities where relevant.	Periodically during operations or as required.	Project Company
Management of cumulative environmental and social risks within Sumgait Chemical Industrial Park	Economic Zones Development Agency (EZDA), neighbouring industries, MENR, emergency services, utility providers, local authorities	Continued participation in the industrial park coordination platform. Annual coordination meetings to review environmental performance, emergency preparedness, shared infrastructure issues, operational interfaces, and stakeholder concerns.	Annually during operations or more frequently based on emerging risks, incidents, or stakeholder concerns.	Project Company / O&M Company
Implementation of grievance mechanism	All identified stakeholders (workers, nearby communities, fishermen, NGOs, government authorities, neighbouring industries)	As described in the Grievance Mechanism section of this SEP. Grievance submission through multiple channels (website, email, phone, grievance boxes, meetings).	Maintained throughout operational life of the Project.	Project Company

7.0 External Grievance Redress Mechanism (GRM)

The Grievance Redress Mechanism (GRM) is a key component of stakeholder engagement and will remain operational throughout the Project's implementation. It will follow a clear, transparent, and culturally appropriate process that is easily accessible and free of charge, ensuring that all stakeholders and affected parties have the opportunity to raise concerns. Stakeholders can be assured that their complaints will be carefully heard, documented, and promptly addressed.

The Project will implement a Grievance Redress Mechanism (GRM) to receive and address concerns, complaints, and grievances from affected stakeholders. This GRM, described in this SEP, is aligned with Acwa's established Stakeholder Engagement Management Plan and Grievance Procedure, and complies with the requirements of project lenders.

7.1 Key Principles of Grievance Mechanism

The grievance mechanism for the Project will comply with the following principles:

- The purpose of the grievance mechanism procedure will be clarified at the outset.
- The process will be scaled to the risks and impacts of the Project.
- The process will be transparent and accountable to all stakeholders by putting it into writing, publicising it and explaining it to relevant stakeholders.
- The grievance mechanism will be made clear, understandable and easily accessible by providing information in the local language and orally where communities cannot read.
- Complaints or concerns will be rapidly resolved.
- The mechanism will not involve any costs nor retribution associated with lodging a grievance; and
- Precautionary measures such as clear non-retaliation policy, confidentiality measures and safeguarding of personal data collected in relation to a complaint, as well as an option to submit grievances anonymously will be in place.

7.2 Scope of Grievance Mechanism

The scope of the grievance mechanism is to evaluate and address stakeholders' complaints and concerns regarding project activities and environmental and social performance during the Project's lifecycle.

All relevant grievances from affected stakeholders will be accepted and no judgment made prior to investigation, even if complaints are minor. However, according to good practice, the following grievances will be directed outside of Project-level mechanisms:

- Complaints clearly not related to the project based on assessment of its legitimacy.
- Issues related to governmental policy and government institutions.
- Complaints constituting criminal activity and violence, which will be referred to the justice system; and
- Commercial disputes: Commercial matters will be stipulated in contractual agreements and issues will be resolved through a variety of commercial resolution mechanisms or civil courts.

If grievance is rejected during screening stage, the grievant will be informed of the decision and provided with clear justification for the rejection.

7.2.1 Differentiation Between Workers' Grievance Mechanism and External Community Grievance Mechanism

The Project will establish and maintain two complementary grievance mechanisms to address concerns arising from different stakeholder groups: (i) a Workers' Grievance Mechanism for project employees and contracted workers; and (ii) an External Community Grievance Redress Mechanism (GRM) for affected communities, stakeholders, and other external parties.

While both mechanisms will follow the principles of accessibility, transparency, confidentiality, non-retaliation, and timely resolution, they will operate separately to ensure that grievances are managed by the appropriate responsible parties and in accordance with applicable lender requirements.

7.2.1.1 Workers' Grievance Mechanism

The Workers' Grievance Mechanism will be established and implemented in accordance with the Project's Labour and Working Conditions Management Plan (LWCMP), applicable labour legislation of Azerbaijan, Acwa's Human Resources policies, and relevant lender requirements.

The Workers' Grievance Mechanism will be available to all direct workers, contracted workers, subcontractors, and other personnel engaged by the Project throughout the construction, commissioning, and operational phases.

The Workers' GRM will address employment-related concerns, including but not limited to:

- Terms and conditions of employment;
- Recruitment and employment practices;
- Wages, benefits, and payment issues;
- Working hours, overtime, and leave arrangements;
- Occupational health and safety concerns;
- Workplace discrimination, harassment, and unfair treatment;
- Accommodation, welfare facilities, and worker living conditions;
- Labour disputes; and
- Gender-based violence, sexual harassment, and other sensitive workplace concerns.

The Workers' GRM will be managed through designated Human Resources and HSSE personnel. Workers will be informed of the mechanism during induction and periodic awareness sessions. In addition to the Project-level grievance channels, ACWA has implemented a corporate digital worker grievance platform, accessible via QR codes displayed at strategic locations across the Project site and provided to workers during induction. The platform enables workers to confidentially, and where requested anonymously, submit grievances, concerns or suggestions electronically. All grievances are logged within a centralised system, tracked through investigation and resolution, and monitored to ensure timely closure without fear of retaliation. Employment-related grievances will be managed through the Workers' GRM and the corporate digital platform, as appropriate, and will not be transferred to the External Community GRM unless they relate to wider community impacts or involve external stakeholders.

7.2.1.2 External Community Grievance Redress Mechanism

The External Community GRM described in this SEP is intended for communities, affected persons, local authorities, civil society organisations, businesses, and other external

stakeholders who may have concerns related to Project activities or environmental and social performance.

The External Community GRM will address concerns including, but not limited to:

- Impacts on community health, safety, and security;
- Noise, dust, vibration, traffic, and access-related impacts;
- Environmental impacts such as waste management, water resources, and pollution;
- Impacts on livelihoods, businesses, or community resources;
- Stakeholder engagement and information disclosure concerns;
- Community-worker interactions;
- Emergency response and safety concerns;
- Concerns raised by vulnerable or disadvantaged groups; and
- Allegations related to SEA/SH, GBVH, or other sensitive social risks.

The External Community GRM will be managed by the Project Company's Environmental and Social Manager/HSSE Manager, supported by relevant technical departments and external specialists where necessary.

The Project will ensure that both GRMs remain accessible, free of charge, culturally appropriate, and available throughout the Project lifecycle. Information regarding both mechanisms, including submission procedures and contact details, will be disclosed to workers and external stakeholders through induction programmes, stakeholder consultations, disclosure materials, notice boards, and other appropriate communication channels.

7.3 Steps in Grievance Mechanism Management

7.3.1 Publicising Grievance Management Procedures

The grievance mechanism will be publicised to stakeholders, including the following information:

- What Project-level mechanisms exist and what they can deliver, and what remedies grievant can receive from using the company's grievance mechanism, as opposed to other resolution mechanisms;
- Who can raise complaints (i.e., all stakeholders);
- Where, when, and how community members can raise complaints;
- Who is responsible for receiving and responding to complaints;
- What sort of response grievants can expect from the company, including timing of response; and
- What other rights and protection are guaranteed.

The availability of external escalation options, including the possibility of submitting grievances to applicable lender grievance mechanisms where stakeholders consider that the Project-level GRM has not adequately addressed their concerns.

7.3.2 Means of GRM Disclosure

The GRM will be clearly publicised at the Project site through a grievance disclosure leaflet. The leaflet will be made available in Azerbaijani and English languages.

7.3.3 Submitting a Grievance

Stakeholders will be fully informed of their rights to access the Grievance Redress Mechanism (GRM) and the procedures for submitting a grievance, either verbally or in writing, as outlined in this chapter. In line with the Project Company's Grievance Mechanism Plan, grievances may be submitted via the grievance form, at the Project site entrance, by phone, email, or through any other method preferred by the complainant. The grievance procedure begins with formal acknowledgment within three working days of submission, using the complainant's preferred communication method. If the grievance is not resolved following a verbal notification, the complainant shall complete a grievance form to document the issue formally.

Information about the availability and accessibility of the GRM will be communicated to the stakeholders during stakeholder meetings (outlined in the stakeholder engagement programme) and the contact details posted at the entrance of the Project site and municipalities.

For illiterate grievant or those that prefer to submit their grievances verbally, they will have the possibility to meet with the Project HSSE manager (or other management representative) who will take notes on the details of the grievant and read them out loud to the complainant to confirm that the key elements of the complaint have been captured.

Anonymous grievances - including letters or emails without identifiable details or grievances submitted verbally with requests for anonymity - will also be accepted and processed.

7.3.4 Keeping Track of Grievances

Upon receiving grievances submitted through any of the means described above, the following steps will be undertaken to ensure that all concerns are thoroughly investigated and addressed, leaving no issue unresolved:

- The grievance will be recorded in the form of register (Appendix B) by the Project Company's H&S Executive Manager. The register will contain:
 - Details of the grievance;
 - The personnel/division(s) responsible for resolving the grievance;
 - Process tracking fields (receipt dates, status, result dates);
 - Response provided to the grievant;
 - Corrective and preventive actions taken to prevent reoccurrence of such complaint; and
 - The grievances will be acknowledged as soon as possible (within three working days from receipt) by sending a formal confirmation with a complaint number and a timeline for response to the complainant to assure the grievant that the organization is responding properly.
- In cases of sensitive grievances, such as those involving multiple interests and a large number of affected people, where a more complex investigation is required, the grievant will receive an update within two weeks of the grievance being received, explaining the actions required to resolve the complaint, and the likely timeframe; and
- The Project Company will explain in the first letter of acknowledgment, which grievances are clearly outside the scope of the mechanism and what alternative mechanisms stakeholders can use to address these potential issues.

7.3.5 Reviewing and Investigating Grievances

Depending on the circumstances of complaints made, various departments may need to be involved in resolving the complaints. The person(s) responsible for handling grievance will organize the process to validate the complaints legitimacy and arrange for investigation of details.

When grievances are complex and cannot be resolved quickly, further investigation may be required to prevent escalation of the issue. The grievance mechanism must conform to the principle of 'no cost'. If the investigation team is formed internally, issues that will be taken into consideration include potential conflicts of interest, qualifications, gender composition, and budget. Meetings with grievant and site visits will be undertaken, as appropriate.

All grievances will be investigated by the responsible Project party within 2 weeks of submission. Where grievances require a longer duration for investigation, the grievant will be informed, and advised of the expected timeline for a response.

In cases of sensitive grievances - such as those involving multiple interests; those relating to sexual abuse and harassment; gender-based violence; or community related conflict- it may be necessary to engage outside organizations in a joint investigation or allow for participation of local or national authorities. This will only take place with agreement of the grievant(s).

7.3.6 Grievance Resolution Options and Response

The approach used in resolving various types of grievances will be different depending on the nature of the issue, frequency of occurrence and the number of grievances. Rather than prescribing a specific procedure for each particular type of complaint, the flexibility of the grievance mechanism will allow for resolution options appropriate for different types of grievances to be provided. The Project HSSE Manager will prepare a grievance resolution form which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance, along with the timeline for their completion. Grievance resolution form will be submitted within twenty (20) days of receiving the grievance.

Resolution of the grievance will be communicated to the grievant either in written format or verbally, depending on the grievant preference. In all cases, a written record will be maintained by the Project Company using a Grievance Resolution Form, as per the Project Company's Grievance Mechanism Plan.

In cases where the grievance is rejected or there is no requirement for action, the Project GRM representative (s) will be diplomatic when informing the grievant about the outcome of the eligibility review process, to prevent dissatisfaction and potential escalation into conflict.

Where the grievance is accepted, a proposed solution will be provided and communicated to the grievant within a stipulated period. If the grievant does not accept the proposed resolution, the Project would re-assess the situation, discuss and clarify the finding with the grievant and make sure that all alternatives within the grievance mechanism are explored. If the grievant is still not satisfied with the proposed resolution, the grievant can take the dispute resolution mechanism outside of the established grievance mechanism (external mechanism).

Note: The Project GRM does not replace any other available grievance mechanism including legal ones.

Where a proposed solution is accepted or agreed upon by all parties involved, the case will be closed out and evidence that necessary actions have taken place will be collected. Such evidence includes:

- Conducting a meeting with the grievant to reach a collective agreement or get a confirmation and file it along with the case documentation to close out the grievance; and
- Take photos or collect other documentary evidence to create a comprehensive record of the grievance and how they were resolved.

Upon resolving the grievance, the Project Company's H&S Executive Manager will fill in the Grievance Closeout Form which will be communicated and countersigned by the grievant.

Where the grievant is not satisfied with the outcome of the proposed resolution, actions concerning further discussion and re-assessment shall be completed and advised within two weeks of notification of dissatisfaction by the grievant.

