



STAKEHOLDER ENGAGEMENT PLAN

Multifunction Satellite Public-Private Partnership Project

SATELIT NUSANTARA TIGA

December 2020

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1. Introduction

1.1. Project Background

Indonesia is the world's largest archipelago with 17,504 islands scattered into 34 provinces, 548 cities, 6,633 sub-districts and 74,954 villages. With its 265 million population (as of 2018), it is the world's 4th most populous country. However, more than 10,500 villages have not been covered by cellular network as of today. Currently, fiber optic stretches around 75,000 kilometers which only serves the urban areas. Satellite becomes indispensable to serve the remote and underserved areas.

Indonesia's Ministry of Communication and Information Technology ("KOMINFO") initiated the Government of Indonesia Multifunctional Satellite PPP Project ("Project") to provide fast internet access to remote areas in Indonesia which can be accessed by various government sectors, such as maritime, education, health, agriculture, communication and others. Satellite-based connectivity is the only feasible access technology to cost-effectively address these remote locations. This is the only telecommunication satellite PPP (Public-Private Partnership) Project in Indonesia.

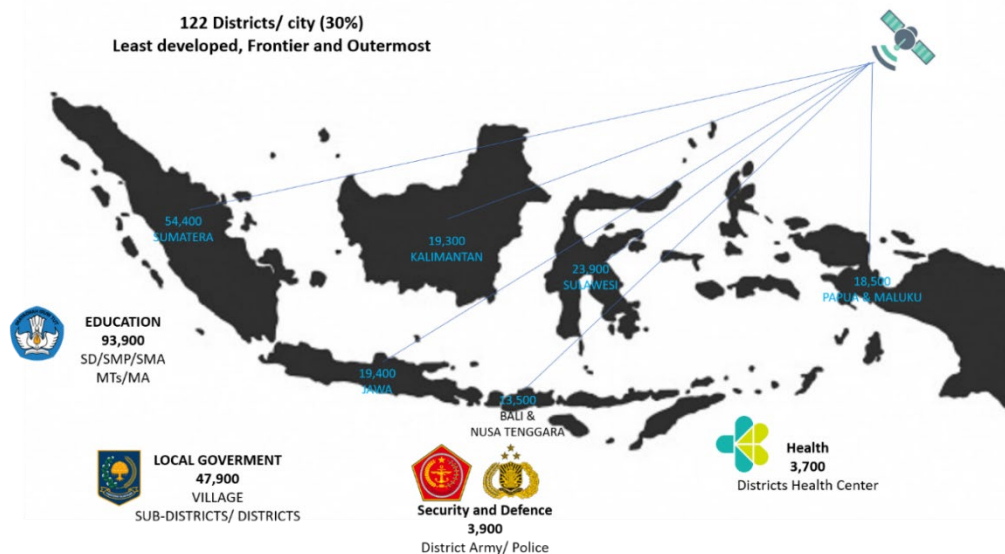


Figure 1 Target users of the SMF network

KOMINFO signed the Cooperation Agreement with PT Satelit Nusantara Tiga ("SNT") in May 2019. As the Implementing Business Entity (IBE), SNT is responsible to build and operate the satellite and the ground systems throughout the contract period including procurement for land requirement.

The Project will have social economic benefits in the following aspects:

- Enhancing provision of educational opportunities for students through improved access to online educational programs, applications and research;



- Connecting the public to healthcare facilities, rural clinics and hospitals; patients can locate nearest healthcare centers, view online medical information, make payments and schedule appointments;
- Increasing national security by providing satellite-based monitoring and timely reporting system from the most remote areas in Indonesia;
- Improving villagers' wealth and standard of living by providing connectivity to open economic opportunities;
- Supporting social security system's efficiency and connectivity for local governments to connect with each other and/or to the Headquarter in Jakarta.

The Project comprises four major components as follows:

High Throughput Satellite ("HTS")

An HTS is an artificial satellite that relays and amplifies Radio Frequency (RF) signals via a transponder; it creates a communication channel between a source transmitter and a receiver at different locations on Earth.

Gateway

A gateway is a ground station that transmits data to/from the satellite to the local area network. It houses the antennas and equipment that convert the RF signal to an Internet Protocol (IP) signal for terrestrial connectivity. A network of 11 RF gateways will be built across Indonesia. Each gateway will use a 13-meter monopulse antenna to ensure pointing accuracy and provide the needed capacity for the network.

Start-up Gateway (IP Processing Hub)

The start-up gateway will be supported by Hughes JUPITER system, which includes the system clock, antenna system, transmitting and receiving RF equipment, telemetry, tracking and command (TT&C) equipment, data-user interface, mission data recovery, and station control center. For the Start-Up Network, only two (2) hubs are required, each collocated in the main and backup Satellite Control Center (SCC).

Network Operation Center ("NOC") / Network Management System ("NMS")

A network operations center (NOC), also known as a "network management center", is the location from which network management will take place.

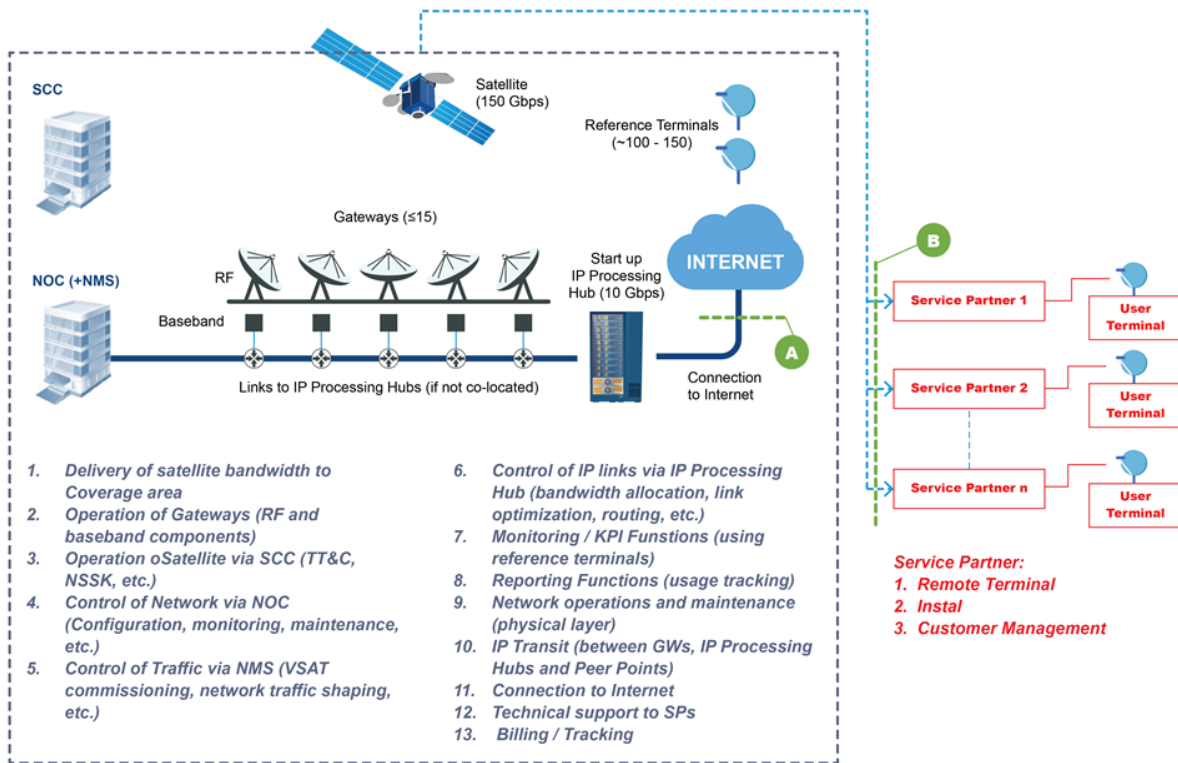


Figure 2 SMF Network service architecture



2. Stakeholder Engagement Objectives

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks.

