Stakeholder Engagement Plan

Sustainable Aviation Fuel

Green Sky Capital

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Table of Contents

Basis of Report ii
Acronyms and Abbreviations v
1.0 Introduction 1
1.1 Project Background 1
1.2 Purpose of the Stakeholder Engagement Plan 3
1.3 Objectives of the Stakeholder Engagement Plan 3
1.4 Principles of the Stakeholder Engagement Plan 3
2.0 Project Overview 5
2.1 Project Description 5
2.2 Environmental and Social Context 6
2.2.1 Biophysical Environment 6
2.2.2 Social Environment 7
3.0 Legislative Framework 9
3.1 Overview 9
3.2 Moroccan Regulatory Framework 9
3.3 International Policies, Guidelines and Standards 10
4.0 Preliminary Stakeholder Identification & Analysis 11
4.1 Stakeholder Identification 11
4.2 Stakeholder Mapping and Analysis 15
4.3 Vulnerable and Disadvantaged Groups 16
5.0 Summary of Previous Stakeholder Engagement 17
6.0 Stakeholder Engagement Programme 18
6.1 Key Objectives for Disclosing Information 18
6.2 Strategy and Methods for Disclosing Information during the ESIA Study 19
6.2.1 Targeted ESIA Engagement and Baseline Validation 19
6.2.2 ESIA Phase Disclosure 25
6.3 Future Stakeholder Engagement Strategy, Plan, and Responsibilities 26
7.0 Implementation Resources & Responsibilities 29
7.1 Resources 29
7.2 Management Functions and Responsibilities 29
8.0 Grievance Mechanism 30
8.1 External Grievance Mechanism 30
8.1.1 Disclosure and Accessibility of the External GRM 34
8.2 Workers' Grievance Mechanism 34
8.3 Lenders' Grievance Mechanism 35

9.0 Monitoring and Reporting 35
9.1 Monitoring Indicators 35
9.2 Feedback to Stakeholders 36
10.0 References 36

Tables in Text

Table 2-1: Summary of Project Activities per Phase 6
Table 3-1: Relevant International Lender Standards 10
Table 4-1: Key Stakeholder Groups Identified 12
Table 4-2: Key Stakeholder Groups and Approach 15
Table 6-1: Consultations Undertaken 21
Table 6-2: Principal Concerns and Expectations Identified During the Consultations 24
Table 6-3: Future Stakeholder Engagement Strategy and Plan 27
Table 7-1: Responsibilities per Phase 30
Table 8-1: Project Grievance Contact Details 33

Figures in Text

Figure 1-1: Project Locality Map 2
Figure 2-1: Project Regional Location 8
Figure 4-1: Stakeholder Engagement Approaches 15
Figure 6-1: Locations of the Consulted Douars 23
Figure 8-1: Grievance Mechanism Process 32

Appendices

Appendix A Grievance Log
A.1 Grievance Log
Appendix B Blank Proforma Forms

Acronyms and Abbreviations

Acronym / Abbreviation	Definition
ABHM	Agence du Bassin Hydraulique de la Moulouya (Moulouya River Basin Agency)
ADII	Administration des Douanes et Impôts Indirects (Customs and Indirect Taxes Administration)
ANEF	Agence Nationale des Eaux et Forêts (National Agency for Water and Forests)
ANP	Agence Nationale des Ports (National Ports Agency)
ANRE	Autorité Nationale de Régulation de l'Électricité (National Electricity Regulatory Authority)
AoI	Area of Influence
BILZ	Bétoya Industrial and Logistic Zone
CESMP	Construction Environmental and Social Management Plan
CLO	Community Liaison Officer
CNEIE	Comité National des Études d'Impact sur l'Environnement (National Environmental Impact Assessment Committee)
CNSS	Caisse Nationale de Sécurité Sociale (National Social Security Fund)
CRI	Centre Régional d'Investissement (Regional Investment Centre)
CRUI	Commission Régionale Unifiée d'Investissement (Unified Regional Investment Commission)
DAE	Décision d'Acceptabilité Environnementale (Environmental Acceptability Decision)
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EIE	Étude d'Impact sur l'Environnement (Environmental Impact Study)
EP4	Equator Principles, fourth edition
EPC	Engineering, Procurement and Construction
ESAP	Environmental and Social Action Plan
ESG	Environmental, Social and Governance
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
ESR	Environmental and Social Requirement
FGD	Focus Group Discussion
GBVH	Gender-Based Violence and Harassment
GIIP	Good International Industry Practice
GPS	Global Positioning System
GRM	Grievance Redress Mechanism

Acronym / Abbreviation	Definition
GSC	Green Sky Capital
HAZID	Hazard Identification
HAZOP	Hazard and Operability Study
HCP	Haut-Commissariat au Plan (High Commission for Planning)
HEFA	Hydroprocessed Esters and Fatty Acids
HR	Human Resources
HSE	Health, Safety and Environment
HVO	Hydrotreated Vegetable Oil
IFC	International Finance Corporation
IFI	International Financial Institution
IPAM	Independent Project Accountability Mechanism
INSAP	Institut National des Sciences de l'Archéologie et du Patrimoine (National Institute of Archaeology and Heritage Sciences)
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Area
MTEDD	Ministry of Energy Transition and Sustainable Development
NGO	Non-Governmental Organisation
NTS	Non-Technical Summary
NWM	Nador West Med
OHS	Occupational Health and Safety
ONEE	Office National de l'Électricité et de l'Eau Potable (National Office of Electricity and Drinking Water)
ONSSA	Office National de Sécurité Sanitaire des Produits Alimentaires (National Office for Food Safety)
PS	Performance Standard
QRA	Quantitative Risk Assessment
SDO	Social Development Officer
SAF	Sustainable Aviation Fuel
SEP	Stakeholder Engagement Plan
SLR	SLR Sustainable Environmental Consultancy LLC SOC
UCO	Used Cooking Oil
WBG	World Bank Group
WHO	World Health Organization

1.0 Introduction

1.1 Project Background

Green Sky Capital (GSC, hereafter the Client) is proposing to develop a Sustainable Aviation Fuel (SAF) production facility within the Bétoya Industrial and Logistic Zone (BILZ) of the Nador West Med (NWM) Complex, in the rural commune of Iaazzanene, Nador Province, Oriental Region, north-eastern Morocco (hereafter referred to as the Project) (Figure 1-1).

The Project will be developed on an approximately 88,000 m² industrial plot and will have an annual SAF production capacity of approximately 176,000 tonnes, together with renewable diesel (Hydrotreated Vegetable Oil (HVO)), renewable naphtha and minor quantities of bio-propane as co-products. The Project will use the Hydroprocessed Esters and Fatty Acids (HEFA) process, based on Axens Vegan® technology, to convert waste-derived and residual lipid feedstocks, such as used cooking oil (UCO) and animal fats, into renewable fuels.

GSC has commissioned SLR Sustainable Environmental Consultancy LLC SOC (SLR), working with CLEAN TECH as its local consultant in Morocco, to undertake an Environmental and Social Impact Assessment (ESIA) for the Project. The ESIA identifies and assesses the potential environmental and social (E&S) risks and impacts of the Project and establishes measures to avoid, minimise and mitigate adverse impacts and enhance positive impacts.

The Client is seeking financing from International Financial Institutions (IFIs), including the European Bank for Reconstruction and Development (EBRD), and intends to develop and manage the Project in accordance with applicable Moroccan regulatory requirements, the EBRD Environmental and Social Policy (ESP) (2024) and its Environmental and Social Requirements (ESRs), the International Finance Corporation (IFC) Performance Standards (PSs), the applicable World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines and Good International Industry Practice (GIIP).

Given the nature and scale of the facility, the Project is expected to be categorised as Category B under the EBRD ESP (2024), requiring a full ESIA, a Stakeholder Engagement Plan (SEP), and a Non-Technical Summary (NTS) together with public disclosure of the NTS. The categorisation and disclosure period are to be confirmed by the EBRD.

At the national level, the Project is subject to an Environmental Impact Study (Étude d'Impact sur l'Environnement, (EIE) under Law No. 49-17 on environmental assessment, including a mandatory public inquiry, and to the issue of an Environmental Acceptability Decision (Décision d'Acceptabilité Environnementale, DAE) prior to construction.

The Project is located within the wider NWM Complex, which has previously been subject to environmental and social assessments, stakeholder engagement, public consultation and land acquisition processes associated with the development of the Complex. NWM has also established a SEP and external grievance mechanism for the wider development.

Accordingly, stakeholder engagement for the Project builds on the available NWM studies and engagement records and no comprehensive stakeholder consultation programme was undertaken as part of the current Project. The current assignment focuses on undertaking targeted focus group discussions (FGDs) with nearby communities to identify SAF Project-specific concerns, expectations and potential impacts. No detailed consultation programme was undertaken. This SEP has been prepared as part of the ESIA to document the existing stakeholder engagement context, describe the Project-specific engagement approach and establish a framework for future stakeholder engagement, information disclosure and grievance management. The SEP will be reviewed and updated by GSC, as necessary, throughout subsequent phases of Project development, construction and operation.