7.3.7 Escalation of Unresolved Grievances to Lenders' Grievance Redress Service / Independent Accountability Mechanisms

The Project-level External Community GRM is the primary mechanism for receiving, investigating, and resolving concerns related to Project activities. The Project Company will make reasonable efforts to resolve grievances through an accessible, transparent, and participatory process.

However, stakeholders, including affected persons and communities, will retain the right to seek further review through external grievance mechanisms, including those established by the Project's lenders, where:

- The stakeholder considers that the grievance has not been adequately addressed through the Project-level GRM;
- The stakeholder is dissatisfied with the proposed resolution or corrective actions;
- The grievance has not been resolved within the communicated timeframe;
- There are concerns regarding the fairness, independence, or effectiveness of the Project-level grievance process; or
- The stakeholder wishes to raise concerns regarding the Project's compliance with applicable lender environmental and social requirements.

Before escalating grievance externally, stakeholders are encouraged, where feasible, to utilise the Project-level GRM to allow the Project Company an opportunity to investigate and address the concern. However, access to lender grievance mechanisms will not be restricted or conditional upon prior use of Project GRM.

The Project Company will disclose information on applicable lender grievance mechanisms during stakeholder engagement activities and through GRM disclosure materials. This information will include the purpose of the lender mechanism, eligibility criteria, submission process, and contact details.

For grievances related to AIIB & IFC financing, affected stakeholders may submit concerns to lenders independent accountability mechanism, the Project-affected People's Mechanism (PPM), where they believe they have been adversely affected by a failure of the Project to comply with Lender requirements.

The lender-level grievance mechanism functions independently from the Project Company's GRM and may undertake its own review, compliance assessment, or problem-solving process in accordance with its established procedures.

The Project Company will cooperate with any lender review process and provide relevant information, documentation, and access to facilitate resolution of legitimate concerns while ensuring confidentiality and protection of personal information.

7.4 Grievance Mechanism During the ESIA-stage

A Grievance Redress Mechanism (GRM) has been established as part of the project. Stakeholders including those located near the site will be able to raise concerns (including anonymously), free of charge, and without fear of retaliation. The purpose of this mechanism is to ensure that stakeholders have a clear and accessible channel through which they can communicate with the Project team and receive timely responses.

Till date, there has been no filing of grievances.

7.5 Grievance Mechanism During the Construction and Commissioning Phase

The Project Company will ensure that external grievance mechanisms are accessible and transparent. Grievance forms will be made available in Azerbaijani and English at the Project site entrance, and sealed, locked grievance boxes will be provided for form submissions. Complaints received through telephone, email, or letters will also be formally recorded and followed up by the Project Company. Responses will be provided using the communication method preferred by the grievant.

Grievances will be addressed diplomatically, particularly when a complaint is rejected, to prevent escalation of conflicts. Where necessary, the Project Company may organize meetings with grievant to clarify findings and explore all available alternatives for resolution. Formal records will capture all grievance submissions, investigations, root cause analyses, corrective and preventive actions, and any follow-up, including monitoring. These records will be maintained in a dedicated grievance folder, which will be accessible to external parties such as independent auditors. Personal data will be protected and used solely for grievance resolution or analysis, with no public disclosure of confidential information. The Project Company will oversee the monitoring of grievances through weekly and monthly EHS meetings and site audit programs.

7.6 Grievance Mechanism – Operational Phase

During the operational phase, the grievance mechanism will follow a similar approach to the construction and commissioning phase and will be available to both workers and third parties. A designated staff member from the Project Company will manage all grievances, including recording, reviewing, investigating, and responding. Grievance forms will continue to be available in Azerbaijani and English. All grievance records, including follow-up documentation, will be maintained on-site for a minimum of five years. The contact details of the responsible manager will be posted on notice boards and information disclosure locations. Worker representatives will also be involved in grievance management, coordinating with the Project Company to ensure issues are resolved effectively.

7.7 Grievance Procedures for Women and Vulnerable and Disadvantaged Groups

A project-specific Gender Management Plan (as required under Acwa's HSSE Management System) will be developed to address risks related to Gender-Based Violence and Harassment (GBVH). The plan will define expected standards of behaviour among workers, set out reporting procedures, specify sanctions for perpetrators, and provide resources and support mechanisms for victims. Implementation will be undertaken in line with lenders' requirements, applicable Azerbaijan regulations, and the Project Company's HSSE Management System.

In line with Company Labor and Working Conditions Management Plan, workers will be informed about the code of conduct in their local languages as part of their employment, including provisions for reporting, investigation, disciplinary action, and termination in cases

of gender-based violence or harassment. The Project Company will conduct regular training and awareness-raising sessions to educate the workforce about GBVH, including expected standards of behaviour, the consequences of unacceptable conduct, and the availability of grievance mechanisms to report incidents. Efforts will be made to ensure representation of women in relevant roles to provide approachable and relatable support to female workers.

Anonymous reporting tools will be made available to workers and community members to enable safe reporting of sexual harassment or GBVH cases while protecting the confidentiality of grievant. Vulnerable workers, including women, will receive targeted training and awareness programs, which may include life skills, leadership, and decision-making, to empower them and enhance their protection. A monitoring system will be implemented to track GBVH activities and assess the effectiveness of preventative and corrective measures.

7.7.1 Reporting of Gender Based Violence and Harassment (GBVH)

Multiple channels will be provided to allow anonymous and confidential reporting of GBVH incidents, ensuring the safety of grievant. For community members, reporting channels may include complaint/feedback boxes, toll-free telephone numbers, local organizations, service-user groups, or women's organizations. Child-friendly and anonymous options will also be available to allow children and young people to report incidents safely. For workers, reporting channels may include on-site or office complaint/feedback boxes, online reporting via the Project Company's website, or email.

Sensitive grievances, particularly those related to GBVH, will be recorded in a separate confidential logbook. Access to this logbook will be restricted to designated personnel trained to manage sensitive cases, ensuring that all grievances are handled with the highest level of confidentiality and discretion. In severe cases, including criminal activity or threats to safety, complaints will be referred to the appropriate authorities or specialized support services in accordance with legal requirements.

All sensitive grievances will be managed in compliance with local laws and the Project Company's non-retaliation and confidentiality policies, safeguarding the rights and dignity of affected individuals. Detailed procedures for handling and logging sensitive grievances will be incorporated into the Project Company's grievance mechanism procedures.

7.7.1.1 Reporting Channels for GBV/SEAH Complaints

To ensure safe and accessible reporting, the Project will establish dedicated GBV/SEAH reporting channels separate from general grievance channels where appropriate.

Available reporting options may include:

- Confidential reporting to the Environmental and Social Manager or designated GBV focal point;
- Dedicated telephone hotline or confidential phone contact;
- Anonymous reporting through grievance boxes;
- Direct reporting through trained community liaison officers;
- Reporting through trusted community organisations, women's groups, or local service providers.

Workers will also have access to confidential reporting channels established under the Worker Grievance Mechanism in accordance with the LWCMP.

All personnel responsible for receiving GBV/SEAH complaints will receive specific training on:

- survivor-centred approaches;
- confidentiality requirements;

- referral procedures;
- prohibited practices when handling GBV cases.

7.7.2 Integration of GBV/SEAH Risk Management with Worker Influx Management and Contractor Obligations

The Project recognizes that the influx of construction workers, including non-local workers, may increase potential risks associated with gender-based violence and harassment (GBVH), sexual exploitation, abuse and harassment (SEAH), particularly for women, girls, vulnerable groups, and local communities within the Project's Area of Influence.

To address these risks, GBV/SEAH prevention and response measures will be integrated with the Project's Worker Influx Management Measures, Labour and Working Conditions Management Plan (LWCMP), Contractor Management Plan, and Code of Conduct requirements.

The Project Company will require all contractors, subcontractors, and other third parties engaged in Project activities to implement measures including, but not limited to, the following:

- Development and implementation of a Contractor Code of Conduct addressing expected standards of behaviour, prohibition of sexual exploitation, sexual abuse, sexual harassment, and other forms of inappropriate conduct.
- Mandatory induction and periodic awareness training for all workers, including managers, supervisors, security personnel, and subcontractors, on:
 - acceptable workplace behaviour;
 - prohibition of GBV/SEAH;
 - reporting mechanisms;
 - consequences and disciplinary actions for violations;
- Inclusion of GBV/SEAH prevention requirements within contractor agreements, procurement documents, and subcontractor obligations;
- Screening and due diligence of contractors' capacity to manage GBV/SEAH risks, including review of existing policies, reporting procedures, and previous performance;
- Implementation of worker accommodation management measures to minimise risks associated with worker camps, including:
 - controlled access;
 - appropriate lighting and security arrangements;
 - prohibition of alcohol/drug-related misconduct within worker accommodation;
 - clear rules of conduct for interactions with surrounding communities;
- Establishment of disciplinary procedures, including sanctions, removal from the Project, and referral to relevant authorities where legally required.
- The Project Company will monitor contractor compliance through regular inspections, audits, worker consultations, training records, grievance monitoring, and review of corrective actions.

7.7.3 Survivor-Centred Approach for Management of GBV/SEAH Complaints

All GBV/SEAH-related grievances will be managed using a survivor-centred approach, ensuring that the safety, dignity, confidentiality, and rights of survivors remain the primary consideration throughout the grievance process.

The Project GRM will apply the following principles when receiving and managing GBV/SEAH complaints:

- **Safety and Protection:** The immediate safety and wellbeing of the survivor will be prioritised. The Project will avoid any actions that may expose survivors to further harm, retaliation, stigma, or discrimination.
- **Confidentiality:** Information related to GBV/SEAH complaints will be treated as confidential and will only be shared with designated personnel on a strict need-to-know basis. Personal information will not be disclosed without the informed consent of the survivor, except where disclosure is required by applicable law.
- **Respect and Non-Discrimination:** Survivors will be treated with dignity, respect, and without judgement regardless of gender, age, disability, ethnicity, nationality, social status, or relationship to the alleged perpetrator.
- **Informed Consent:** Survivors will receive clear information regarding available options, referral pathways, and potential outcomes. Any referral to external services will only be undertaken with the informed consent of the survivor.
- **Do No Harm Principle:** The Project will ensure that grievance handling procedures do not require survivors to repeatedly recount traumatic experiences or participate in investigations unless they voluntarily choose to do so.

7.7.4 GBV/SEAH Referral Pathway and Service Provider Mapping

The Project Company will establish and maintain a GBV/SEAH referral pathway to ensure that survivors have access to appropriate support services, including medical care, psychosocial support, legal assistance, and protection services.

Prior to commencement of construction, the Project Company will undertake a service provider mapping exercise to identify available GBV/SEAH support services within the Project's Area of Influence and surrounding administrative areas.

The mapping exercise will assess:

- Availability of healthcare facilities capable of providing clinical management and emergency support;
- Availability of psychosocial counselling services;
- Availability and capacity of women's support organisations and civil society organisations;
- Availability of legal aid and protection services;
- Accessibility of services for vulnerable groups, including women, persons with disabilities, and economically disadvantaged persons;
- Confidentiality practices and capacity of service providers to manage sensitive cases.

7.8 Grievance Mechanism Contact Details

The following details will be provided to the stakeholders in order to be able to submit their grievances or comments regarding the proposed Project.

Table 7-1 Construction, Commissioning and Operation Phase - Grievance Mechanism Contact Details

Company	Role	Contact Person	Phases
Project Company	H&S Manager	Vusal Afandizade	Construction, Commissioning and Operation Phases
Project Company	E&S Manager	Levent Demir	Construction, Commissioning and Operation Phases
Project Company	CLO	Narmin Osmanli	Construction, Commissioning and Operation Phases
Project Company	GBV Focal Points	Nargis Abbasova Nijat Gahramanov	Construction, Commissioning and Operation Phases
EPC	GRM Focal Point	Vusal Safarov	Construction and Commissioning

The Project Company, EPC Contractor and O&M Company's contact details will be confirmed before the commencement of the construction and operational phases as applicable.

