



Rovuma
LNG

**STAKEHOLDER ENGAGEMENT
MANAGEMENT PLAN**

ROVUMA LNG PROJECT

MZLN-EL-RPSEP-00-0001

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ExxonMobil Upstream Socioeconomic Management Standard
The Equator Principles Association. (2013). The Equator Principles.
International Finance Corporation. (2009). Good Practice Note, Addressing Grievances from Project-Affected Communities, Guidance for Projects and Companies on Designing Grievance Mechanisms.
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International Finance Corporation. (2007). Stakeholder Engagement: A Good Practice Handbook for Companies, Doing Business in Emerging Markets.
OIMS System 1-1 – Management Leadership, Commitment, and Accountability
OIMS System 2-1 – Risk Assessment and Management
OIMS System 4-2 – Compliance with Laws, Regulations and Permits
OIMS System 6-5 – Environmental Management
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1. PURPOSE AND SCOPE

MZLN-EL-RPSEP-00-0001 Rev 0 Stakeholder Engagement Management Plan is an individual, topic specific plan comprising an integral component of the Rovuma LNG Environmental and Social Management Plan (ESMP) MZLN-EL-RPPLN-00-0016.

Information regarding the Project Overview, Objectives (of the ESMP), Scope, Project Components and Associated Facilities and other information regarding the context of the ESMP can be referenced in the Rovuma LNG Environmental and Social Management Plan MZLN-EL-RPPLN-00-0016 Rev 0.

The principal objective of the ESMP is to facilitate the avoidance, reduction, and mitigation of environmental, social and community health, safety and security risks and impacts associated with the construction phase of the Midstream Project.

The ESMP sits within a broader Environmental and Social Management Framework, as illustrated in Figure 1-1 as shown in the Environmental and Social Management Plan MZLN-EL-RPPLN-00-0016 Rev 0.

This Framework comprises two overarching, system-level documents (Environmental and Social Management Plan and Environmental and Social Requirements for Contractors) and a set of theme and activity-specific documents that collectively describe how the Project will manage its environmental and social (E&S) risks. The listing of the ESMP set of documentation is contained below:

- MZLN-EL-RPPLN-00-0016 Rev 0– Environmental and Social Management Plan (ESMP)
- MZLN-EL-RAZZZ-00-0001 Rev 0 – Requirements for Camps and Accommodation
- MZLN-EL-RBENV-00-0001 Rev 1 – Environmental and Social Requirements for Contractor (with Annexes)
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 1 Air Quality, Greenhouse Gases and Energy Efficiency
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 2 Effluent Discharges
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 3 Waste Management
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 4 Hazardous Materials
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 5 Site Development, Construction and Reinstatement
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 6 Road Traffic and Transport
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 7 Marine Operations
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 8 Water Use and Abstraction
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 9 Raw Materials and Aggregates
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 10 Dredging
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 11 Lighting and Visual Impact
 - MZLN-EL-RBENV-00-0001 Rev 1 Annex 12 Ballast Water and Biofouling

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- MZLN-EL-RBENV-00-0001 Rev 1 Annex 13 Weed and Pest Management
- MZLN-EL-RBENV-00-0001 Rev 1 Annex 14 Wildlife Protection
- MZLN-EL-RPLCP-00-0001 Rev 0 – Local Content Management Plan
- MZLN-EL-RPPLN-00-0005 Rev 0 – Community Development Support Plan
- MZLN-EL-RPPLN-00-0007 Rev 0 – Cultural Heritage Management Plan
- MZLN-EL-RPPLN-00-0008 Rev 0 – Supplemental Land Access Management Plan
- MZLN-EL-RPPLN-00-0009 Rev 0 – Project Induced In-Migration Management Plan
- MZLN-EL-RPPLN-00-0013 Rev 0 – DUAT Encroachment Management Plan
- MZLN-EL-RPPLN-00-0014 Rev 0 – Employment and Worker Relations Plan
- MZLN-EL-RPSEP-00-0001 Rev 0 – Stakeholder Engagement Management Plan
- MZLN-EL-RPPLN-00-0006 Rev 0 – Community Health Safety and Security Management Plan
- MZLN-EL-RPPLN-00-0004 – Biodiversity Strategy
- MZLN-EL-RPPLN-00-0011 – Biodiversity Action Plan

This ExxonMobil Moçambique, Limitada (EMML) Stakeholder Engagement Management Plan (Plan) describes EMML's approach to stakeholder engagement and the steps it intends to take during the construction phase of the Project to develop and maintain constructive and mutually beneficial relationships with stakeholders during the Project's development and construction phases.

Before the entry of EMML into the Project, the Project was granted 6,253 hectares of land through the Direito de Uso e Aproveitamento da Terra (DUAT) Process for the Livelihood Development Zone, and the Project Industrial Zone (PIZ). Anadarko and Eni East Africa, S.p.A. (EEA), as the Project Sponsors for the Mozambique Gas Development Project Área 1, Lda, engaged in resettling affected residents under the Resettlement Plan (RP) for the Mozambique Gas Development Project in Palma District, Cabo Delgado Province, Mozambique. An Environmental Impact Assessment (EIA) for the Project was approved by the Ministry for the Coordination of Environmental Affairs (MICOA) in June 2014. As prescribed by the Regulation on the Resettlement Process Resulting from Economic Activities Decree No. 31/2012 dated 8 August, Anadarko developed an approved resettlement plan required as a precursor to issuing an Environmental License. Refer to Section 4 for more information.

Public consultation is an integral part of the EIA process for projects classified as Category A in Article 19 of the Environmental Regulations for Petroleum Operations. A comprehensive Stakeholder Engagement Framework was created by Anadarko Moçambique Area 1 Limitada (AMA1) and implemented to ensure effective, ongoing communications involving the Operator, national and provincial governments, local communities, non-governmental organizations (NGOs), and other stakeholders. The Project Sponsors believe it is in the Project's interests that all stakeholders understand the Project and its implications for them and their interests. As a result, the Project Sponsors have devoted much attention to both briefings on progress and understanding and addressing issues.

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The Draft EIA Report and Environment and Social Management Plan (ESMP) were made available for public comment between 23 August and 27 September 2013. At the request of MICOA, the commenting period was extended by approximately 1 month to 31 October 2013. This request was to provide all stakeholders with additional time to effectively review the Draft EIA Report, given the document's size and complexity.

Public meetings were held in Palma, Pemba, and Maputo between 09 and 12 September 2013 to present the findings of the Impact Assessment Phase and to elicit comment on the Draft EIA Report and ESMP. During the meeting held in Palma on 11 September 2013, participants requested that the EIA Team facilitate further meetings in Palma District at a community level. Three additional public meetings were held in Maganja, Quitupo, and Senga with Community Representatives between 16 and 18 October 2013.

On 22 February 2018, the Ministry of Land, Environment and Rural Development (MITADER) under the terms of the Environmental Law 20/97 from October 1 and in accordance with Line j Number 1, Article 6 of Chapter I from the Environmental Regulation for Petroleum Operations approved by the Decree 56/2010 from November 22, issued Environmental License No. 10/2018 to EEA, approving implementation of infrastructures exclusive to Area 4 covering the scope of the Midstream Project in Afungi, Palma District, Cabo Delgado Province.

Building upon the stakeholder engagement work conducted by AMA1 before the entry of EMMML into the Rovuma Gas Development Project, EMMML will utilize the processes developed and the information obtained by AMA1 to the maximum extent practical, considering scope, location, time, and planned activities.

To ensure the continuity and consistency of stakeholder engagements in the Rovuma Basin Area, to avoid confusion, and to provide clarity between respective Operator activities, AMA1 and EMMML have established committees at both the executive and managerial levels to manage issues common to both Operators, and to maximize the delivery of both AMA1 and Rovuma LNG Project to the benefit of the economy and people of Mozambique.

This Plan, while recognizing the importance of mutual cooperation between AMA1 and Rovuma LNG Project, describes the EMMML standards and requirements, early engagement activities, the proposed engagement program for construction, description of the grievance mechanism, monitoring, reporting, roles and responsibilities, and training.

Pursuant to the Decree Law and in accordance with the Government's desire for effective coordination among the Area 1 Operator (Anadarko Moçambique Área 1 Limitada) and the Area 4 Operator (EMML), and for a single materials offloading facility and a single LNG marine terminal to be developed, the Area 1 Operator and Area 4 Operator will develop such joint facilities to support their respective onshore LNG projects, in the Afungi LNG Park.

RBLL is a company by quotas incorporated under the Law of Mozambique, registered in Maputo, with MRV, AMA1, and ENH being the quota holders in equal proportions. The following Assignments of Exploitation were executed in November 2014:

- An Amended Assignment of Exploitation Agreement – Common Area, executed between the Area 1 Operator, the Area 4 Operator and Rovuma Basin LNG Land, Lda -, for the exploitation of a 'Common Area';
- An Amended Assignment of Exploitation Agreement – Area 4 Site, executed between the Area 4 Operator and Rovuma Basin LNG Land, Lda for the exploitation of the Area 4 Site;

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- An Amended Assignment of Exploitation Agreement – Area 1 Site, executed between the Area 1 Operator and Rovuma Basin LNG Land, Lda for the exploitation of the Area 1 Site.