Stakeholder engagement will be free of manipulation, interference, and intimidation, and conducted based on timely, relevant, understandable, and accessible information, in a culturally appropriate form. It involves interactions between identified groups of people and provides stakeholders with an opportunity to raise their concerns and ensure that this information is taken into consideration when making project decisions.

The goals of stakeholder engagement for the satellite telecommunications project are to:

- Provide ongoing information on the project to related government agencies, affected communities, landowners, private interests (e.g. financing parties), and other stakeholders;
- Provide timely and appropriate information prior to and during construction, and during operations phase to enable informed participation in the project and definition of appropriate mitigation measures;
- Carry out engagement to all affected groups in the consultation process;
- Disclose the impacts of the project and proposed mitigation measures;
- Provide ongoing information on the implementation of the mitigation measures; and
- Facilitate open and continuous communication and consultation between various groups including construction contractors, stakeholders, and the public.

The stakeholder engagement process is ongoing throughout the life of the project. Information will also be disseminated as needed to address significant changes in schedule or other important project developments. The stakeholder engagement process includes two key aspects:

- Early and ongoing outreach to key stakeholders to provide information on the project.
- A grievance redress process to address workers and public complaints during implementation of the project.

3. Regulatory Overview

3.1. Land Acquisition Regulation

The table below lists the key laws and regulations related to land acquisition issues in Indonesia.

Table 1 Indonesia Land Acquisition Regulation

No.	Subject	Description	Relevance to the Project
1.	Law No. 2/2012 concerning land procurement process for public interest	<p>The Law outlines required Government-facilitated land procurement steps which includes:</p> <ul style="list-style-type: none"> • Planning • Preparation • Implementation • Handover <p>The land procurement must comply with National Medium-Term Development Plan and National Strategic Plan. The process also involves multiple layers of Government institutions.</p> <p>The Law also provides for prevailing compensation mechanism should there be any resettlement of people or economic displacement of people. Compensation value will be determined by registered third party appraiser chosen by local land office.</p> <p>Forms of compensation:</p> <ul style="list-style-type: none"> • Financial; • Land substitution; • Land resettlement; • Share ownership; or, • Others, as agreed by both parties. 	<p>As the Project is a PPP it may benefit on this regulation. Government facilitation is an alternative if the procurement of land cannot be settled through direct sale & purchase mechanism (i.e. Willing Seller-Willing Buyer approach) and replacement of land location is impossible.</p> <p>SNT will follow direct procurement approach (without Government facilitation). It is more efficient in terms of time and cost because the Project land requirement is less than 5 Ha and there are multiple location options available. It also to prevent the possibilities of increasing of price by land speculators party.</p>
2.	Presidential Regulation No. 71/2012 concerning land	The regulation provides for land procurement to be facilitated by	

No.	Subject	Description	Relevance to the Project
	procurement process for public interest, and its subsequent amendments	the government if it fulfills the requirements provided therein. Small scale land procurement (<5 Ha) can be conducted directly by the Company/Institution (i.e. SNT) without Government facilitation.	
2.	Government Regulation of The Republic of Indonesia No. 24/1997 concerning Land Registration		If the Project land that will be acquired has no title, it is for the interest of SNT (and the government and the lenders) to register such land and obtain land title evidenced by land certificates.
3	Indonesian Civil Law Article 1550 - 1580	These provisions regulate land lease.	If the Project land is obtained through long term lease, these provisions will need to be taken into account.
4	Law No. 5/1960 concerning basic regulations on agrarian principles	The law provides the types of land titles that can be owned by an entity and the principles of such land titles	If the Project land is obtained through acquisition, these provisions will need to be taken into account.

3.2.Environmental Impact Assessment Regulation

The below are prevailing Indonesian regulations on environmental impact in relation to the Project:

Table 2 Indonesia Environmental Impact Assessment Regulation

No.	Regulation	Description	Relevance to the Project
1.	Minister of Environment Regulation No. 5/2012 concerning mandatory requirement of environmental impacts assessment (<i>Analisa Mengenai Dampak Lingkungan Hidup/AMDAL</i>)	AMDAL is a formal study process used to calculate the impact on the environment by a project activity plan, which aims at ensuring if there are any environmental impact issues that need to be analyzed in the initial stages of project planning	AMDAL is not required for the Project because the required land for each gateway (approx. 500m2 to 2,000m2) is less than minimum land plot required by the regulation.

No.	Regulation	Description	Relevance to the Project
	for specified business plans and activities.	<p>and design as a consideration for decision makers.</p> <p>Indonesia's Environment Law provides that an AMDAL is required for those businesses and/or activities which, amongst other things:</p> <ol style="list-style-type: none"> 1. change the form and contour of the environment; 2. exploit natural resource (renewable or non-renewable); 3. may cause environmental pollution and/or damage and/or degradation of natural resources; 4. result in natural and artificial environmental, social and cultural impacts; 5. impact the sustainability of a natural resource conservation area and/or the protection of cultural heritage; 6. introduce new species of plants, animals and micro-organisms; 7. produce and utilize natural or non-natural raw material; 8. are high risk activities and/or impact State defense; and/or 9. implement new technology which is predicted to have a large impact on the environment. <p>Appendix 1 listed detailed business plans and activities which mainly require AMDAL for large-scale use of land.</p>	The required land will not be located in any biodiversity conversation areas or natural habitats.

No.	Regulation	Description	Relevance to the Project
2.	Minister of Environment Regulation No. 13/2010 concerning Environmental Management and Monitoring Program (<i>Upaya Pengelolaan Lingkungan Hidup dan Upaya Pemantauan Lingkungan Hidup/UKL-UPL</i>).	<p>There are two situations in which an enterprise would need to prepare a UKL-UPL:</p> <ol style="list-style-type: none"> 1. where the operations of the enterprise have potentially adverse effects on the environment albeit of a lesser degree than in situations where an AMDAL is required; or 2. where the enterprise is exempted from preparing an AMDAL. <p>A UKL-UPL has a prescribed form, which includes:</p> <ul style="list-style-type: none"> • the activities plan; • the environmental impact; and • the environmental management and monitoring program. 	<p>The Project is subject to UKL-UPL requirement.</p> <p>The location of the business operations of the enterprise (in case of the Project, location of ground segment i.e. gateways) will determine which authority (whether the Minister, the governor or the regent / mayor) will evaluate the UKL-UPL prepared by the enterprise.</p>
3.	The Republic of Indonesia Government Regulation No. 27/2012 concerning Environmental Permit.	An environmental permit is required to obtain a business license for any business and/or activity for which an Environment Impact Analysis (AMDAL) or Environmental Management and Monitoring Program (UKL-UPL) is required (Article 1.1).	The Project is subject to this regulation because ground segment construction requires UKL-UPL.