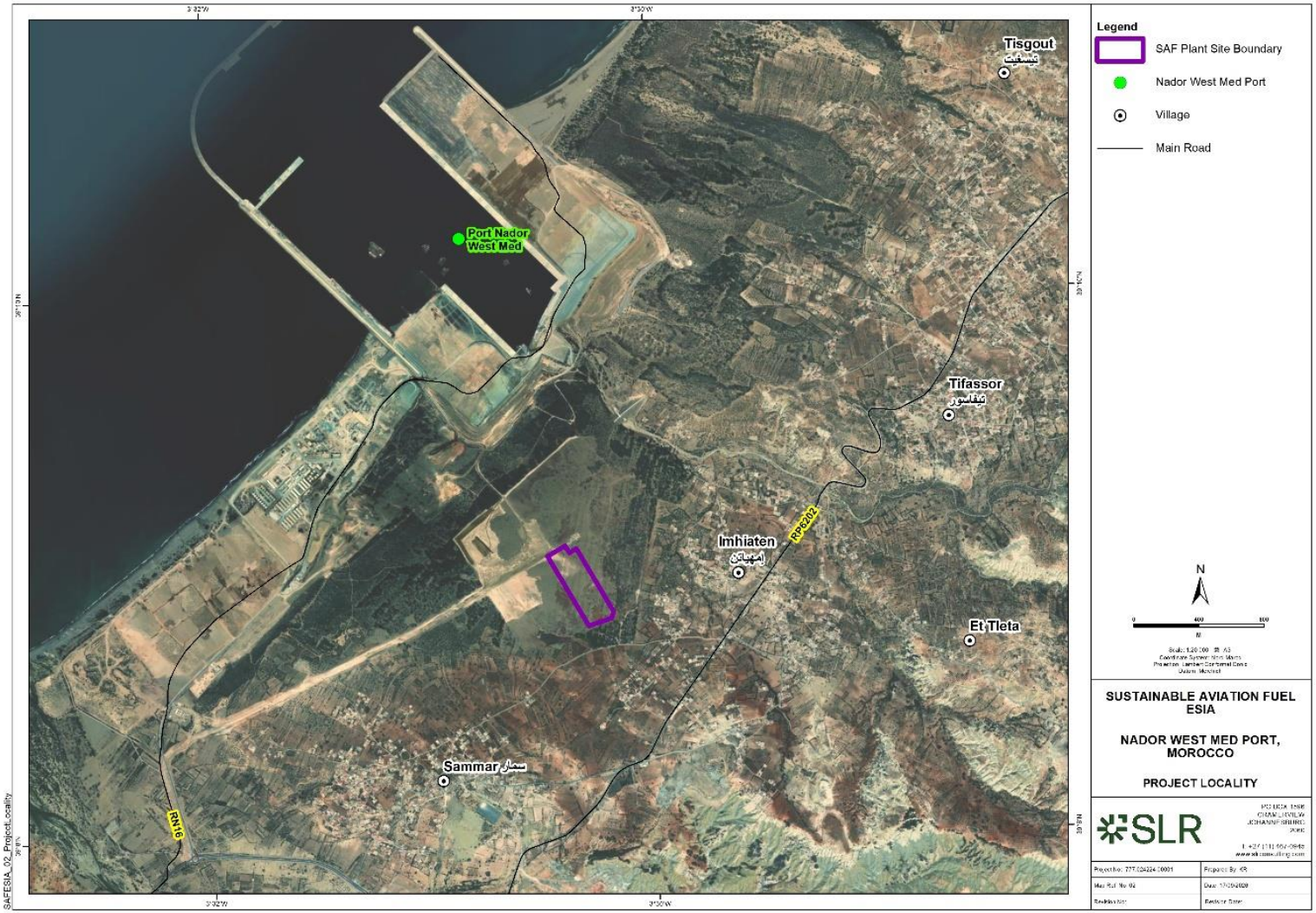


Figure 1-1: Project Locality Map

1.2 Purpose of the Stakeholder Engagement Plan

A SEP outlines how an organisation will identify, engage, and manage relationships with its stakeholders. Its primary objective is to ensure that stakeholders are informed, consulted, and actively involved in the decision-making process.

This SEP sets out a proportionate approach to Project-specific stakeholder engagement, taking account of the established NWM stakeholder engagement framework and previous consultation activities undertaken for the wider development. The agreed scope comprised a review and validation of existing information and targeted community FGDs.

The SEP distinguishes previous NWM engagement from the limited SAF-specific engagement undertaken for this ESIA, and identifies future information disclosure, consultation and grievance arrangements for GSC to implement as appropriate.

Stakeholder engagement remains an ongoing responsibility of GSC throughout Project development, construction and operation, subject to applicable Moroccan requirements and any confirmed lender obligations.

1.3 Objectives of the Stakeholder Engagement Plan

The key objectives of the SEP are proportionate to the available information and agreed scope to:

- Provide a clear, concise, and focused description of the Project and its stakeholders.
- Identify what information will be available in the public domain, in what languages, and where the materials will be located.
- Explain the opportunities for public participation, including the statutory public inquiry under Moroccan law, and how people will be notified of information or opportunities for comment.
- Explain how comments will be assessed and considered.
- Present the proposed Project grievance mechanism and how to access this mechanism.
- Provide an indicative framework for GSC to disclose relevant E&S information, receive feedback and maintain engagement during future Project phases.

1.4 Principles of the Stakeholder Engagement Plan

The following principles inform the proposed approach, drawing on the Moroccan legislation, including the participation and access to information principles of Framework Law No. 99-12 and Law No. 31-13, and the applicable good practice principles of EBRD ESR 10 and IFC PS 1. These describe the approach for future Project engagement.

- **Disclose early** – provide relevant information to targeted stakeholders in advance of decision-making.
- **Disclose objective information** – provide accurate information about the Project and anticipated impacts (both positive and negative).
- **Design disclosure to support consultation** – where appropriate, treat the disclosure of Project and E&S information as an integral part of stakeholder consultation. Give potentially affected communities and/or stakeholders the information they need to participate in an informed manner, and leave sufficient time between the provision of information and the start of consultations so that people can consider the issues and weigh the trade-offs.

- **Provide meaningful information** – information should enable stakeholders to make informed judgements and should be in a format and language that is readily understandable and tailored to the target stakeholder group. Arabic, French and English, with oral explanations in Tarifit (Amazigh) for community members, cultural sensitivity, the roles of women and men, literacy levels, community leadership structures and local methods of disseminating information will be considered.
- **Ensure the accessibility of information** – ensure the intended recipient will most readily receive and comprehend the information by considering what information different stakeholders require, the format and how each stakeholder group is best engaged.
- **Engage free from manipulation** – ensure engagement is free of external manipulation, interference, coercion and intimidation, and that it is documented and reported back to stakeholders.

2.0 Project Overview

2.1 Project Description

The Project is located within the Energy Zone of Phase 1.1 of the NWM Complex, an integrated port and industrial development at the Bay of Bétoya, approximately 30 km west of the city of Nador on the Mediterranean coast. The Project site comprises Plots 14 and 17, Block H-F of the Energy Zone, with a total area of approximately 88,000 m² (8.8 ha). The plot has already been cleared and levelled as part of the development of BILZ, and no residential occupation, agricultural activity or other land use has been observed within the Project boundary.

The Project land is owned and administered by NWM and will be made available to the Project through a long-term land-use agreement with an initial term of 20 years, renewable for subsequent 20-year periods. No additional physical or economic displacement is currently anticipated; this will be verified through the social baseline and stakeholder engagement activities.

The principal facilities within the Project boundary comprise:

- Feedstock reception, sampling and unloading facilities and on-site feedstock storage (12 tanks with a total nominal capacity of approximately 36,000 m³);
- Feedstock pretreatment and degumming facilities;
- Hydrotreatment, hydro-isomerisation and product fractionation units;
- An on-site hydrogen generation unit (steam methane reforming), hydrogen recovery, amine treatment, sour-water stripping and propane recovery systems;
- Product storage (16 tanks with a combined capacity of approximately 41,700 m³) and road-tanker loading facilities;
- Utilities, including process heaters, boilers, cooling towers, a reverse osmosis plant, emergency diesel generators, firewater and fire protection systems, and a flare;
- A wastewater treatment plant with separate reuse and discharge treatment trains; and
- Control room, laboratory, workshops, administration buildings, internal roads and parking, and areas reserved for future expansion.

The Project will require approximately 200,000 tonnes per year of feedstock at full capacity. The expected feedstock mix comprises approximately 40% domestically sourced UCO, 30% imported UCO and 30% imported soap-stock acid oil. Domestic feedstock will be collected from restaurants, hotels, food-processing facilities, edible-oil refineries, slaughterhouses and rendering facilities through a network of collectors, aggregators and transport contractors, and delivered to site by road tanker. Imported feedstock will be received through NWM Port. Finished products intended for export will be transported by road tanker to NWM Port for export by vessel.

During operation, electricity will be supplied from the national grid serving the Energy Zone and natural gas from the industrial gas network. Raw water will be supplied from the external network, with approximately 25% of the Project's water demand met through the reuse of treated wastewater. Treated effluent will be discharged to the wastewater collection system serving the wider development.

The overall Project programme is approximately 22 months, from contract award in October 2026 to start-up in August 2028. Construction is scheduled from November 2026 to May

2028, followed by commissioning from May to August 2028. The construction workforce is expected to peak at approximately 400 workers, and the indicative operational workforce is approximately 162 personnel. No worker accommodation camp will be built; non-local workers will stay in existing rented accommodation in nearby towns such as Nador, Selouane or Beni Ensar, with daily organised transport to site. The Project has an operational life of approximately 30 years.

The main activities per Project phase are summarised in Table 2-1.

Table 2-1: Summary of Project Activities per Phase

Phase	Key Activities
Planning and Development	ESIA and specialist studies; stakeholder engagement; confirmation of land allocation and access; environmental and other permits; design development; procurement and appointment of the Engineering, Procurement and Construction (EPC) Contractor; development of the Environmental and Social Management System (ESMS), Environmental and Social Management Plan (ESMP) and management plans.
Construction (Nov 2026 – May 2028)	Site establishment, fencing and temporary facilities; earthworks, piling and foundations; erection of storage tanks, structural steel and process equipment; piping, electrical and instrumentation works; containment, drainage and internal roads; delivery of heavy equipment from NWM Port by road.
Commissioning (May – Aug 2028)	Hydrostatic and pressure testing; system flushing and cleaning; refractory dry-out and first firing; start-up at reduced capacity with short, planned start-up flaring; monitoring of effluent, flaring, waste and noise.
Operation (30 years)	Continuous 24-hour operation (approx. 8,000 hours per year); feedstock receipt and storage; SAF production; product storage and dispatch by road tanker; wastewater treatment and reuse; waste management; maintenance; E&S monitoring and reporting.
Decommissioning	Controlled shutdown and isolation; removal of residual materials; decontamination and dismantling; waste management; any required remediation, in accordance with a Decommissioning and Closure Plan.

2.2 Environmental and Social Context

2.2.1 Biophysical Environment

The Project plot has already been cleared and substantially altered from its former condition and currently supports no natural vegetation; the Project footprint is therefore considered to comprise modified habitat. The wider landscape outside the Project footprint contains a mixture of modified, semi-natural and natural habitats, including plantations, agricultural land, scrub, wadis and riparian vegetation, beaches and marine habitats.

The Project site does not overlap any legally protected or internationally recognised biodiversity area, and no protected area or Key Biodiversity Area (KBA) is located within 10 km of the site. The nearest are the Cap des Trois Fourches Ramsar Site (approximately 20 km north-east) and the associated Trois Fourches KBA (approximately 17 km). The Sites of Biological and Ecological Interest of Jbel Gourougou and Sebkha Bou Areg are located approximately 11 km and 18 km east of the site respectively. The desktop review has not identified any Critically Endangered or Endangered species associated with the Project area.

Baseline ambient air quality monitoring undertaken at two locations representative of the nearest residential receptors in September 2026 found concentrations within the applicable Moroccan standards, although particulate (PM_{10} and $PM_{2.5}$) concentrations exceeded the WHO guideline values, reflecting the dry, exposed environment and existing dust sources. The air quality and noise modelling, climate risk and vulnerability assessment and cumulative impact assessment are ongoing and will be reported in the final ESIA.

2.2.2 Social Environment

The Project is located within Iaazzanene Commune, Nador Province, Oriental Region. According to the 2024 General Population and Housing Census, Nador Province had a population of approximately 565,987 people in 146,090 households, and Iaazzanene Commune a population of approximately 12,706 people in 2,925 households. The communities surrounding NWM are predominantly rural.

There are no settlements or residential receptors within the Project site. The surrounding settlement pattern comprises rural villages, smaller douars and dispersed dwellings, including Imhiaten, Sammar and Bouyafar, and Tifassor, Et Tleta and Tisgout in the wider area. The closest residential dwellings are located approximately 230 m from the Project boundary (Figure 2-1).

The wider area has historically supported a mixed rural economy based on agriculture, livestock rearing, artisanal fishing, commerce and migration, with remittances forming an important component of some household incomes. The economic character of the area is changing with the development of NWM, with traditional activities increasingly occurring alongside industrial, logistics, construction, transport and service-sector activities. Access to healthcare and higher-level services within the commune has historically been limited, with such services principally provided in larger centres within Nador Province.

Development of the wider NWM Complex required land acquisition, compensation and livelihood restoration, which were implemented under the NWM land acquisition and livelihood restoration framework. These processes relate to the wider NWM Complex and are considered part of the existing social context rather than impacts of the Project.