On June 20, 2017 the Council of Ministers of Mozambique approved the Concession Agreement for the Materials Offloading Facility ("MOF Concession") between the Government of the Republic of Mozambique and Mozambique MOF Company S.A. ("MOFCo"). MOFCo is a Mozambican company with shares to be owned by the Area 1 Concessionaires (or their affiliates) and the Area 4 Parties (or their affiliates) with the purpose of holding the MOF Concession and building, owning, operating, and maintaining the Materials Offloading Facility, including the Service Harbor. The MOF Concession provides the Area 4 Concessionaires and the Area 1 Concessionaires with use of the MOF facility on equal terms.

On June 20, 2017 the Council of Ministers of Mozambique approved the Concession Agreement for the LNG Marine Terminal ("LMT Concession") between the Government of the Republic of Mozambique and Mozambique LNG Marine Terminal Company S.A. ("LMTCo"). LMTCo is a Mozambican company with shares to be owned by the Area 1 Concessionaires (or their affiliates) and Area 4 Parties (or their affiliates) with the purpose of holding the LMT Concession and building, owning, operating, and maintaining the LNG Marine Terminal. The LMT Concession provides the Area 4 Concessionaires and the Area 1 Concessionaires with use of the LMT facility on equal terms.

On 10 August 2017, the Shared Facilities Implementation Agreement (the "SFIA"), was entered into between the Area 1 Operator, the Area 4 Operator, MOFCo. and LMTCo which outlines the terms and conditions related to the funding, design, construction, ownership, management and use of the Materials Offloading Facilities and the LNG Marine Terminal (together the "Shared Facilities"). The SFIA also describes the process, the timeline, and the governance principles to support the delivery and operation of the Shared Facilities.

In furtherance of the above, a number of agreements have been or will need to be executed in order to establish onshore coordination, including operation and management, between the Area 1 Operator, Area 4 Operator, MOFCo, LMTCo, and TrainCo SPE.

These agreements will set the coordination of the activities in Afungi at different stages, as well as the governance of MOFCo and LMTCo

The coordinated efforts aim to ensure timely construction and appropriate and efficient operation of MOFCo, LMTCo, and the Common Facilities for the benefit of the Government of Mozambique, the Area 1 Concessionaire, and the Area 4 Concessionaire.

In particular, the agreements, permits and other shared documents that govern such coordination include:

- The Environmental Impact Assessment, approved in June 2014
- The Resettlement Action Plan for Afungi, approved in December 2016
- The Resettlement Joint Operating Agreement (RJOA), executed on 5 July 2018
- The Shared Facilities' Ancillary Agreements:
 - Construction Management Agreements (between the LMTCo and the Constructing Entity and MOFCo and the Constructing Entity, the "Constructing Entity" being either the Area 1 Operator or the Area 4 Operator (as agreed pursuant to the terms of the SFIA, or associated Shareholders Agreement (as applicable))).

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- Shared Facilities Usage Agreements—governing the right for Area 1 and Area 4 to use and receive certain services from the LMTCo and MOFCo.
- Operations Services Agreements (between LMTCo and either the Area 1 Operator or an Affiliate of the Area 4 Operator, and MOFCo and either the Area 1 Operator or an Affiliate of the Area 4 Operator) as agreed pursuant to the terms of associated Shareholders Agreement.

The DUAT Common Area Joint Operating Agreement to be executed by the Area 1 Operator and the Area 4 Operator, for the funding, design, construction and use of certain common infrastructures agreed to between Area 4 and Area 1 such as, but not limited to, the common roads, security fences, shared airstrip, waste management facility, and the onshore portion of an offshore fiber optic cabling system ("Common Facilities").

Coordination committees, at both the managerial and technical levels have been established with AMA1 for the purpose of managing shared and common facilities. Management of common and shared facilities will include not only operational concerns, but also include safety, security, environmental, and socioeconomic stewardship in accordance with respective commitments.

In addition, alignment and management of shared operational, SSHE, and social stewardship issues for shared and common facilities, AMA1 and EMMML are also working together to jointly harmonize and manage potential issues of regional concerns not necessarily limited to a physical facility. To the extent practical, taking into account differences in scope, it is the intent of the Operators through such coordination committees to harmonize processes and desired outcomes to minimize the potential of perceived inequities among impacted communities. These potential issues include, but are not limited to:

- Stakeholder engagement
- Grievance management
- Security
- Community health and safety
- Community development initiatives
- Recruitment procedures
- Worker welfare and industrial relations
- Emergency response
- Harmonization of baseline data
- Biodiversity management

1.1. Scope

Stakeholders are defined in this Plan as people, groups, or communities that may be directly or indirectly affected by the Project or have an interest in it. This is a diverse group that, over time, will comprise locally affected communities or individuals and their formal and informal representatives, national or local government authorities, political leaders, religious leaders, civil society organizations, groups with special interests, the academic community, and other businesses.

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Stakeholder engagement is regarded as an ongoing process and applies broadly to the Project's operations. Priority will be given to stakeholders who are directly affected by Project activities, but stakeholder engagement will not exclude those that fall within a broader sphere of influence or whose legitimate interests define them as stakeholders.

While the Stakeholder Engagement Program is a dedicated EMMML function (refer to Section 5), it shares an interrelationship with other departments and, to some extent, all Project employees. Therefore, the requirements of this Plan will be considered by the following departments and incorporated into their planning:

- Public and Government and Affairs (P&GA)
- Community Affairs (Socioeconomics)
- Local Content (Socioeconomics)
- Safety, Security, Health, and Environmental (SSHE)
- Security
- Procurement and Supply
- Human Resources
- Medicine and Occupational Health (MOH)
- Prime contractors, to extent relevant

1.2. Objectives

International Finance Corporation (IFC) principles of engagement will be applied during the construction phase and will serve as the basis of stakeholder engagement during the production phase. These principles are as follows:

- Provide meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s)
- Provide information in advance of consultation activities and decision-making
- Disseminate information in ways and locations that make it easy for all stakeholders to access it
- Respect local traditions, languages, timeframes, and decision-making processes
- Establish two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed
- Seek inclusiveness in representation of views, including women, vulnerable and elderly people, and/or minority groups
- Adopt processes free of manipulation, interference, intimidation, or coercion and free of charge for participation

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- Develop clear mechanisms for receiving, documenting, and responding to people's concerns, suggestions, and grievances
- Incorporate feedback into Project or program design, and report back to stakeholders in a reasonable time.

With these principles in mind, the overall objectives of the Project's stakeholder engagement activities are to keep stakeholders informed with respect to their specific interests, to provide stakeholders (especially the directly affected) with the ability to participate in decisions on matters that affect them, and to maintain stakeholder confidence and trust in the Project and its activities through open, informative, inclusive, and timely communications.

The expectation is that this will be achieved by building on the relationships established during the EIA phase and making appropriate adjustments that are consistent with the previously described entry of EMMML into the Rovuma Project.

2. ACRONYMS AND TERMS

Term	Definition
AMA1	Anadarko Moçambique Area 1 Limitada
CLO	Community Liaison Officer
EMML	ExxonMobil Moçambique Limitada (EMML) is the ExxonMobil Affiliate conducting Midstream Operations for MRV.
DUAT	Direito de Uso e Aproveitamento
EEA	Eni East Africa, S.p.A.
EIA	Environmental Impact Assessment
ESMP	Environment and Social Management Plan
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immunodeficiency Syndrome
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
LNG	Liquefied Natural Gas
MICOA	Ministry for the Coordination of Environmental Affairs
MIREM	Ministry of Mineral Resources
MITADER	Ministerio da Terra, Ambiente e Desenvolvimento (Ministry of Land, Environment and Rural Development)
MOH	Medicine and Occupational Health
MRV	Moçambique Rovuma Venture
NGO	Non-Governmental Organizations
OIMS	Operations Integrity Management System
P&GA	Public and Government Affairs
PIZ	Project Industrial Zone
Project	The development of the onshore and nearshore facilities for Area 4 by EMML, in conjunction with its nominated contractors.
RIC	Resource and Information Center
Rovuma LNG Project, RLNG Project or Project	The overall development of the Area 4 Offshore Rovuma Basin Straddling and Non-Straddling Reservoirs will be pursued in multiple phases, of which the Rovuma LNG Project is the first onshore phase. The Rovuma LNG Project will be targeting the production of 12 TCF of gas from the Mamba Straddling Resources (to be undertaken independently of Area 1) together with condensate and domestic gas as described below, as well as the parallel development of the Oligocene Lower 385 East Non-Straddling Resources (5.7 TCF)
RP	Resettlement Plan
SSHE	Safety, Security, Health, and Environmental
STD	Sexually Transmitted Disease

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3. PROJECT STANDARDS AND REQUIREMENTS

EMML Project is committed to undertaking all activities in accordance with applicable Mozambican legislation, IFC requirements, and ExxonMobil standards. The requirements described in this section form the basis of this Plan, but they are not an exhaustive list of all regulatory requirements and ExxonMobil commitments.