3.3. Grievance Redress Mechanism

The national Grievance Redress Mechanism is regulated under Indonesian Law Ministry of Environment and Forestry Regulation No. 22/2017. However, the Law does not required Contractors to establish a Grievance Redress Mechanism during construction. SNT, with the support of the Contractor will place the similar GRM mechanism for its workers to address workplace concerns.

No.	Regulation	Description	Relevance to the Project
1.	Law No. 25 Year 2009	Public Service	This regulation requires all public services including those which controlled by government, corporation, independent institutions and other form of legal agency to handle and manage grievance from relevant stakeholders and public. As public service provider, this project is required to also manage any grievance submitted.
2.	Law No. 32 Year 2009	Protection and Management of the Environment	Stakeholder and community engagement and environmental management can be conducted through dialogue, discussion and public consultation. It is mandatory for project executor on conducting stakeholder engagement related to environment management.
3.	Presidential Decree No. 76 Year 2013	Management of Public Service Complaints	This regulation requires all public services including those which controlled by government, corporation, independent institutions and other form of legal agency to handle and manage grievance from relevant stakeholders and public. As public service provider, this project is required to also manage any grievance submitted. In this regulation, related to grievance management, the project executor is required to disclose the name and office address of the person in charge of grievance management; announce the grievance redress mechanism and procedure; accept, respond, process and redress all submitted grievance; channel grievance that are unrelated or outside of organizer authority to the authorized organizer; record the grievance handling process; and monitor and evaluate the grievance management.
4.	Ministry of Agrarian Affairs and Spatial Planning/National Land Agency	Complaints Management	Only regulates obligations of Ministry of Agrarian Affairs and Spatial Planning to handle the grievances within their organization.

No.	Regulation	Description	Relevance to the Project
	Regulation No. 11 Year 2018		
5.	Ministry of Agrarian Affairs and Spatial Planning/National Land Agency Regulation No. 11 Year 2016	Land Conflict Settlement	If land conflict occurs within the project and complainants are dissatisfied with resolution given through developed grievance redress mechanism and/or using legal channels to settle the conflict, this regulation can be utilized to settle the land conflict.
6.	Ministry of Environment and Forestry Regulation No. 22/2017	Regulates grievance redress mechanism towards planning, implementation, and post-implementation of activities with potential to impact environment and forestry	Only regulates obligations of government institutions to handle the grievances. Does not require Contractors to establish a Grievance Redress Mechanism during construction.

3.4. AIIB's Environmental and Social Policy and Standards

1. The Project is proposed to be supported by the Asian Infrastructure Investment Bank (AIIB, or the Bank). The Project has been tentatively assigned Category B under the Bank's Environmental and Social Policy (ESP). Under the AIIB financing, SNT will satisfy not only the local environmental and social laws and regulations, but also the ESP and Environmental and Social Standards (ESS) of AIIB. The Project will require application of Environmental and Social Standard (ESS) 1 – Environmental and Social Assessment and Management. The ESS 1 aims to incorporate appropriate assessment of the environmental and social risks and commensurate mitigation measures into the Project's decision-making process and implementation. This includes preparing project screening checklist and preparing environmental and social management plans before construction works. Thereafter, effective mitigation and monitoring measures during Project Implementation are the responsible of SNT as the Client.
2. Transparency and meaningful consultation is essential for the design and implementation of a Project. AIIB ESF requires meaningful consultation, a process that begins early and is ongoing throughout the Project. It is inclusive, accessible, timely and undertaken in an open manner. It conveys adequate information that is understandable and readily accessible to stakeholders in a culturally appropriate manner and in turn, enables the consideration of stakeholders' views as part of decision-making. Stakeholder engagement is conducted in a manner commensurate with the risks to, and impacts on, those affected by the Project.

The Bank requires carrying out of environmental and social assessment which includes among others scoping, including stakeholder identification and consultation plan; evaluation of environmental and



social risks and impacts; public consultation and information disclosure; and development of mitigation, monitoring and management measures and actions in the form of an ESMP or ESMF.

AIIB's ESP requires that relevant information about environmental and social risks and impacts of the Project is made available in the Project area in a timely and accessible manner, and in a form and language(s) understandable to the Project-affected people, other stakeholders and the general public, so they can provide meaningful inputs into the design and implementation of the Project.

3. The Bank requires SNT to manage the environmental and social risks and impacts associated with its Project in a manner designed to meet the ESP and the applicable ESSs in accordance with the Environmental and Social Management Framework (ESMF).

4. Stakeholder Identification Analysis

4.1. Stakeholder Identification

The initial step in the stakeholder engagement process is to identify the key stakeholders to be consulted and involved during the project lifetime. Stakeholders consist of individuals or groups who are affected or likely to be affected by the project and who may have an interest in the project. The stakeholder groups to be engaged may be expanded during project implementation.

Due to the nature of the project being Private-Public Partnership (PPP), many of the stakeholders are government agencies related to the national infrastructure provision and telecommunications will take interest in the project both during the construction and operation. The government agencies generally fall within two categories, first, high-level agencies who take interest in the entire project because of the PPP structure and/or they are direct stakeholders in the project, and second, the lower-level agencies (e.g. district offices) who take part in the project as part of the administrative requirements. In addition to government agencies and non-governmental organizations supporting the project, key stakeholders include individuals living near the project area and other private interests, such as the landowners for site acquisition, contractors and workers, and the financing parties.

Since the SMF system comprises space and ground segment, some of the stakeholders will primarily concern the ground construction that will take place in different cities in Indonesia. The project location is shown on table below and consists of 11 gateway sites, each with earth station antenna and a small shelter for the servers and other equipment. The size of the land plots will be approximately 500m² up to 2000m², with each site construction to take around 3-4 months.