Table 7-2 External Lender Grievance Mechanism Contact Details

Organisation	Mechanism	Purpose	Applicability / When Stakeholders May Use The Mechanism
Asian Infrastructure Investment Bank (AIIB)	Project-affected People's Mechanism (PPM) ⁴	Provides an independent forum for project-affected people to raise concerns regarding environmental and social impacts and alleged non-compliance with AIIB's Environmental and Social Policy requirements.	Available to affected people and communities who believe they have been adversely affected by an AIIB-financed project and where concerns regarding the application of AIIB's environmental and social requirements remain unresolved through the Project-level GRM.
International Finance Corporation (IFC)	Compliance Advisor Ombudsman (CAO)	Provides an independent accountability mechanism to address complaints from communities or individuals affected by IFC-supported projects.	Available to affected communities or individuals who believe they have been or may be adversely affected by an IFC-supported project and consider that project-level grievance mechanisms have not adequately addressed their concerns.
Other Project Lenders (as applicable)	Independent Accountability Mechanism / Grievance Service	Provides an external avenue for stakeholders to raise concerns	Applicable where project-level grievance resolution has not resulted in satisfactory outcomes or

⁴ <https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html>

Organisation	Mechanism	Purpose	Applicability / When Stakeholders May Use The Mechanism
		regarding lender requirements, project impacts, and implementation of environmental and social commitments.	where stakeholders seek independent review of lender-related concerns.

The Project Company will ensure that information regarding applicable lender grievance mechanisms, including AIIB's Project-affected People's Mechanism (PPM) and IFC's Compliance Advisor Ombudsman (CAO), is disclosed to stakeholders as part of the Project's grievance mechanism communication materials. Access to lender accountability mechanisms will not be restricted by the requirement to first submit a grievance through the Project-level GRM. However, stakeholders are encouraged, where feasible, to utilise the Project-level GRM initially to allow the Project Company an opportunity to investigate and address concerns directly.

7.9 Process Flow and Timeline

Table 7-3 Grievance Process and Timeline

Stage	Timeline
Grievance Received/Submitted	-
Complainants informed about invalid grievance with justification	-
Valid grievance logged in grievance register and formally acknowledged to complainant	Within 3 working days of grievance being submitted
Grievance investigated and analysed	Within 7 working days of grievance being submitted
Preparation of Grievance Resolution Close Out Form and submission	Within 20 working days of grievance being submitted
Outcomes of Grievance Resolution Close Out Form conveyed to grievant	Within 30 days of grievance being submitted
In the case the grievance resolution form identifies proposed actions to be implemented, the grievant will be contacted once actions are completed	-
If applicable following dissatisfaction of resolution by Grievant	
Actions to re-assess grievance/propose new solution/inform Grievant of final decision	Within 2 weeks of notification of dissatisfaction by Grievant
In the event that a grievance cannot be resolved between the two parties a mediator will be involved i.e. local leaders who understand the culture and practices within the Project site.	Within 2 weeks of notification of dissatisfaction by the Grievant.
Grievances that are not resolved at the project level - a grievance committee involving senior management from Acwa, municipality and any other relevant authorities (if required).	Within 30 days of notification of dissatisfaction by the Grievant.

Note: Where complex grievances, or other factors are extending the investigation time, the Grievant will be informed of this delay and advised of an updated expected timeline for response.

8.0 Implementation Plan

In order for this Stakeholder Engagement Plan to function effectively, it is important to determine a management structure and assign suitable personnel(s) to implement and manage this Stakeholder Engagement Plan.

8.1 Roles and Responsibilities (Project Company)

Note: The roles below will need to be revised upon finalisation of Project staff and responsibilities on-site. The responsibilities of the HSE/HSSE Manager and Environmental & Social Manager are to be outlined below once confirmed by the Project parties.

8.1.1 Project HSSE Manager

Name	Vusal Afandizade
Contact Details	To be confirmed

The HSE/HSSE Manager is responsible for:

- Ensuring stakeholders are recognized as partners in the development and delivery of strategic goals;
- Assisting the stakeholder management unit to effectively consult and engage stakeholders;
- Advising Senior Management of issues and/or risks to stakeholder relationship as soon as they arise so risk can be managed effectively;
- Supporting the implementation and management of the SEP;
- Getting involved in stakeholder engagement activities that relate directly to HSE concerns or emergency planning; and
- Engaging with any external stakeholders with respect to emergency planning, drills, and instances of emergency as appropriate.
- Identifying, informing and recording public views, opinions & grievances and or relaying them to the necessary personnel for follow up;
- Setting up a grievance complaint tracker system to keep track of the type of complaints raised, the grievant and status of each complaint;
- Publicizing & Distributing information to applicable stakeholders and translation of the material into applicable languages;
- Handling minor, straightforward issues such as those related to a grievants request for information;
- Obtaining clarification from other members of management in regard to dealing with specific grievances, such as a need to notify the Project Company (or other Project parties) in regard to the content or response to specific grievances;
- Ensuring all received external grievances are properly recorded, addressed and managed within the specified timelines as detailed in this procedure; and
- Keeping up to date with any changes in compliance obligations with respect to stakeholder engagement and grievances.

8.1.2 Environmental and Social Manager

Name	Levent Demir
Contact Details	ldemir@acwapower.com

The Project Company will employ/nominate the Environmental and Social Manager during the construction and the operation phase. The Environmental and Social Manager is responsible for:

- Implementation of all aspects of the SEP ensuring that the Project is compliant with lenders requirements;
- Identifying stakeholder issues and acting appropriately to address those issues.
- Ensuring that the SEP and the available engagement methods are publicized;
- Ensuring that Project personnel are well briefed in regard to the SEP and grievance mechanism (including security personnel), and that the required resources (e.g. vehicles, company phones, office materials) are provided;
- Ensuring stakeholder meeting and disclosure of information are managed properly.
- Supervising the processing and resolution of all grievances; and
- Supervising the independent periodic monitoring and disclosure of the non-technical summary of the audit reports and of the full reports if required.

8.2 Monitoring and Reporting

The Project will implement robust monitoring and reporting systems to track both the effectiveness of the Grievance Redress Mechanism (GRM) and the Stakeholder Engagement Plan (SEP). All grievances, incidents, and stakeholder engagement activities will be systematically recorded, monitored, and reported to support internal management oversight and ensure compliance with applicable health, safety, security, and social standards.

Monitoring will include regular documentation of grievances, resolution status, and key social performance indicators (KPIs), such as the number and type of grievances, resolution timelines, workforce training, community awareness programs, and employment metrics, including gender considerations. Activities will be reported at defined frequencies, weekly for project-level grievances and monthly for broader SEP indicators ensuring timely evaluation and continuous improvement. All records will be maintained in dedicated registers and reports to enable transparency, accountability, and informed decision-making by the Project management and relevant stakeholders.

8.2.1 GRM Monitoring and Reporting

The project-level Grievance Redress Mechanism (GRM) will maintain comprehensive records of grievances received, their status, and resolutions achieved. These records will support internal monitoring and provide periodic updates to the Project's management and relevant stakeholders, including authorities if required.

All monitoring and reporting activities (including site-level meetings, inspections, audits, weekly and monthly reports) will be conducted in accordance with the Construction HSSE-MS of Acwa.

To track and evaluate the effectiveness of the GRM, the following project-level KPIs will be monitored and reported:

Table 8-1 Monitoring Indicators for Grievance Management and Compliance

No.	KPI	Measurement Action	Frequency	Goal
1	Number of valid grievances submitted	Project Grievance Register	Weekly	ZERO
2	Number of resolved grievances	Project Grievance Register	Weekly	All grievances
3	Outstanding grievances	Project Grievance Register	Weekly	ZERO
4	Number of grievances not processed on time	Project Grievance Register	Weekly	ZERO
5	Number of grievances related to GBVH	Project Grievance Register	Weekly	ZERO
6	Average time for resolution of complaints by severity	Project Grievance Register	Weekly	Within 14 days from receipt
7	Category of grievances submitted. Ex. Waste, air quality	Project Grievance Register	Monthly	N/A
8	Number of incidents and/or non-compliances in relation to this plan	Submission of Incident Report and/or Non-Compliance Report (NCR)	Weekly	ZERO

In addition to the above, all grievances will be documented within the grievance register provided in [Appendix C: Grievance Register].

8.2.2 SEP Monitoring and Reporting

The following Key Performance Indicators (KPIs) should be considered to evaluate the progress or successful implementation of the SEP. KPIs should be accounted on a monthly basis.

- Number of incidents off-site that could have caused injuries or loss of life/property to community member(s);
- Number of project training/inductions provided to workers on a monthly basis, number of attendees and number of new employees;
- Number of women employed;
- Number of education and awareness training on reproductive health, and HIV/AIDS provided to women & adolescent girls residing in the project's area of influence;
- Number of awareness training provided to all project workers in regards to SEA/SH risks;
- Number of mandatory regular training and awareness provided to workforce about gender-based violence and harassment towards local community members (including women) and their colleagues especially women; and
- Number of grievances received and resolved in regards to SEA, SH and GBV etc.

All engagement activities will be tracked and reported by Project Company. The Project Company's E&S Manager will be responsible for overseeing the implementation, monitoring and periodic review of the SEP.

8.3 Training

To ensure the effective implementation of the SEP and Grievance Mechanism, the following measures will be undertaken:

- Endorsement and Awareness
 - The Project Company and related project parties will formally endorse the SEP and GRM.
- Staff Allocation and Training
 - Competent staff will be assigned to manage the SEP and GRM. These staff will receive training to understand their roles and responsibilities, ensuring they can effectively implement the SEP and manage incoming grievances as per the GRM.
- Security Staff Training
 - Given that grievances can be submitted at the Project entrance, security personnel will be trained on the GRM and specifically how to receive incoming grievances. Security staff will be provided with access to relevant GRM documents, grievance forms, and contact details of the responsible staff to facilitate the submission and management of grievances.
- Induction Program
 - All staff will be informed about the external GRM and availability of the workers GRM (under the labour and working condition Management Plan) during their induction to the project. This will include details on what types of grievances can be raised, how and where grievances can be raised, the process for review and resolution of grievances, as well as timelines.

8.4 Data Management

Effective management of stakeholder information is essential for ensuring transparency, accountability, and compliance with both national data protection regulations and international good practice standards, including IFC Performance Standard 1 and guidance set out in the *IFC Stakeholder Engagement Handbook*. For the desalination Project, Acwa has established a structured approach to data management that encompasses the collection, storage, protection, and use of stakeholder-related data.

- Data Collection Protocols:
 - Stakeholder information will only be gathered for defined project purposes, such as engagement planning, documentation of consultations, grievance handling, monitoring, and reporting. Data will be collected through agreed methods, including consultation meetings, surveys, interviews, correspondence, and grievance mechanisms. Prior informed consent will be obtained from stakeholders before collecting personal or sensitive information, with clear communication on how their data will be used. Only relevant and proportionate data will be collected, in line with the principle of data minimization.
- Data Storage and Access:
 - All electronic records will be maintained in secure, password-protected systems with role-based access controls. Physical records, such as meeting attendance sheets or grievance forms, will be stored in secure cabinets within Acwa's project office. Data will be categorized according to its sensitivity (e.g., personal information, general stakeholder records, public domain information). Regular system backups will be undertaken to prevent loss or corruption of data.

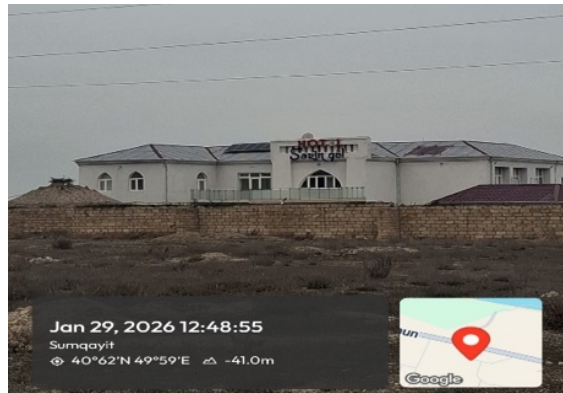
- Data Management Process:
 - Standard operating procedures will be applied for data entry, verification, updating, and archiving to ensure completeness and accuracy. A central stakeholder database will be maintained to track engagement activities, feedback received, issues raised, and commitments made. The database will support monitoring of engagement frequency, timeliness of responses, and resolution of grievances. Outdated or irrelevant data will be archived or securely destroyed in accordance with retention schedules.
- Data Protection and Confidentiality:
 - All stakeholder information will be treated as confidential and used exclusively for project purposes. Personal data will not be disclosed without explicit consent, except where required by law. Where third parties (e.g., consultants, contractors) require access to data, this will be governed by confidentiality clauses and data-sharing protocols. Security measures will be in place to prevent unauthorized access, loss, or misuse of data, including physical safeguards and IT system protections.
- Reporting, Transparency and Compliance:
 - Aggregated, non-identifiable data may be used in public reports to demonstrate stakeholder engagement performance while protecting individual identities. Acwa will ensure that all data management practices are compliant with applicable national legislation and aligned with IFC good practice guidance. Project staff with responsibility for handling stakeholder information will receive training on confidentiality, ethical data management, and compliance obligations. Continuous improvement will be sought by reviewing data management protocols periodically and updating them where necessary.