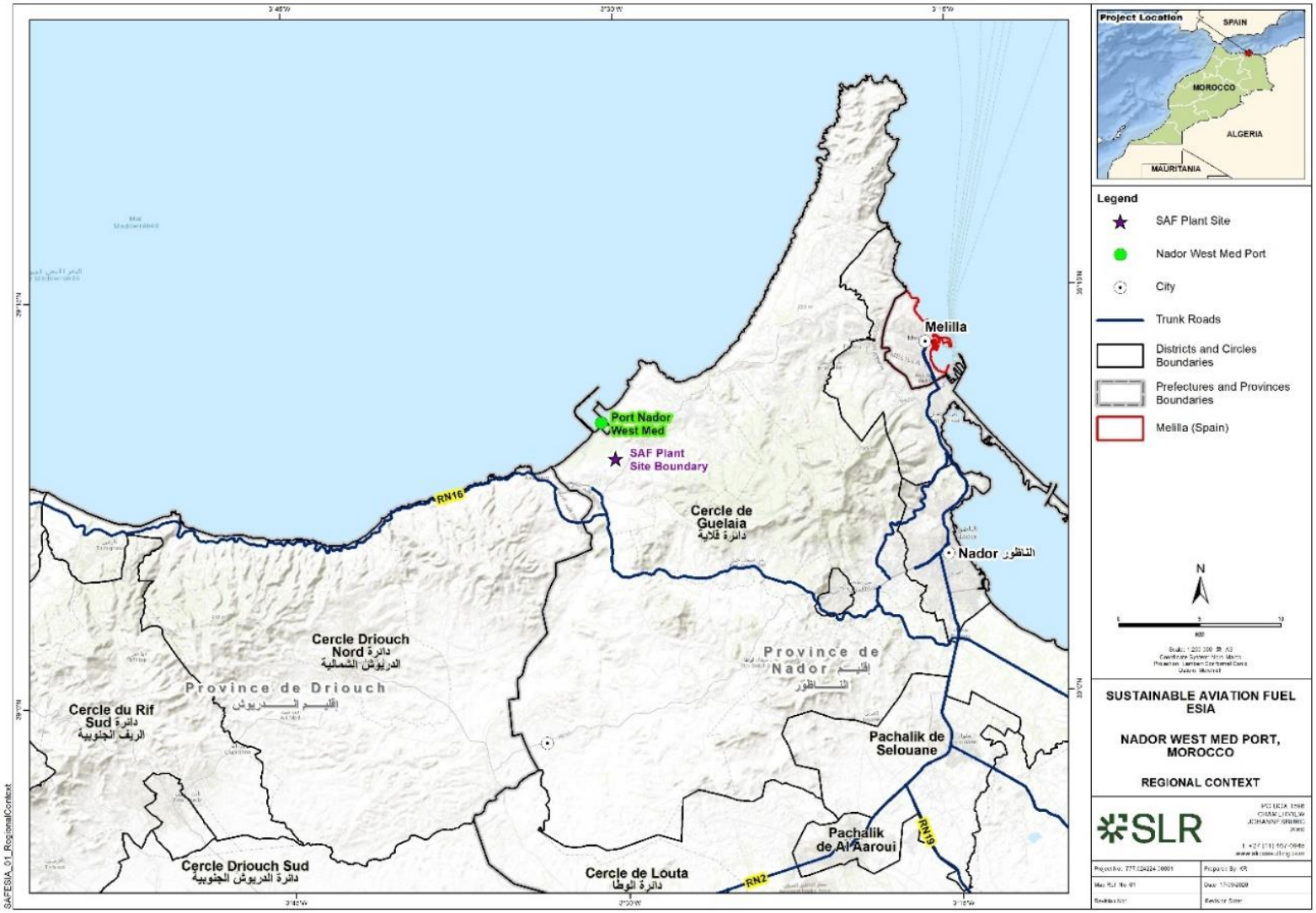


Figure 2-1: Project Regional Location

3.0 Legislative Framework

3.1 Overview

This Section provides a high-level overview of the Moroccan national regulations and the international policies, guidelines and standards which are considered in, and inform, the SEP.

3.2 Moroccan Regulatory Framework

The **Constitution of the Kingdom of Morocco (2011)** establishes the right of access to information held by the public administration (Article 27), places a duty on the State to secure equal access for citizens to a healthy environment and sustainable development (Article 31), and identifies sustainable development as a right of present and future generations (Article 35).

Framework Law No. 99-12 establishing the National Charter for the Environment and Sustainable Development codifies, among others, the principles of participation and access to environmental information.

Law No. 49-17 on environmental assessment is the governing statute for environmental assessment. It makes the public inquiry mandatory for every project subject to a detailed EIE and requires that environmental assessment studies be prepared by accredited consultancies (BET). Under **Law No. 47-18**, the Regional Investment Centre (CRI) acts as the single administrative window and the Commission Régionale Unifiée d'Investissement (CRUI) reviews the EIE.

The national process relevant to stakeholder engagement comprises the following steps:

- **Dossier preparation** – the Project proponent, through an accredited BET, compiles the public inquiry request, the EIE, the Environmental Monitoring and Follow-up Programme (PSSE), a site location plan, a non-technical summary for the general public and a project description sheet;
- **Filing with the CRI** – the complete dossier is deposited with the CRI de l'Oriental, which verifies completeness and issues a deposit receipt;
- **Public inquiry** – the CRI publishes the inquiry notice in two newspapers (one in Arabic and one in French), displays it at the offices of the relevant commune, and makes the EIE dossier available for consultation so that anyone potentially affected can review the study and submit observations. The inquiry must run for at least ten days, at the proponent's expense, and in current practice typically extends to approximately twenty days;
- **Committee review** – the CRUI (or, for projects of national interest, the national committee, Comité National des Études d'Impact sur l'Environnement (National Environmental Impact Assessment Committee (CNEIE) examines the EIE together with the observations gathered during the public inquiry; and
- **Decision** – the process concludes with the Environmental Acceptability Decision, which is a prerequisite for the Project's other authorisations.

Law No. 31-13 on the right of access to information (2018) governs public access to information held by the administration, and **Law No. 09-08 (2009)** governs the protection of personal data, which applies to personal data collected during socio-economic surveys, stakeholder engagement and grievance management. The Project's stakeholder database and grievance register will be managed in accordance with Law No. 09-08.

The Project is also expected to require a first-class classified establishment operating authorisation under the **Dahir of 25 August 1914** on unhealthy, inconvenient or dangerous establishments. The **Labour Code (Law No. 65-99)** governs worker representation, freedom of association and work rules, which are relevant to the worker grievance mechanism.

3.3 International Policies, Guidelines and Standards

EBRD ESR 10 focuses on information disclosure and stakeholder engagement. It aims to ensure that EBRD-financed projects are transparent and that affected communities are informed, consulted, and involved in decision-making processes throughout the project cycle. Engagement under ESR 10 extends beyond the statutory public inquiry required by Moroccan law.

The IFC recognises the importance of stakeholder engagement as the basis for building strong, constructive, and responsive relationships essential for the successful management of a project's E&S impacts (IFC, 2012). As Morocco is a Non-Designated Country under the Equator Principles, the IFC PSs and the WBG EHS Guidelines also apply to any Equator Principles Financial Institution participating in the financing.

Pertinent international standards, guidelines and policies considered in the preparation of the SEP are outlined in Table 3-1.

Table 3-1: Relevant International Lender Standards

Standard / Policy / Guideline	Key Consideration
EBRD ESP and ESRs (2024)	The EBRD ESP (2024) took effect on 1 January 2025 and renamed the Performance Requirements as ESRs. ESR 10 (Information Disclosure and Stakeholder Engagement) covers identification of relevant stakeholders, proportionate information disclosure, meaningful consultation, consideration of vulnerable groups, ongoing engagement and an accessible external grievance mechanism. ESR 2 requires stakeholder engagement findings to inform the assessment and management of Project-related E&S risks and impacts. ESR 4 relevant to communication and consultation with potentially affected communities regarding Project-related traffic, community safety, industrial risks and emergency preparedness, as appropriate. .
IFC PS (2012)	PS 1 establishes requirements for stakeholder identification, information disclosure, consultation, external communications, grievance management and ongoing engagement proportionate to Project risks and impacts. PS 2 requires a grievance mechanism for workers to raise workplace concerns, including employment conditions, occupational health and safety, and treatment at work. PS 4 relevant to communicating with potentially affected communities regarding Project-related community health and safety risks and applicable emergency preparedness arrangements.
Equator Principles (EP4, 2020)	Principle 5 requires structured, culturally appropriate and ongoing engagement with affected communities, in their preferred language, free from manipulation, interference, coercion and intimidation, with results documented. Principle 6 requires a grievance mechanism that is accessible at no cost, culturally appropriate, without retribution and does not impede access to judicial or administrative remedies.
IFC Stakeholder Engagement: A Good Practice Handbook (2007)	Provides guidance on stakeholder identification and analysis, information disclosure, consultation, negotiation and partnerships, grievance management, stakeholder involvement in monitoring, reporting and management functions.

4.0 Preliminary Stakeholder Identification & Analysis

4.1 Stakeholder Identification

Stakeholders relevant to the SAF Project have been identified provisionally from available NWM studies and engagement records, the Project setting and the Project-specific engagement.
The stakeholder groups listed below reflect the wider Project context, including nearby communities, NWM and relevant authorities, workers, transport and supply-chain interfaces, and interested parties. Inclusion in the list does not imply that each group was directly consulted under this ESIA assignment.

- are directly and/or indirectly affected by the Project (or by GSC's operations and supply chain);
- have “interests” in the site, the Project or GSC that determine them as stakeholders; and
- have the potential to influence Project outcomes or company operations.

The SEP considers the Project plot and potentially affected surrounding communities, including communities within approximately 2 km of the Project. The extent of relevant impacts may vary by topic, including traffic and community health and safety; these distances should not be treated as fixed consultation boundaries.

GSC should maintain and update an appropriate stakeholder register using available NWM records, verified Project-specific engagement records and information arising from future consultation and disclosure.

- use of existing engagement records held by NWM and the Client to develop the Project stakeholder database;
- the focus group discussions (FGDs); and
- the public inquiry and disclosure process.

GSC will maintain and periodically update a Project stakeholder register identifying relevant stakeholder groups, their interests and potential concerns, and records of engagement undertaken. The register will draw upon available information from previous NWM stakeholder engagement and Project-specific consultations and will be updated throughout Project development, construction and operation, as appropriate. The key stakeholder groups relevant to the Project are presented in Table 4-1.

