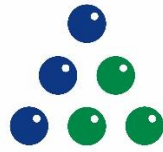


INDORAMA



RustaviAZOT

Grievance Mechanism Procedure

Dated: 27/05/2026

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1. PURPOSE

This Grievance Mechanism Procedure (the “Procedure”) establishes an integrated, accessible, transparent, and gender-responsive grievance mechanism for Rustavi Azot (“RAI”) to receive, assess, resolve, and monitor grievances raised by workers and external stakeholders in relation to the Company’s operations and projects.

The objectives of this Procedure are to:

- Ensure effective access to remedy for workers and external stakeholders through an accessible, confidential, and culturally appropriate grievance mechanism;
- Enable early identification, mitigation, and prevention of actual or potential adverse environmental, social, labour, and human rights impacts;
- Ensure confidentiality, anonymity (where requested), and protection against retaliation;
- Promote gender-responsive grievance handling, including provision of grievance information to women in accessible formats and languages;
- Strengthen stakeholder trust through transparent communication, feedback, and reporting;
- Support continuous improvement of RAI’s Environmental & Social (E&S) and Labour & Human Resources Management Systems (LHRMS).

This document has been developed in accordance with the requirements of Georgian legislation, EBRD, ADB, IFC and other applicable requirements.

2. SCOPE

This Procedure applies to all grievance-related matters arising from or associated with RAI operations, facilities, projects, and activities, including construction, operation, maintenance, and associated supply chain activities.

Specifically, this Procedure applies to grievances raised by the following categories of stakeholders:

Workers

- Direct employees of RAI;
- Contractor and subcontractor workers engaged at any stage of project implementation;
- Supplier personnel performing work or services on-site;
- Temporary, seasonal, and migrant workers.

The Worker Grievance Mechanism applies regardless of the form or duration of employment and covers grievances related to labour and working conditions, occupational health and safety, employment relationships, workplace conduct, and other work-related concerns and applicable to any activity or event, whether direct or indirect, on-site or off-site, without limitation.

External Stakeholders

- Local communities and residents in areas affected by RAI’s activities;
- Farmers, informal land users, pasture users, and other livelihood-dependent persons;
- Non-governmental and civil society organisations (NGOs/CSOs);
- Local authorities, institutions, and community-based organisations;
- Visitors, service providers, and other third parties.

The External Grievance Mechanism applies to environmental, social, community health and safety, access-related, livelihood-related, and other project-related concerns.

Contractors and Suppliers

Contractors and suppliers are required to:

- Inform their workers about the existence and use of the Worker Grievance Mechanism;
- Cooperate with RAI in the receipt, investigation, and resolution of grievances;
- Ensure non-retaliation and confidentiality in grievance handling;

- Allow contractor and subcontractor workers to access RAI's grievance mechanisms without restriction.

Exclusions and Limitations

This Procedure does not replace, restrict, or limit the right of any individual or group to access judicial, administrative, or other statutory remedies at any time. Use of this grievance mechanism is voluntary and does not preclude parallel or subsequent use of external legal or regulatory processes.

Matters related to criminal conduct or national security may be referred to competent authorities in accordance with applicable legislation.

3. DEFINITIONS and ABBREVIATIONS

Definitions:

Organisation	«Rustavi Azot» JSC
Document	Information (meaningful data) and data carrier
Documented information	Information required to be managed and maintained by the organisation.
Records	It is the documentation, reflecting achieved results or containing evidence of the activity carried out.
Procedure	Established method of activity or process implementation
Stakeholders	Individuals, groups, or organizations that have an interest in, are affected by, or can influence an organization's activities, decisions, or outcomes.
Grievance	A concern, complaint or feeling of resentment raised by any stakeholder either affected or interested in company operations. Both concerns and complaints can result from either real or perceived impacts of the company's operations.
Consultation	A purposeful dialogue which deliberately seeks input from stakeholders in order to shape relations and the development of programs. It involves the business, key individuals, organizations and groups affected by or interested in the development and outcomes of the issue/process being discussed. The aim is to ensure mutual understanding and for all parties to be able to manage decisions that have a potential to affect all concerned