3.1. Mozambican Regulatory Framework

In Mozambique, both the Constitution (1990) and Environment Law establish the rights of citizens to have information about and to participate in decision-making in regard to activities which may affect the environment. Public participation and stakeholder engagement are requirements in Mozambican laws and regulations, including the following:

- Rovuma Basin Decree Law (Law No. 2/2014)
- Land Law (Law No. 19/97)
- Environmental Law (Law No. 20/97)
- Regulations on the Environmental Impact Assessment Process (Decree No. 45/2004)
- Regulations for Managing an EIA (Diploma No. 129/2006)
- Regulations for Managing Public Participation within an EIA (Diploma No. 130/2006)
- Regulations for Land Law (Decree No. 66/98), including the Technical Annex
- Environmental Regulations for Petroleum Operations (Decree No. 56/2010)
- Regulation for Resettlement Resulting from Economic Activities (Decree No. 31/2012 and guidance on its implementation, Ministerial Resolution No. 156/2014 of September 19)

3.2. IFC Requirements

The IFC's Performance Standard 1: Social and Environmental Assessment and Management Systems (IFC, 2012) and associated Guidance Notes are most relevant to stakeholder as follows:

- Community engagement is an ongoing process involving disclosure of information. When local communities may be affected by risks or adverse impacts from a project, the engagement process will include consultation with them. The purpose of community engagement is to build and maintain over time a constructive relationship with local communities. The nature and frequency of community engagement will reflect the Project's risks to and adverse impacts on the affected communities. Community engagement will be free of external manipulation, interference, coercion, and intimidation, and it will be conducted on the basis of timely, relevant, understandable, and accessible information.
- EMML 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 that allows EMML to consider and respond to them.
- The consultation process will ensure the free, prior, and informed consultation and participation of impacted communities and will facilitate their informed participation. The Initial IESC Phase I Environmental and Social Due Diligence Report (ESDD) indicated that it had not found any evidence of indigenous groups in the Project area, but recommended that

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more conclusive evidence of whether Indigenous groups that fit the IFC definition are located in area was needed. The Project subsequently reassessed the issue using non-project related research findings on indigenous peoples in the Project area by reputable anthropologists and other experts, as well as a paper on the application of PS 7 in Sub-Saharan Africa by a well-known retired IFC Principal Social Specialist and oral histories collected by the reputable NGO from members of each project affected village (Quitupo, Maganja, and Senga), site archaeological research and records as presented in the EIA and household socio-economic surveys undertaken for the EIA and Resettlement Plan. The collective research found that Cabo Delgado is not home to any Indigenous Peoples groups as defined by IFC PS7. The IESC agreed that the evidence strongly supports the conclusion that there are no ethnic or cultural groups within the Mozambique Gas Project Afungi site area that meet the IFC PS 7 definition of Indigenous Peoples and, therefore, PS7 does not apply to the LNG Projects.

- Informed participation involves organized and iterative consultation, leading to EMMML incorporating into its decision-making process the views of the affected communities on matters that affect them directly, such as proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. EMMML will document its processes, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected communities.
- EMMML will respond to communities' concerns related to the Project. Where ongoing risks to or adverse impacts on affected communities are likely, EMMML will establish a grievance mechanism to receive and facilitate resolution of the affected communities' concerns and grievances about EMMML's environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the Project. It should address concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected communities, and at no cost and without retribution. The mechanism should not impede access to judicial or administrative remedies. EMMML will inform the affected communities about the mechanism in the course of its community engagement process.

Additionally, recommended good practice in stakeholder engagement is contained in the following documents:

- Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (IFC, 2007)
- Good Practice Note, Addressing Grievances from Project-Affected Communities, Guidance for Projects and Companies on Designing Grievance Mechanisms (IFC, 2009).

Key themes of these documents include:

- Early Engagement—Beginning engagement early is crucial to building trust and mutual respect and to establishing relationships with stakeholders. The development and implementation of this stakeholder engagement management plan will ensure that consultation activities are proactive, planned, and delivered in a timely manner.
- Long-Term View—Establishing and maintaining relationships is a long-term investment. To enhance the value of stakeholder relationships, EMMML will take a long-term view to engagement. This stakeholder engagement framework embeds a long-term view by identifying and planning engagement activities that are tailored for each phase of the Project.

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- Proactive Not Reactive—This stakeholder engagement framework sets a proactive path for consultation, as opposed to being reactive and responding to issues as they arise. A proactive approach to consultation helps to build credibility and relationships with stakeholders.
- Managed as a Business Priority—This stakeholder engagement framework will ensure that EMMML plans and delivers engagement activities using a systematic and consistent approach. This approach involves assigning management responsibilities and resources to each consultation activity.

3.3. Equator Principles

An additional guide on international standards for stakeholder engagement is contained in The Equator Principles (The Equator Principles Association, 2013). These Principles set out environmental and social criteria and guidelines for the financing of projects. Specifically, Principles 5 and 6 outline the main consultation, disclosure of information, and grievance management requirements, which are as follows:

- EMMML must consult "with Project-affected communities in a structured and culturally appropriate way."
- Consultation should be "free" (free from external manipulation, interference, coercion, or intimidation), "prior" (timely disclosure of information), and "informed" (relevant, understandable, and accessible information), and it should apply to the entire Project process.
- EMMML will prepare a Project Consultation and Disclosure Plan.
- Consultation will be tailored to meet the needs of the affected communities in terms of language, their decision-making processes, and the specific needs of disadvantaged or vulnerable groups.
- EMMML will make documentation, especially non-technical summaries of Project documents, available to the public.
- EMMML will document the process and results of consultation with the public.
- EMMML will establish a grievance mechanism to consider concerns from impacted communities promptly, transparently, and in a culturally appropriate manner.

3.4. EMMML Standards

EMMML is committed to conducting business in a manner that considers the needs of the communities in which it operates. These commitments are supported by community, human safety, health, environment, product safety, and security policies. Each of these policies is put into practice through a disciplined management framework called the ExxonMobil Operations Integrity Management System (OIMS). The OIMS documents, as well as the Socioeconomic Management Standard, apply to stakeholder engagement and grievance management as follows:

- OIMS System 1-1 – Management Leadership, Commitment and Accountability—The requirement to establish Management Systems for Operations Integrity (OI). Managers and supervisors demonstrate commitment and personal accountability to them through active and visible participation.

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- OIMS System 2-1 – Risk Assessment and Management—The requirement to identify and manage risks.
- OIMS System 4-2 – Compliance with Laws, Regulations and Permits—The requirement to comply with applicable laws, regulations, permits, licenses, and other legally binding requirements or agreements
- OIMS System 6-5 – Environmental Management—The requirement to identify and assess significant environmental aspects (including socioeconomic) and to develop mitigations.
- OIMS System 10-1 – Community Awareness—The requirement that addresses communication and interaction with employees, contractors, government, law enforcement officials, NGOs, the media, and local communities where the office and field/plant operations could have an impact on the communities. The review of grievances, status, statistics, and issues is a required activity within this element.
- OIMS System 11-1 – OIMS Assessment—The requirement for periodic internal and external assessment of the performance of the OIMS systems.

The ExxonMobil Upstream Socioeconomic Management Standard provides guidance on how socioeconomic issues will be identified, with specific consideration given to the following:

- Consultation with relevant communities, government officials, and appropriate stakeholder organizations or individuals to share information, solicit opinions/ideas/feedback, and respond to expressed concerns
- Identification of potential socioeconomic issues and risks including, but not limited to, management of cultural and heritage properties, interaction with indigenous and/or vulnerable populations, involuntary resettlement, compensation, employment and training, and the procurement of goods and services
- Development of appropriate prevention (or enhancement), control, mitigation, and monitoring strategies related to potential socioeconomic issues and impacts

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4. EARLY STAKEHOLDER ENGAGEMENT

This section outlines early stakeholder engagement activities carried out by AMA1 for the EIA, exploration, and land-related consultation on behalf of both Area 1 and Area 4 operators.

Beginning in 2011, AMA1 carried out a series of consultations with communities within and adjacent to the proposed Project development site. The consultations focused on AMA1's gas exploration, its discoveries, and the requirement of land on which to construct the LNG plant and auxiliary facilities. During this time, AMA1 created a stakeholder database that included the ranking of interests of stakeholders, records of issues and concerns, and an engagement plan required for EIA disclosure. A series of focus groups and public, individual, and community meetings with key stakeholder groups were held. The aim of these meetings was to provide stakeholders with information about activities that could affect them and to understand their issues and concerns related to Project development. In addition to focus groups and meetings, AMA1 shared Project information using notice boards placed in all the local villages.

In 2013, AMA1 undertook other land-related engagement, including the demarcation of communities affected by the DUAT. This process began during the third quarter of 2013 and concluded in July 2014. It was carried out by a consortium that worked in collaboration with the AMA1 Community Relations Team and Community Representatives and leaders. The identification of land within the DUAT, occupied through custom, that may be affected by the development of the Project and therefore result in either physical or economic displacement impacts, was incorporated into the resettlement program in a participatory community boundary mapping process. During the community boundary mapping process, AMA1 gathered information on community histories, culture and social organization, use of land and natural resources, and the mechanisms for land and natural resource management, spatial occupation, population dynamics and possible conflicts, and the mechanisms for their resolution. The process involved communities and government representatives to ensure that the results were representative.

5. STAKEHOLDER ENGAGEMENT PROGRAM

EMML, primarily through the Community Affairs Team, will have responsibility for the establishment and stewardship of the stakeholder engagement program. The program will form the basis of future engagement activities, specifically with respect to stakeholders, issues, forms of engagement, and priorities. Establishing the program will be the responsibility of the EMML Community Affairs Team under the management of the EMML Socioeconomic Manager.

EMML's Midstream Community Affairs Team is solely responsible for communication of information related to Area 4 activity. In the event that engagements are necessary for transfer of information relevant to the Midstream as well as other area Operators, EMML will utilize coordination procedures established to ensure alignment in messaging. Such communication and alignment between area Operators includes stewardship of grievances of mutual interest and concerns.