Figure 3 Proposed Project Land Locations

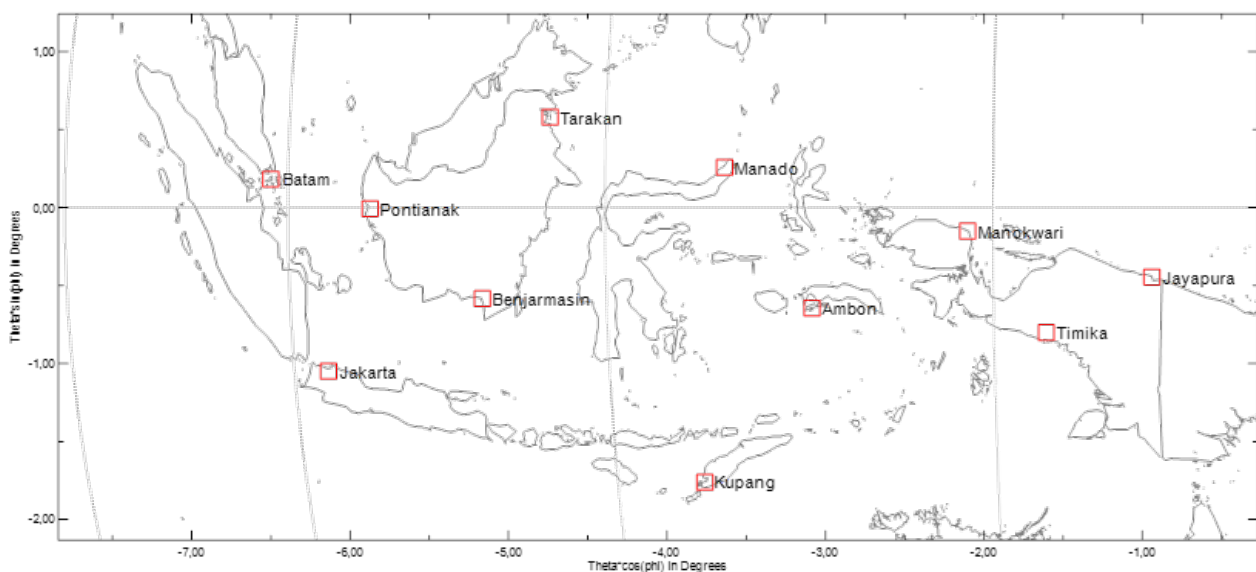


Table 3 Project Location

City	Province
Batam	Riau Islands
Tarakan	North Kalimantan
Pontianak	West Kalimantan
Banjarmasin (Start-Up)	South Kalimantan
Cikarang (Start-Up)	West Java
Manado	North Sulawesi
Ambon	Maluku
Kupang	East Nusa Tenggara
Manokwari	West Papua
Timika	Papua
Jayapura	Papua

Table 4 lists key stakeholder groups that will require engagement during project implementation. The stakeholders are categorized in: Government Ministries, Government Departments, Non-Governmental Groups, affected communities, and other private interests.

Table 4 Stakeholder Groups

Stakeholder	Involvement Period	Contact Information
Government Ministries		
Kementerian Komunikasi dan Informatika Republik Indonesia (Ministry of Communication and Information Technology)	On-going throughout cooperation period	Jl. Medan Merdeka Barat no. 9, Jakarta 10110 Tel: (021) 3452841 Email: humas@mail.kominfo.go.id
Kementerian Koordinator Bidang Perekonomian (Coordinating Ministry for Economic Affairs)	On-going throughout cooperation period	Jl. Lapangan Banteng Timur Nomor 2-4, Jakarta 10710 Tel: (021) 352 1835 Fax: (021) 351 1643 Email: humas@ekon.go.id
Kementerian Perencanaan Pembangunan Nasional Republik Indonesia (Ministry of National Development Planning)	On-going throughout cooperation period	Jl. Taman Suropati No.2, Jakarta 10310 Tel: (021) 3193 6207 Fax: (021) 3145 374 Email: humas@ekon.go.id
Kementerian Keuangan Republik Indonesia (Ministry of Finance)	On-going throughout cooperation period	Jl. Dr.Wahidin Raya No 1, Jakarta 10710 Tel: 134 Fax: 021-3500842 Email: kemenkeu.prima@kemenkeu.go.id
Kementerian Lingkungan Hidup dan Kehutanan Republik Indonesia (Ministry of Environment and Forestry)	Construction period	Gedung Manggala Wanabakti Blok I Lt. 2 Jl. Jenderal Gatot Subroto, Jakarta 10270 Tel: (021) 5730191, (021) 5705086 Email: pusdatin@menlhk.go.id
Government Departments		

Stakeholder	Involvement Period	Contact Information
Badan Aksesibilitas Telekomunikasi dan Informasi (BAKTI) (Telecommunications Accessibility and Information Agency)	On-going throughout cooperation period	Gedung Menara Merdeka, Lt.9, Jl. Budi Kemuliaan 1 No.2, RT.2/RW.3, Gambir, Kota Jakarta Pusat, Daerah Khusus Ibukota Jakarta 10110 Tel: (021) 31936590 Fax: (021)31927516 Email: humas@baktikominfo.id
Dinas Komunikasi dan Informatika Republik Indonesia (Local District Office of Ministry of Communication and Information Technology)	Construction period	Location dependent
Dinas Lingkungan Hidup (Local District Office of Environment)	Construction period	Location dependent
Pemerintahan Kabupaten Daerah (District Regency Government)	Construction period	Location dependent
Tri-Party: Kecamatan, Polisi Sektor, dan Komando Rayon Militer (Local District)	Construction period	Location dependent
Village Head	Construction period	Location dependent
Badan Pertanahan Nasional (Local office of National Land Agency)	Construction period	Location dependent
Non-Governmental Groups		
Program Management Unit (BAKTI external consultant)	Construction period + 2 years of operation	Location in BAKTI office Contact/email to be updated
PT Surveyor Indonesia (Independent Supervisor Consultant)	Construction period + 2 years of operation	Jl. Jend. Gatot Subroto Kav.56 Jakarta 12950 - Indonesia Tel: (021) 526 5526 Fax: (021) 5265525
Local public notary	Construction period	Location dependent
Affected Communities (local community nearby the gateway site)		
Batam	On-going throughout cooperation period	To be provided once site is identified
Tarakan	On-going throughout cooperation period	To be provided once site is identified
Pontianak	On-going throughout cooperation period	To be provided once site is identified
Banjarmasin (Start-Up)	On-going throughout cooperation period	To be provided once site is identified
Cikarang (Start-Up)	On-going throughout cooperation period	To be provided once site is identified

Stakeholder	Involvement Period	Contact Information
Manado	On-going throughout cooperation period	To be provided once site is identified
Ambon	On-going throughout cooperation period	To be provided once site is identified
Kupang	On-going throughout cooperation period	To be provided once site is identified
Manokwari	On-going throughout cooperation period	To be provided once site is identified
Timika	On-going throughout cooperation period	To be provided once site is identified
Jayapura	On-going throughout cooperation period	To be provided once site is identified
Other Private Interests		
Landowner	Pre-Construction period	Location dependent
Contractors and Workers	Construction period	Location dependent
Financing Parties	On-going throughout cooperation period	Lead Arranger HSBC France 109, avenue des Champs Elysées – Paris Cedex 08 75419 Phone: +33 (0) 1 40 70 36 85 Mobile: +33 (0) 6 07 23 75 84

Specific stakeholder identification for each Project Site will be defined on Appendix.

4.2. Stakeholder Analysis

4.2.1. Stakeholder Analysis Process

The subsequent section describes the stakeholder analysis process for each stakeholder group. The role of each stakeholder is defined, and their interest and influence on the project is also scaled from Low, Medium, or High. For clarity, the following definition is determined for each interest and influence assessment.

Interest

Low: The stakeholder role is administrative in nature, but necessary for documentation/license process

Moderate: The stakeholder role is required for approval and/or compliance, but general interest for this specific project is minimal

High: The stakeholder role is required for participation, evaluation, approval, and/or compliance; stakeholder expects the proper and successful execution of the project

Influence

Low: The stakeholder is not exclusive (replaceable), stakeholder indecision cannot cause interference

Moderate: The stakeholder is not directly involved in the project, but have some interference power *or* can cause delay

High: The stakeholder is capable of a decision that can result in project halt *or* capable of creating significant schedule delay.