Table 4-1: Key Stakeholder Groups Identified

Group	Organisation / Stakeholder	Relevance to the Project
National Government Ministries and Agencies	Ministry of Energy Transition and Sustainable Development (MTEDD) – Department of Environment	National environmental policy and regulatory oversight, including applicable environmental assessment and authorisation requirements.
	National Environmental Assessment Committee (CNEIE)	Potential involvement in the review of the Project's national Environmental Impact Study (EIE), depending on the applicable environmental assessment and approval procedure.
	Labour Inspectorate (Ministry of Economic Inclusion, Small Business, Employment and Skills) and CNSS	Oversight of labour law compliance, OHS requirements and social security obligations associated with the Project workforce.
	Direction Générale de la Protection Civile	Approval of fire protection design and coordination of fire safety, emergency preparedness and response arrangements, including potential emergency scenarios affecting neighbouring industrial facilities and communities.
	Office National de Sécurité Sanitaire des Produits Alimentaires (National Office for Food Safety) (ONSSA)	Potential regulatory involvement concerning sanitary requirements, traceability and importation of animal-derived feedstocks, depending on the Project's feedstock sourcing arrangements.
	Ministry of Youth, Culture and Communication and Institut National des Sciences de l'Archéologie et du Patrimoine (National Institute of Archaeology and Heritage Sciences) (INSAP)	Potential involvement in the event of unexpected archaeological or cultural heritage discoveries during construction, including notification, assessment and coordination of appropriate protection and management measures in accordance with applicable Moroccan legislation and the Project's Chance Finds Procedure. No known cultural heritage resources or impacts have been identified within the Project site.
	Autorité Nationale de Régulation de l'Électricité (National Electricity Regulatory Authority) (ANRE);	Electricity sector regulatory authority, potentially relevant to electricity network access and supply arrangements, where applicable.
	Office National de l'Électricité et de l'Eau Potable (National Office of Electricity and Drinking Water) (ONEE);	Potential interface concerning electricity supply and grid connection and associated infrastructure, depending on the final Project utility arrangements.
	Administration des Douanes et Impôts Indirects (Customs and Indirect Tax Administration) (ADII)	Responsible for applicable customs procedures and controls associated with the importation of feedstocks and equipment and the exportation of SAF and associated products.
Regional, Provincial and Local Authorities	CRI de l'Oriental and CRUI	Regional investment facilitation and coordination of applicable administrative procedures, organisation of the public inquiry and review of the EIE for authorisations associated with Project development.



Group	Organisation / Stakeholder	Relevance to the Project
	Wilaya of the Oriental Region and Province of Nador	Regional and provincial administrative oversight and coordination with relevant local authorities, including facilitation of stakeholder engagement and organisation of the statutory public inquiry process, as applicable.
	Iaazzanene Commune (communal council)	Host commune for the Project, responsible for local administrative coordination and supporting stakeholder engagement, including public display of statutory public inquiry notices, availability of relevant Project documentation for public consultation, and collection of public comments and observations during the inquiry process.
	Agence du Bassin Hydraulique de la Moulouya (ABHM)	Regional authority responsible for water resource management and protection. Direct involvement in the Project is not anticipated, as water will be supplied through the existing network and operational water and wastewater services will be provided through NWM infrastructure, with no groundwater abstraction proposed.
Zone and Infrastructure Operators	NWM and relevant BILZ management entities	Responsible for the development and management of the wider NWM industrial-port complex, including coordination of the Project's industrial plot arrangements, access, utility connections (water and wastewater), and interfaces with shared infrastructure. Relevant to coordination of environmental and social management, stakeholder engagement and grievance mechanisms within the wider development.
	Relevant NWM port terminal operator(s)	Potential involvement in the handling, storage and movement of imported feedstocks and exported SAF and associated products, including port logistics, operational safety and coordination of transport activities, depending on the final import and export arrangements.
	Neighbouring BILZ tenants and industrial operators	Potential interface concerning shared infrastructure, industrial safety, emergency preparedness and cumulative environmental impacts associated with activities within the industrial zone.
Local Communities	Residents of Sammar, Imahyatten and Tifassour douars	Communities identified through the Project's targeted stakeholder engagement activities. Relevant to potential construction-related dust, noise, traffic, community health and safety, employment opportunities and local procurement expectations.
	Other communities along Project-related transport routes, where identified	Potentially affected by Project-related vehicle movements, including construction deliveries and operational transportation, particularly in relation to traffic, road safety, noise and dust. Specific communities and their relevance should be confirmed based on transport arrangements and the ESIA assessment.
	Community representatives, women, youth, elderly people and potentially vulnerable groups.	Relevant to ensuring that community concerns and expectations are understood and that engagement is accessible to groups who may experience different impacts or face barriers to participation.

Group	Organisation / Stakeholder	Relevance to the Project
	Owners and users of surrounding agricultural land	Agricultural land is present in the vicinity of the Project, although no agricultural land acquisition or displacement is anticipated. Potential interest in Project-related impacts that may affect nearby agricultural activities.
Workers	EPC Contractor, subcontractors, construction workforce, and operational employees	Relevant to labour and working conditions, OHS, workforce accommodation where applicable, employment opportunities and implementation of a separate workers' grievance mechanism.
Feedstock Supply Chain	UCO generators, food processors, edible-oil refineries, slaughterhouses and rendering facilities; collectors, aggregators and transport contractors	Potential engagement regarding Project feedstock sourcing and transportation arrangements, including communication of relevant environmental and social requirements and mechanisms for raising concerns.
Other Interested Parties and NGOs	Local development and women's associations in Iaazzanene and Nador.	Potential interest in local employment, community development, social inclusion and participation of women and potentially vulnerable groups.
	Environmental NGOs active in the Oriental Region	Potential interest in environmental performance, biodiversity, pollution prevention and management of environmental impacts associated with the Project.
	Academic institutions, e.g. the Multidisciplinary Faculty of Nador	Potential interest in technical cooperation, skills development, vocational training and local employment opportunities.
	Regional and national media	Dissemination of public information, Project announcements and statutory disclosure notices, where relevant.
Lenders	EBRD	Environmental and social due diligence, assessment of compliance with applicable requirements, review of Project documentation, stakeholder engagement and disclosure requirements, and monitoring of environmental and social performance for Project Financing

4.2 Stakeholder Mapping and Analysis

The stakeholder engagement approach is determined for each group as illustrated in Figure 4-1. Table 4-2 provides an indicative prioritisation of stakeholder groups for future engagement.

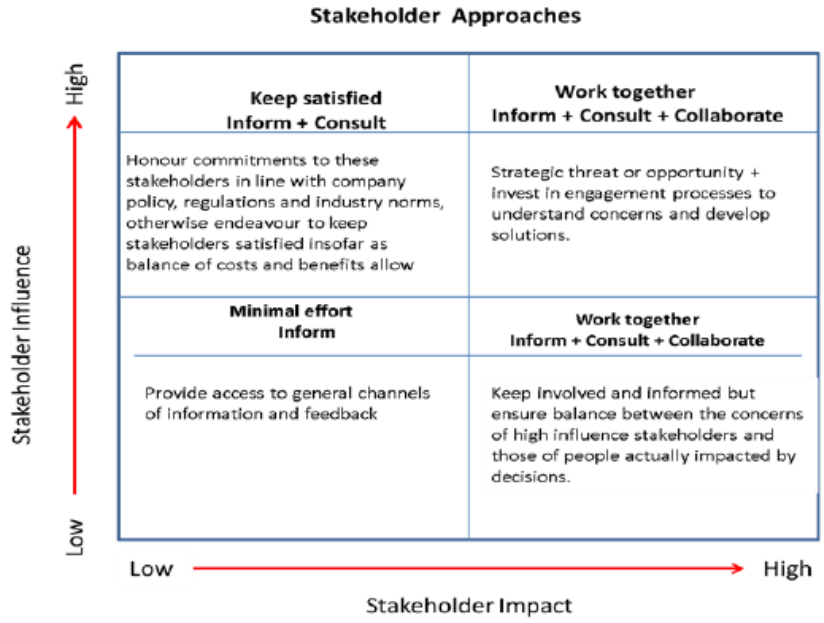


Figure 4-1: Stakeholder Engagement Approaches

Table 4-2: Key Stakeholder Groups and Approach

Category	Level of Influence	Potential Degree Affected	Approach	Engagement Method
National government ministries and agencies	High	Low	Engage as required	Official correspondence, permitting submissions and meetings where required.
CRI, CRUI, Wilaya, Province and Iaazzanene Commune	High	Medium	Coordinate and consult	Official correspondence, coordination meetings, statutory public inquiry and disclosure procedures.
NWM including BILZ	High	Medium	Work together	Regular coordination meetings, infrastructure and utility interface discussions, environmental and social management coordination and emergency planning.
Port operator (s)	High	Low to Medium	Coordinate as required	Coordination regarding feedstock imports, product exports, transportation and port safety arrangements, where applicable.
Local communities (Sammar, Imahyatten and Tifassour)	Low to Medium	Medium	Inform and consult	Targeted community FGDs where appropriate, information disclosure and access to the Project grievance mechanism.

Category	Level of Influence	Potential Degree Affected	Approach	Engagement Method
Owners and users of surrounding agricultural land	Low	Low to Medium	Inform and consult as required	Community engagement, disclosure of relevant Project information and access to the grievance mechanism.
Potentially vulnerable community members	Low	Medium to High	Targeted engagement where necessary	Targeted meetings and oral information in local languages.
Workers and contractors	Medium	High	Engage through workforce management arrangements	Workforce communications, inductions, toolbox talks, worker representatives and a workers' grievance mechanism.
Feedstock supply chain	Medium	Low	Inform and consult as required	Direct communication and meetings, where relevant, regarding feedstock sourcing, transportation arrangements and any identified environmental or social concerns.
Local associations, NGOs, academic institutions and media	Low to Medium	Low	Keep informed and provide opportunities for feedback	Publicly available information, disclosure materials, official announcements and responses to enquiries.
Lenders (EBRD)	High	Low	Maintain regular communication	Formal correspondence, coordination meetings, disclosure of relevant Project information and periodic environmental and social performance reporting.

4.3 Vulnerable and Disadvantaged Groups

It is important to identify whether potentially vulnerable or disadvantaged individuals or groups may be disproportionately affected by the Project and whether additional measures may be required to ensure their effective participation in stakeholder engagement activities.

The assessment of potential vulnerability has been informed by available secondary socioeconomic information, including previous studies undertaken for the wider Nador West Med (NWM) Complex. These studies indicate that vulnerability within surrounding communities may be influenced by factors such as age, educational attainment, employment status, household income, dependence on natural resource-based livelihoods and access to economic opportunities. For example, previous surveys of landowners affected by the wider NWM development identified that more than half of household heads were over 60 years of age and approximately 46% had never attended school. While these findings are not necessarily representative of communities within the Project's area of influence, they provide useful context for understanding potential socioeconomic vulnerabilities.

It should be noted that detailed household-level socioeconomic surveys and vulnerability assessments of surrounding communities were not included within the scope of the Project. The assessment has instead relied on available secondary information, supplemented by targeted community FGDs undertaken to validate the socioeconomic baseline and identify relevant community concerns. Consequently, the presence, distribution and specific circumstances of vulnerable or disadvantaged individuals and households within the Project's area of influence have not been established.

Based on the available information, potentially vulnerable or disadvantaged groups, if encountered within Project-affected communities, may include:

- Female-headed households, particularly those with limited income or access to employment opportunities;
- Households headed by elderly persons (over 60 years of age), particularly those with limited family or financial support;
- Households with members who have physical or mental disabilities or chronic illnesses, particularly where these conditions affect household livelihoods or access to services;
- Households experiencing poverty or significant socioeconomic disadvantage;
- Individuals with low literacy levels or limited access to information, who may face barriers to understanding Project information or participating in consultation activities; and
- Unemployed youth and other individuals with limited access to economic opportunities, particularly where barriers to participation in employment or consultation activities are identified.