5.1. Principal Stakeholder Groups and Issues

Project stakeholders are unlikely to change significantly during the construction phase from those with whom AMA1 engaged during the EIA phase (at least in the short-term) before EMML entry. However, the priorities and therefore the form and nature of engagement will change because of time, location, and scope differences.

Table 5-1 summarizes the key stakeholder groups that are anticipated to be the focus of the EMML engagement program during construction, together with an overview of the type of engagement and likely key issues.

Table 5-1: Principal Stakeholder Groups During Construction

Stakeholder Group	Typical Engagement Mechanism	Key Interests/Issues
National		
Government of Mozambique (GoM) (National)	Regular briefings and meetings and quarterly report	<ul style="list-style-type: none"> Land provision and socioeconomic services EMML benefits contributing to community development benefits EMML monitoring
Ministry of Energy	Meetings	<ul style="list-style-type: none"> Electricity supply to the site
MICOA	Meetings and reporting	<ul style="list-style-type: none"> EIA processes Environmental licensing Environmental impacts Annual environmental reporting Annual audits
Ministry of Mineral Resources (MIREM)	Meetings and reporting	<ul style="list-style-type: none"> Regulation of mining license Contribution to the economy Regular reporting
Ministry of Finance	Meetings as required	<ul style="list-style-type: none"> Auditing for tax purposes
Media	Periodic and proactive engagement as needed	<ul style="list-style-type: none"> EMML benefits and effects, including key milestones and schedule



Stakeholder Group	Typical Engagement Mechanism	Key Interests/Issues
Export Credit Agencies or Lenders	Meetings and formal monitoring visits	<ul style="list-style-type: none"> EMML benefits, effects, key activities, and schedule
Bilateral Groups (e.g., World Bank, International Monetary Fund)	Periodic briefings and meetings	<ul style="list-style-type: none"> Continuing and broad interest in the EMML
Co-Venture Companies	Meetings and periodic reporting	<ul style="list-style-type: none"> Key EMML activities and schedule
Area 1 Operator (Anadarko)	Management briefings and joint working groups	<ul style="list-style-type: none"> Corporate responsibility and good governance Enforcement of environmental and social responsibility Minimizing EMML risks
Provincial		
Governor of Cabo Delgado Province	Regular EMML updates	<ul style="list-style-type: none"> EMML benefits EMML potential environmental and social impacts Resettlement activities
Provincial Directorate of Energy	Meetings as required	<ul style="list-style-type: none"> Electricity supply to the site
Labor Department (National and Provincial)	Meetings and reporting	<ul style="list-style-type: none"> Mozambican labor standards at EMML Union formation and management Project in-migration
Ara Centro-Norte (Water Authority)	Meetings and reporting	<ul style="list-style-type: none"> Income from license agreement Monitoring of EMML
Ministry of Public Works (National and Provincial)	Meetings as required	<ul style="list-style-type: none"> Maintenance of road infrastructure
Provincial Directorate of Fishing	Meetings and reporting	<ul style="list-style-type: none"> Project impacts on fishing activities
Women and Social Action Department	Meetings and workshops	<ul style="list-style-type: none"> EMML benefits in regard to programs for women, children, and disabled Land disputes Women in the workplace Education and training
Department of Agriculture	Meetings	<ul style="list-style-type: none"> Land acquisition Land disputes
Provincial Ministry of MIREM	Meetings and reporting	<ul style="list-style-type: none"> Project benefits to economy Regulation of mining license



Stakeholder Group	Typical Engagement Mechanism	Key Interests/Issues
Provincial Office of MICOA	Meetings and reporting	<ul style="list-style-type: none"> • Regulation of environmental license • Environmental impacts • EMML environmental performance
District-Level		
The District Administrator and his/her Chief Secretary	Meetings	<ul style="list-style-type: none"> • EMML benefits within the District, including employment and improved infrastructure
The District Administrator	Meetings	<ul style="list-style-type: none"> • EMML effects on villages, including employment and improved infrastructure
Local-Level		
Project-Affected Local Communities in and around the DUAT Area	Regularly scheduled engagements (formal and informal meetings with EMML Community Liaison Officers [CLOs]), road shows, flyers/newsletters/posters, and videos	<ul style="list-style-type: none"> • Unforeseen physical and/or economic displacement • Land use and safety-related restrictions in the vicinity of above-ground installations • Unfilled expectations, such as community services (e.g., education, medical, transportation) and infrastructure (e.g., roads, schools, clinics) • Changing social structures, cohesion, and culture • In-migration • Conflict in the area caused by external factors • Government presence/capacity • Monitoring and evaluation activities, including participative community monitoring as appropriate • Local business development • Emergence of new opportunities associated with construction operations (e.g., community-based Right-of-Way management, community-based conservation activities) • Increased availability of cash in communities, possibly leading to increased domestic issues • Demobilization/future employment opportunities • Health issues (e.g., sexually transmitted diseases [STDs] such as Human Immunodeficiency Virus [HIV]/Acquired Immunodeficiency Syndrome [AIDS])



Stakeholder Group	Typical Engagement Mechanism	Key Interests/Issues
Village Secretaries and Chiefs	Periodic meetings	<ul style="list-style-type: none"> • EMMML benefits for village, including employment, economic opportunities, and improved infrastructure • Continuous engagement with resettled communities and households • EMMML effects, including environmental impacts
Schoolteachers, Traditional Healers	Periodic meetings	<ul style="list-style-type: none"> • EMMML benefits, including employment and improved infrastructure
Women's Groups, Youth Groups, Disabled Groups	Periodic meetings	<ul style="list-style-type: none"> • EMMML benefits, including employment and educations • Project effects, including potential food shortages or loss of access to land and income
Communities Affected by the Project's Transportation Operations	Community meetings, school engagement program, and market events	<ul style="list-style-type: none"> • Project construction schedule and key transportation routes • Access to land • Health and safety impacts
NGOs and Community-Based Organizations	Primarily meetings, occasional workshops and multi-stakeholder forums, and regular dissemination of printed material (reports, etc.)	<ul style="list-style-type: none"> • EMMML benefits and effects • EMMML schedule • Project impacts
Local Businesses	Periodic meetings with Field EMMML Business Development officers	<ul style="list-style-type: none"> • Local supply and transparent procurement procedures • Local business development • EMMML benefits • Human resources issues and labor relations
EMMML Employees	Periodic employee forums and notices	<ul style="list-style-type: none"> • EMMML activities and schedule

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5.2. Forms of Engagement and Information Disclosure

EMML will use different forms of engagement and information disclosure with stakeholders depending on the stakeholder group. EMML will adapt existing engagement techniques and develop new ones as necessary to ensure effective and culturally appropriate interaction with stakeholders.

EMML will continue to utilize participatory tools and methodologies such as workshops and focus groups, as they are more likely to increase stakeholder involvement in the process and elicit alternative responses, especially if there is controversy, complexity, or a need to build a consensus around possible solutions. EMML will develop specific tools and tactics, as needed, to engage sub-groups within communities, including women, vulnerable groups, the elderly, and minority groups.

Given the nature of engagement, the process will always be context-specific. This means that techniques, methods, approaches, and timetables will be tailored to the issue, to the local situation, and to the various types of stakeholders being consulted.

EMML will determine appropriate engagement practices, processes, methods, and tools based on the following factors:

- Location and sensitivity of the Project or activity, locally and internationally
- Cultural preferences and sensitivities
- Number and interest of stakeholders
- Complexity of the issue to be discussed
- Significance of potential impacts
- Expected or targeted outcomes of engagement

As noted elsewhere in this Plan, the type of engagement and targeted stakeholders will change throughout the Project lifecycle. However, in general, the more a particular stakeholder group is materially affected by a component of the Project, the more important it is for the group to be properly informed and encouraged to participate in matters that directly affect them.

EMML will establish four general formats for stakeholder engagement during the construction phase in recognition of the fact that effective engagement needs to take account of the type of information and issue being discussed or communicated, as well the intended audience or target of the engagement. Variations of these formats will continue to form the basis of future engagements, recognizing that all will be open to change as needs and circumstances dictate. The four formats are as follows:

- 1) Bringing people together into productive dialogue through the following:
 - a) Road shows to deliver key messages or specific studies, reports, or data
 - b) Public meetings to deliver regular updates to the general public (e.g., monthly meetings in Project-affected villages)
 - c) Capacity building institutes (e.g., the Enterprise Centre for business capacity building)

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- 2) Sharing information using the following methods:
 - a) Newsletters, which are a useful tool for enabling regular feedback and updates for stakeholders
 - b) The EMMML Environmental and Social Report (to be produced biannually during construction), including the publication of an Executive Summary distributed in Portuguese and English through national newspapers
 - c) Community notice boards, which are useful for announcing upcoming events and general updates
 - d) Mass media, including national newspapers and radio, which will be used to announce upcoming events and provide general updates
 - e) A website, which will provide Project information to stakeholders who have internet access
 - f) Other targeted techniques, used for specific audiences (e.g., drama, posters, and informative/educational books for villagers or the Project workforce)
- 3) Holding the following direct meetings with representative individuals/groups and conducting perception surveys:
 - a) Individual meetings for direct discussions with individuals or small groups to allow for the sharing of specific information with a narrow audience
 - b) Focus groups, conducted to collect data or gain feedback on specific actions or programs and reach consensus on resolution of issues. Focus groups discussions may be used for weekly meetings with respected groups of community leaders and are also a useful way to engage women, minority, and youth groups.
 - c) Periodic perception surveys, used to monitor the opinions or perspectives of different stakeholder groups.
- 4) Employing CLOs
 - a) Persons who act as a critical interface between the EMMML and the community
 - b) Respected members of a community, often an ex-councilor, clan leader, ex-peace and good order committee member, religious leader, etc.
 - c) Assist with disseminating Project information either via formal engagements or informal one-to-one sessions. They also assist locals with preparing and submitting grievance claims and help to manage the process through to closure.
 - d) Provide timely information on current or brewing issues/grievances and potential work stoppages. They provide insight into the clan/village mind-set, clan composition, and clan relationships (e.g., intra- or inter-clan rivalries/disputes), as well as any external conflicts that may affect communities or the Project.