The stakeholder analysis is an ongoing process and will evolve as the project progresses to the implementation phase. The preliminary stakeholder analysis conducted for the SEP identified the various interests of stakeholder groups and the influence these groups may have on the project. The analysis also shaped the design of stakeholder consultation events and which stakeholders to engage and when. The analysis will be updated as needed when the sites for the facilities are identified.

4.2.2. Government

Table 5 Government Stakeholder Analysis

Stakeholder	Role in Project	Interest	Influence
Ministries			
Kementerian Komunikasi dan Informatika Republik Indonesia (Ministry of Communication and Information Technology)	Project owner to provide connectivity to government functions in rural Indonesia; Provide information on relevant telecommunications regulations and policies	High	High
Kementerian Koordinator Bidang Perekonomian (Coordinating Ministry for Economic Affairs)	Oversee national strategic projects and ensure the successful execution of the project	High	High
Kementerian Perencanaan Pembangunan Nasional Republik Indonesia (Ministry of National Development Planning)	Oversee all foreign funding and national strategic project planning/implementation	High	Moderate
Kementerian Keuangan Republik Indonesia (Ministry of Finance)	Oversee performance and provide financial/budgetary approval	High	High
Kementerian Lingkungan Hidup dan Kehutanan Republik Indonesia (Ministry of Environment and Forestry)	Provide information on relevant environmental regulations and policies	Moderate	Moderate
Government Departments			
Badan Aksesibilitas Telekomunikasi dan Informasi (Telecommunications Accessibility and Information Agency)	Project owner (implementing agency)	High	High

Stakeholder	Role in Project	Interest	Influence
Dinas Komunikasi dan Informatika Republik Indonesia (Local District Office of Ministry of Communication and Information Technology)	Provide letter of recommendation for construction license	High	High
Dinas Lingkungan Hidup (Local District Office of Environment)	Provide letter of recommendation for ESIA (AMDAL/UKL/UPL)	Low	High
Pemerintahan Kabupaten Daerah (District Regency Government)	Provide land-use license approval for land certification process	Moderate	High
Tri-Party: Kecamatan, Polisi Sektor, dan Komando Rayon Militer (Local District)	Coordination for safety and community case	Moderate	Moderate
Village Head	Issue construction license, assess and facilitate consultation/engagement with the villagers on the project in terms of ES impacts and risks, grievances redress or facilitation when applicable	High	High
Badan Pertanahan Nasional (Local office of National Land Agency)	Issue land certification	Moderate	High

4.2.3. Non-Governmental Groups

Table 6 Non-Government Stakeholder Analysis

Stakeholder	Role in Project	Interest	Influence
Non-Governmental Groups			
Program Management Unit (BAKTI external consultant)	Program management consultant for BAKTI; supervise the program progress	High	High
PT Surveyor Indonesia	Independent supervisor consultant: oversee compliance to the Cooperation Agreement and the agreed design proposed in the Technical Proposal	High	High

Stakeholder	Role in Project	Interest	Influence
Local public notary	Manage the land acquisition and certification process	Low	Low

4.2.4. Local Community

Local communities near the gateway sites are likely to have a high interest and high influence in the project, influence being primarily due to the capacity of causing significant delay. The description of the potential topic of concerns are summarized in Table 7, using previous experiences as reference. The project's Land Procurement team will work closely with the Village Head and supporting authorities to manage any concern or complaint from the community. The specific Grievance Redress Mechanism is described in a supplemental document.

Table 7 Local Community Potential Concern

Potential Topic of Concerns	Stakeholder Concerns Addressed
Air quality	Generation of some particulate matter emissions from construction
Obstruction	Obstruction of view or air circulation due to building or fence block
Noise	Disruption to the adjacent communities from construction noise
Road access blockage and traffic	Effects on vehicle access to the area during construction
Dirt contamination on road	Generation of construction waste on local roads
Hazards	Use of large construction equipment (i.e. cherry pick-up, container)
Customary land ownership	Acquisition of locally owned land and administered by local customs (subject to local requirement)

4.2.5. Other Private Interests

Other private interests in the project includes landowners from which the gateway sites will be procured from and the financing party, including all the constituents. The interest of the landowners is considered low, as they will primarily concern the transactional nature of the land purchase. However, their influence is considered moderate because delays in site acquisition may lead to further delay in gateway construction.

As for the financing parties, they hold both high interest and influence. Frequent update will be provided regarding the project progress throughout construction and operation.

Table 8 Other Private Interests

Stakeholder	Role in Project	Interest	Influence
Other Private Interests			



Landowner	Negotiate land sale before the construction of the ground facility (on a willing seller-willing buyer scheme).	High	Moderate
Contractors and Workers	Construct the gateways and ground network facilities	Moderate	Moderate
Financing Parties	Provide financing aligned with the national laws and regulations and Lenders' policies.	High	High

Specific stakeholder analysis for each Project Site will be described on Appendix.

5. Information Disclosure and Engagement with Stakeholders

5.1. Approach to Information Dissemination

There are a variety of engagement methods used to build relationships, gather information, consult, and disseminate project information to stakeholders. Table 9 provides a list of different methods to disseminate information on the project and describes the application of these methods.

Table 9 Information Dissemination and Engagement Methods with Stakeholders

Information Dissemination Method	Application
Correspondence by phone/email	<ul style="list-style-type: none"> Request/distribute project information Inform stakeholders about consultation meetings
Website	<ul style="list-style-type: none"> Disseminate information to public audiences and stakeholders via project website Disseminate information on GRM
Formal meetings	<ul style="list-style-type: none"> Present project information Build impersonal relations with high level stakeholders Distribute technical documents Record discussion, comments/questions raised and responses
Public meetings	<ul style="list-style-type: none"> Present project information to a large audience of stakeholders or to specific community, including status of project construction and implementations, environmental and social impacts and risks and the measures and actions to address them Build relationships with local communities Distribute non-technical project information Disseminate information on GRM and contact person(s) Record discussion, comment/questions raised and responses
Focus group meetings	<ul style="list-style-type: none"> Facilitate meeting in smaller group of between 5 and 15 people to discuss specific topic of technical or non-technical matter of the project, including status of project construction and implementations, environmental and social impacts and risks and the measures and actions to address them Record discussion, comment/questions raised and responses
Site visit	<ul style="list-style-type: none"> Gather assessment from individual stakeholders through visiting project site Show planned activities and construction progress
Negotiation	<ul style="list-style-type: none"> Conduct site visit on potential site Discuss offer to purchase land plot, negotiate land/asset price, process documentary requirements to facilitate purchase/sale of land, etc

5.2. Stakeholder Consultation Process

To ensure the stakeholders are kept informed of the project progress, it is critical to plan each consultation process, consult inclusively, document the process, and communicate follow-up. The timing of stakeholder engagement is broken down by project phase: ongoing throughout project lifetime and construction phase (ground). The timing and methods of engagement with stakeholders are provided

below in Table 10. Engagement and consultation will be carried out on an ongoing basis as the nature of issues, impacts, and opportunities evolves.