The Project is located within an allocated industrial plot in BILZ and is not anticipated to result in physical or economic displacement. Therefore, the identification of these groups does not imply that they are necessarily present within the Project's area of influence or will be affected by the Project.

5.0 Summary of Previous Stakeholder Engagement

The wider NWM development has been subject to stakeholder engagement over several years through the previous ESIAs undertaken in 2014 and 2023, associated public inquiry processes, socioeconomic surveys, land acquisition activities, and related consultation and ongoing engagement undertaken by NWM.

These activities have involved a broad range of stakeholders, including:

- Surrounding communities and landowners affected by the wider NWM development;
- Local and regional authorities, including provincial and communal representatives;
- Relevant national government and institutional stakeholders; and
- other organisations and interested parties associated with the development of the NWM Complex.

Stakeholder engagement has included formal public inquiries, public consultation and information sharing events, socio-economic surveys, meetings with affected persons and ongoing coordination with relevant authorities. Furthermore, NWM has established a Stakeholder Engagement Plan (SEP) and external grievance mechanism for the wider development. The continued implementation and updating of these arrangements have been recognised as part of the subsequent development of the industrial and logistics zones.

The 2024 NWM Stakeholder Participation Plan further establishes a framework for ongoing stakeholder information, consultation and grievance management associated with the development of the NWM. This includes continued coordination with relevant local authorities, including Governor services and communal representatives, to support information-sharing and consultation activities.

Previous environmental and social assessments and stakeholder engagement undertaken for the NWM Complex have identified several environmental and social issues of relevance to the development, including:

The key issues raised through previous engagement of relevance to the Project include:

- Community health and safety, including potential environmental and safety risks associated with industrial activities;
- Traffic movements and road safety;
- Local employment and economic opportunities, including community expectations regarding employment and socioeconomic benefits;
- Potential environmental impacts associated with air emissions, noise, water and wastewater management, hazardous materials and waste; and
- Land acquisition, compensation and livelihood-related concerns associated with the wider NWM development.

Land acquisition, compensation and livelihood restoration have represented an important component of previous NWM stakeholder engagement, particularly in relation to communities and landowners affected by the development of the port and associated infrastructure. These matters are primarily associated with the wider NWM development and provide contextual information regarding historical stakeholder concerns and socioeconomic conditions in the surrounding area.

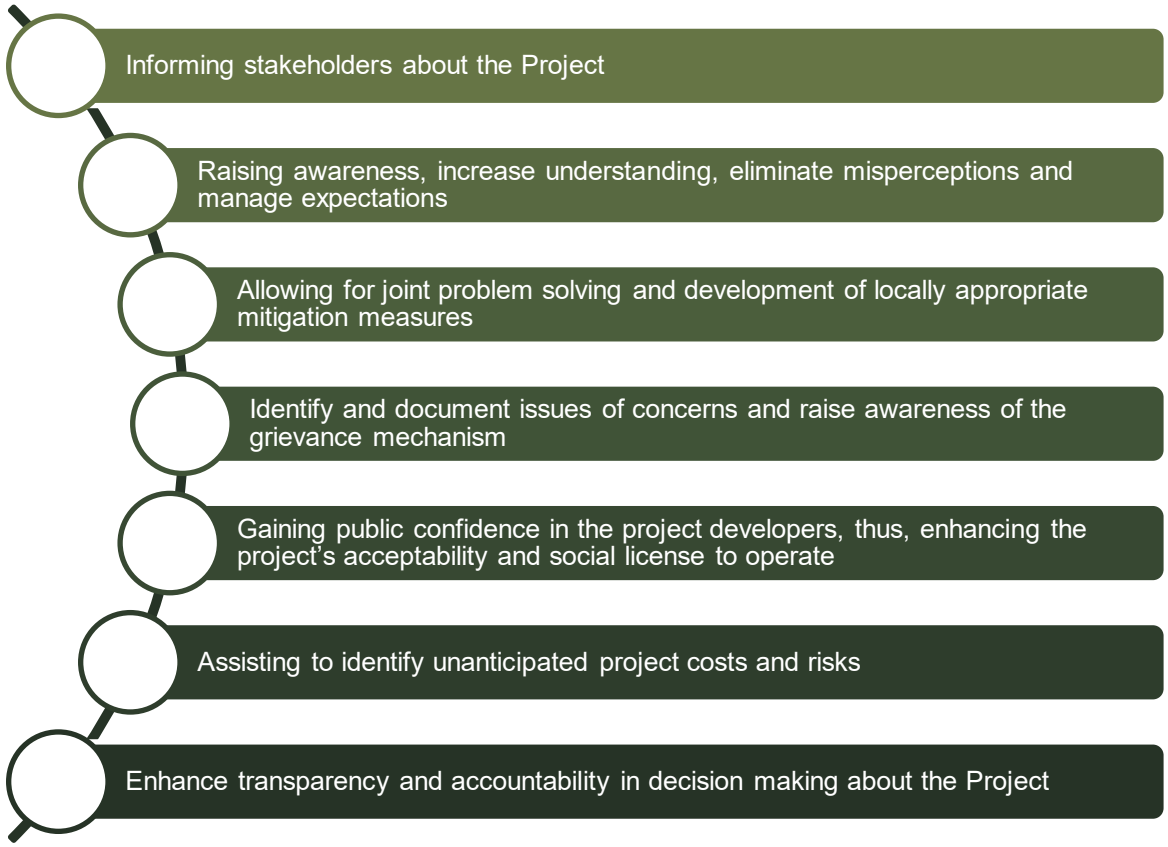
The existing NWM stakeholder engagement framework, including its SEP, grievance mechanism and established arrangements for coordination with local authorities and surrounding communities, provides an important reference for stakeholder engagement associated with developments located within the NWM Complex. These arrangements also provide opportunities for coordination and information-sharing to support a consistent approach to stakeholder communication across the wider industrial and logistics development.

These findings have been considered in the preparation of the Project's ESIA. Potential effects associated with traffic and tanker movements are addressed under Traffic, Transport and Road Safety; potential impacts on surrounding communities, including industrial and process safety risks and worker-community interactions, are considered under the Social Impact Assessment; and air emissions, noise, water and wastewater management, hazardous materials and waste are addressed within the respective environmental assessments. Employment, recruitment, working conditions and local economic opportunities are also considered as part of the social impact assessment, with appropriate mitigation and management measures identified where relevant.

6.0 Stakeholder Engagement Programme

6.1 Key Objectives for Disclosing Information

The key objective of disclosing information to stakeholders is to ensure that the following is achieved:



6.2 Strategy and Methods for Disclosing Information during the ESIA Study

6.2.1 Targeted ESIA Engagement and Baseline Validation

6.2.1.1 Engagement Approach

Stakeholder engagement undertaken as part of the SAF Project ESIA involved a review of existing socio-economic information and stakeholder engagement records associated with the wider NWM Complex, supplemented by targeted community focus group discussions (FGDs) to validate the available baseline information and identify concerns and expectations relevant to the Project.

The engagement activities included:

- Review of publicly available NWM ESIA documentation, stakeholder engagement records and available socio-economic studies to establish the existing baseline context and identify relevant stakeholder concerns.
- Coordination of targeted community FGDs by CLEAN TECH, the local consultant, with support from NWM and relevant local representatives, under the oversight of SLR.
- Separate discussions with men and women from three surrounding douars, namely Semmar, Imheyaten and Tiffasour, undertaken on 15 and 16 October 2026.
- Intorducing the SAF Project development and facilitate discussions on potential community concerns and expectations.

The discussions covered local socio-economic conditions, livelihoods, access to natural resources and basic services, vulnerable groups, awareness of the proposed Project and expectations regarding employment and economic opportunities.

6.2.1.2 Summary of Consultation Activities

The targeted engagement was undertaken on 15 and 16 October 2026 in the douars of Semmar, Imheyaten and Tiffasour, located within Iaazzanane Commune, Nador Province.

A preliminary coordination meeting was held with NWM representatives on 15 October 2026 to introduce the survey team and discuss the planned activities.

Separate FGDs were subsequently undertaken with men and women in each of the three douars. A total of 18 community members participated, comprising nine men and nine women. An additional interview was conducted with the Vice-President of the Iaazzanane Communal Council, who also represents Tiffasour.

Table 6-1 summarises the consultations undertaken. The locations of the three consulted douars are presented in Figure 6-1.

Table 6-1: Consultations Undertaken

Date	Stakeholder group	Engagement activity	Participants	Photographs from the Engagement
15 October 2026	NWM representatives	Introductory coordination meeting	NWM representatives and survey team	
15 October 2026	Semmar community	Separate FGDs with men and women	3 men and 3 women	

Date	Stakeholder group	Engagement activity	Participants	Photographs from the Engagement
15 October 2026	Imheyaten community	Separate FGDs with men and women	2 men and 3 women	No Photo
16 October 2026	Tiffasour community	Separate FGDs with men and women	4 men and 3 women	
16 October 2026	Iaazzanane Communal Council	Interview with the Vice-President of the Communal Council	1 representative	No Photo