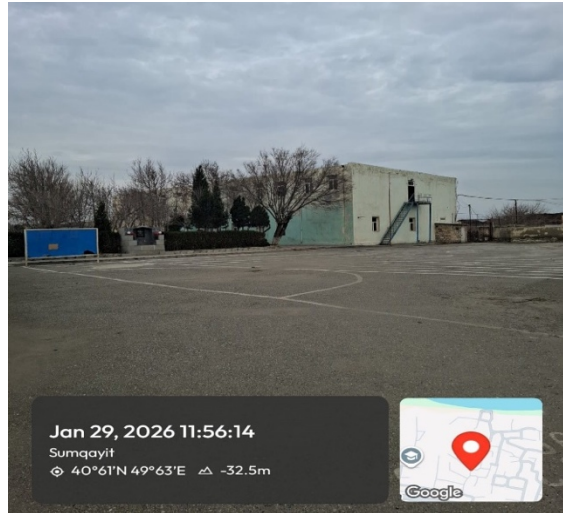
9.0 Review

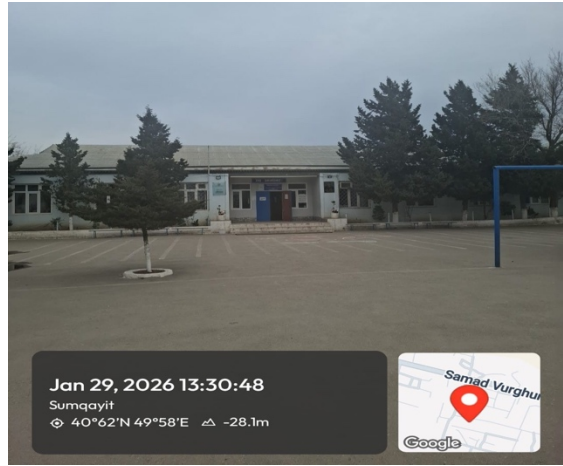
This SEP is a living document to be applied within the Project's HSSE-MS throughout the Project's lifecycle. It will therefore need to be updated to reflect changes in project circumstances, requirements, stakeholders, engagement methods, personnel, grievance procedures, or techniques, as well as to make enhancements based on corrective actions arising from audits or other findings. At a minimum, the SEP will be reviewed annually to support continual improvement.

10.0 Appendix A – Site Area Overview

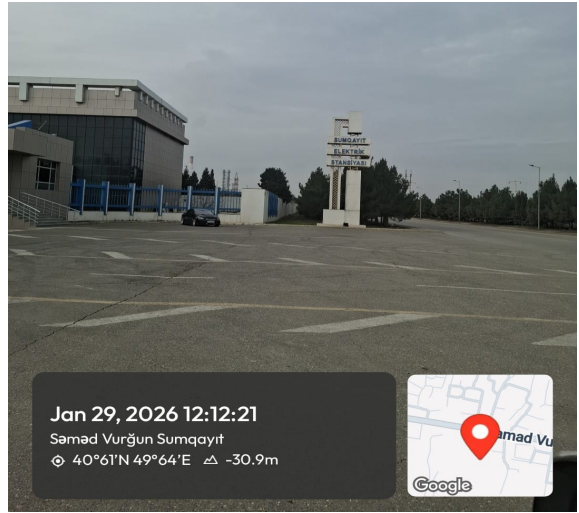
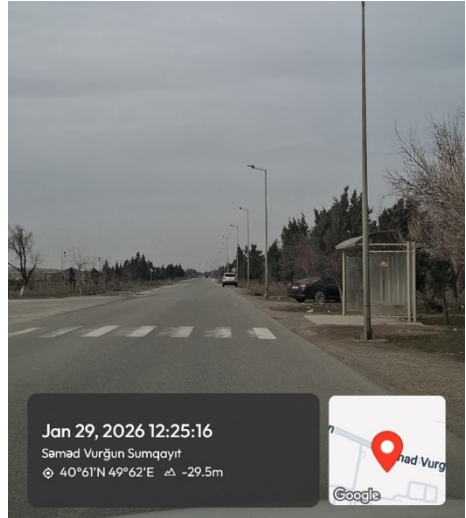
Identified Sensitive Receptors Around Project Area

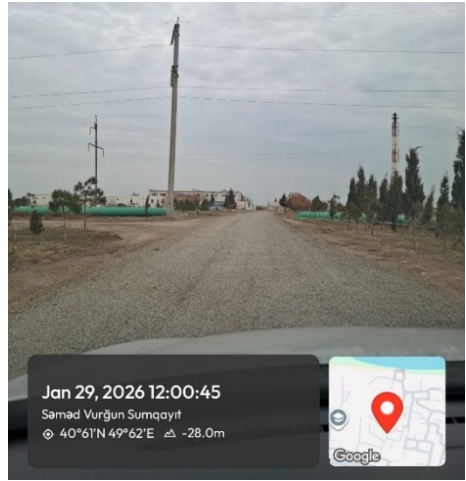
Type of Receptor	Approximate Distance from Site	Receptor Description	Photo (where applicable)
Residential / Commercial	1,600 m	Serin Gol Hotel & Restaurant The “Serin Gol” facility comprises a hotel and a restaurant, neither of which are currently operational. However, it was noted that, should the factory construction commence, the facility may potentially be used to accommodate construction workers.	

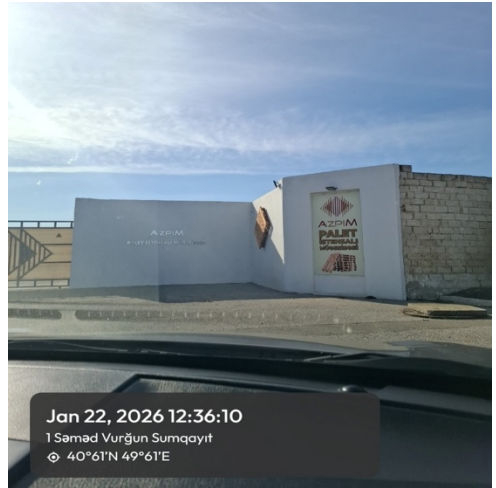
Type of Receptor	Approximate Distance from Site	Receptor Description	Photo (where applicable)
School	750 m	Jabrayil District Secondary IDP School No. 6	 Jan 29, 2026 11:56:14 Sumqayit 40°61'N 49°63'E 32.5m
School	750 m	Jabrayil District Secondary IDP School No. 5 is located on the first floor of the building shown in the photograph. Gubadli District, Mardanli Village IDP Secondary School, is located on the second floor of the building. This two-storey building located in the Kimyachilar settlement. Although the schools are officially registered as IDP schools, children from the local settlement as well as from surrounding settlements also attend school at this facility.	 Jan 29, 2026 11:21:19 Sumqayit 40°61'N 49°64'E 29.0m

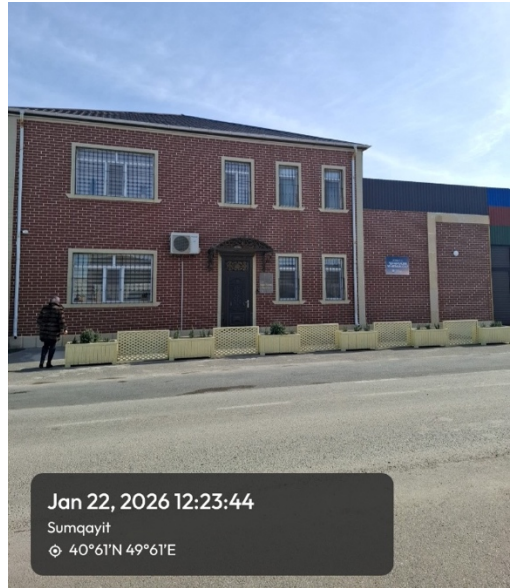
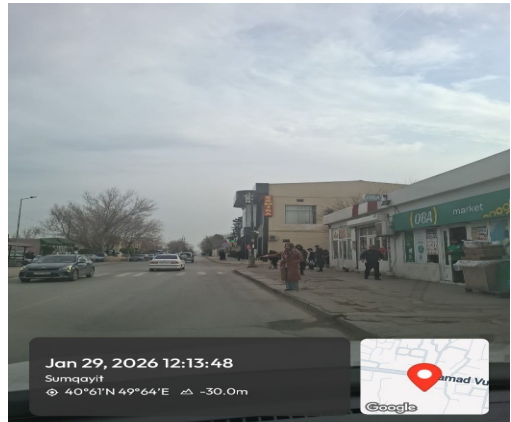
Type of Receptor	Approximate Distance from Site	Receptor Description	Photo (where applicable)
School	2,700 m	Gubadli District, Khalaj Village Secondary IDP School This school building is located in the Khazri settlement.	
Kindergarten	1,800 m	Kindergarten No. 6 Children aged 1 to 5 years are educated at this facility	

Type of Receptor	Approximate Distance from Site	Receptor Description	Photo (where applicable)
Hospital	2,500 m	Sumgait City Hospital No. 4 It is located in the Khazar Baghlari settlement and provides services to the entire population of Sumgait city, including residents of the surrounding settlements.	
Industrial	700 m	SOCAR Polymer Plant (SOCAR Polymer LLC) SOCAR Polymer LLC is a subsidiary of the State Oil Company of the Republic of Azerbaijan (SOCAR) and operates Azerbaijan's first large-scale polymer production complex.	Not available
Industrial	240 m	SOCAR Ethylene and Polyethylene Production Plant The SOCAR Ethylene-Polyethylene Plant (EPP) is a major petrochemical production facility operated by SOCAR and forms a core part of Azerbaijan's oil and gas-based chemical industry. The Plant produces ethylene and polyethylene, which are key raw materials used in the manufacture of plastic products.	Not available

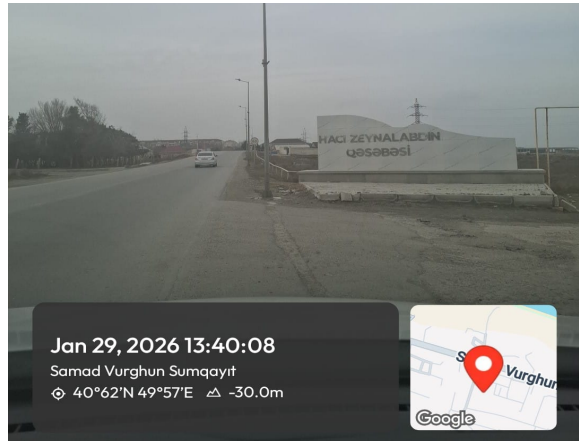
Type of Receptor	Approximate Distance from Site	Receptor Description	Photo (where applicable)
Industrial	1,500 m	Sumgait Power Station Sumgait Power Station is a major electricity generation facility located in Sumgait city. It supplies power to the national grid and plays an important role in meeting the electricity demand of Sumgait and surrounding regions. Due to its strategic importance, the facility is considered part of Azerbaijan's critical energy infrastructure.	 Jan 29, 2026 12:12:21 Səməd Vurğun Sumqayıt 40°61'N 49°64'E Δ -30.9m
Road	120 m	Main Road (Samad Vurgun Street) Samad Vurgun Street is a paved urban road located in Sumgait city, functioning as a main access and traffic corridor within the area. The road consists of a two-lane carriageway with street lighting installed along side. It is primarily used by vehicles and industrial traffic, including service and delivery vehicles. The surrounding land use is predominantly industrial and semi-industrial, with limited roadside vegetation. The road appears to be in good physical condition and provides important connectivity between industrial facilities, nearby settlements, and access roads leading to project-related areas.	 Jan 29, 2026 12:25:16 Səməd Vurğun Sumqayıt 40°61'N 49°62'E Δ -29.5m

Type of Receptor	Approximate Distance from Site	Receptor Description	Photo (where applicable)
Road	Adjacent	Access Road to the project area The road leading to the project area is an unpaved gravel road extending through an industrial landscape. The road surface consists of compacted gravel and soil and appears to be in fair condition, suitable for light and medium vehicular traffic.	
Accommodation Structures	40 m	SOCAR greening containers The containers are used to accommodate workers engaged in tree planting and landscaping activities in areas surrounding SOCAR's industrial facilities. The workers stationed at these containers are engaged in planting new trees and carrying out greening and landscaping improvement works within the surrounding areas.	