Table 10 Stakeholder Engagement Method

Stakeholder	Engagement Method	Timing
Ministries		
Kementerian Komunikasi dan Informatika Republik Indonesia (Ministry of Communication and Information Technology)	<ul style="list-style-type: none"> • Formal meetings • Focus group meetings • Correspondence by phone/email • Website 	Ongoing throughout cooperation period
Kementerian Koordinator Bidang Perekonomian (Coordinating Ministry for Economic Affairs)	<ul style="list-style-type: none"> • Formal meetings • Correspondence by phone/email • Website 	Ongoing throughout cooperation period
Kementerian Perencanaan Pembangunan Nasional Republik Indonesia (Ministry of National Development Planning)	<ul style="list-style-type: none"> • Formal meetings • Correspondence by phone/email • Website 	During financial funding period
Kementerian Keuangan Republik Indonesia (Ministry of Finance)	<ul style="list-style-type: none"> • Formal meetings • Correspondence by phone/email • Website 	Ongoing throughout cooperation period
Kementerian Lingkungan Hidup dan Kehutanan Republik Indonesia (Ministry of Environment and Forestry)	Website	Construction phase (ground)
Government Departments		
Badan Aksesibilitas Telekomunikasi dan Informasi (Telecommunications Accessibility and Information Agency)	<ul style="list-style-type: none"> • Formal meetings • Focus group meetings • Correspondence by phone/email • Website • Site visit 	Ongoing throughout cooperation period
Dinas Komunikasi dan Informatika Republik Indonesia (Local District Office of Ministry of Communication and Information Technology)	<ul style="list-style-type: none"> • Formal meetings • Correspondence by phone/email • Site visit 	Construction phase (ground)
Dinas Lingkungan Hidup (Local District Office of Environment)	<ul style="list-style-type: none"> • Formal meetings • Site visit 	Pre-construction, Construction phase (ground)
Pemerintahan Kabupaten Daerah (District Regency Government)	<ul style="list-style-type: none"> • Formal meetings • Correspondence by phone/email 	Construction phase (ground)
Tri-Party: Kecamatan, Polisi Sektor, dan Komando Rayon Militer (Local District)	<ul style="list-style-type: none"> • Formal meetings • Correspondence by phone/email • Site visit 	Construction phase (ground)

Stakeholder	Engagement Method	Timing
Village Head	<ul style="list-style-type: none"> Formal meetings Correspondence by phone/email Site visit 	Pre-construction, Construction phase (ground)
Badan Pertanahan Nasional (Local office of National Land Agency)	<ul style="list-style-type: none"> Formal meetings Correspondence by phone/email Site visit 	Construction phase (ground)
Non-Governmental Groups		
Program Management Unit (BAKTI external consultant)	<ul style="list-style-type: none"> Formal meetings Focus group meetings Correspondence by phone/email Website Site visit 	Ongoing throughout cooperation period
PT Surveyor Indonesia (Independent Supervisor Consultant)	<ul style="list-style-type: none"> Formal meetings Focus group meetings Correspondence by phone/email Website Site visit 	Ongoing throughout cooperation period
Local public notary	<ul style="list-style-type: none"> Formal meetings Correspondence by phone/email Site visit 	Pre-construction, Construction phase (ground)
Affected Communities (local community nearby the gateway site)		
Batam	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations
Tarakan	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations
Pontianak	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations
Banjarmasin (Start-Up)	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations
Cikarang (Start-Up)	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations
Manado	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations
Ambon	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations
Kupang	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations
Manokwari	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations
Timika	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations

Stakeholder	Engagement Method	Timing
Jayapura	Public meeting (if required)	Pre-construction, Construction phase (ground), Operations
Other Private Interests		
Landowner	<ul style="list-style-type: none"> • Formal meetings/Negotiation • Correspondence by phone/email • Site visit 	Pre-Construction phase (ground)
Contractors and Workers	<ul style="list-style-type: none"> • Formal meetings • Correspondence by phone/email • Site visit 	Construction phase (ground)
Financing Parties	<ul style="list-style-type: none"> • Formal meetings • Focus group meetings • Correspondence by phone/email • Website 	Ongoing throughout cooperation period

Specific stakeholder engagement method for affected communities (if required) in each Project Site will be described on Appendix.

6. Stakeholder Engagement History

Since the inception of the project, tender process, and up to current stage of financing, most of the stakeholder engagement were focused on the project owners (i.e. KOMINFO, BAKTI), the relevant government agencies supporting foreign funding, and BAKTI's consultant parties. The engagement took the form in formal meetings, focus group meetings, and/or correspondence by phone or email. The subject of the interaction revolved around the project requirements, proposed design, and financing process.

Stakeholder	Engagement History	Topic/Timeframe	Concerns Raised and Agreements
Ministries			
Kementerian Komunikasi dan Informatika Republik Indonesia (KOMINFO) (Ministry of Communication and Information Technology)	<ul style="list-style-type: none"> Formal meetings Focus group meetings Correspondence by phone/email 	Continuous interaction since tender process until current financing stage; consultation on project design and planned implementation; update on regulatory matters; update on financing status.	11 October 2019 meeting between SNT and GCA: The Cooperation Agreement initially requires SNT to provide ESIA document as condition precedent to achieve Effective Date. SNT explained the ESIA document will only be available post Effective Date. Hence, the requirement is proposed to change into conditions subsequent.
Kementerian Koordinator Bidang Perekonomian (Coordinating Ministry for Economic Affairs)	<ul style="list-style-type: none"> Formal meetings Correspondence by phone/email 	Correspondence/discussion for the issuance of Commercial Foreign Loan Approval letter	N/A on E&S matter
Kementerian Perencanaan Pembangunan Nasional Republik Indonesia (Ministry of National Development Planning)	<ul style="list-style-type: none"> Formal meetings Correspondence by phone/email 	Two formal meetings to update on financing status and financial schedule	N/A on E&S matter
Kementerian Keuangan Republik Indonesia (Ministry of Finance)	<ul style="list-style-type: none"> Formal meetings Correspondence by phone/email Website 	Correspondence/discussion for the issuance of Commercial Foreign Loan Approval letter	N/A on E&S matter
Kementerian Lingkungan Hidup dan Kehutanan Republik Indonesia (Ministry of Environment and Forestry)	None	N/A	
Government Departments			

Stakeholder	Engagement History	Topic/Timeframe	Concerns Raised and Agreements
Badan Aksesibilitas Telekomunikasi dan Informasi (Telecommunications Accessibility and Information Agency)	<ul style="list-style-type: none"> Formal meetings Focus group meetings Correspondence by phone/email Website Site visit 	Continuous interaction since tender process (formal meetings/discussion on requirements, proposal, and design); consultation on program planning; discussion on technical matters regarding system design; updates on financing process; discussion on Lenders' requirements	
Dinas Komunikasi dan Informatika Republik Indonesia (Local District Office of Ministry of Communication and Information Technology)	None	N/A	
Dinas Lingkungan Hidup (Local District Office of Environment)	<ul style="list-style-type: none"> Correspondence by phone/email Informal meeting 	SNT sent a letter to Dinas Lingkungan Purwakarta on ESIA requirement	Dinas Lingkungan Purwakarta has answered with official letter only UKL-UPL is required (not AMDAL)
Pemerintahan Kabupaten Daerah (District Regency Government)	None	N/A	
Tri-Party: Kecamatan, Polisi Sektor, dan Komando Rayon Militer (Local District)	None	N/A	
Village Head	None	N/A	
Badan Pertanahan Nasional (Local office of National Land Agency)	None	N/A	
Non-Governmental Groups			
Program Management Unit (BAKTI external consultant)	<ul style="list-style-type: none"> Formal meetings Focus group meetings Correspondence by phone/email 	Periodic interaction during financing stage to update on program planning, financing status, and planned schedule	N/A on E&S matter
PT Surveyor Indonesia (Independent Supervisor Consultant)	<ul style="list-style-type: none"> Formal meetings Correspondence by phone/email 	Interaction during ISC appointment tender process and contract negotiation/finalization	N/A on E&S matter
Local public notary	None	N/A	
Affected Communities (local community nearby the gateway site)			
Batam	None	N/A	
Tarakan	None	N/A	
Pontianak	None	N/A	