Abbreviations:

RAI	«Rustavi Azot» JSC
EBRD	European Bank for Reconstruction and Development
ADB	Asian Development Bank
IFC	International Finance Corporation
ISO	International Organisation for Standardization
BES	Business Excellence System
SC	Site Coordinator
HOD	Head of Department
GD	General Director
MR	Management Representative
HSE	Health, safety, environmental
EHSS	Environment, Health, Safety and Social
E&S	Environment and Social
LHRMS	Labour & Human Resources Management Systems
GV	Grievance Mechanism
NGO	Non-Governmental Organization
CSO	Civil Society Organization

CLO	Community Liaison Officer
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4. ROLES AND RESPONSIBILITIES

Defining clear roles and responsibilities is crucial for the successful operation, transparency, accountability, and ongoing enhancement of the grievance mechanisms. The roles described below are applicable to both the External and Worker Grievance Mechanisms, as appropriate. RAI establishes, where necessary, a grievance committee consisting of senior management representatives and relevant employees.

Role	Responsibility
Top Management	– Approve this Procedure and any subsequent updates; – Ensure adequate financial, human, and organisational resources for implementation of the grievance mechanisms; – Provide strategic oversight of serious, sensitive, or high-risk grievances, including those related to human rights, fatal accidents, or significant environmental and social impacts; – Review periodic grievance reports, trends, and systemic issues; – Endorse corrective and preventive actions and ensure their timely implementation; – Support a culture of non-retaliation and openness to grievance raising.
Grievance Committee	– Oversee, review, and recommend actions on grievances raised by employees, contractors, and external stakeholders within Rustavi Azot JSC, in line with the established Indorama Group Grievance Mechanism once in a month (Need based).
Community Liaison Officer (CLO) (Administration Department)	– Lead outreach, communication, and awareness-raising activities related to the External GM in accordance with the SEP; – Ensure grievance information is accessible to all external stakeholders, including women and vulnerable groups, in appropriate formats and languages; – Receive, register, and acknowledge external grievances; – Coordinate assessment, investigation, and resolution of external grievances with relevant departments; – Maintain regular communication with complainants and provide feedback on grievance status and outcomes; – Facilitate consultations, meetings, and field visits as necessary; – Ensure proper documentation and maintenance of the grievance register; – Prepare periodic reports on external grievances as per BES-S-ESMS-05-D for management and stakeholders, while protecting personal data.

HR Department	– Manage and administer the Worker Grievance Mechanism as part of the Labour and Human Resources Management System (LHRMS); – Ensure accessibility of the WGM to all categories of workers, including contractor, subcontractor, and migrant workers; – Communicate grievance procedures during worker induction and refresher trainings, in relevant languages; – Receive, register, assess, and coordinate investigation of worker grievances; – Ensure confidentiality, anonymity (where requested), and protection against retaliation; – Engage with worker representatives or trade unions, where applicable, to enhance credibility and trust; – Analyse grievance data, including gender-disaggregated data, and report trends and systemic issues.
HSE Department	– Lead assessment and investigation of grievances related to occupational health and safety, environmental impacts, and community health and safety; – Support implementation of corrective and preventive actions arising from grievances; – Contribute to closure of grievance-related E&S risks; – Support periodic reviews of grievance mechanisms as part of the E&S Monitoring Plan.
E&S Manager	– Track the overall implementation and effectiveness of both External and Worker Grievance Mechanisms as part of the ESMS; – Coordinate between departments (HR, CLO, EHS, Legal) to ensure timely and consistent grievance handling; – Track the closure of the investigation findings and proposed corrective actions for significant or high-risk grievances; – Monitor and ensure that the consolidated grievance performance is submitted by the CLO to the Top Management and external stakeholders (as required); – Ensure integration of grievance outcomes into E&S risk management, mitigation measures, and ESMS updates; – Support audits, inspections, and lender reporting related to grievance mechanisms;
Legal Department	– Provide legal advice on grievance handling, particularly for complex, high-risk, or sensitive cases; – Support compliance with applicable Georgian legislation and IFI requirements; – Advise on escalation to external or independent grievance mechanisms or authorities, where required; – Support data protection and confidentiality compliance