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5.3. Continuous Improvement of Stakeholder Engagement Program

During engagements, EMMML will record, monitor, and analyze the issues of interest and or concern and, where appropriate, develop and communicate responses by means of an established feedback mechanism. The monitoring and analysis component of the engagement process will allow EMMML to either adapt its engagement program or anticipate the need to change the approach or emphasis to achieve better outcomes, not only for the Project, but more importantly for stakeholders, especially directly-affected communities. Such changes may take many forms including the following:

- Increased or re-targeted engagement
- The collection and provision of additional information or different types of information
- Enhanced methods for information disclosure
- Changes to Project methodology to resolve unintended community impacts
- Enhanced Project activity resulting in positive community impacts
- Awareness and influence on non-Project-related individuals, groups or enterprises having potentially negative impacts on the community (i.e., engaged in destabilizing or illicit behaviors, dealing in destabilizing commodities, speculators targeting vulnerable people, in-migrants, predatory business enterprises, etc.)

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6. GRIEVANCE MANAGEMENT

EMML will use the Grievance Management Process outlined in this section.

6.1. Features

A core element of the stakeholder engagement program is the Grievance Management Process. This process involves the following:

- Effective procedures and functions for receiving and managing grievances at the Project level
- A readily accessible and comprehensible service for stakeholders
- A clear process for receipt, acknowledgement, and management (including closure) of concerns from external stakeholders
- Confidentiality provisions
- Provisions of separation, whereby experienced and qualified personnel responsible for managing the Grievance Management Process are separate from the personnel in charge of management of the business activities
- Provision for third-party review and mediation, if necessary

6.2. Scope

The Grievance Management Process will address Project-related individual and community grievances. The process is designed to fairly and promptly receive, assess, respond to, and resolve grievances. It will also provide a mechanism to identify and address trends or systemic sources of concern.

Participation in the Grievance Management Process does not in any manner negate an individual's right to pursue other remedies as provided under Mozambican law. Equally, EMML retains its rights under law to pursue legal remedies.

Project and contractor industrial relations grievances, such as pay, overtime, and working conditions, are not managed through this process; they are managed through processes established by each employer. The industrial relations process is described in further detail in the Workforce Relations Management Plan.

6.3. Terminology

The terms "issues" and "grievances" are often confused or used interchangeably. The definitions in Sections 6.3.1 and 6.3.2 are used in this Plan, and Section 6.3.3 discusses the judgment needed to distinguish them.

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6.3.1. Issues

Stakeholder issues are defined as questions, comments, concerns, suggestions, observations, etc., of local and other knowledge that are presented to the Project. This includes communications on matters that are out of EMML control (i.e., government-related grievances such as benefit distributions or other stakeholder grievances such as legacy issues from other projects located in the vicinity of Project activities). Such matters are captured through a variety of methods, including standard and ongoing community liaison and formal stakeholder engagement processes.

Stakeholders, including community members, employees, contractors, and local and international NGOs, may submit their issues to representatives of EMML and/or EMML contractors.

EMML recognizes that some issues, if not addressed to the stakeholder's satisfaction, may eventually be submitted as a grievance. Accordingly, EMML makes provision within the information management system to manage issues.

Issues differ from grievances in that an issue may be any of the following:

- A question about Project activity
- A comment or observation
- A suggestion for the Project to consider
- Concerns about potential but unrealized impact
- A complaint or grievance resulting from third-party activity not associated with the Project (e.g., legacy issues such as unfulfilled government commitments, complaints about other developers, inter-tribe disputes, business disputes, etc.).

Recording and monitoring of issues provides a useful indicator of community mood, tensions, or discontent. While not necessarily attributable to Project activity, issues may result in local disruptions with the potential to impact community stability, personnel safety, or the Project's social license to operate.

Issues may not necessarily be the EMML's responsibility to resolve, but EMML routinely reviews and analyzes them to determine the need to engage, encourage, and/or facilitate others to actively seek resolution. Issues are collected from both formal and informal engagements and entered into the information management system. EMML provides analyses of issues to the following groups on a routine basis for further consideration and action, where warranted:

- Community Relations group
- Security Department
- P&GA

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EMML presents information about issues in the EMML Environmental and Social Reports. EMML also updates the Lenders' Independent Environmental and Social Consultants on issues during their regular monitoring visits. This information is periodically reported in the Independent Environmental and Social Consultant's (IESC's) Environmental and Social Monitoring reports and disclosed on the EMML website.

6.3.2. Grievances

A grievance is defined as a complaint lodged by an individual, group, or community alleging damage, impact, or dissatisfaction specifically resulting from Project actions or a lack of action. It is usually submitted in expectation of a corrective action, compensation, or both.

Examples include the following:

- Negative impacts on, or increased risks to, an individual or a community, such as financial loss, physical harm, damage to an asset, disruption to social practices including access to resources as a direct result of Project activities, or a real or perceived threat of such
- Project actions leading to health, safety, and environmental impacts
- Harassment of any nature by Project Representatives

Criminal activity, bribery, corruption, or fraud may be recorded as grievances, but resolution would be referred to the justice system.

6.3.3. Informed Judgment to Distinguish Issues from Grievances

Many grievances have the potential to escalate and present significant risk to the Project, its employees, and its physical assets. In evaluating any grievance, the Grievance Coordinator is required to make an informed judgment regarding the potential for escalation. If a grievance carries a significant risk of escalation to a much more serious situation, then the Grievance Coordinator informs the appropriate level of management.

Judgment is required to correctly and consistently determine whether a communication or situation is deemed unrelated to an EMML activity (e.g., government) and therefore whether it is classified as a grievance or an issue. From an EMML perspective, this is managed by ensuring that all EMML personnel (primarily Community Liaison Officers [CLOs]) having direct interaction with communities and those processing grievances and general complaints are properly trained and competent to undertake these duties (refer to Section 10).

6.4. The Grievance Management Process

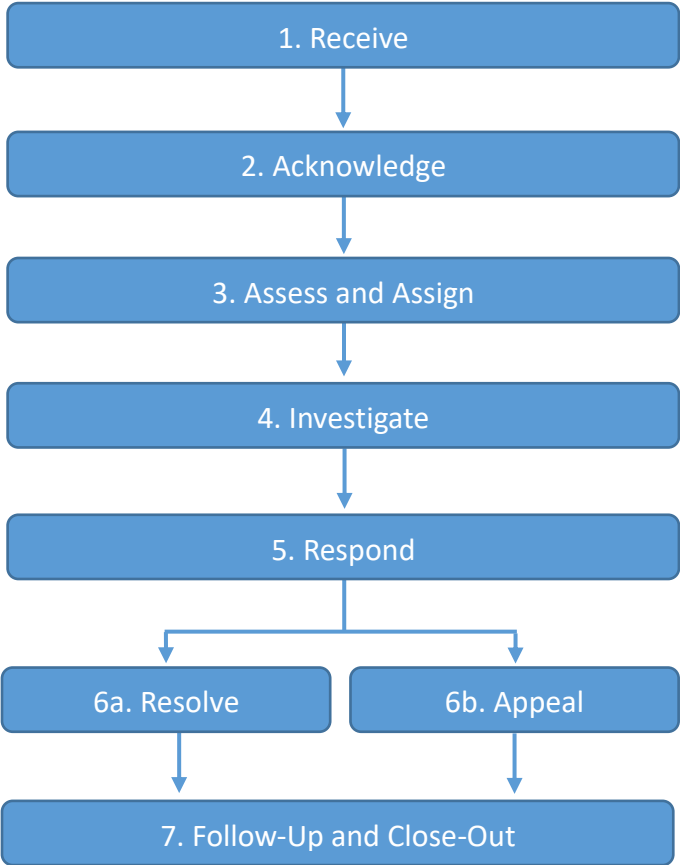
The Community Affairs Team will widely communicate the Grievance Management Process throughout the Project area as part of construction activities, primarily through formal awareness programs, ongoing community engagement, and day-to-day informal interactions. The primary means of communications will be written and verbal and will use other public communication media for information dissemination as necessary. Written communications will be posted at areas frequented by locals and readily available to the public, in a variety of local languages. Consideration will also be given to communication through various electronic media forums to benefit those with limited education or mobility, and in harder to reach communities. To ensure that communications efforts are effective, taking into account cultural norms, the use of gender specific means of communication, and receipt of grievances will be included in the communication methods. To ensure that knowledge remains current, and fresh in the midst of local communities,

messaging will take place at regular intervals. EMMML workers and contractors will also be made aware of the Grievance Management Process.