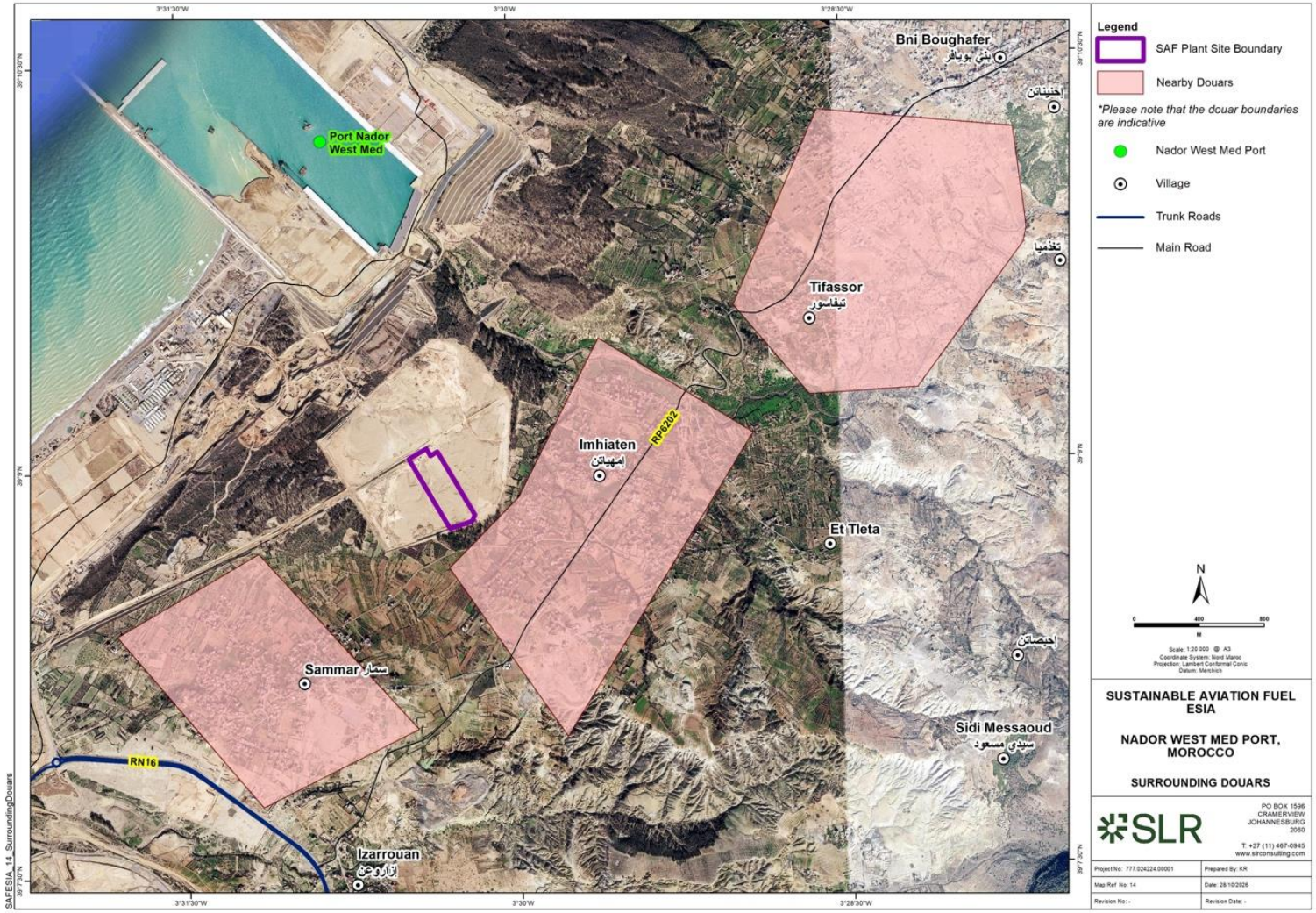


Figure 6-1: Locations of the Consulted Douars

6.2.1.3 Key Consultation Findings and Outcomes

The consultations provided an opportunity to obtain community perspectives on existing socio-economic conditions, ongoing developments within the NWM area and expectations associated with the proposed SAF Project.

Awareness of the SAF Project varied among the communities consulted. In Semmar, male participants expressed a favourable attitude towards the Project, primarily due to the potential for local employment opportunities, while female participants indicated that they were not aware of the proposed development. In Imheyaten and Tiffasour, participants were generally familiar with the wider NWM development but were not specifically aware of the SAF Project.

The creation of employment opportunities and diversification of household income sources emerged as key expectations across the three communities.

Participants also raised concerns regarding existing challenges affecting traditional livelihoods, particularly agriculture, fishing and livestock farming. This included drought, reductions in available agricultural land associated with NWM development, changes to fishermen's embarkation and landing points, and difficulties accessing markets.

Other concerns included shortcomings in local healthcare services, particularly the availability of medicines and medical equipment, and the loss of certain income-generating activities dependent on natural resources.

The concerns raised during the consultations primarily related to existing socio-economic conditions and impacts associated with previous developments in the wider NWM area, rather than impacts or concerns specifically related to the proposed SAF Project.

The principal concerns and expectations identified during the consultations are summarised in Table 6-2.

Table 6-2: Principal Concerns and Expectations Identified During the Consultations

Topic	Concerns and expectations raised	Communities
Employment and economic opportunities	Interest in local employment opportunities and diversification of household income sources	All three douars
Agriculture	Drought and reduction in available agricultural land associated with NWM development	All three douars
Traditional fishing	Relocation of fishermen's embarkation and landing point, resulting in increased travel distances for some fishermen	All three douars
Marketing of local products	Reduced income from fish sales due to intermediaries and difficulties accessing markets for agricultural products	Primarily Imheyaten
Access to natural resources	Loss of income from forest plant collection following clearance associated with NWM development	Imheyaten
Livestock farming	Difficulties obtaining animal feed and maintaining livestock during drought conditions	Imheyaten
Healthcare	Inadequate availability of medicines and medical equipment at the communal dispensary and costs associated with travelling to healthcare facilities	All three douars
Vulnerable groups	Economic difficulties affecting low-income households, widows with dependent children, elderly people and persons with disabilities	Across the surveyed communities

6.2.2 ESIA Phase Disclosure

In addition to the targeted engagement undertaken for the ESIA, the Project will be subject to the statutory national public inquiry process. Following submission of the EIE dossier to the CRI of the Oriental Region, the public inquiry will be announced through notices published in Arabic and French newspapers and displayed at the offices of Iaazzanene Commune. The EIE dossier will be made available for public consultation, together with a register for recording written observations, for a minimum period of twenty (20) days.

Comments received through the statutory public inquiry process will be documented and considered by GSC, with consultant support provided in accordance with the agreed scope of services. Relevant outcomes will be reflected in the Project's environmental and social management and stakeholder engagement arrangements, as appropriate.

For the national process, the EIE dossier (in French), including the NTS (in Arabic and French) and the PSSE, will be submitted to the CRI de l'Oriental and made available during the public inquiry.

As a Category B Project, disclosure of the ESIA will be undertaken through the preparation and dissemination of a NTS. The NTS will be prepared in Arabic and French for local stakeholder disclosure and in English for lender disclosure. It will present an accessible overview of the Project, its potential environmental and social impacts, proposed mitigation measures and arrangements for stakeholder engagement and grievance management.

The disclosure process will include the following activities:

- Publication of disclosure notices in Arabic and French in national newspapers, informing stakeholders of the availability of the NTS, where it can be accessed and how comments can be submitted;
- Distribution of formal notifications to relevant institutional stakeholders and local authorities;
- Placement of hard copies of the Arabic and French NTS at the offices of Iaazzanene Commune, the Province of Nador and the CRI de l'Oriental;
- Electronic disclosure of the NTS in Arabic, French and English through the Project's designated disclosure channels and, where applicable, the relevant lenders' websites; and
- Provision of contact details and accessible channels through which stakeholders may submit questions, comments or grievances relating to the Project.

The statutory national EIE public inquiry will be undertaken in accordance with the procedures established by the competent Moroccan authorities. This process is separate from the targeted community FGDs undertaken during preparation of the ESIA and will provide an additional opportunity for stakeholders to review the relevant Project information and submit observations.

The disclosure process will include the following activities:

- Stakeholders will be informed of the disclosure through official letters and newspaper advertisements published in Arabic and French;
- GSC and the relevant lenders will disclose the NTS on their respective websites, together with any additional documentation required under the applicable disclosure arrangements;
- Hard copies of the NTS in Arabic and French will be made available at the offices of Iaazzanene Commune, the Province of Nador and the CRI de l'Oriental;



- A hard copy of the ESIA will be made available at the offices of Iaazzanene Commune and the Province of Nador as an additional information resource for interested stakeholders; and
- Information on the disclosure process will include contact details and arrangements for submitting comments, questions and grievances.

The disclosure period will follow the applicable lenders' requirements. A fixed 120-day disclosure period is not prescribed for Category B projects under EBRD ESR 10.

Comments and concerns received during disclosure and the statutory public inquiry will be recorded, reviewed and considered in the finalisation of the relevant Project documentation and environmental and social management measures, as appropriate. The SEP will be updated to reflect material stakeholder feedback and any resulting changes to engagement arrangements.

6.3 Future Stakeholder Engagement Strategy, Plan, and Responsibilities

Following the ESIA, GSC will be responsible for planning and implementing proportionate stakeholder engagement, disclosure and grievance management throughout subsequent Project phases. The SEP should be updated to reflect continuous consultation findings, regulatory requirements, lender comments and changing Project risks.

To foster a collaborative environment and ensure the alignment of Project activities with stakeholder expectations, this SEP will be updated throughout the Project to provide a strategy that is proactive, inclusive and ensures transparent communication. This strategy aims to build trust, facilitate feedback, and ensure that stakeholders are well informed and actively involved in decision-making processes.

During implementation, the Social Development Officer (SDO) shall coordinate engagement with communities and relevant external stakeholders, with Environmental, Social and Governance (ESG) Manager oversight. Table 6-3 outlines the stakeholder engagement strategy and plan for the Project, including the relevant stakeholders, the objectives of engaging each group, the communication methods and tools, the timeframe and the responsible entity. The log will be updated on a need basis, serving as a register of all consultations and engagements undertaken for the Project. A template for the log is included in Appendix A.

By implementing this strategy, the aim is to create a positive and productive relationship with stakeholders, ensuring that their needs and expectations are considered throughout the Project lifecycle.

Table 6-3: Future Stakeholder Engagement Strategy and Plan

Stakeholder Group	Stakeholders	Objectives	Communication Methods and Tools	Timeframe	Responsibility
National Government Ministries and Agencies	Relevant environmental authority including MTEDD and/or CNEIE; Labour Inspectorate; CNSS; ONSSA; ANEF; ANRE and ONEE; ADII; INSAP in the event of archaeological chance finds	Communicate Project information; coordinate applicable environmental, labour, safety and sector-specific requirements; respond to regulatory enquiries and inspections; communicate relevant incidents where required	Official correspondence; coordination meetings; permit applications; regulatory notifications and responses and monitoring reports as/if required by permits,	Prior to construction, then as required during construction and operation	GSC ESG Manager; EPC Contractor
Regional, Provincial and Local Authorities	CRI de l'Oriental; CRUI; Wilaya of the Oriental Region; Province of Nador; Iaazzanene Commune	Coordinate statutory disclosure and public inquiry activities; communicate Project progress and potential community impacts; support communication with surrounding communities; coordinate responses to local concerns	Official correspondence; authority meetings; disclosure notices; coordination through designated representatives	Prior to construction; as needed during construction and operations	GSC ESG Manager / SDO
Zone and Infrastructure Operators	NWM; BILZ management/operator; relevant port operators; neighbouring industrial tenants	Coordinate Project interfaces with the wider NWM Complex, including access, transport routes, utilities, wastewater arrangements, emergency preparedness and stakeholder communications	Regular coordination meetings; formal correspondence; technical interface meetings; exchange of Project updates and emergency contact information	Prior to construction and as needed during construction and operation,	GSC Project Manager; GSC ESG Manager; EPC Contractor where applicable
Emergency Response and Public Services	Civil Protection; relevant emergency response services; local health and emergency service providers, where relevant	Share relevant emergency preparedness information; establish communication arrangements for incidents potentially affecting surrounding communities; coordinate emergency response interfaces	Coordination meetings; formal correspondence; emergency contact lists; joint exercises where appropriate	Before construction and commissioning, as relevant; periodically and as required thereafter	GSC ESG Manager; GSC Project/Operations Manager; EPC Contractor during construction



Stakeholder Group	Stakeholders	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Local Communities including nearby landowners and any vulnerable groups	Residents and representatives of Imhiaten, Sammar and Tifassour douars; other surrounding communities where relevant	Provide information on Project activities and potential impacts; communicate construction schedules and traffic changes; explain employment opportunities and recruitment arrangements; obtain feedback and address community concerns; promote awareness of the grievance mechanism	Community meetings and meetings with douar representatives when required; information notices; leaflets and verbal communication in appropriate local languages; direct contact with the SDO; grievance channels	During relevant community engagement activities throughout construction and operation	GSC ESG Manager / SDO
Project Workers and Contractors	GSC personnel; EPC Contractor; subcontractors; operations and maintenance personnel	Communicate relevant Project E&S requirements, contracts, working conditions, OHS arrangements, worker conduct expectations and access to the workers' grievance mechanism	Workers' inductions; toolbox talks; notice boards; workforce meetings; workers' grievance channels.	Before mobilisation and throughout construction and operation	GSC HR Manager, GSC ESG Manager; EPC HR Manager,
Feedstock Suppliers	Feedstock suppliers; transport and logistics contractors	Communicate relevant Project sourcing, delivery, transport, safety and environmental requirements; coordinate delivery arrangements; receive feedback on operational interfaces	Direct correspondence; supplier and contractor meetings; operational coordination meetings; provision of relevant requirements and contact details	During procurement and contracting; throughout operation as required	GSC Procurement/ Operations Team; GSC ESG Manager
Other Interested Parties	Relevant local NGOs, community associations and other organisations expressing an interest in the Project	Provide access to Project information; receive comments and concerns; engage on relevant environmental and social matters where an interest is identified	Information disclosure; direct correspondence; meetings where relevant; grievance and feedback channels	During disclosure and as required throughout the Project lifecycle	GSC SDO and ESG Manager
Lenders	EBRD	Facilitate disclosure of relevant NTS; communicate Project E&S performance, stakeholder engagement outcomes, grievances and implementation of agreed commitments	Formal correspondence; lender coordination meetings; disclosure of relevant Project documents; periodic E&S performance reporting	During financing and disclosure; throughout construction and operation in accordance with financing requirements	GSC ESG Manager; GSC Management

7.0 Implementation Resources & Responsibilities

7.1 Resources

GSC is responsible for providing the personnel and resources necessary to implement future Project engagement and grievance arrangements, with support from NWM, contractors or other advisers as appropriate and separately agreed.