Supervisors (concern department)	– Act as an accessible first point of contact for grievances, where appropriate; – Promptly forward grievances to the e-mail address: grievance@ge.indorama.com or deliver it directly to the CLO/GRO; – Cooperate in investigations and implementation of corrective actions; – Ensure non-retaliation against workers who raise grievances
Contractors and Suppliers	– Inform their employees about the Worker Grievance Mechanism and how to access it; – Ensure grievance information is communicated in languages understood by their workers; – Cooperate fully with RAI in grievance investigations and resolution; – Ensure non-retaliation and confidentiality in grievance handling; – Allow unrestricted access of their workers to RAI's grievance mechanisms.

5. TYPES OF GRIEVANCE MECHANISMS

5.1 Worker Grievance Mechanism (WGM)

Eligible complainants:

- Employees of RAI;
- Contractor and subcontractor workers.

Typical issues:

- Employment conditions, wages, working hours;
- Occupational health and safety;
- Discrimination, harassment, bullying;
- Disciplinary actions;
- Breach of labor contracts or internal policies.

5.2 Community / Stakeholder Grievance Redress Mechanism (GRM)

Eligible complainants:

- Local communities;
- Residents;
- NGOs;
- Local authorities;
- Other affected stakeholders.

Typical issues:

- Environmental impacts (emissions, noise, dust);
- Health and safety concerns;
- Access restrictions;
- Social or community conflicts;
- Project-related disturbances.

5.3 External / Independent Grievance Mechanism

This mechanism applies when:

- A grievance cannot be resolved through internal mechanisms;
- The issue involves serious human rights, safety, or environmental impacts;
- The complainant requests independent review.

External mechanisms may include:

- Independent ombudsperson;
- Third-party hotline;
- Relevant national authorities or International Financial Institutions accountability mechanisms.
- Accountability mechanisms of International Financial Institutions (IFIs), including, where applicable, the Asian Development Bank (ADB) Accountability Mechanism and other lenders' platforms.

Stakeholders may submit complaints to such external or independent mechanisms if they believe they are adversely affected by project activities and their concerns have not been adequately addressed through the Project's grievance mechanism, or if they prefer to seek independent review.

Customers can use the Customer Satisfaction Questionnaire form or this procedure to express their grievances.

6. CHANNELS FOR SUBMITTING GRIEVANCES

Grievances can be submitted through multiple accessible and confidential channels to ensure inclusivity and convenience for all stakeholders. Grievances may be submitted verbally without requiring literacy, and support will be provided for individuals with disabilities, limited literacy, or limited digital access. Channels include:

- **Direct submission:** To HR Department and to the CLO for record and alignment.
- **Line managers or supervisors:** Workers may report grievances to immediate supervisors who will forward them to the E-mail address: grievance@ge.indorama.com
- **Dedicated grievance email:** the CLO for both, internal and external stakeholders.
- **Written complaints:** Through letters or completed grievance forms, submitted in-person/E-mail to the Grievance Committee members.
- **Grievance boxes:** Secure and regularly checked boxes located at the applicable places.
- **Company website portal:** Online submission form available for external stakeholders.

Key features:

- Anonymous grievances are accepted to protect the identity of the complainant.
- Accessibility measures are in place for stakeholders with disabilities or limited literacy.
- Multiple language options are available for both workers and community members.
- Guidance on the grievance process, expected timelines, and contact points are provided on each channel.
- The CLO and HR monitor and log all incoming grievances to ensure timely acknowledgment and response.
- All submissions are recorded in the grievance register for tracking, monitoring, and reporting purposes.
- The Grievance box shall be opened on weekly basis on every Monday by CLO and the representative from the Legal Department.
- On every Wednesday from 12 Noon to 2PM, representative of Grievance cell shall be available for personal meeting. (At the administration building, HR Department).