EMML will follow the IFC grievance management process as described in Sections 6.4.1–6.4.8. The seven steps in the Grievance Management Process (shown in Figure 6-1) are as follows:

- 1) Receive
- 2) Acknowledge
- 3) Assess and Assign
- 4) Investigate
- 5) Respond
- 6) Resolve or Appeal
- 7) Follow-Up and Close-Out

Figure 6-1: The Grievance Management Process



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6.4.1. Step 1: Receive

The initial receipt of a grievance is likely to be through the grievant's CLO in the course of regular community engagements. In Mozambique and Cabo Delgado, the Afungi Peninsula Project area specifically, the practice is for the grievant (community member or group) to request the assistance of the community-designated spokesperson to present the grievance information to the EMMML community affairs personnel, typically a CLO within the Community Affairs Team. The CLO will document the grievance on an EMMML grievance form, the Rovuma LNG Grievance Report (refer to Figure 6-2) and obtain as much information as possible in support of the grievance.

EMMML anticipates that grievances will also arise from individuals whose communities are outside the Project area. Individuals from outside the Project district may not have access to Community Affairs personnel or to a CLO to facilitate their grievance submission. For these grievants, and any other grievants such as civil society organizations, EMMML will establish a central access point to the EMMML Grievance Management Process, away from the Project site and activities, in the form of a multi-purpose project Resource and Information Center (RIC). The RIC will be located in the Palma District seat (Palma Sede) in the first half of 2019 and will include a desk to file grievances.

The EMMML grievance recipients will provide the completed Rovuma LNG Grievance Report forms and supporting information to the Grievance Management Lead. The Grievance Management Technician will log the grievance into the grievance management database for tracking purposes.

Figure 6-2: Grievance Report

ROVUMA LNG GRIEVANCE REPORT	
Receiving Officer Name:	Date of Receipt:
Location where Grievance was received:	
Type of Grievance: Individual <input type="checkbox"/> Group <input type="checkbox"/> Community <input type="checkbox"/>	Received Via: Phone <input type="checkbox"/> Mail <input type="checkbox"/> In the Field <input type="checkbox"/>
Name of Person or Representative presenting Grievance and any Associations:	
Phone Number or Contact Information:	
Has this Grievance been raised previously by you or anyone else: No <input type="checkbox"/> Yes <input type="checkbox"/> (describe)	
Location and Date of Event:	
Grievance Statement (who, what, when, where, why) (Attach additional pages if more space required):	
Copies of Additional Documents Provided: No <input type="checkbox"/> Yes <input type="checkbox"/> Describe:	
This document acknowledges receipt of the grievance. It will be necessary to thoroughly investigate your grievance, and we will provide a written response when such investigations are completed. If you make any further enquiries in relation to this grievance, please quote the above Identification Number.	
_____ Community Liaison Officer Signature Date: _____	_____ EMML Representative Signature Date: _____

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6.4.2. Step 2: Acknowledge

EMML will acknowledge grievances received in a tangible manner, with a firm commitment for follow-up and deadlines. After a grievance has been registered, the grievant will receive a timely acknowledgement that the grievance is in the system. Acknowledgement will be made in a culturally appropriate manner with deadlines for next steps.

Within 7 days of receiving a grievance, EMML will convey a message to the grievant describing who, or what organization, is investigating the matter and the anticipated time it will take EMML to reply to or address the grievance.

6.4.3. Step 3: Assess and Assign

A Grievance Management Advisor will quickly assess the nature of the grievance once it is logged. To make a rapid assessment (within 24–48 hours), the Grievance Management Team, other Community Affairs Team member, or CLO will liaise with the appropriate EMML staff to address the more typical kinds of grievances received during construction.

For a grievance deemed by the rapid assessment to need a more specialized investigation, the case will be assigned to the department with the technical expertise to conduct the investigation or to one that is associated with the complaint. Matters are typically assigned to a senior manager in the department most closely associated with the cause of the grievance. Grievances about contractor policies or behavior will be assigned to a senior manager in the department with which the contractor is working (the contract owner) and to the procurement department, as relevant. If a case is assigned to a specific department, then the department will receive clear timelines for the investigation and response.

Any grievance of a more serious nature and/or a grievance with the potential to escalate will be taken to the appropriate senior manager(s).

6.4.4. Step 4: Investigate

Where possible, grievances will be quickly resolved by a grievance officer or other EMML staff. However, a severe or technically complex grievance may require a more thorough investigation to provide evidence for analysis and to support the resolution. This process will begin by seeking to understand the grievant's perception of the issue, what the grievant is requesting, and what should be done about it. The process will include examination of the circumstances of the case, which can be done by speaking with involved parties and conferring with relevant stakeholders.

The objective of the investigation is to establish the facts to assist in the analysis or formulation of the appropriate response and resolution where possible, establish agreement on the facts with the grievant, and document these on the investigation form. All information gathered will be maintained and/or logged to ensure that the EMML response is fully documented.

Throughout the investigation process, grievants will be kept informed on progress. If EMML is unable to provide a response within an agreed period, then EMML will provide an updated timeframe for the response.

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6.4.5. Step 5: Respond

The outcome of an investigation will include EMMML's response and resolution options. In some cases, a senior manager in the department associated with the grievance may determine the response. In other cases, a grievance response committee with cross-departmental representation may decide. In either case, EMMML will investigate the matter and notify the grievant of the outcome of the investigation within 30 days of receiving the grievance.

6.4.6. Step 6: Resolve or Appeal

If the solution to the grievance is acceptable to all parties, then the process should move to Step 7: Follow-up and Close-out (refer to Section 6.4.7). If the grievance is without substantiation, or if it is the result of non-EMMML-related activities or activities that result in additional negative impacts, then the explanation will be provided to the grievant in a culturally appropriate manner. If the grievant and EMMML cannot reach agreement, then EMMML will provide an appeals mechanism to explore all potential resolutions. In either case, EMMML will provide a response to the grievant within 30 days.

6.4.7. Step 7: Follow-Up and Close-Out

After EMMML and the Grievant have agreed on a resolution, the final stage is to implement the decision, monitor outcomes, and close out the grievance. Follow-up may also be needed to address problems that develop during implementation of the response. Adjustments may be necessary to ensure that EMMML addresses root causes of complaints and that outcomes are consistent with the spirit of the agreement with the grievant. Experience from the follow-up can also be used to further refine the grievance handling process or to inform future responses to similar grievances.

6.4.8. Grievance Management Process Awareness

The Community Affairs/Relations Team will review the status of grievances registered by local residents and/or communities on a routine basis with community leaders and residents. These reviews will take place at locations established within local communities at times that facilitate attendance by interested parties without undue travel requirements. Consistent communication using an easily understood process, delivered in a clear, transparent manner on a routine basis will be an important tool in building and maintaining credibility and trust among local communities. A variety of means and locations will be made available for persons wishing to submit grievances in the language of their choice. Access points will be best located to minimize travel distances and costs for grievants.

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7. MONITORING

Active stewardship of stakeholder engagement is fundamental given the importance of stakeholder engagement to the communities, government, and Project Sponsors. Most importantly, active stewardship provides a feedback mechanism to EMLL and the contractor(s) on the effectiveness of implemented programs as well as recipient appreciation. Active feedback will help support alignment among key functions on programs and provide a mechanism for reporting to the Mozambican Government, EMLL leadership, and other stakeholders on EMLL stakeholder engagement performance.

7.1. Performance Monitoring and Reporting

EMLL will monitor the stakeholder engagement program through the use of an information management system (Figure 7-1).

The information management system includes a specific stakeholder engagement module that enables the management and monitoring of activities linked to community relations and communications. The module comprises the following three sub-modules that are designed to assist with monitoring and reporting:

- Formal consultation sub-module: Used to plan, record, and track all the formal interactive sessions with various stakeholders, such as planned one-on-one meetings, town hall meetings, information sessions, focus groups, public consultations, workshops, liaison committees, and negotiation sessions. Features include a meetings calendar, participants' attendance record, questions, and answers, disclosure of decisions and information, and management of actions and commitments.
- Informal consultation sub-module: Used to collect and manage daily informal interactions with community members who share their concerns and mention problems or issues to EMLL. These interactions can take the form of phone calls, email messages, or informal meetings on EMLL sites or within surrounding communities.
- Issues management sub-module: Used to record and track issues.

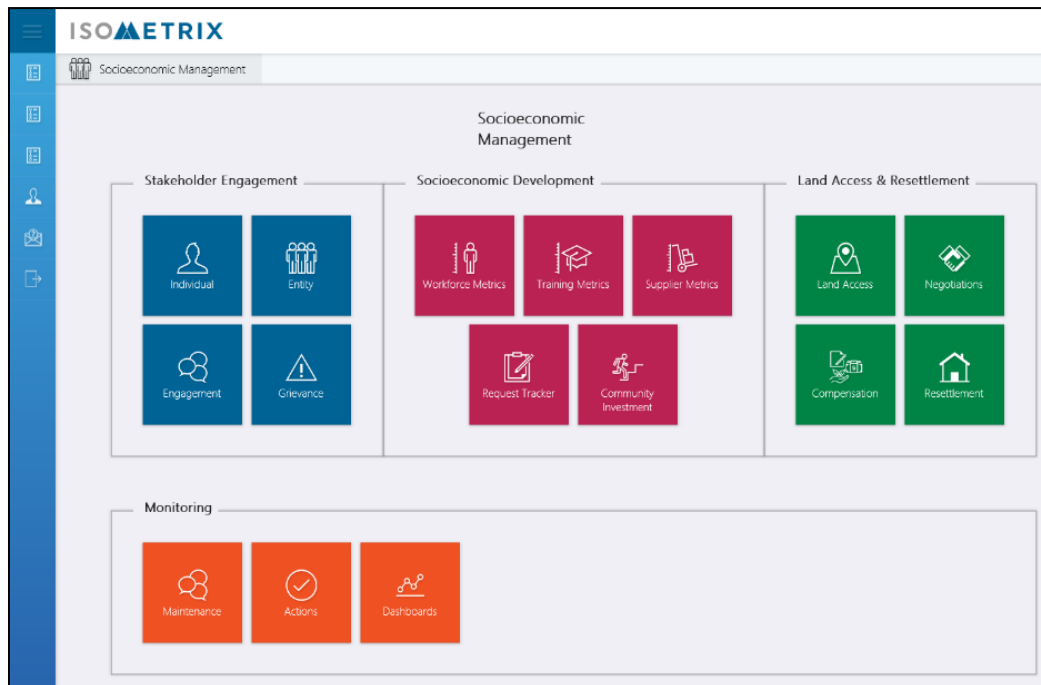
The information management system also includes a grievances module. This module is used to capture, track, and manage grievances received by EMLL and its contractors.