7.2 Management Functions and Responsibilities

Under the current ESIA assignment, SLR and CLEAN TECH are responsible for:

- Preparing the SEP based on the Project-specific engagement;
- Undertaking and documenting the agreed targeted FGDs and socioeconomic baseline validation, subject to the verified local consultant records;
- Supporting the public inquiry and disclosure; and
- Providing relevant consultation records and framework to GSC for consideration in future Project engagement.

GSC will be responsible for:

- Updating the SEP before construction and before operation, and as required thereafter;
- Implementing the SEP post-ESIA, including the GRM;
- Ensuring that the EPC Contractor and suppliers implement the applicable SEP, GRM and Code of Conduct requirements; and
- Reporting on stakeholder engagement and grievances to the lenders.

GSC's ESG Manager is accountable for stakeholder engagement and grievance oversight, while the SDO coordinates community communication, maintains stakeholder and grievance records and follows up corrective actions. The GSC SDO will be responsible for the following:

- Coordinating and facilitating stakeholder engagement activities with local communities, including relevant community representatives and potentially vulnerable or disadvantaged groups, where applicable;
- Preparing and disseminating stakeholder engagement materials, including Project information, notices and updates, in appropriate languages and formats;
- Serving as the primary point of contact for local communities, receiving enquiries, concerns and feedback, and coordinating responses with relevant Project personnel;
- Administering the Project's external grievance mechanism, including receiving, registering, acknowledging and tracking grievances, coordinating their investigation and resolution, communicating responses to complainants and documenting closure;
- Maintaining the stakeholder database and engagement records, including meeting minutes, attendance registers, key issues raised, commitments made, follow-up actions and their implementation status;
- Maintaining the stakeholder engagement and grievance logs, ensuring that records are accurate, up to date and handled confidentially where required;

- Monitoring stakeholder concerns and recurring grievances, and reporting engagement outcomes, outstanding issues and recommended actions to the ESG Manager; and
- Supporting the periodic review and updating of the SEP based on stakeholder feedback, Project activities and emerging environmental and social issues.

EPC and operations personnel provide technical input and implement measures within their control.

The responsibilities per phase of the Project are detailed in Table 7-1.

Table 7-1: Responsibilities per Phase

Phase of the Project	Engagement	Responsibility to Lead
ESIA Phase - Stakeholder Engagement	Review of existing NWM socioeconomic baseline information and stakeholder engagement records, supplemented by targeted FGDs with selected surrounding communities to validate baseline conditions, introduce the proposed SAF Project, and identify relevant community concerns, expectations and potential environmental and social impacts.	SLR and CLEAN TECH, supported by GSC
ESIA Phase - Public inquiry and disclosure	Statutory national EIE public inquiry coordinated by the competent authorities, including public notice, access to the required EIE dossier and submission of observations. Separate Client and lender disclosure of the NTS and other agreed documents will follow applicable lender requirements.	GSC, supported by SLR and CLEAN TECH EBRD
Pre-construction	Review and update of the SEP; appointment of the SDO; establishment and communication of the grievance mechanisms; provision of information to relevant stakeholders on construction activities, recruitment opportunities and procurement arrangements.	GSC
Construction Phase	Ongoing engagement with the relevant stakeholders; advance notification of potentially disruptive construction activities, including traffic movements; communication of employment opportunities and Project updates; implementation of the external community grievance mechanism and separate workers' grievance mechanism.	GSC and EPC Contractor
Operational Phase	Ongoing engagement with the relevant stakeholders; and disclosure of relevant operational information; communication of community health, safety and emergency arrangements; engagement with relevant suppliers and transport service providers; continued implementation of grievance mechanisms and reporting in accordance with applicable requirements.	GSC Operator

8.0 Grievance Mechanism

The Project shall maintain separate external stakeholder and workers' grievance mechanisms. This SEP describes the external mechanism; workers' grievances shall be managed under the separate workers' grievance procedure, including arrangements for contractor personnel. The SDO administers the external mechanism under the oversight of the ESG Manager.

8.1 External Grievance Mechanism

The Project will establish an external grievance mechanism (GRM) consistent with EBRD ESR 10 and IFC PS 1 to receive, assess and facilitate resolution of concerns and grievances

raised by affected communities and other external stakeholders regarding the Project's environmental and social performance.

The GRM will be transparent, culturally appropriate, readily accessible to affected communities, free of charge and without retaliation. It will allow grievances to be raised confidentially or anonymously and will not restrict access to judicial or administrative remedies. The SDO will administer the GRM under the oversight of the GSC ESG Manager. The process is illustrated in Figure 8-1.

The mechanism will also be inclusive and accessible to stakeholders facing language, literacy, disability or other barriers. All submissions will be documented and processed in accordance with communicated timelines, without charge or retaliation. Grievances may be submitted anonymously, and participation shall not limit access to judicial, administrative or other remedies.

Grievance management is an effective way of reinforcing positive long-term relationships with stakeholders and of detecting issues early on that may result in risks to the Project if not addressed. It is not a substitute for stakeholder engagement, but is valuable in multiple ways:

- To ensure unwanted events with negative impacts on external stakeholders are dealt with swiftly and appropriately;
- To enable GSC to identify and correct problems before they recur or escalate into more serious problems;
- To elevate the credibility and reputation of GSC by demonstrating that it listens to stakeholders and takes their complaints seriously;
- To offer an additional means to track and monitor impacts and risks;
- To provide insight into stakeholders' understanding (or misunderstanding) of GSC policies, activities and behaviour;
- To provide an efficient and low-cost means of resolving disputes and providing remedy, where appropriate; and
- To avoid tension and conflict with stakeholders resulting from neglect or mismanagement of grievances.

The Project GRM will take into account NWM's existing stakeholder engagement framework and grievance mechanism. Where appropriate, GSC will coordinate with NWM to ensure that Project-related grievances received through NWM or Iaazzanene Commune are referred to the SDO for registration and follow-up under the Project GRM.

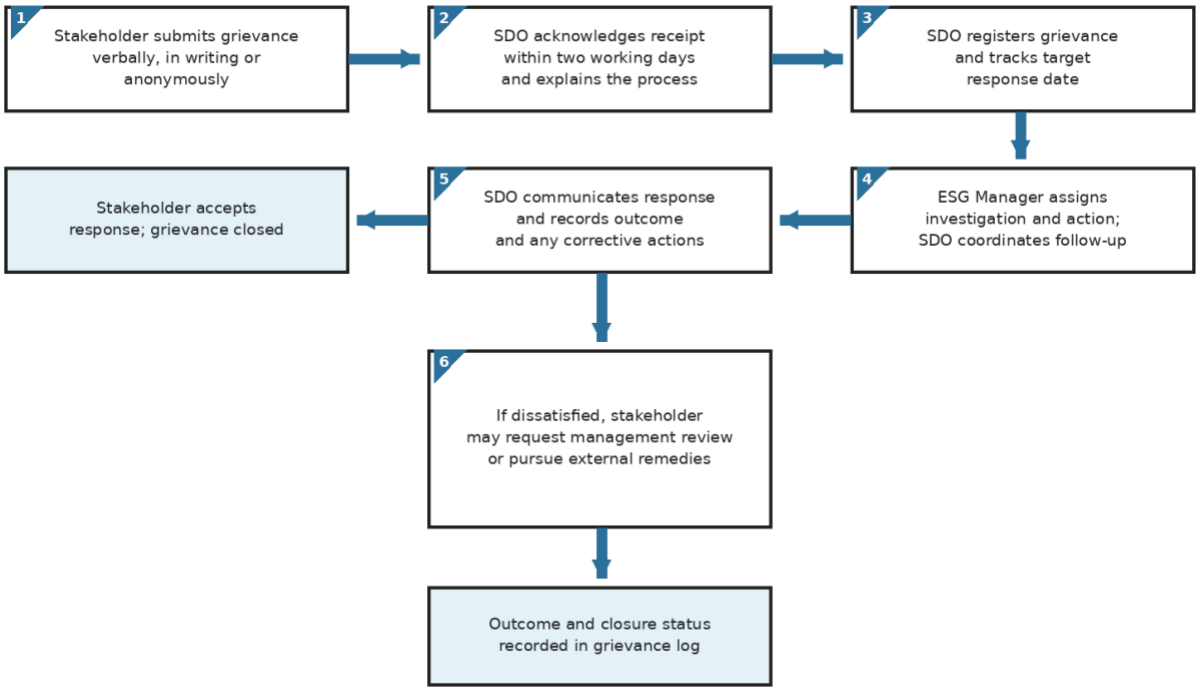


Figure 8-1: Grievance Mechanism Process

The SDO will receive, acknowledge and register grievances, coordinate their referral to the responsible Project personnel for investigation and response, and track actions through to closure. The SDO will receive appropriate training in grievance handling, confidentiality and stakeholder communication. The grievance process is as follows:

- Grievances may be submitted by telephone, email, written letter, in person or orally to the SDO, including in Arabic, Tarifit (Amazigh) or French. The SDO shall record oral grievances on behalf of the complainant. Submissions may also be referred through NWM/BILZ, the relevant commune or established community representatives. An online portal may be used once operational. The SDO shall acknowledge receipt within the timeframe established in the Project ESMS and explain the process in an accessible format;
- Anonymous grievances may be submitted through locked complaint boxes at designated accessible locations and through other anonymous channels once established. They shall be registered and investigated to the extent practicable; where no contact details are available, outcomes shall be documented internally without disclosing confidential information;
- Women will be offered the option of submitting grievances to, and receiving feedback from, a female representative, with confidentiality maintained;
- The SDO will record each grievance in the grievance register, including the date received, nature of the concern, relevant stakeholder category, action required, responsible person, progress and outcome. Complainant details will be recorded where provided, with personal data handled in accordance with Law No. 09-08;
- Target response periods are 10 working days for Level A grievances and 15 working days for Level B grievances requiring more detailed investigation or consultation. Where additional time is required, the complainant will be informed of the reason and the anticipated response date;

- The ESG Manager will assign the grievance to the appropriate Project personnel for investigation and corrective action, as required. The SDO will coordinate follow-up, maintain the investigation and action records, and monitor progress against the target response period;
- The proposed resolution will be communicated to the complainant in writing or verbally, as appropriate, by the SDO. The grievance register will record the response, any agreed corrective actions, the complainant's acceptance or dissatisfaction, and the closure status. Grievances will be closed once the agreed actions have been completed and the outcome documented; and
- Where the complainant is dissatisfied with the proposed resolution, the SDO will explain the available appeal and escalation arrangements:
    - The grievance may be escalated to GSC management for review and, where appropriate, referred to a mediation or appeals arrangement involving relevant independent representatives agreed for the case; and
    - The complainant retains the right to seek recourse through the competent Moroccan administrative bodies or courts at any stage.