This expanded approach ensures that all stakeholders, including women and vulnerable groups, can easily access the grievance mechanisms, and that RAI maintains a transparent and accountable system. Any confidential or anonymous grievances can be reported by email, phone on following address:

JSC Rustavi Azot

Mshvidoba Street #02

Rustavi 3700

Tel: +995 (341) 27 09 09

e-mail: grievance@ge.indorama.com

7. COMMUNICATION AND AWARENESS

Effective communication and awareness are critical for the successful implementation of the grievance mechanisms, ensuring that all stakeholders are informed, confident, and able to access the system. RAI adopts a multi-channel, inclusive, and transparent approach to communicate the existence, purpose, and use of both Worker and External Grievance Mechanisms.

All grievance procedures, forms, and channels shall be disclosed in Georgian and any other locally relevant languages (e.g., (e.g. English, Russian and Hindi) to ensure full accessibility for local communities, women, migrants, and vulnerable groups.

7.1 External Stakeholders

- **Stakeholder Engagement Plan (SEP):** The grievance mechanism will be communicated through the SEP to all identified stakeholders, including local communities, NGOs/CSOs, local authorities, and other affected parties.
- **Community Outreach:** Regular community meetings, workshops, and focus group discussions will be organized to explain the grievance mechanism, provide practical guidance on how to submit complaints, and address questions or concerns.
- **Website and Online Platforms:** The RAI website and social media platforms will host detailed information on grievance procedures, downloadable forms, submission instructions, expected response timelines, and contact points.
- **Gender-Responsive Communication:** Information will be tailored to reach women, elderly, youth, and other vulnerable groups, using accessible formats, local languages, simple visuals, and oral briefings where needed.
- **Feedback and Reporting:** Stakeholders will receive periodic updates on the status of grievances, resolutions, and systemic actions, with strict adherence to confidentiality and privacy standards (In cases where the grievance is not anonymous).
- **Multi-Lingual Communication:** Materials and announcements will be available in all relevant local languages to ensure comprehension and accessibility.
- **Collaborations:** Partnering with NGOs, local institutions, and community representatives to reinforce awareness and trust in the grievance mechanism.

7.2 Workers

- **Induction and Training:** All workers, including direct employees and contractor/subcontractor staff, will be provided information about the Worker Grievance Mechanism during induction, safety briefings, and refresher trainings.
- **Internal Communication:** Posters, notice boards, digital displays, newsletters, emails, and mobile notifications will provide clear information on grievance channels, responsible personnel, submission procedures, and expected response times.
- **Supervisor and Peer Support:** Line managers and supervisors will actively encourage grievance reporting, provide guidance on submission, and ensure protection against retaliation. Peer mentors or worker representatives may assist in disseminating information.
- **Gender Considerations:** Communication will account for literacy levels, language diversity, and gender-specific barriers, ensuring that women and migrant workers can easily access and use the grievance mechanism.
- **Targeted Awareness Sessions:** Specialized sessions or focus groups may be held for specific groups of workers who face additional barriers (e.g., shift workers, remote workers, temporary staff).

7.3 Monitoring Communication Effectiveness

- **Surveys and Feedback Mechanisms:** Periodic surveys, interviews, focus group discussions, and suggestion forms with workers and external stakeholders will assess awareness levels, accessibility, and perceived effectiveness of the grievance mechanisms.

- **Performance Indicators:** Metrics such as the number of grievances submitted, channels used, demographic data, gender distribution, and stakeholder satisfaction will be monitored to measure communication effectiveness.
- **Review and Improvement:** Communication materials, channels, and outreach methods will be updated regularly based on feedback, lessons learned, and identified gaps to improve accessibility and stakeholder engagement.
- **Documentation and Record-Keeping:** All communication activities, training sessions, awareness campaigns, and outreach efforts will be documented and monitored for accountability, transparency, and continuous improvement.
- **Engagement with Community Leaders and Worker Representatives:** Regular consultations with community leaders, NGOs, and worker representatives to validate communication effectiveness and identify potential gaps or barriers.

This communication and awareness framework ensures that all stakeholders, including women, vulnerable groups, and migrant workers, are fully informed about the grievance mechanism, understand how to raise concerns, know what to expect from the process, and are confident that their grievances will be addressed in a fair, transparent, and timely manner.