Type of Receptor	Approximate Distance from Site	Receptor Description	Photo (where applicable)
Industrial	460 m	AZPIM Azerbaijan Pallet Production Center	 Jan 22, 2026 12:36:10 1 Səməd Vurğun Sumqayıt 40°61'N 49°61'E

Type of Receptor	Approximate Distance from Site	Receptor Description	Photo (where applicable)
Industrial	300 m	Baki Chemistry LLC Baku Chemistry LLC is engaged in the production and supply of chemical products used mainly for industrial and oil-and-gas-related applications. Its activities typically include the manufacture, storage, and handling of chemical materials, as well as related logistics and support services for industrial clients.	
Residential Community	420 m	Kimyachilar Community	

Type of Receptor	Approximate Distance from Site	Receptor Description	Photo (where applicable)
Residential Community	2,500 m	Khazri Community	
Health Clinic	2,900 m	Gubadli District (IDP) Qarakishiler Medical Clinic The building functions as a first aid/primary health care facility. It is used by local residents to receive immediate assistance and basic medical advice from healthcare staff. The facility provides limited primary healthcare services and serves the surrounding residential population.	

Type of Receptor	Approximate Distance from Site	Receptor Description	Photo (where applicable)
Residential Community	2,750 m	Khazar baglari settlement	
Residential Community	3,600 m	Haji Zeynalabdin settlement	

11.0 Appendix B – Example of Grievance Form

Reference No.	
Full Name:	
Contact Information Please mark how you wish to be contacted and add contact details	☐ By Post: ☐ By Telephone: ☐ By E-mail: ☐ Other (please specify)
Description of Concern, Incident or Grievance	What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of concern, incident, or grievance	
☐ One-time incident/grievance (date) ☐ Happened more than once (how many times?) ☐ On-going (currently experiencing problem)	
What would you like to see happen to resolve the problem?	
Signature:	
Date:	
Please insert this form in one of the grievance boxes	

12.0 Appendix C - Grievance Register Template

ID	How Was grievance received (i.e. grievance channel)	Date of Submission of Grievance	Name and Contact Information	Description of Grievance	Department/Person Responsible for Resolution	Actions Taken to Resolve the Grievance	Date of Communication of Solution	Has grievance been resolved (Y/N) if not explain why	Has grievance been repeated (Y/N)

13.0 Appendix D - Grievance Resolution Form

Grievance Resolution Form

How was grievance received	☐ Grievance Box (specify which box) ☐ Directly contact with Project HSSE Manager
Reference No:	
Description of Concern, Incident or Grievance: <i>What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>	
Date of Grievance	
Has the Grievance been Resolved?	☐ Yes ☐ No; <i><u>If not provide a justification below</u></i>
<u>Fill Out Either Section 1 OR Section 2 below</u>	
Section 1	
Summary of Actions Undertaken to Resolve Grievance	

Date of Implementation	
Section 2	
Summary of Proposed Actions to be Implemented to Resolve Grievance	
Timeline for Implementation	

Date of Submission of Grievance	
Date of Communication of Solution to Grievance	

Project HSSE Manager

Name:

Date:

Signature:

Grievant

Name:

Date:

Signature:

E&S Manager Signature:

Date:

14.0 Appendix E – Project Engagement – Summary

Summary of Stakeholder Engagement During the ESIA Phase

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Sumgait City community – Male youth	To provide information about: - Key project information and obtain feedback. - To outline ESIA activities to be undertaken by 5 Capitals (part of SLR), including public meetings, FGDs and household surveys. - Potential construction and operational impacts, potential mitigation and monitoring measures. - The Project's grievance redress mechanism and	A FGD was held with male youth on 16th December 2025. Venue: Sumgayit Youth House Participants: 7 Brochures distributed: 7	Participants provided responses to FGD questions, including community strengths, challenges, land and sea use, livelihoods and employment, access to public infrastructure and services, labour conditions, and potential project impacts. The following feedback and concerns were raised: - Expectation of job opportunities. - Reduction of the Caspian Sea levels. - Increased water supply.	The information was noted for preparation of the ESIA. The following responses was provided: - The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation. - The Project is not expected to reduce Caspian Sea water levels, and any significant changes will be communicated.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
	explain how stakeholders can access it.	A FGD was held with male youth on 19th December 2025. Venue: Sumgayit State University Participants: 12 Brochures distributed: 12	Participants provided responses to FGD questions, including community strengths, challenges, land and sea use, livelihoods and employment, access to public infrastructure and services, labour conditions, and potential project impacts. The following feedback and concerns were raised: • Male youth do not use the Project site for livelihood activities. • Expectation of job and internship opportunities. • Adverse environmental impacts.	The information was noted for preparation of the ESIA. The following responses was provided: • The ESIA will assess all environmental and social impacts per national and lender requirements, and findings will be presented to stakeholders during disclosure. • The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
		A FGD was held with male youth on 23rd December 2025. Venue: Sumgait Heydar Aliyev Center – Youth Development and Career Centre Participants: 7 Brochures distributed: 7	Participants provided responses to FGD questions, including community strengths, challenges, land and sea use, livelihoods and employment, access to public infrastructure and services, labour conditions, and potential project impacts. The following feedback and concerns were raised: • Expectation of job opportunities. • Improved water supply, and access to clean water. • Current sewage discharge makes seawater unsuitable for drinking water.	The information was noted for preparation of the ESIA. The following responses were provided: • The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation. • The sea water will be adequately treated to comply with national and international drinking water standards.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Sumgait City community – Female youth		A FGD was held with female youth on 16th December 2025. Venue: Sumgayit Youth House Participants: 10 Brochures distributed: 10	Participants provided responses to FGD questions, including livelihoods and economic participation, land and sea use, cultural heritage, education and health, vulnerability and GBVH risks, and potential project impacts. The following feedback and concerns were raised: • Female youth do not use the Project site or Caspian Sea for livelihood activities. • Project may increase travel distances for recreational users accessing the coastal area. • Water pollution due to use of chemicals. • Improved water supply, and access to clean water. • Expectation of job opportunities.	The information was noted for preparation of the ESIA. The following responses were provided: • The sea water will be adequately treated to comply with national and international drinking water standards. • The sea water will be adequately treated to comply with national and international drinking water standards. • The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
		A FGD was held with female youth on 19th December 2025. Venue: Sumgayit State University Participants: 13 Brochures distributed: 13	Participants provided responses to FGD questions, including livelihoods and economic participation, land and sea use, cultural heritage, education and health, vulnerability and GBVH risks, and potential project impacts. The following feedback and concerns were raised: • Potential decrease of Caspian Sea water level. • Water pollution due to brine discharge and chemical use. • Expectation of job opportunities.	The information was noted for preparation of the ESIA. The following responses were provided: • The Project is not expected to reduce Caspian Sea water levels, and any significant changes will be communicated. • The sea water will be adequately treated to comply with national and international drinking water standards. • The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
		A FGD was held with female youth on 23rd December 2025. Venue: Sumgait Heydar Aliyev Center – Youth Development and Career Centre Participants: 19 Brochures distributed: 19	Participants provided responses to FGD questions, including livelihoods and economic participation, land and sea use, cultural heritage, education and health, vulnerability and GBVH risks, and potential project impacts. The following feedback and concerns were raised: • Female youth do not use the Project site or marine resources for livelihood activities. • Community members use the Seagull Monument and seaside park for walking and recreation – these are not near the Project site. • There are no tangible cultural heritage sites. • Expectation of job opportunities. • Potential decrease of Caspian Sea water level. • Water pollution due to chemical use. • Improved water supply to support agricultural activities in other regions.	The information was noted for preparation of the ESIA. The following responses were provided: • The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation. • The Project is not expected to reduce Caspian Sea water levels, and any significant changes will be communicated. • The sea water will be adequately treated to comply with national and international drinking water standards.