Stakeholder	Engagement History	Topic/Timeframe	Concerns Raised and Agreements
Banjarmasin (Start-Up)	None	N/A	
Cikarang (Start-Up)	None	N/A	
Manado	None	N/A	
Ambon	None	N/A	
Kupang	None	N/A	
Manokwari	None	N/A	
Timika	None	N/A	
Jayapura	None	N/A	
Other Private Interests			
Landowner	None	N/A	
Financing Parties	<ul style="list-style-type: none"> • Formal meetings • Focus group meetings • Correspondence by phone/email • Website 	Multilateral loan and financing; financial advisory; technical and legal advisory for Lenders	

Specific stakeholder engagement history for each Project Site will be described on Appendix.

7. Grievance Redress Mechanism

SNT establishes a suitable GRM before the first land purchase, to receive and facilitate resolution of the concerns and complaints of project-affected people. The national Grievance Redress Mechanism is regulated under Indonesian Law Ministry of Environment and Forestry Regulation No. 22/2017. However, the Law does not required Contractors to establish a Grievance Redress Mechanism during construction. SNT, with the support of the Contractor will place the similar GRM mechanism for its workers to address workplace concerns.

Key principles of grievance mechanism will be based on the key principles, which as follows:

- **Free.** The stakeholders can submit the complaints without fees, through diverse channels, which are available at each different level namely Village, District, Provincial and/or National;
- **Fairness.** Stakeholders who submit complaints must be treated fairly and non-threatening access, and the follow-up complaints and conflict resolution regardless of their origin, ethnicity, religion, nationality status, social and economic background;
- **Immediate response.** Complaints and conflicts will be resolved as early as possible, at the lowest levels. The cases that cannot be resolved at a lower level will be brought to a higher level;
- **Options.** The complainants are given various options for settlement and they can be invited for negotiations to reach an agreed resolution and can be accepted by all parties;
- **Objective and Transparent.** The system for handling complaints will safeguard the principle of objectivity, transparency and justice, by having an Independent Advisory Team, which will be formed based on needs and willingness to help those who complain at any level.

Below is the schematic diagram of general SNT GRM mechanism and SNT will disseminate information about the GRMs to Project affected communities and workers.

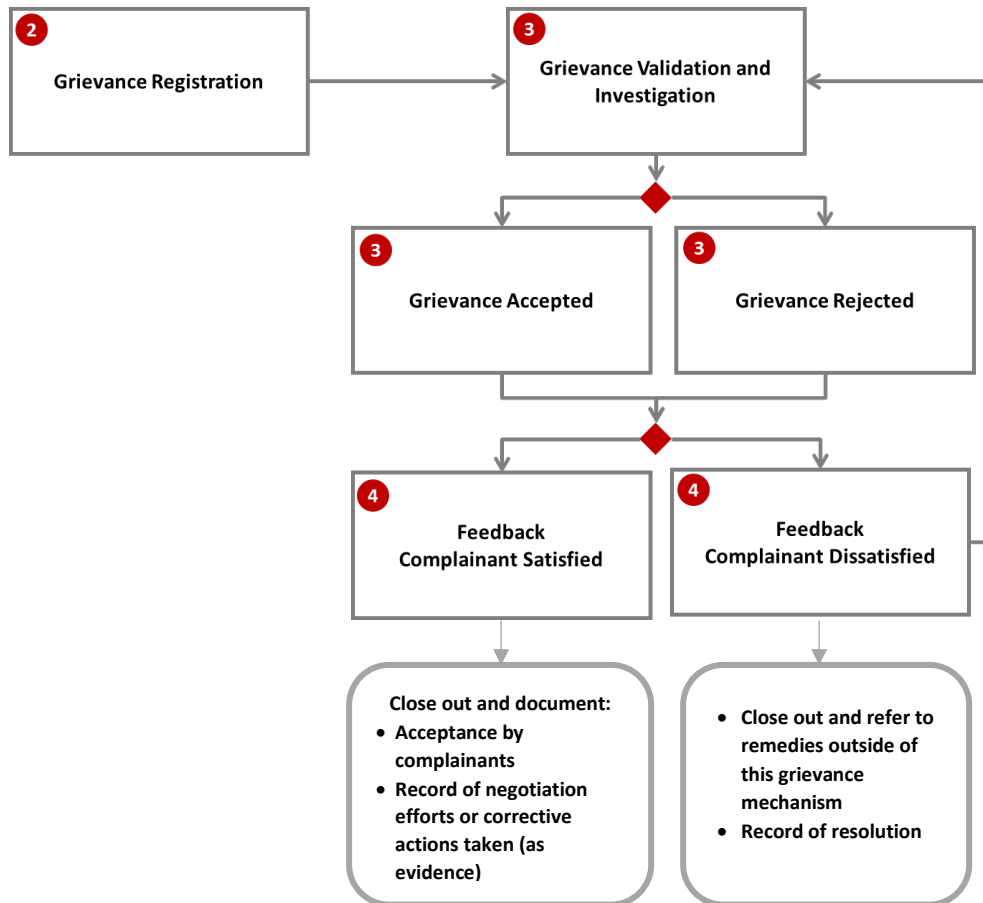


Figure 4 SNT Grievance Mechanism

1. Grievance Report Options

- Direct visit to any of worksites:
 - Request to speak to SNT representative or Contractor’s supervisor in charge; or
- Indirect:
 - Phone and facsimile, to SNT General Affairs Division during working hours (8AM-5PM) Monday to Friday on:
 - Phone : +62 21 576 4262
 - Fax : +62 21 576 4262
 - Letter, to be directed to SNT Health, Safety, and Environment (HSE) Manager and addressed to SNT office in Jakarta:
 - Gedung Kantor Taman A9 Unit C3-C4
 - Jl. DR. Ide Anak Agung Gde Agung Lot 8/9 No. 9
 - Mega Kuningan, Setiabudi
 - Jakarta 12950 Indonesia

- E-mail, to be directed to admin@snt.co.id with attachment of official letter.
- Announcement Board in Village Office which include Contractor Representative's contact number and SNT Representative's contact number.

2. Grievance Registration and Categorization

All accepted grievance reports should have the following information at minimum:

- (a) Name
- (b) Contact details (address, phone, email)
- (c) Date of complaint
- (d) Event location
- (e) Alleged source or cause of event
- (f) Time, description of event and perceived impact(s)
- (g) Proof (photo and/video) as case(s) evidence
- (h) Expected resolution
- (i) History of other complaints/queries/questions submitted by the complainant
- (j) History related or similar complaints/queries/questions

The information above will be recorded on Grievance Registration Log. SNT Officer will give Grievance Report Receipt within three (3) working days upon acceptance of complete report.