8. GRIEVANCE HANDLING PROCESS

The grievance handling process is designed to ensure timely, fair, transparent, and gender-sensitive resolution of complaints from workers and external stakeholders. The process includes clear steps, responsible personnel, and timelines to ensure accountability and continuous improvement.

8.1 Receipt and Acknowledgement

- All grievances, regardless of channel, shall be formally received and acknowledged within 5 working days.
- The acknowledgment shall include a reference number, the expected timeline for resolution, and the contact person for follow-up.
- Anonymous grievances will also be logged and addressed with equal importance.
- For external stakeholders, CLO will acknowledge receipt and provide guidance on the process.
- For workers, the CLO will provide acknowledgment, with optional confidential follow-up channels.
- For grievances submitted through external or independent mechanisms (e.g., IFI accountability mechanisms), the E&S Manager shall act as the focal point for acknowledgment (where applicable), coordination, and communication with the respective external body. The CLO may support communication with the complainant, as appropriate.

Respective external body means an independent external organisation (such as a lender's accountability mechanism, government authority, or other third party) that handles complaints outside the Project's grievance system.

8.2 Registration and Documentation

- All grievances will be recorded in the Grievance Register by the CLO, including key information: date, complainant category, gender, type of grievance, issue description, and responsible personnel.
- Documentation must ensure confidentiality and secure storage of personal and sensitive information.
- Electronic and physical records will be maintained to support monitoring, reporting, and audits.

8.3 Screening and Classification

- Grievances will be screened by the CLO to determine the type, urgency, and severity.

- Classification categories may include: workplace issues, environmental concerns, community impacts, health and safety, discrimination, or legal compliance.
- Gender-disaggregated analysis will be conducted to identify specific barriers or trends affecting women or vulnerable groups.

8.4 Investigation and Consultation

- Assigned personnel (HR, Legal & Top Management) will conduct a fair, impartial, and timely investigation.
- Consultations may include interviews with complainants, witnesses, line managers, community representatives, or contractors.
- External expert advice may be sought for complex environmental, legal, or human rights grievances.
- Ensure adherence to confidentiality, protection against retaliation, and respect for cultural sensitivities.
- If the grievance is raised against anyone who is the member of the **Grievance Committee**, he/she should not participate in the review process to avoid any conflict-of-interest challenges.
- In addition, persons directly or indirectly subordinate to the individual against whom the grievance is raised should also be excluded from the review and decision-making process where impartiality or independence may reasonably be questioned.

For grievances submitted through external or independent mechanisms (e.g., IFI accountability mechanisms), the investigation shall be conducted by the respective external body in accordance with its procedures. RAI will fully cooperate by providing relevant information, facilitating access where appropriate, and participating in consultations as requested. The E&S Manager shall act as the focal point for coordination and liaison with the external body regarding the Company's inputs and responses, while ensuring compliance with confidentiality and non-retaliation principles.

8.5 Resolution and Corrective Actions

- Based on investigation findings, appropriate corrective and preventive actions will be developed and implemented.
- Actions may include policy changes, workplace adjustments, environmental remediation, community engagement activities, or disciplinary measures.
- Complainants will be informed of the resolution outcome, while respecting confidentiality.
- Actions are tracked to ensure completion within agreed timelines.

8.6 Feedback and Communication

- Complainants will receive timely feedback on the status of their grievance, the investigation process, and the resolution outcome (In cases where the grievance is not anonymous).
- Feedback will be provided through the same channel used for submission or the complainant's preferred method.
- For external stakeholders and workers, the CLO will ensure accessible communication in appropriate languages and formats and may provide feedback directly, or via supervisors if appropriate and agreed upon.

Regardless of the type and complexity of the grievance, the review and response period may not exceed 30 working days from the date of registration.

8.7 Closure

- Once resolution actions are completed and the complainant is informed, the grievance will be formally closed in the Grievance Register.
- Grievance Acknowledge time: 3-5 working days;
- Grievance initial review/ discussion time: 5-10 working days;
- Resolution time: 30 Days (Excluding the particular cases);

- For urgent cases 24-48 hours;
- Closure confirmation includes documenting lessons learned and any systemic changes implemented to prevent recurrence.