Khazar Baghlari community	To provide information about: • Key project information and obtain feedback. • To outline ESIA activities to be undertaken by 5 Capitals (part of SLR), including public meetings, FGDs and household surveys. • Potential construction and operational impacts, potential mitigation and monitoring measures. • Planned upcoming surveys. • The Project's grievance redress mechanism and explain how stakeholders can access it.	A public meeting was held on 10th December 2025. Participants: 38 (26 males, 12 females) Brochures distributed: 38	The following feedback was provided: • The project's importance for water supply and recommendation to conduct ecological monitoring and exploration of salt recovery. • The following questions was raised: • Potential project emissions, smoke, and odours impact to nearby communities. • Reason for engaging foreign companies instead of local specialists. • Risks of sewage discharge on community health, especially on vulnerable people, as well as mitigation measures. • Impact of the project on sea levels and water distribution responsibilities.	The feedback was noted and the following responses were provided: No chemicals, smoke, or odours will be emitted, and technical and environmental impacts will be assessed, including noise. Currently, no local companies or specialists have the required experience. Acwa brings extensive international desalination expertise, and national specialists will be trained during project implementation and operation. The ESIA will assess all environmental and social impacts per national and lender requirements, including impact on community health and safety and vulnerable groups. Findings will be presented to stakeholders during disclosure. The Project is not expected to reduce Caspian Sea water levels, and any significant changes will be communicated. According to the initial agreements, the treated water will be pumped to storage reservoirs and subsequently sold to the population in
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TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
				Sumgait, Baku, and the Absheron peninsula area by ASWRA.
Khazar Baghlari community – Men		A FGD was held on 10th December 2025. Venue: Garaguzu Cafe Participants: 10 Brochures distributed: 10	Participants provided responses to FGD questions, including on gendered livelihoods and employment, land use and natural resource access, community health, safety and security, access to infrastructure and services, vulnerable groups, labour and working conditions, tangible and intangible cultural heritage, and potential project impacts. The following concerns were raised: Potential health and environmental impacts on vulnerable groups if chemicals are used.	The information was noted for preparation of the ESIA. The following response was provided: The ESIA will assess all environmental and social impacts per national and lender requirements, and findings will be presented to stakeholders during disclosure.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Khazar Baghlari community – Women		A FGD was held on 10th December 2025. Participants: 7 Brochures distributed: 7	Participants provided responses to FGD questions, including on gendered livelihoods and employment, land use and natural resource access, community health, safety and security, access to infrastructure and services, vulnerable groups, labour and working conditions, tangible and intangible cultural heritage, and potential project impacts. The following feedback and concerns were raised: There are no land users or nomadic users in the Project areas. Caspian sea occasionally used in Summer, but there is reduced recreational use due to pollution-related health concerns. Marine areas are not critical for women's livelihoods. Women only work in restaurants in coastal area. Consideration of alternative water supply projects other than Caspian Sea desalination. Expectation of job opportunities. Improved access to portable water. Risk of polluted water and impact to community health.	The information was noted for preparation of the ESIA. The following response was provided: The ESIA will assess all environmental and social impacts per national and lender requirements, including community health and safety, and findings will be presented to stakeholders during disclosure. The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation. The sea water will be adequately treated to comply with national and international drinking water standards.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Khazar Baghlari community – Vulnerable households		A door-to-door visit was conducted on 10th December 2025, with a mother of a war veteran living alone, Martyr's family, and pensioner. Households: 3 Brochures distributed: 3	The following feedback and concerns were raised: Support of the project due to growing portable water demand and declining resources. Potential demolition of residential houses along the pipeline route.	The feedback was noted and the following response provided: No residential areas are within the plant construction zone, and relocation is not expected. Pipeline route assessments are ongoing, and final alignment details will be shared once approved.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Haji Zeynalabdin Tagiyev community	To provide information about: Key project information and obtain feedback. To outline ESIA activities to be undertaken by 5 Capitals (part of SLR), including public meetings, FGDs and household surveys. Potential construction and operational impacts, potential mitigation and monitoring measures. The Project's grievance redress mechanism and explain how stakeholders can access it.	A public meeting was held on 11th December 2025. Venue: No. 19 Complete Secondary School Participants: 57 (14 males, 43 females)	The following feedback was shared: The settlement has had a reliable water supply since 1916 from Shollar water. Replacing this source would be seen as disregarding his legacy, and there is preference to maintain the current supply. Caspian Sea water must be tested, mineralized, and carefully managed due to pollution. Community member opposes the plant location and calls for ecological assessment due to water quality risks. The following questions were raised: Risk of further Caspian Sea level decline due to reduced inflows from the Volga and Kura rivers. Possibility of raising sea levels by adding water from other sources.	The feedback was noted and the following responses were provided: The water levels are being monitored, and appropriate preventative measures will be applied. The Project is not expected to reduce Caspian Sea water levels, and any significant changes will be communicated. Minerals will be added to treated water to meet international drinking water standards, and the specific composition will be defined by relevant specialists.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Haji Zeynalabdin Tagiyev community – Men		A FGD was held on 11th December 2025. Participants: 9	Participants provided responses to FGD questions, including on gendered livelihoods and employment, land use and natural resource access, community health, safety and security, access to infrastructure and services, vulnerable groups, labour and working conditions, tangible and intangible cultural heritage, and potential project impacts.	The information was noted for preparation of the ESIA.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Haji Zeynalabdin Tagiyev community – Women		A FGD was held on 11th December 2025. Participants: 9	Participants provided responses to FGD questions, including on gendered livelihoods and employment, land use and natural resource access, community health, safety and security, access to infrastructure and services, vulnerable groups, labour and working conditions, tangible and intangible cultural heritage, and potential project impacts. The following feedback and concerns were raised: Women do not use the Project area for livelihood activities. There are no natural resources in the Project area. There are no nomadic land users of the Project area. Potential air emissions from project activities. Reduced sea water levels.	The information was noted for preparation of the ESIA.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Haji Zeynalabdin Tagiyev community – Vulnerable households		A door-to-door visit was conducted on 11th December 2025, with a physically disabled woman, female pensioner, and blind man and his spouse. Households: 3 Brochures distributed: 3	The following feedback and concerns were raised: Project supported as an important initiative. Potential risk of polluted drinking water arising from sewage discharge into the Caspian Sea.	The feedback was noted and the following responses were provided: The sea water will be adequately treated to comply with national and international drinking water standards.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Khazri community – Men	To provide information about: Key project information and obtain feedback. To outline ESIA activities to be undertaken by 5 Capitals (part of SLR), including public meetings, FGDs and household surveys. Potential construction and operational impacts, potential mitigation and monitoring measures. The Project's grievance redress mechanism and explain how stakeholders can access it.	A public meeting was held on 9th December 2025. Venue: Gubadli IDP School Participants: 30	The following comments were shared: Expectation that the project will insulate sound to prevent noise impact to communities. The following questions were raised: Negative impact on flora and fauna. Chemical use and waste management of the plant. Whether houses will be demolished due to the pipeline construction.	The following responses were provided: The ESIA will assess all environmental and social impacts per national and lender requirements, including biodiversity and noise impacts. Findings will be presented to stakeholders during disclosure. Minerals will be added to treated water to meet international drinking water standards, and the specific composition will be defined by relevant specialists. No residential areas are within the plant construction zone, and relocation is not expected. Pipeline route assessments are ongoing, and final alignment details will be shared once approved.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
		A FGD was held on 9th December 2025. Venue: The building of Khalaj Village (Qubadli District, IDP) Full Secondary School Participants: 26	Participants provided responses to FGD questions, including on gendered livelihoods and employment, land use and natural resource access, community health, safety and security, access to infrastructure and services, vulnerable groups, labour and working conditions, tangible and intangible cultural heritage, and potential project impacts.	The information was noted for preparation of the ESIA.
Khazri community - Women		A public meeting was held on 9th December 2025 with a female group. Venue: Gubadli IDP School Participants: 21	The following questions were raised: Whether the community will be required to contribute money towards construction of the plant. Guarantee that the sea water will be properly treated given ongoing sewage and wastewater discharge into the sea. Guarantee of employment opportunities and application procedure.	The following responses were provided: The project will seek funding from international finance institutions and not the communities. The sea water will be adequately treated to comply with national and international drinking water standards. The project will promote local hiring where possible, and opportunities will be announced through official channels.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
		A FGD was held on 9th December 2025. Participants: 8	Participants provided responses to FGD questions, including on gendered livelihoods and employment, land use and natural resource access, community health, safety and security, access to infrastructure and services, vulnerable groups, labour and working conditions, tangible and intangible cultural heritage, and potential project impacts. The following feedback and concerns were raised: There are no natural resources in the Project area. Community health impact of chemical use on people and the environment. Access restriction to the sea. Expectation of job opportunities.	The information was noted for preparation of the ESIA.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Khazri community – Vulnerable households		A door-to-door visit was conducted on 9th December 2025, with mother of a disabled girl, and father of a disabled boy. Households: 2 Brochures distributed: 2	The following feedback and concerns were raised: Project supported as an important initiative to address the region's growing demand for potable water.	The feedback was noted.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Kimyachilar community	To provide information about: Key project information and obtain feedback. To outline ESIA activities to be undertaken by 5 Capitals (part of SLR), including public meetings, FGDs and household surveys. Potential construction and operational impacts, potential mitigation and monitoring measures. The Project's grievance redress mechanism and explain how stakeholders can access it.	A public meeting was held on 8th December 2025. Venue: Kimyachilar Community Center Participants: 50 (28 males, 22 females) Brochures distributed: 40	The following feedback was shared: Previous seawater treatment initiatives did not adequately assess impacts, and emissions from the existing facility (4–5 km from the new plant site) affect communities. Environmental impacts on community health should be thoroughly evaluated for this project. The community has identified several needs, including the lack of centralized water and sewage systems, asphalt internal roads, street lighting, traffic lights, pedestrian crossings, and road signs, and construction of secondary schools as currently, only IDP schools exist. The following questions were raised: Clarification on the exact project site and allocated land area. Water source, treatment, and potential noise impact to nearby communities. Inquiry about CSR initiatives to address community social and infrastructure needs. Potential impact radius and types of impact on communities.	The following responses were provided: The ESIA will assess all environmental and social impacts per national and lender requirements, including community health and safety, and findings will be presented to stakeholders during disclosure. The project site comprises 26 hectares within a total area exceeding 40 hectares, is located away from residential areas, so no relocations are expected, and detailed information will be provided during disclosure. Information on the water treatment process will be provided to stakeholders during disclosure. The plant's water source is the Caspian Sea. The pumps will operate quietly and will not generate adverse noise for surrounding communities.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Kimyachilar community – Men		A FGD was held on 8th December 2025. Venue: Community Centre Participants: 7 Brochures distributed: 7	Participants provided responses to FGD questions, including on gendered livelihoods and employment, land use and natural resource access, community health, safety and security, access to infrastructure and services, vulnerable groups, labour and working conditions, tangible and intangible cultural heritage, and potential project impacts. The following concerns were raised: Project restriction for recreational use of the shoreline for picnicking and swimming. Potential impact of chemicals on the environment and community health.	The information was noted for preparation of the ESIA. The following response was provided: The ESIA will assess all environmental and social impacts per national and lender requirements, and findings will be presented to stakeholders during disclosure.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Kimyachilar community – Women		A FGD was held on 8th December 2025. Participants: 7 Brochures distributed: 7	Participants provided responses to FGD questions, including on gendered livelihoods and employment, land use and natural resource access, community health, safety and security, access to infrastructure and services, vulnerable groups, labour and working conditions, tangible and intangible cultural heritage, and potential project impacts. The following concerns and feedback were shared: Potential impact of chemicals on the environment and community health. Ecological standards should be followed to prevent air and water pollution.	The following response was provided: The ESIA will assess all environmental and social impacts per national and lender requirements, and findings will be presented to stakeholders during disclosure. Mitigation and management measures will be prepared for implementation by the project.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Kimyachilar community – Vulnerable households		A door-to-door visit was conducted on 9th December 2025, with an elderly physically disabled man and his spouse. Households: 1 Brochures distributed: 1	The following feedback was raised: Request that project offers employment opportunities as it would support household's livelihood.	The following response was provided: The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation.
Sumgayit City Executive Power	To provide information about the Project and obtain feedback. To outline ESIA activities to be undertaken by 5 Capitals (part of SLR), including public meetings, FGDs and household surveys. To seek institutional support and cooperation for ESIA phase activities.	An introductory meeting was held with the Deputy Head of the EP and the Senior Advisor on 1st December 2025.	The following information was provided: The Project site is situated on State land, and that privately owned agricultural plots may exist along the proposed pipeline route. The land along the proposed pipeline route can be transferred to State land if required for State needs. It was noted that the Economic Zones Development Agency (EZDA) should be consulted.	Acwa's representative stated that the desalination plant will be located within Sumgait Industrial Area and EZDA has formally proposed this territory for project implementation. A letter was sent to EZDA requesting a consultative meeting.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
	To obtain secondary socio-economic data related to the Project area, current land use situation and surrounding settlements, including information on natural resource users. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	A meeting was held with the Head and Deputy Head of the EP on 1st December 2025.	The Head expressed need for a wider stakeholder meeting with Sumgait government institutions and offered to host the meeting on 4th December 2025. Additionally, the Head stated the strategic importance of the Project due to the declining water levels of the Caspian Sea and increasing demand for portable water. The Project's potential to generate employment was stated as a priority due to unemployment challenges in Sumgait. The existence of a separate intake and discharge pipelines, and SOCAR infrastructure within the Project area was noted.	The following response were provided: A meeting with government institution was held on 4th December 2025. The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation. A letter was sent to SOCAR to request for a consultative meeting. The Project layout and offshore pipeline routes will be provided to all stakeholders during ESIA disclosure.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
		A meeting was held with the Head of Sumgayit EP, Deputy Head, Head of the Urban Economy Department, and Senior Advisor on 1st December 2025. Participants: 4	A representative requested layout maps showing the desalination plant and offshore intake/outfall pipelines to be presented at the meeting on 4 December 2025. The following was inquired: The length of the offshore pipeline. The budget for the Project. Whether employment will be generated for Sumgait residents.	Acwa's representative provided the following responses: The approximate length of the offshore pipeline is 3,500 meters. The budget of the Project is approximately USD 406 million. The Project will require 1,800 workers during peak construction, primarily sourced from Sumgait.

		A meeting was held with the representatives 25 government organisations⁵ on 4th December 2025. Participants: 42	The Head of Sumgayit EP highlighted the plant's strategic importance amid rising water demand in Baku and Absheron. The following questions were raised: If the project's environmental risks have been assessed. Whether future meetings with Fisheries and Aquaculture Centre will address chlorine levels, impacts on fish species and livelihoods. Potential impacts on flora and fauna, considering the current sea-level decline. Number of local personnel to be employed, with recruitment prioritizing the local population. Existing Oghuz-Gabala and Jeyranbatan water projects are underutilized; should their capacity be increased before building a new plant? Project development process, responsible party, and submission timeline for Ministry approval. Planned meetings with the Ministry of Emergency Situations.	The following responses were provided: The ESIA will assess all environmental and social impacts per national and lender requirements, with findings presented to stakeholders during disclosure. Potential impacts on fish, aquatic species, and other issues were discussed with the MENR before the tender, which confirmed no negative environmental impacts. The ESIA will address this concern. A meeting will be arranged with Fisheries and Aquaculture Center to gather more feedback on relevant issues. Project is an additional water source beyond Qabala-Oguz, aligns with Presidential programs, and will include water scarcity awareness activities. The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation. The Ministry of Emergency Situations is a key stakeholder,
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TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
				and meetings will be held with the institution.
		A KII was held a Senior Advisor at Sumgait City EP on 23 rd January 2026. Participants: 1	KII responses included socio-economic and demographic data of nearby communities.	The information was noted for preparation of the ESIA.