The information management system therefore enables EMLL to perform the following:

- Record, screen, and assess the issues raised
- Register stakeholders, record their interests/concerns/perceptions, and track EMLL responses
- Identify areas where EMLL needs to improve its performance or skills and, equally, where it is achieving positive results
- Map and monitor trends, patterns, and emerging issues in the stakeholder domain
- Assess the overall effectiveness of the stakeholder engagement program and adjust the program as appropriate.

This information has been used for this Plan and other relevant plans, for the training needs analysis and competency assessment, and for reviews of the adequacy of resources.

Figure 7-1: Example Screenshot of the Information Management System



7.2. Performance Indicators

EMML will use performance indicators to monitor the effectiveness of the Stakeholder Engagement Management Plan. The performance indicators will include both leading and lagging measurements.

At the outset, EMML will steward the following information:

- Number of engagements (total, by village, formal and informal)
- Demographics of attendees (i.e., age, gender, etc.)
- Participation rates at EMML-coordinated stakeholder meetings

The Grievance Management Process indicators will include the following targets or goals:

- Participation—The target is to channel 100% of grievances through this process before they cause Project work stoppages or create community distrust.
- Resolution—The target is to resolve 75% of grievances within 30 days.
- Recurrence Reduction—The goal is to differentiate the number of grievances by categories and define the cause of grievances to identify lessons learned, so that over time, the type, frequency, and severity of similar types of grievances are reduced.

The aim of this approach is to achieve continuous improvement of the Grievance Management Process throughout the Project's life.

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Specific grievance management indicators that will be used are as follows:

- Number of grievances received during the reporting period
- Number of grievances closed during the reporting period
- Percent of grievances closed in less than 30 days
- Reporting of aged unresolved grievances, if relevant, to management

Other indicators that EMMML will utilize include:

- Attendance levels (numbers of attendants) in total, by site, gender, age group;
- Participation levels by site, gender, age group (i.e., how engaged / involved were the attendants?)
- Type of issues discussed by site, gender, age group
- Type of questions raised by site, gender, age group
- Type of frequent concerns raised by site, gender, age group
- Number of questions raised by site, gender, age group
- Trends in attendance levels by site, gender, age group from one year to the next
- Trends on the type of issues discussed by site, gender, age group from one year to the next
- Trends on the type of questions raised by site, gender, age group from one year to the next
- Trends on frequent concerns raised by site, gender, age group from year to the next

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8. REPORTING AND NOTIFICATION

Both internal and external reporting requirements apply to stakeholder engagement.

8.1. Internal Reporting

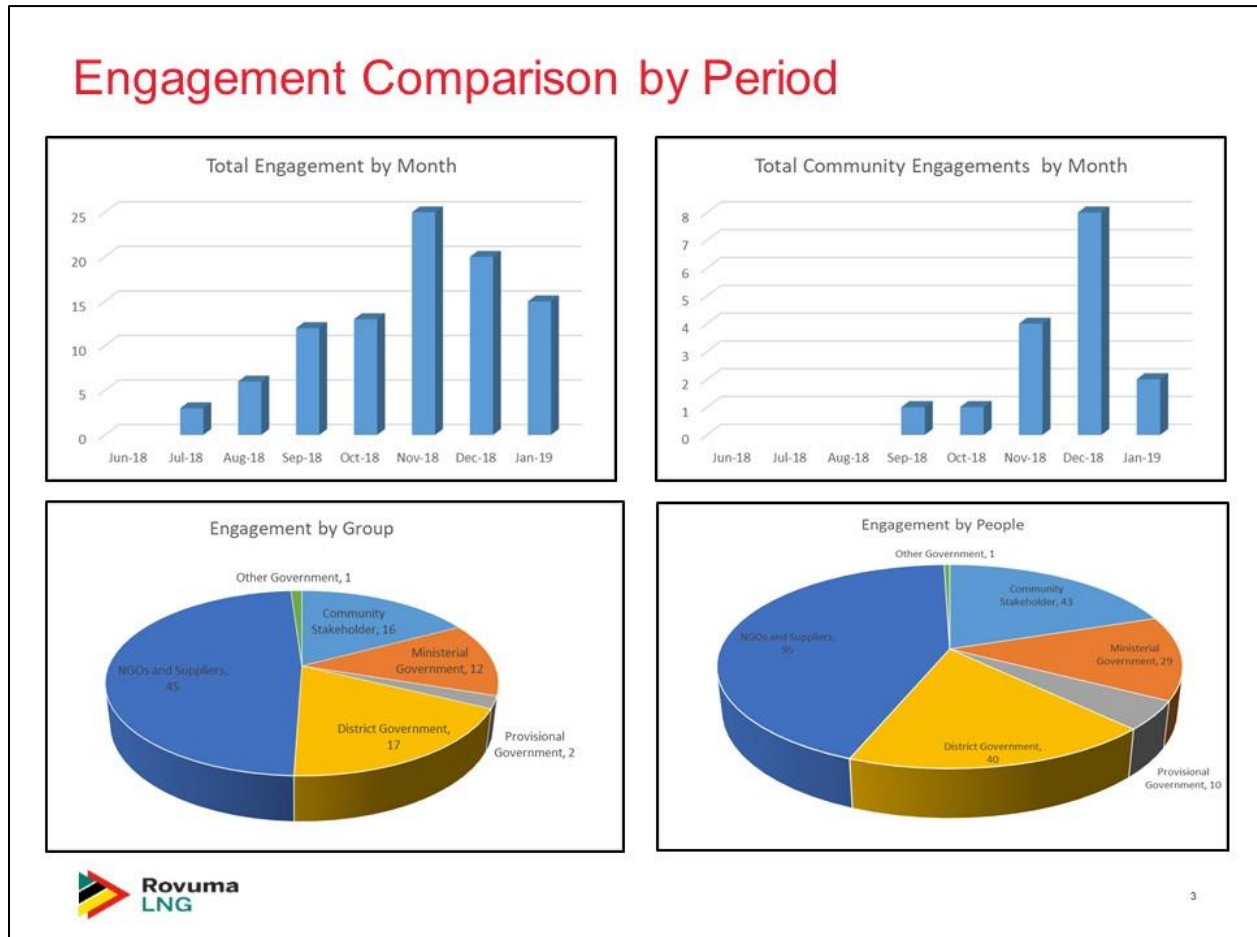
The Community Relations Team will provide weekly updates to the Socioeconomics Manager on its Key Performance Indicators through the Socioeconomic Work Plan spreadsheet. The Community Relations Manager will provide verbal updates in the Area 4 Weekly SSHE Meeting and the EMLL Socioeconomic weekly catch up calls and to EMLL management to ensure a line-of-sight on the importance of timely grievance resolution.

A review of stakeholder performance will be included in EMLL monthly management reports. The review will as follow:

- 1) Summarize stakeholder engagement activities for the review period
- 2) Assess performance against performance indicators
- 3) Summarize new grievances and provide progress reports on the resolution of existing grievances
- 4) Summarize issues or topics arising through ongoing stakeholder consultation or recorded in the stakeholder consultation register/database
- 5) Provide an analysis of trends or issues relating to stakeholders
- 6) Establish templates for engagements and reporting in the IsoMetrix systems employed by EMLL to manage socioeconomic data.

Typical examples of monthly stakeholder engagement reporting are illustrated below in Figure 8-1.

Figure 8-1: Example Stakeholder Engagement Monthly Summary



8.2. External Reporting

The Community Relations Team will prepare regular updates and monthly reports for the District Administration and the five Project-impacted Community Leaders, with statistics on community engagement and grievance management. The report may include trends or concerns arising from Project in-migration under review by the EMLL.

Reports for lenders will be prepared in compliance with lender requirements.

External reporting will include submissions to government agencies on national content statistics and reports required as part of the Project's license conditions. Other external reports include the EMLL Environmental and Social Report and accounting and financial reports.

In addition to the OIMS external reviews, the IESC will conduct independent, external reviews on a routine basis during the calendar year during construction basis as part of the defined Project assessment.

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EMML will report externally using a variety of methods and at varying frequencies, largely depending on the stakeholders concerned and the nature of the issue. Less targeted external communications will include the following:

- EMMML newsletters
- Publication of the EMMML Environmental and Social Report to the EMMML website
- The Executive Summary of the EMMML Environmental and Social Report, which is distributed in Portuguese and English through appropriate national newspapers
- Mass media, including national newspapers, radio, and a newspaper column by EMMML 's Managing Director, which is also published in Portuguese and one or more local languages such as Swahili, Kimwane, and Makonde
- Publication of the IESC Monitoring report to the Rovuma LNG and EMMML website
- IESC and Core Lender group websites, where appropriate

8.3. Grievance Reporting

The Grievance Coordinator will prepare a regular summary report of grievances. The report will be sent to all Socioeconomics management (Maputo and field) and to the EMMML management team.