8.8 Appeal and Escalation

- If the grievance is not resolved to the satisfaction of the complainant, escalation options are available:
 - Internal appeal to Top management or HR Director for workers.
 - Escalation to external or independent mechanisms for serious, unresolved, or sensitive cases, including IFI accountability mechanisms or relevant authorities.
- Appeal processes will be clearly communicated to complainants at the time of acknowledgment. Workers retain the right to submit complaints directly to the Labour Inspection Service of Georgia at any time, irrespective of the internal grievance mechanism process.

8.9 Monitoring and Reporting

- Regular monitoring of grievance handling performance will be conducted, including tracking resolution timelines, gender-disaggregated trends, repeat issues, and effectiveness of actions taken.
- Reports will be shared with Top Management and relevant oversight committees.
- Findings will inform continuous improvement of grievance mechanisms, communication strategies, and stakeholder engagement practices.

This grievance handling process ensures a structured, accountable, and transparent approach for addressing complaints, building stakeholder trust, and maintaining compliance with Georgian legislation and International Financial Institutions requirements.

Below is a visualization of the Grievance handling process.



9. GENDER-SENSITIVE APPROACH AND DATA MONITORING

RAI ensures that grievance mechanisms are accessible, inclusive, and responsive to the needs of all stakeholders, with particular attention to gender and other vulnerable groups. Monitoring and analysis of grievance data by gender helps evaluate accessibility, effectiveness, and potential barriers to reporting.

9.1 Gender-Sensitive Approach

- **Accessibility:** Ensure that all communication materials, grievance forms, and awareness campaigns are accessible to women, migrant workers, and vulnerable groups, including in multiple languages, visual aids, and oral formats where needed.
- **Confidentiality and Safety:** Protect complainants from retaliation, harassment, or discrimination, with special measures for women and vulnerable individuals.
- **Targeted Awareness:** Conduct focused outreach sessions for women workers, local female community members, and marginalized groups to explain grievance procedures and rights.

- **Inclusive Participation:** Engage women representatives, worker councils, and community leaders in grievance handling processes, consultations, and monitoring.
- **Gender Mainstreaming:** Incorporate gender considerations in investigation, analysis, and resolution of grievances to ensure fairness and equity in outcomes.

9.2 Data Monitoring and Analysis

- **Data Collection:** Collect and record grievance data disaggregated by gender, age, stakeholder type, and location.
- **Trend Analysis:** Periodically analyze data to identify patterns, systemic issues, and accessibility barriers affecting women or vulnerable groups.
- **Effectiveness Assessment:** Evaluate whether grievance channels are being used effectively by all genders and groups, and whether outcomes are satisfactory and timely.
- **Feedback Loop:** Use findings to adjust communication, outreach, and grievance handling processes to improve inclusivity and accessibility.
- **Reporting:** Include gender-disaggregated data and analysis in regular reports to management, the SEP, and relevant oversight bodies, maintaining confidentiality.

9.3 Continuous Improvement

- Identify gaps in accessibility, communication, or responsiveness related to gender and vulnerable groups.
- Develop and implement corrective actions and targeted interventions.
- Review progress periodically and update procedures, awareness campaigns, and monitoring mechanisms to ensure sustained gender-sensitive grievance management.

This approach ensures that women, migrant workers, and vulnerable stakeholders have equitable access to grievance mechanisms, that their concerns are effectively addressed, and that the organization continuously improves its gender-responsive practices.

10. TRAINING AND CAPACITY BUILDING

Effective implementation of the grievance mechanisms requires that all relevant personnel and stakeholders clearly understand their roles, responsibilities, rights, and procedures. RAI is committed to systematic, continuous, and targeted training and capacity building to ensure effective, consistent, and compliant grievance management across all levels of the organization and its contractors.