5 The list of organisations and departments represented include: Sumgait City EP, Sumgait City Municipality, Sumgait City Municipality Gender Commission, Haji Zeynalabdin Municipality, Jorat Municipality, Executive Department for Haji Zeynalabdin settlement, Executive Department for Jorat settlement, Housing and Communal Services Department of Sumgait city, Ministry of Emergency Situations - Sumgait Regional Center, Sumgait Water Supply Department, Sumgait Electricity Network Department, Sumgait City Gas Operation Department, Regional Department of Ecology and Natural Resources, Sumgait Medical Center, Sumgait Statistics Department, Regional Branch of Food Safety Agency, State Committee for Refugees and IDPs - Sumgait City Branch, SOCAR, Sumgait Police Department, Sumgait Telecommunications Hub, Absheron–Khizi Regional Education Department, State Property Service - Sumgait Branch, Land Management Department SPS - Sumgait branch, and Fisheries and Aquaculture Center of Ministry of Agriculture.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Sumgait Municipality Head of Gender Commission	To provide information about the Project and obtain feedback. To gather secondary data on local and regional GBVH issues and statistics To gather information on existing GBVH support services (shelters, counselling, hotlines, police) and referral systems, including challenges Discussion on social ills, i.e. child labour, forced labour, gender discrimination in the workplace, wages etc. Identification of vulnerable groups in the local communities. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	A KII was held with the Head of Gender Commission on 17th December 2025. Participants: 1 Brochures distributed: 1	KII responses included the Commission's mandate, gendered livelihoods, project impacts, human rights, and GBVH/SEAH.	The information was noted for preparation of the ESIA.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Haji Zeynalabdin Tagiyev Municipality	To provide information about the Project and obtain feedback. To seek assistance with coordination of household surveys. To gather secondary data i.e., i.e. information on existing or potential influx pressures in the local communities, including housing availability. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	A KII was held with the Chairwoman on 11th December 2025 Participants: 1 Brochures distributed: 1	KII responses included demographics, in-migration, cultural heritage, and ecosystem services. The following feedback was provided: No negative impacts anticipated. Existing grievance mechanisms for local communities include verbal and written submissions via phone or email to the municipality.	The information was noted for preparation of the ESIA.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Jorat Municipality and Head of Gender Commission	To provide information about the Project and obtain feedback. To gather secondary data on local and regional GBVH issues and statistics To gather information on existing GBVH support services (shelters, counselling, hotlines, police) and referral systems, including challenges Discussion on social ills, i.e. child labour, forced labour, gender discrimination in the workplace, wages etc.	A KII was held with the Head of the municipality on 8th December 2025. Participants: 1 Brochures distributed: 1	KII responses included demographics, infrastructure, fishing, and land use near the Project. The following feedback and concerns were raised: No concerns of in-migration impacts and emphasis on local workforce recruitment. The Project area does not fall within the administrative jurisdiction of Jorat Municipality. Existence of fish and birds near Project area. Expectation of thorough environmental assessment and implementation of mitigations.	The information was noted for preparation of the ESIA. The following feedback was provided: The ESIA will assess all environmental and social impacts per national and lender requirements, with findings presented to stakeholders during disclosure.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
	Identification of vulnerable groups in the local communities. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	A KII was held with the Head of Gender commission on 8th December 2025 Participants: 1 Brochures distributed: 1	KII responses included the Commission's mandate, gendered livelihoods, project impacts, human rights, and GBVH/SEAH. The following feedback and concerns were raised: Existing channels for reporting GBVH cases include the police hotline, which is widely known within the community. No project-related GBVH/SEAH risks are anticipated, as similar activities have previously occurred without incidents. Expectation of job opportunities and improved social welfare. Expectation of increased water supply. Community health risks and overcrowding from worker influx; monitoring required. Expectation for project to organise regular GBVH awareness training with parents and teachers at schools and kindergartens. Increased air pollution and poor waste management practices.	The information was noted for preparation of the ESIA. The following responses were provided: The ESIA will assess all environmental and social impacts per national and lender requirements, including community health and safety and waste, with findings presented to stakeholders during disclosure.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
State Labour Inspectorate Service	To provide information about the Project and obtain feedback. To obtain updated secondary socio-economic data related to the potential occupational health and safety risks to workers, applicable labour protocols and reporting mechanisms, To address identified data gaps and complement the information already collected by IQLIM (the national EIA Consultant). To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	An online meeting was held on 3rd December 2024. Participants: 4	Representatives emphasized the importance of the Project and expressed their institutional support. The following questions were raised: If there are planned offshore facilities where workers will be stationed. HSE and technical training provision by Acwa, EPC Contractor, or recruiter. The existence of specific requirements to ensure safe working conditions. Whether HSE specialists will be engaged during the construction and operation phases. If there are plans to provide skills training to local workers who may be interested in this new field. Representatives requested an email of the KII questionnaire.	The following responses were provided: The project plans to construct offshore pipelines, however, workers will not be stationed there. There will be regular trainings on plant operations and safety procedures. Acwa has years of experience, and all facilities under the company's operation comply with established requirements to ensure safe working conditions. In addition, Acwa will comply with the lenders' standards on labour and working conditions. HSE specialists will be engaged during the project's construction and operation phases. Local workers will be trained – more information on this will be provided during ESIA disclosure. The KII questionnaire was emailed on 4th December 2025 and a response is pending.

Economic Zones Development Agency (EZDA), and Project Management Department – Ministry of Economy	To provide information about the Project and obtain feedback. To obtain updated secondary socio-economic data related to the regulatory framework for economic zones, and information on Sumgait Chemical Industrial Plant use of infrastructure. To address identified data gaps and complement the information already collected by IQLIM (the national EIA Consultant).	A face-to-face meeting was held on 5th December 2025 with the Head of Internal Control Department, Head of Strategic Projects Management Department of EZDA, as well as representative from the Project Management Department from the Ministry of Economy. Participants: 3 Brochures distributed: 1	The representatives provided the following information: The MoE and EZDA were key in coordination, early project development, and contract negotiations with Acwa, and are well informed about the Project. The plant site lies on is state-owned land, which was leased to EZDA under an indefinite lease agreement and subsequently allocated for development of the plant. The project ESIA team should visit the Vocational Training Centre in Sumgait Industrial Zone to gather information on future professionals' capabilities. According to official documents, EZDA has allocated 29 ha, which differs from the previously reported 26 ha for the project. The most recent Project document updates have not been considered and should be included in future approved documents. The following questions were raised: Potential impacts of the seawater intake and brine outfall on marine flora and fauna. Expected condition and operational status of the plant at handover to ASWRA after 25 years of operation. Required competencies for project implementation and operation, and plans	The ESIA Team noted the information and stated that the MoE has shared the Presidential Degree. Updated details about the project will be shared with all stakeholders during ESIA disclosure. The following responses were provided: Comprehensive impact assessments to biodiversity will be undertaken in alignment with Lenders' requirements, and the relevant mitigation measures will be prepared and applied. The project will conduct periodic technical assessments, and the necessary upgrades or refurbishments will be undertaken to maintain operational performance in line with evolving industry standards and regulatory requirements. Acwa typically focuses on employing and building the capacity of local specialists to support long-term operations and self-sufficiency. It is anticipated that the same
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TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
			for local staff training and long-term transfer to ASWRA.	approach will be adopted in this project to ensure continuity and effective local management.
		A KII was held with the Senior Specialist – Strategic Projects Department on 25th December 2025. Participants: 1 Brochures distributed: 1	KII responses included the Department's mandate, infrastructure, training, and potential project impacts. The following feedback and concerns were raised: EZDA has not received any grievances related to industrial activities in Sumgait Industrial Park. Expectation of regular communication and collaborative partnership with EZDA during project lifecycle. Brine discharge and pipeline construction activities impact to marine ecosystems and fish migration patterns.	The information was noted for preparation of the ESIA. The following response was provided: Comprehensive impact assessments to biodiversity will be undertaken in alignment with Lenders' requirements, and the relevant mitigation measures will be prepared and applied.

Azerbaijan State Water Resources Agency (ADSEA), Ministry of Emergency Situations	To provide information about the Project and obtain feedback. To gather responses to questions about the proposed water pipeline associated with the Project. To obtain socioeconomic information on the emergency preparedness and response requirements for Sumgait City. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	An online meeting was held with the Head and Engineers of the Water and Melioration Complex Design Institute on 23rd January 2026. Participants: 13	Representatives provided the following responses to questions posed to them: The water pipeline will be constructed solely for the project. The pipeline will be owned, operated, and maintained by ADEA. The pipeline is planned for completion by end-2028, with construction expected to take six months, subject to funding. The pipeline crosses Sumgait City and Absheron District. The Sumgait City section has been approved, while approval for the Absheron District section is pending completion of cadastral documentation, expected in late January or early February 2026. The pipeline will be installed underground at road and railway crossings and above watercourses at canal and river crossings, pending final technical design. The planned pipeline length is approximately 15 km, with a diameter of 1,600 mm. The total protection corridor is 20 m, comprising 10 m on each side of the pipeline. Efforts were made to avoid residential areas. Based on available information and field verification, no residential properties fall within the 10 m construction corridor. As the pipeline is 15 km long, below the 20 km threshold under Azerbaijani legislation,	
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TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
			an EIA was not required. Project implementation is subject to approval by the Ministry of Ecology and Natural Resources.	
Fisheries and Aquaculture Centre, Ministry of Agriculture	To provide information about the Project and obtain feedback. To discuss potential Project-related impacts on aquatic habitats, fish breeding/spawning areas, and fishing routes. To gather data on local fishing activities, patterns, and community dependence on aquatic resources. To identify measures to minimize and mitigate impacts on aquatic biodiversity.	A meeting was held with on 9th December 2025 with the Deputy Director, Head of Department of Aquaculture Management, Head of Legal Department and Senior Specialist – Media relations. Participants: 4 Brochures distributed: 4	The following feedback and concerns were raised: Impact of sea water abstraction and brine discharge on marine species and habitats. Recommendation to minimize chlorine concentration in brine before discharge to quantities below 0.02 mg. Recommendation to implement appropriate fencing/barrier around the outfall zone to mitigate risks to marine fauna. Request for KII questions to be emailed for review by management.	The recommendations were noted and the following response provided: Comprehensive biodiversity assessment including marine flora and fauna will be undertaken in alignment with Lenders' requirements, and the relevant mitigation measures will be prepared and applied. Findings will be shared during disclosure. The KII was emailed, and a KII was held on 12th December 2025.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
	To share information about the Project's grievance redress mechanism and explain how stakeholders can access it. To present the Project information and collect feedback.	A KII was undertaken on 12th December 2025 with the Senior Specialist. Participants: 1	KII responses included the Department's mandate, fish breeding, potential aquatic impacts, local fishing, and mitigation measures. The following feedback and concerns were raised: Absence of officially registered designated sensitive or protected aquatic habitats near the Project site. Seasonal use of coastal zone by fish for feeding and migration. Primary spawning areas located outside the Project area. Potential temporary sedimentation/turbidity during construction, localized salinity/temperature changes and ecological risks during operation, which should be mitigated with sediment controls, diffusers, and barriers to protect fish from affected zones. Fishing restrictions may limit catch, lead to income loss. Recommendations include fish relocation, habitat restoration, waste management, and ongoing monitoring.	The information was noted for preparation of the ESIA. The following response was provided: Comprehensive impact assessments to biodiversity will be undertaken in alignment with Lenders' requirements, and the relevant mitigation measures will be prepared and applied.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Khazar Complex Ecological Monitoring Department (KCEM), MENR		A meeting was held with representatives of KCEM and SFCS on 4th December 2025 Participants: 5 Brochures distributed: 5	It was recommended that the Project conduct sea water analysis in the planned intake area. Representatives provided the following comments: The Project intake pipeline should be constructed away from the nearby Sumgayit River due to pollution. The Project should conduct seawater analysis in the intake area. The following was inquired: Which areas will be supplied with the treated 300,000 m³, water? Whether the Project intake pipeline will intersect with the shipping routes. Where the brine water will be discharged. Whether the impact assessment on air quality has been conducted. Whether future meetings with the department will be held. It was advised that the Fishing and Aquaculture Department is best placed to respond to the KII questionnaire.	The feedback was noted, and the following responses were provided: Current water consumption in Sumgait City is 100,000 m³, with the remaining 200,000 m³ supplied to other settlements in the Absheron Peninsula. Details of the location of brine discharge and offshore pipelines will be provided during ESIA disclosure. Air quality impacts will be assessed and included in the ESIA, which will be shared with stakeholders for feedback. The ESIA team will conduct a KII with the Department and hold future consultations during disclosure. As advised, the KII was conducted with the Fishing and Aquaculture Department on 12th December 2025.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
State Fire Control Service (SFCS), Ministry of Emergency Situations			The representative expressed that SFCS will support the Project during its planning to operation.	The feedback was noted.
Baku Office, Absheron DOST Service Centre	To present the Project information and collect feedback. To outline ESIA activities to be undertaken by 5 Capitals (part of SLR). To seek institutional support and cooperation for ESIA phase activities. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	A meeting was held with various department at DOST Agency on 15th December 2025. Participants: 9 Brochures distributed: 9	The following feedback was provided: Mineral addition to treated sea water for potable use must be carefully managed. Information on unemployed and registered job seekers for potential local workforce recruitment can be provided by the office. The following questions were raised: Potential impacts of Caspian Sea level decline on project operation. Consultations and information provision to vulnerable groups. It was agreed that the KII questionnaire should be shared via email.	The feedback was noted and the following responses were provided: Declining Caspian Sea levels are being assessed in the ESIA, with design and operational measures evaluated to ensure long-term project sustainability. The ESIA follows international lender's requirements, ensuring vulnerable and disadvantaged groups are included in stakeholder engagement. Facilitators support their participation through public consultations, door-to-door visits, and distribution of informational brochures to ensure they are fully informed.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
		A KII was undertaken with the Director of the office on 15th December 2025. Participant: 1	KII responses provided include the Office's mandate, socioeconomic data of communities in Sumgait area, existing public infrastructure, and potential project impacts. The following feedback was provided: Expectation of job opportunities, social infrastructure development, and improved water security. The use of local resources and participatory approach can help prevent risks.	The feedback and information were noted for preparation of the ESIA.
Sumgait Regional Gas Maintenance Office of the Azerigaz /SOCAR	To present the Project information and collect feedback. To obtain confirmation of the presence of any SOCAR-owned gas pipelines within the project area and to collect information on pipeline and utility Information along with SOCAR-Owned Facilities Near the Project Area. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	A meeting was held on 23rd December 2025 with the Senior Engineer and Engineer. Participants: 2 Brochures distributed: 2	No SOCAR gas pipelines are present in the Project area; water pipelines used for industrial cooling are likely. Representatives recommended sending a formal inquiry to SOCAR Senior Management regarding existing infrastructure.	The information was noted for preparation of the ESIA. A letter was prepared and sent to SOCAR Senior Management.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
State Border Service of the Republic of Azerbaijan	To present the Project information and collect feedback. To verify the number of registered fishermen and fishing groups near the Project area, the type and number of registered fishing boats and vessels operating near the Project area, fishing routes, spawning and breeding areas and location of alternative fishing grounds. To seek information on any relevant spatial or operational constraints applicable to fishing activities near the Project area.	A KII was undertaken with the SBS guard at Pier 63 on 22nd January 2026. Participants: 1	The following feedback was provided: Fishing activities are governed by the Ministry of Emergency Situations, Water Police Office of the Ministry of Internal Affairs, and SBS. Currently five fishing boats with crews of three to four operate from Pier 63, with approximately 20 fishermen currently fishing. Fishermen disperse up to 10 km offshore, to the north towards Siyazan District; movement untracked by SBS. Daily fishing is monitored through document stamps, with a daily limit of 5 kg per day between May and September due to spawning season. The guard requested that an official written request for information should be sent to SBS.	The information was noted for preparation of the ESIA.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
State Committee for Affairs of Refugees and Internally Displaced Persons (IDP)	To present the Project information and collect feedback. To obtain secondary socio-economic data on IDPs residing within the Project Area, with a focus on key information gaps such as demographic characteristics, livelihood and income sources, access to services and any specific vulnerabilities or support needs. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	A face-to-face meeting was held with the Head of Employment and Deputy Head on 5th December 2025. Participants: 2	Representatives viewed the project positively and strategically, given Baku's water scarcity and growing demand. The following information was provided: Existence of refugee and IDP families living in communities near the project site. The Committee provides cash assistance to about 800,000 IDPs and 400,000 people in Sumgait. The following questions were raised: The Project impact on the environment, particularly the biodiversity of the Caspian Sea. The planned distribution mechanism for the treated water to households. If users will be required to pay for water. The Head of the Employment Department requested the KII questionnaire by formal submission by ADSEA.	The following responses were provided: Comprehensive impact assessments to biodiversity will be undertaken in alignment with Lenders' requirements, and the relevant mitigation measures will be prepared and applied. According to the initial agreements, the treated water will be pumped to storage reservoirs and subsequently sold to the population in Sumgait, Baku, and the Absheron peninsula area by ASWRA. The State Committee for Refugees and IDPs responded to KII questionnaire on 19th December 2026.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
Institute of Archaeology and Ethnography, Azerbaijan National Academy of Sciences (ANAS)	To present the Project information and collect feedback. To obtain updated secondary socio-economic data on cultural heritage or archaeological sites near the Project area. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	A KII was held on 12th December 2025 with an Associate Professor. Participants: 1	KII responses provided included historical information about artefacts found in the nearby factories and cemeteries. Additional information provided included: Ethnographic studies do not show the existence of communities with a historical connection to the Project area. Absence of concrete evidence of intangible cultural heritage practices. Absence of cultural tourism initiatives near the Project site.	The information was noted for preparation of the ESIA.