- A monthly summary of grievances will also be compiled and sent to the Socioeconomics Manager, the EMMML management team, and EMMML Leadership for review and discussion with a focus on highlighting and resolving open or reoccurring grievances with a potential impact on schedule, budget, or community goodwill.
- A Grievance Management summary is included in the EMMML Environmental and Social Report. This document will be publicly available on the EMMML website.

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9. ORGANIZATION – ROLES AND RESPONSIBILITIES

The Socioeconomics Manager will own this Plan, and the requirements described within will be implemented primarily by the Socioeconomics Department. Close interaction with SSHE, Security, Business Services, Human Resources, Environmental and Regulatory, Biodiversity team, MOH, and other important stakeholders will be required to ensure that complementary, topic-specific stakeholder engagement activities are appropriately implemented.

To ensure broad coverage and consistent, transparent, multilateral communications to support the Project activities, the Community Relations personnel will be organized to carry out responsibilities in three general areas: Community Relations, Community Liaison, and Grievance Management. These groups will work closely together to maintain alignment in internal and external communications and to leverage their respective positions to ensure a consistent approach to managing community relations.

9.1. Executive Management

Executive management has a responsibility to endorse and monitor the implementation of this Plan by performing the following:

- Reinforcing and supporting a culture of respect for stakeholders
- Reviewing the Project's stakeholder reports, including summary of grievances and Project responses
- Leading the management review, including the review of this Plan

9.2. Socioeconomics Manager

The Socioeconomics Manager has the following roles and responsibilities:

- Is responsible for stewardship of this Plan, including management of the relationship with non-community-based stakeholders (e.g., government)
- Has overall responsibility for all stakeholder engagement activities with community-based stakeholders, including the Grievance Management Process
- Reviews key performance indicators and issues with the Managing Director and EMLL Management at EMLL Stewardship Reviews and elevates issues (as appropriate) if they emerge urgently and outside of EMLL Stewardship Reviews
- Assesses patterns or issues and potential stakeholder-related ramifications for the Project's operation
- Provides reports to executive management
- Provides sufficient and competent resources, including budget, for effective implementation of this Plan
- Maintains an open-door policy for stakeholders and participates regularly in stakeholder consultation activities.

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9.3. Community Relations Manager

The Community Relations Manager has the following roles and responsibilities:

- Manages stakeholder engagement activities with local communities
- Maintains awareness of local grievance management issues via Community Relations Area Coordinators
- Maintains dialogue with Community Relations Area Coordinators on active grievances and progress on closure and provides guidance and perspective to ensure appropriateness of handling, precedents being set, and overall adequacy
- Chairs a regular internal (to Socioeconomics) review of the Grievance Management Process
- Supervises Community Relations Area Coordinators, who provide quality control of grievance reporting, investigation, and management to closure, by performing the following:
 - Works with the Socioeconomics Compliance Manager to ensure that contractor engagement is consistent with the EMML process.
 - Ensures that Community Relations Area Coordinator(s) have access to and are supported by Socioeconomics office-based staff as required.

9.3.1. Community Relations Supervisors

A responsible and experienced individual will be assigned as Community Relations Supervisors with the following roles and responsibilities:

- Works closely with the EMML team to understand the overall and upcoming Project activities that will have an impact on the surrounding communities
- Works closely with the CLO teams to formulate the information and messages to be conveyed and responses to anticipated questions
- Supports the development of information and strategies to address concerns conveyed by the communities, including community grievances
- May provide support in engagements with provincial and national level NGOs and civil societies.

9.3.2. Community Liaison Officer

The CLO is the primary interface with local authorities, community stakeholders, local NGOs, and civil societies and has the following roles and responsibilities:

- Engages in bilateral communications with the traditional and appointed community leaders, and other influential, knowledgeable and trusted members of the community to learn and be cognizant of the communities' current and ongoing concerns regarding the Project and other life and livelihood impacts
- Is responsible for communicating relevant Project information and upcoming activities for the community's awareness and potential adjustment of activities if deemed necessary

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- Is the main recipient of community grievances, which will be provided to the grievance management team for processing and management
- Has responsibility for providing the approved response and any discussions necessary to complete the resolution of a grievance and communicates the information back to the grievance management team.

9.4. Compliance Coordinator

The Grievance Coordinator has the following roles and responsibilities:

- Serves as administrator for the Grievance Management Process
- Facilitates handling of grievances to promote consistency across the three regional areas and between Moçambique Rovuma Venture (MRV) and contractors
- Provides quality control on the management and resolution of grievances
- Ensures that required responses to grievances have been prepared either directly or by Community Relations Area Coordinators
- Ensures that all data, information, and scanned documentation related to the complaint or response entered into the information management system are high quality, complete, and accurate
- Reviews Outstanding Grievance Reports extracted from the information management system and liaises with relevant departments to finalize resolution
- Prepares Grievance Status Reports for review by Community Affairs Manager
- Prepares reports regarding grievance trends and performance indicators that indicate opportunities for improvement
- Liaises with the Community Relations Area Coordinator(s) on progress towards closure of grievances, updating status of entries in information management system
- As directed by the Community Relations Area Coordinator(s), closes grievances on provision of evidence and updates the information management system, or advises Maputo Grievance Management Team
- Monitors progress of grievances towards close-out target of 30 days and advises Community Relations Area Coordinator of open grievances nearing target date
- Participates in regular grievance management meeting to progress closure of outstanding grievances.

9.4.1. Environmental, Regulatory, Socioeconomic (ERS) Technician

The ERS Technician has the following roles and responsibilities:

- Is largely responsible for ensuring the reporting, processing, and close-out of grievances through the EMLL tool of choice (IsoMetrix)
- Meets with the CLOs to go over reported grievances to document and follows the process through to completion and internal close-out

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- Is responsible for issuing tracking reports on related key performance indicators to verify timely assessment, response, and resolution to reported grievances.

9.5. Contractor Responsibilities

MRV has primary responsibility for external engagements with the government, local communities, and other stakeholders. The primary exception to EMMML having the lead responsibility is in instances in which external communications are required by the contractor as part of its permitting and approvals process required to conduct the agreed scope of work. In such circumstances, EMMML will provide support and assistance to ensure consistency of key messages, facilitate access to target audiences, and demonstrate benefit of the Project in the best interest of the people of Mozambique.

9.6. Area 1 Operator

EMML considers the Area 1 Operator as an important stakeholder in the overall success of the Project, associated facilities, and other Operators engaged in development for the benefit of the people and GoM. EMMML will engage at multiple levels with the Area 1 Operator, as required, commensurate with the type and level of interactions required for their mutual benefit.

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10. TRAINING – AWARENESS AND COMPETENCY

Success in developing and maintaining positive and mutually beneficial relationships with stakeholders is founded in having the appropriate skills and awareness to bring to the stakeholder engagement role.

Competencies relevant to the stakeholder engagement discipline for the Project will be defined. Key competencies include the following:

- Knowledge and understanding of methods used to identify stakeholders, analyze their interests and issues, differentiate between issues and grievances, and engage effectively with them
- Demonstrated ability for working with stakeholders, such as participatory planning methods, determining best methods for addressing community concerns, and developing and maintaining partnerships
- Patience and flexibility, recognition of the value of win-win relationships, and a commitment to facilitation.

Appropriate training will be conducted for those involved in the stakeholder engagement program. This may also include contractors, if a specific contractor has a significant relationship with Project stakeholders. The training program will cover the following requirements of this Plan:

- Job requirements and associated competencies
- The external stakeholder environment and any particular needs, interests, or challenges presented by the environment (e.g., cultural sensitivities or working with minority, vulnerable, and under-represented groups)
- Technical training in methods of engagement, including the following:
 - Interviewing techniques
 - Data collection techniques such as surveys, polls, and questionnaires
 - Public meetings, workshops, focus groups, participatory methods, and other traditional mechanisms for consultation and decision-making
 - Grievance handling
 - Refresher training to meet required competency levels
 - Management training to provide managers and supervisors with skills to perform their duties
 - Analysis of data and evaluation of trends (qualitative and quantitative)

EMML will base and develop training programs on a training needs analysis. EMML will source appropriate training opportunities externally or develop internal training programs, as appropriate. Whichever mode of delivery is chosen, the quality of training will be evaluated for effectiveness. EMML will maintain accurate training records to demonstrate due diligence.

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EMML will make proactive efforts to cultivate stakeholder awareness and to promote a culture of support across the Project, including those business units and operational areas outside of the dedicated stakeholder engagement function. Some of the awareness-raising methods that will be used include the following:

- The incorporation of stakeholder information and background, EMML objectives and principles, and stakeholder grievance mechanisms in employee induction and refresher programs
- Stakeholder engagement topics of interest in management meetings, toolbox talks, and meetings and briefings with employees (and contractors, where relevant)
- Stakeholder engagement "short courses" for employees and contractors who do not have formal functional responsibility for stakeholder engagement but who may nevertheless interact with stakeholders
- The inclusion of stakeholder material from engagement activities and grievance mechanisms in EMML newsletters, on poster boards, and in online forums.