10.1 Objectives of Training

Training and capacity building activities aim to:

- Ensure that all workers and external stakeholders are aware of the existence, purpose, and functioning of the Worker and External Grievance Mechanisms;
- Clarify roles, responsibilities, and escalation pathways in grievance handling;
- Strengthen competencies in receiving, assessing, investigating, resolving, and documenting grievances;
- Promote a culture of openness, trust, confidentiality, and zero tolerance for retaliation;
- Integrate gender-sensitive, human rights-based, and culturally appropriate approaches into grievance management.

10.2 Target Groups

Training and awareness activities shall be provided, as relevant, to:

- Top Management and senior leadership;
- Human Resources (HR) personnel;
- Health, Safety and Environment (HSE) staff;
- Community Liaison Officer (CLO) and stakeholder engagement staff;

- Line managers and supervisors;
- Contractors and subcontractors (management and supervisory staff);
- Contractor and subcontractor workers;
- Worker representatives and trade union representatives, where applicable.

10.3 Types of Training

The following types of training shall be implemented:

- **Induction Training:** Mandatory for all new employees and contractor workers, covering grievance rights, procedures, available channels, confidentiality, and protection against retaliation.
- **Refresher Training:** Periodic sessions for existing workers and managers to reinforce knowledge, address updates to procedures, and respond to identified gaps.
- **Specialized Training:** Targeted training for HR, HSE, CLO, and management staff on grievance screening, investigation techniques, mediation, conflict resolution, and documentation.
- **Gender and Vulnerability Training:** Focused sessions on gender-sensitive grievance handling, prevention of harassment and discrimination, and effective engagement with vulnerable and marginalized groups.
- **Contractor Awareness Training:** Dedicated sessions to ensure contractors understand their obligations, including unrestricted access for their workers to RAI's grievance mechanisms and non-retaliation requirements.

10.4 Training Methods and Delivery

Training may be delivered using a combination of methods, including:

- Classroom-based training and workshops;
- Toolbox talks and on-site briefings;
- E-learning modules and digital materials;
- Practical case studies, simulations, and role-playing exercises;
- Community-based awareness sessions for external stakeholders, where appropriate.

All training materials shall be prepared in appropriate languages and formats, taking into account literacy levels, cultural context, and accessibility needs.

10.5 Monitoring and Evaluation of Training Effectiveness

- Attendance and participation in training sessions shall be documented and retained;
- Pre- and post-training assessments may be conducted to evaluate improvements in knowledge and understanding;
- Feedback from participants shall be collected and analyzed to improve training quality and relevance;
- Training effectiveness shall be reviewed as part of the E&S Monitoring Plan;
- Identified gaps or weaknesses shall inform updates to training content and future capacity building plans.

10.6 Continuous Capacity Development

RAI shall ensure continuous improvement of grievance management capacity by:

- Updating training materials based on lessons learned from grievance cases and monitoring results;
- Integrating grievance-related findings into broader E&S and LHRMS training programs;
- Reflecting changes in legislation or International Financial Institutions requirements in training content in a timely manner;
- Promoting internal knowledge sharing and dissemination of good practices across departments and contractors.

11. CONFIDENTIALITY AND DATA PROTECTION

RAI is committed to ensuring strict confidentiality and robust data protection throughout the grievance management process. Protecting the identity, personal data, and safety of complainants is essential to building trust in the grievance mechanisms and encouraging their effective use.

Compliance with Georgian Legislation: All personal data collected as part of grievance handling shall be processed and stored in full compliance with applicable Georgian data protection laws and regulations, as well as relevant international good practices.

Purpose Limitation and Data Minimization: Personal information shall be collected only where necessary for the assessment and resolution of a grievance and shall be limited to data directly relevant to the case.

In cases of anonymous grievances or where the complainant limits consent, only personal data strictly necessary for grievance assessment, investigation, and resolution shall be processed in accordance with the Law of Georgia on Personal Data Protection and the principle of data minimization.

Need-to-Know Access: Grievance-related information shall be shared strictly on a need-to-know basis and only with authorized personnel directly involved in grievance assessment, investigation, decision-making, or oversight.

Secure Storage: Grievance records, whether electronic or hard copy, shall be stored securely with controlled access to prevent unauthorized disclosure, loss, or misuse.