Sumgayit State University (SSU)	To present the Project information and collect feedback. To outline ESIA activities to be undertaken by 5 Capitals (part of SLR). Potential construction and operational impacts, potential mitigation and monitoring measures. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	A meeting was held with senior management, academic staff, and students on 19th December 2025. Venue: Sumgait State University Participants: 26 (13 males, 13 females)	The following comments were provided: Acwa may collaborate with SSU to support training and development of plant operations specialists. The following questions were raised: Project staffing needs over the 25-year project life, and how long-term plant operation will be managed given the limited availability of national specialists. Potential impacts on flora and fauna, effects of brine discharge under declining sea levels and risks from chemical use. Types of minerals used to treat sea water. Energy supply and management required for seawater treatment.	The comment was noted and the following responses were provided: The project is expected to employ up to 1,800 personnel during peak construction, prioritizing local communities during construction and operation. A vocational school operates within the Sumgait Industrial Park and is expected to support the development of required specialists. Comprehensive impact assessments to biodiversity will be undertaken in alignment with Lenders' requirements, and the relevant mitigation measures will be prepared and applied. Minerals will be added to treated water to meet international drinking water standards, and the specific composition will be defined by relevant specialists. Acwa's experience in wind and other renewable energy could be applied to this project, subject to assessment by technical specialists.
Ecological Society "Ruzigar"		A KII was undertaken with the	KII responses provided included the NGO's role in and responsibilities in	The information was noted for preparation of the ESIA.

TARGET GROUP	CONSULTATION AGENDA	METHOD AND DATE OF CONSULTATION	INPUTS FROM STAKEHOLDERS	PROJECT RESPONSE
		Head of the NGO on 14th January 2026. Participants: 1	monitoring and protecting aquatic resources, potential impacts, and mitigation measures. Additional comments provided included: Waste generated by the Project should be segregated and managed in an environmentally sound manner.	

Consultations with Fishermen

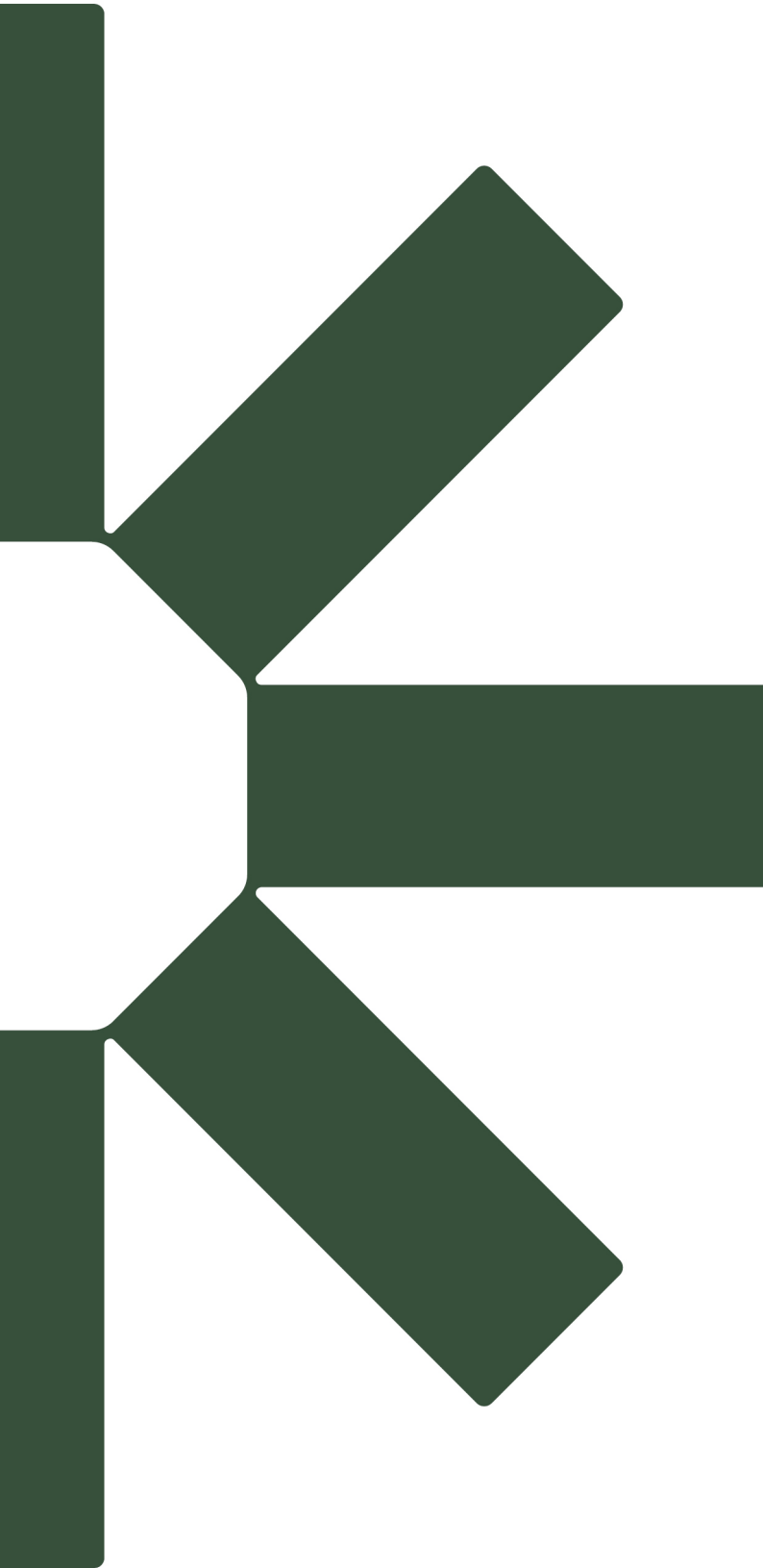
The following table presents the summary of stakeholder consultations undertaken fishermen near the Project area.

TARGET GROUP	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUT FROM STAKEHOLDERS (COMMENTS/CONCERNS)	PROJECT RESPONSE
Fishermen operating near the Project area	To provide information about the project and obtain feedback. To gather information fishing activities near and within the Project area, including livelihoods, and marine ecology. To share information about the Project's grievance redress mechanism and explain how stakeholders can access it.	An FGD was held with fishermen from Haji Zeynalabdin on 25th December 2025. Participants: 5 Brochures distributed: 5	Fishing is the primary source of livelihood for their households and there are no alternative livelihoods. The fishermen conduct small-scale fishing from Pier 64 within two nautical miles, and fish is directly sold to individuals at the landing site. Concern raised about brine discharge and impact on fish populations and marine ecosystem. Concern of impact of intake pipelines on fish larvae and juvenile fish. Project will affect vessel routes; clear maritime signals and alternative routes needed for fishers. Expectation of a collaborative approach where community fishing vessels are procured to support offshore logistics, environmental monitoring, and maritime security operations.	Comprehensive impact assessments to biodiversity will be undertaken in alignment with Lenders' requirements, and the relevant mitigation measures will be prepared and applied.

TARGET GROUP	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUT FROM STAKEHOLDERS (COMMENTS/CONCERNS)	PROJECT RESPONSE
			Preference of individual face-to-face consultations with fishermen throughout project lifecycle.	
		An FGD was held with fishermen from Jorat and Kimyachilar on 24th December 2025. Venue: Jorat Municipality building Participants: 2 Brochures distributed: 2	Approximately 25 fishermen from Kimyachilar and Sumgait conduct fishing from Pier 63, located approximately 500 m from the Project area. Kimyachilar use the area for recreational activities during Summer. Fishing activities are conducted in and within the Project area. The recent discharge of wastewater discharge has adversely impacted fish stocks and livelihoods. There is a protected zone around a plant owned by SOCAR, with pumping facilities located near Pier 63. Concern that brine discharge may reduce fish stocks and hinder the survival of native species due to increased salinity. Concerns of reduced access for recreation, safe navigation and fishing due to construction and operation activities, indirectly causing conflict among fishermen.	Comprehensive impact assessments to biodiversity will be undertaken in alignment with Lenders' requirements, and the relevant mitigation measures will be prepared and applied.

TARGET GROUP	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUT FROM STAKEHOLDERS (COMMENTS/CONCERNS)	PROJECT RESPONSE
State Border Service of the Republic of Azerbaijan	To provide information about the project and obtain feedback. To verify the number of registered fishermen and fishing groups near the Project area, the type and number of registered fishing boats and vessels operating near the Project area, fishing routes, spawning and breeding areas and location of alternative fishing grounds. To seek information on any relevant spatial or operational constraints applicable to fishing activities near the Project area. To seek permission to take photos of the fishing boats docking areas, the pier, the beach area next to the site, recreational sites etc.	Formal letter correspondence was sent on 14 th January 2026.	No response has been received to date.	
Azerbaijan Caspian Sea Shipping Joint Stock Company (ASCO)	To provide information about the project and obtain feedback To request information on fishing activities near and in the Project area, including number of fishing boats, fishing routes, transit routes for fishing vessels,	Formal letter correspondence was sent on 13 th January 2026.	No response has been received to date.	

TARGET GROUP	CONSULTATION AGENDA	MODE OF ENGAGEMENT	INPUT FROM STAKEHOLDERS (COMMENTS/CONCERNS)	PROJECT RESPONSE
	docking, as well as anchoring and landing sites. To obtain information on minimum or maximum distance limits prescribed for different fishing activities or vessel types (e.g. artisanal vs. motorised vessels).			



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