While in registration process, grievance categorization is required to simplify the officer in conducting validation and investigation process. Table below describes category of grievance which potentially occurs in this Project.

CATEGORY	ISSUE/GRIEVANCE	MANAGEMENT APPROACH
Technical	Covers all issues related to the construction and technical construction.	Complaints that have been submitted will be corrected immediately. Unresolved disputes will be coordinated with related government agency.
Environment disturbance	Covers all issues related to environmental change in the affected area.	Complaints that have been submitted will be corrected immediately. Unresolved disputes will be coordinated with related government agency.
Social disturbance	Covers all issues related to economic disruption, health, community safety and security and other social issues.	Complaints that have been submitted will be corrected immediately.

		Unresolved disputes coordinated with related government agency.
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3. Grievance Validation and Investigation

Grievance report will be verified and validated through the following mechanisms:

- (a) Administration investigation
Document check and/or data request or other information from related internal and/or external work units.
- (b) Field investigation
Physical check and/or related on-field documents.

SNT Health, Safety, and Environment (HSE) Manager will be in charge of grievance validity, categorization, and evaluation.

4. Feedback

After validation and investigation process is completed, SNT will contact complainant to advise finding and outcome of the investigation.

- If the complainants are not satisfied with the results then further investigations will be conducted and they are free to take dispute resolution action outside the SNT grievance mechanism. (i.e. back to Step 3).
- If complainant is satisfied with the outcome: corrective actions will be taken accordingly, and Grievance Report Log will be updated.

SNT will ensure all grievances raised by all Project stakeholders will be treated in impartial, respectful, and confidential manners.

Specific Grievance Redress Mechanism for each Project Site will be described on Appendix.

7.1. Timetable

For grievance handling period for each grievance submitted will be explained in table below. The period described is applied for general, detailed timetable will be updated for each land site SEP.

TIER	SCOPE OF GRIEVANCE	PERIOD		EXTERNAL PARTY TO BE ENGAGED
		REGISTRATION	FEEDBACK	
Tier 1	Minor request from stakeholders and public, including but not limited to: <ul style="list-style-type: none"> • Construction problems, e.g. noise, vibration and dust pollution during 	3 x 24 hours (working days)	7 x 24 hours (working days)	N/A

TIER	SCOPE OF GRIEVANCE	PERIOD		EXTERNAL PARTY TO BE ENGAGED
		REGISTRATION	FEEDBACK	
	<p>construction; quality of contractor work; utility disturbances (water and electricity); road safety; worker health and safety; damage to adjacent property not included in the compensation package; water pollution in private and public water resources; submerged in water/flood; damage to road access or access to housing; road accidents (public safety); damage to natural and cultural heritage; and other issues (complainants to determine).</p> <ul style="list-style-type: none"> Employee/labor related problems, e.g, wages and overtime pay are not paid, including delayed payment of wages; wages of workers below the amount determined by the government. Problems related to gender-based violence, sexual harassment and violence. 			
Tier 2	<p>Major accident and request from stakeholders and public, including but not limited to:</p> <p>Regarding the compensation for project-affected assets, e.g, land ownership disputes; rejection of compensation value offered; rejection of the amount of affected assets such as trees, building structures; delayed compensation payments; and other issues (complainants to determine).</p>	3 x 24 hours (working days)	12 x 24 hours (working days)	<p>Environmental: <i>Dinas Lingkungan Hidup</i>/Local Environmental Agency</p> <p>Land Dispute: <i>Kantor Perwakilan Badan Pertanahan Nasional</i> /National Land Agency</p>

8. Resource and Responsibilities

Stakeholder Engagement Plan will involve multiple layers of positions in SNT. However, in terms of environmental and social, the activities will be conducted by internal Project Team consists of Project Manager, Land Legal Expert, and E&S Experts. The Project Team has more than 15 years of experience in building satellite ground infrastructure. Land Legal and E&S Experts are professionally trained and hold HSE and ESIA/AMDAL certificates. To assist Project Team in environmental and social matters, SNT will appoint an Environment and Social Consultant. The consultant will be appointed before financial close.

The budget for these activities has been allocated on the proposed project financial model under budget posts of pre-operation cost during construction and technical consultancy cost during commercial operation.

9. Monitoring and Reporting

SNT will document stakeholder engagements. SNT will prepare and submit bi-annual progress report on the SEP implementation as part of the bi-annual ES progress report to the Financing Parties. The SEP will be updated to indicate the evolution of the stakeholder engagement, including engagement activities and consultations. Any major changes to the project related activities will be duly reflected in the SEP. This document will serve as a living document to provide a record for all engagement throughout the Project lifetime.

The SEP report will also summarize the implementation of the Grievance Redress Mechanism should any complaints arise from any of the affected stakeholders. The number and the nature of complaints and requests for information will be assessed, along with the Project's ability to address those in a timely and effective manner.

10. Conclusion

The goal of the Stakeholder Engagement Plan is to build and maintain constructive relationships over time. Described in this document is SNT's strategy and program for engaging with stakeholders to ensure the timely provision of relevant and understandable information to all parties. It is an ongoing process and encompasses a range of activities and approaches, from information sharing and consultation, to participation, negotiation, and partnerships. The SEP will be updated from time to time as sites of the ground facilities are identified. SNT will commit to ensure the successful execution of the Project to maximize the economic and social benefit for the people of Indonesia.



APPENDIX 1. GRM LOG TEMPLATE

A1 Grievance Log

Name		<input type="checkbox"/> Please keep my identity confidential		Registered by:	
				Date/Time	
Village		District		Name	
Date		Time		Title	
Preferred contact via	<input type="checkbox"/> Telephone	<input type="checkbox"/> Social media (Twitter and Instagram)		Institution	
	<input type="checkbox"/> Email (Electronic)	<input type="checkbox"/> Texting media (Whatsapp, SMS, dll)		Signature	
	<input type="checkbox"/> Face to face				
Detail of grievance					
Expected remedy					



Additional remarks		Evidence (Photos and/or Video)	
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A2 Grievance Redress Log

A. Registered By	
Officer name	
Date/time	
Tittle	
Institution	
Telephone/contacts	
Signature	
B. Complainants Identity	
Name	
Date of grievance submitted	
Village	
District	
Telephone/contact	
Channel use on submitting grievance	
<input type="checkbox"/> Please keep my identity confidential	
Detail of Grievance	



Expected remedy			
Detail redress remedy implemented (time, place, action, etc.)			
Additional remarks		Evidence (Photos and/or Videos)	

APPENDIX 2. STAKEHOLDER ENGAGEMENT PLAN OUTLINE (Applicable and Relevant for all eleven Sites)

1. Stakeholder Identification

[This Chapter will be developed based on relevant identified stakeholders specific for Cikarang Site]

2. Stakeholder Analysis

[*idem* above]

3. Stakeholder Engagement Method

[This Chapter will be developed based on local requirement (if required) and relevancy to stakeholders' criteria on Site]

4. Stakeholder Engagement History

[*idem* above]

5. Grievance Redress Mechanism

[This Chapter will be developed based on relevancy to stakeholders' criteria and applicability to the Site characteristic]