Data Retention: Grievance-related personal data shall be retained only for the minimum period necessary for grievance resolution and in compliance with Georgian data protection legislation. Unless otherwise required by law, grievance records shall not be stored for longer than five (5) years after the closure of the grievance case. Upon expiry of the retention period, grievance-related personal data shall be securely deleted or anonymized in accordance with applicable legal requirements.

Anonymous Grievances: Anonymous grievances shall be accepted and handled with equal priority and seriousness. The absence of identifying information shall not affect the assessment, investigation, or resolution process.

Protection from Retaliation: Confidentiality measures are complemented by a zero-tolerance approach to retaliation, ensuring that complainants are protected from any form of intimidation, discrimination, or adverse treatment.

Disclosure Restrictions: No personal or sensitive information shall be disclosed to third parties without the explicit consent of the complainant, unless disclosure is required by law.

Any transfer or sharing of grievance-related personal data with International Financial Institutions (IFIs), external consultants, investigators, auditors, or other third parties shall be limited to what is necessary for grievance handling purposes and carried out in compliance with the applicable Georgian data protection legislation and confidentiality requirements.

12. MONITORING, REPORTING, AND REVIEW

RAI shall monitor, report on, and periodically review the grievance mechanisms to ensure their effectiveness, accessibility, and continuous alignment with Georgian legislation and the requirements of ADB, EBRD, and IFC.

12.1 Monitoring

- Grievance statistics shall be monitored on a quarterly basis and shall include the number, type, source, and status of grievances.

- Monitoring shall assess resolution timelines, closure rates, and recurrence of similar issues.
- Gender-disaggregated and vulnerability-related data shall be included, where voluntarily provided, to assess inclusiveness and accessibility.

12.2 Reporting

- Trends, recurring grievances, and systemic issues shall be summarized and reported to senior management as part of regular E&S and LHRMS reporting.
- Reports shall highlight high-risk issues, lessons learned, and corrective or preventive actions taken.
- Grievance-related information shall be reported to International Financial Institutions (IFIs) in accordance with their respective requirements and reporting schedules.
- External reporting to stakeholders shall be conducted in line with the Stakeholder Engagement Plan (SEP), ensuring transparency while protecting confidentiality.

12.3 Review and Continuous Improvement

- The Grievance Mechanism Procedure shall be formally reviewed at least once every three (3) years, or more frequently if required due to regulatory changes, International Financial Institutions requirements, or significant grievance trends.
- Periodic reviews shall be conducted as part of the E&S Monitoring Plan.
- Reviews shall evaluate the effectiveness, awareness, accessibility, and actual usage of the grievance mechanisms by workers and external stakeholders.
- Systemic issues identified through grievance monitoring shall be incorporated into updates of the ESMP, OHS Management Plan, Labour Management Plan, and Stakeholder Engagement Plan to ensure preventive and corrective actions are applied across the organization.
- Where applicable, worker representatives, including trade union representatives, shall be involved in the review process to enhance credibility and inclusiveness.
- Review results shall be documented, approved by management, and used to define corrective and improvement actions.
- Identified corrective actions shall be implemented in a timely manner and tracked to closure.

This monitoring, reporting, and review framework ensures transparency, accountability, regulatory compliance, and the continuous improvement of RAI's grievance mechanisms.

13. REFERENCES

IMS-ISO Requirements:

- ISO 9001:2015 – Clause 4.2: Understanding the needs and expectations of interested parties
- ISO 9001:2015 – Clause 7.4: Communication
- ISO 14001:2015 – Clause 4.2: Understanding the needs and expectations of interested parties
- ISO 45001:2018 – Clause 4.2: Understanding the needs and expectations of interested parties

Georgian Regulations:

- Organic Law of Georgia on the Labour Code of Georgia, (No 729 dated 12 June 2013)
- Law of Georgia on Personal Data Protection (No 3144 dated 14 June 2023)

Other Applicable References:

- EBRD PR2: Labour and Working Conditions
- EBRD PR4: Health, Safety and Security
- EBRD PR10: Information Disclosure and Stakeholder Engagement
- ADB Safeguard Policy Statement (2009) – Stakeholder Engagement and Information Disclosure