Where a complainant is dissatisfied with the outcome, they may request a review within 15 working days of receiving the response. The review will be undertaken by a Grievance Review Panel comprising the ESG Manager, a senior manager not involved in the original decision and an appropriate independent representative for external grievances. The Panel shall issue a reasoned decision within 20 working days. Participation of third parties shall be subject to confidentiality safeguards and shall not apply to sensitive GBVH or child safeguarding cases, which follow restricted procedures. Access to external judicial or administrative remedies remains available at any stage.

The SDO will communicate the GRM and available grievance channels to surrounding communities before construction and throughout Project implementation. Contact information and grievance submission options will be included in Project information materials. The mechanism shall be publicised in Arabic, French and English, with oral explanation in Tarifit (Amazigh) where needed. Information on channels, responsible contacts, timeframes and anonymous reporting will be available at the Project gate, through relevant community engagement and online once the Project website is operational. Relevant local authorities, NWM/BILZ, neighbouring facilities and suppliers will be informed through proportionate Project communications.

The Project grievance contact details are provided in Table 8-1.

Table 8-1: Project Grievance Contact Details

Channel	Details
Contact person	Tarik Bouattioui Telephone
Telephone	+212 6000097402 Email
Email	Tarik.bouattioui@saffly.com

The grievance register will be reviewed regularly by the SDO and ESG Manager to confirm that grievances are acknowledged, investigated and addressed within the established response periods, corrective actions are completed and closure is documented. Trends and recurring issues will inform improvements to Project management and the SEP. The SDO will provide monthly grievance monitoring information to senior management. Consolidated quarterly summaries will be prepared for lenders and relevant authorities in line with applicable ESMS and reporting requirements. Monitoring will cover grievance numbers and categories, response and resolution times, outstanding cases, effectiveness of corrective

and preventive actions, and recurring trends. The mechanism will be reviewed annually for accessibility and effectiveness. Reporting will protect identities, with sensitive cases recorded in a restricted register and included only as suitably anonymised aggregate information.

Grievances relating to gender-based violence and harassment will be managed through a confidential, survivor-centred process, with the following additional safeguards:

- Reports will be handled only by trained, designated personnel, with access to identifying information restricted to those who need it for appropriate support and follow-up;
- Complainants will have the option of speaking to a trained female focal point;
- Information on available health, psychosocial, legal and protection support services will be provided where appropriate and with the complainant's consent;
- No investigation or referral will be undertaken in a manner that compromises the complainant's safety, confidentiality or informed consent; and
- Anonymous reporting will remain available.

Concerns of child sexual exploitation and abuse (CSEA) involving Project personnel, contractors, security staff or suppliers shall be received through confidential, child-sensitive reporting arrangements accessible to children, caregivers, community members and workers, including trained female and male focal points and other established reporting channels. No written complaint shall be required from a child. Handling shall prioritise the child's best interests and safety, avoid repeated interviews, restrict information sharing and involve a parent or guardian only where safe. Referrals to competent authorities and medical, psychosocial, legal or child protection services shall follow Moroccan law and safeguarding procedures. Allegations shall be managed separately from routine grievance investigation; records shall be restricted and management reporting anonymised.

8.1.1 Disclosure and Accessibility of the External GRM

GSC will communicate the external grievance procedure, available channels, contact details and response arrangements to relevant stakeholders through Project information materials and engagement activities. Information will be available in Arabic and French, with oral explanation in Tarifit (Amazigh) where needed. Contact details will be displayed at accessible Project locations and made available online once the relevant channel is operational. The SDO will facilitate access for stakeholders facing literacy, language or other barriers.

8.2 Workers' Grievance Mechanism

In addition to the external community GRM, a separate worker grievance mechanism will be established for direct and contracted in accordance with EBRD ESR 2 and IFC PS 2. Worker grievances will be managed through the relevant employer and human resources arrangements and will not be administered through the external community GRM. The worker grievance mechanism will be accessible with confidential and anonymous channels and without retaliation. Workers will be informed of the mechanism during induction and relevant toolbox talks. The worker mechanism will remain separate from the external community GRM, with appropriate oversight under the ESMS.

Workers, including contractor and subcontractor personnel, may submit grievances through the following channels:

- Confidential reporting directly to the HR Manager or designated SDO;

- Written grievance forms, email or designated complaint boxes, including anonymous submissions;
- A dedicated hotline or WhatsApp channel, where established; and

Workers will be informed of the available reporting channels during induction and through workplace communications. A dedicated confidential channel will be available for GBVH-related complaints, including sexual harassment and sexual assault, with an appropriately trained female focal point available to women workers. Such matters will be managed through a survivor-centred procedure, outside routine grievance review, with safeguards against retaliation and access to relevant support services. Workers may also use judicial or administrative remedies without first completing the Project procedure.

8.3 Lenders' Grievance Mechanism

In addition to the project-level grievance redress mechanism provided by the borrower, people who are, or may in the future be, adversely affected by the project have a range of forums available to them for purposes of raising their complaints, grievances, and concerns. These include applicable judicial or administrative forums and EBRD through EBRD's Independent Project Accountability Mechanism (IPAM) which deals with complaints about environmental, social and disclosure matters related to the Bank's investments. GSC should provide the applicable EBRD contact details as part of stakeholder consultations and information disclosure, including in response letters to a complaint where appropriate, so that project-affected people know how to reach out to EBRD. The EBRD IPAM is accessible via the following link: https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism.html

9.0 Monitoring and Reporting

9.1 Monitoring Indicators

GSC will monitor implementation of the SEP using a proportionate set of indicators, taking account of the scale of Project impacts, actual engagement undertaken and applicable lender requirements. The indicators that will be used to monitor the implementation of the SEP will comprise the following:

- The percentage of Project documents that have been adequately disclosed to stakeholders in accordance with the ESMP and SEP;
- The number of stakeholder engagements completed, broken down by stakeholder group and affected community, against what was planned;
- The number of public sessions (awareness-raising sessions, campaigns, etc.) aimed at maintaining community safety, including emergency preparedness and road safety;
- The number of activities completed that are designed to support the informed consultation and participation of women;
- The number of activities completed that are designed to support the informed consultation and participation of vulnerable groups;
- The number of feedstock suppliers onboarded and trained under the SCMS;
- The number of announcements made in press and media outlets;
- The number of community grievances raised, broken down by gender, category and affected community;

- The number of community grievances raised that were resolved within the specified target time; and
- The number of community grievances that recur, to track whether the Project is learning lessons from past experience and improving its E&S performance over time.

GSC will maintain records of engagement activities and grievances, periodically review implementation and report material matters to lenders in accordance with agreed financing requirements.

The SEP will be reviewed when material Project changes occur, following significant consultation findings, and before construction or operation where necessary; the frequency of subsequent updates should be agreed by GSC with its lenders.

9.2 Feedback to Stakeholders

GSC will provide appropriate feedback on material issues raised by stakeholders, including information on how comments have been considered. The form and frequency of feedback should be proportionate to the engagement undertaken and the needs of affected communities; routine distribution of full comment-and-response reports to every attendee is not assumed.

10.0 References

EBRD. (2024). Environmental and Social Policy. London: European Bank for Reconstruction and Development.

Equator Principles Association. (2020). The Equator Principles EP4.

HCP. (2024). Recensement Général de la Population et de l'Habitat 2024. Rabat: Haut-Commissariat au Plan.

IFC. (2007). Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets. Washington: International Finance Corporation.

IFC. (2009). Good Practice Note: Addressing Grievances from Project-Affected Communities. Washington: International Finance Corporation.

IFC. (2012). Performance Standards on Environmental and Social Sustainability. Washington: International Finance Corporation.

ORÉADE-BRÈCHE. (2023). Environmental and Social Impact Assessment and Cumulative Impact Study for the Development of the Nador West Med Industrial-Port Complex – Phase I.

SLR. (2026). Environmental and Social Impact Assessment for the Sustainable Aviation Fuel Production Facility, Nador West Med, Morocco – Draft V01 (work in progress).

Appendix A Grievance Log

Stakeholder Engagement Plan

Sustainable Aviation Fuel

Green Sky Capital

SLR Project No.: 777.024224.00001

6 November 2026

Stakeholder engagement is a process that is designed to enable all stakeholders to voice their opinion and/ or concerns which enables the practitioner to evaluate all aspects of the proposed Project, with the objective of improving the Project by maximising its benefits while minimising its adverse effects. A summary of the issues raised and responses in relation to these issues is provided in this Grievance Log template. The issues are listed in the date order in which they were received. The name, affiliation and date of the commentator are also indicated.

A.1 Grievance Log

No.	Method and Date of Receipt	Organisation and Contact Person	Comment	Method of Response	Response
1	[Method and date]	[Organisation and contact person]	To be populated following the FGDs, institutional meetings, public inquiry and disclosure.	[ ]	[ ]

Appendix B Blank Proforma Forms

Stakeholder Engagement Plan

Sustainable Aviation Fuel

Green Sky Capital

SLR Project No.: 777.024224.00001

6 November 2026

Project Stakeholder Register Form															
No	Name, Position and Group	Role	Importance and Priority Contact									Expectations	Communication Methods and Tools	Timeframe	Responsibility
			Level of Interest			Ability to Influence			Priority						
			Low	Medium	High	Low	Medium	High	Low	Medium	High				

SLR

Meeting Notes			
Project Name			
Date		**Venue**	
Time		**Meeting**	
No. Of participants			
Who are the participants			
Key points of meeting			
Key follow up Actions			

STAKEHOLDER ENGAGEMENT CHECKLIST

- [ ] Decision on date, time, venue and required attendees with approval by relevant management
- [ ] Newspaper/radio adverts developed and translated if necessary, signed off by relevant management, and placed with media in advance of meeting
- [ ] Stakeholder informed (verbally, in writing as appropriate)
- [ ] Attendance register
- [ ] Comments and response report
- [ ] Meeting notes record
- [ ] Camera/GPS to log meeting data (with spare batteries)
- [ ] Consultation materials prepared and printed with translation if necessary (posters, letters, reports etc.)
- [ ] Engagement team aware of HEP communication protocol and key and message and response statements
- [ ] All attendance registers, comments and response reports, meeting notes and additional visual/ GPS records handed over to CLO/HSE Manager
- [ ] All consultation records filed and documented appropriately

ATTENDANCE REGISTER			
Date		**Venue**	
Time		**Meeting**	

Surname	Forename	Sex	Position/Title	Email	Address/village	Telephone	Signature

SLR

Surname	Forename	Sex	Position/Title	Email	Address/village	Telephone	Signature

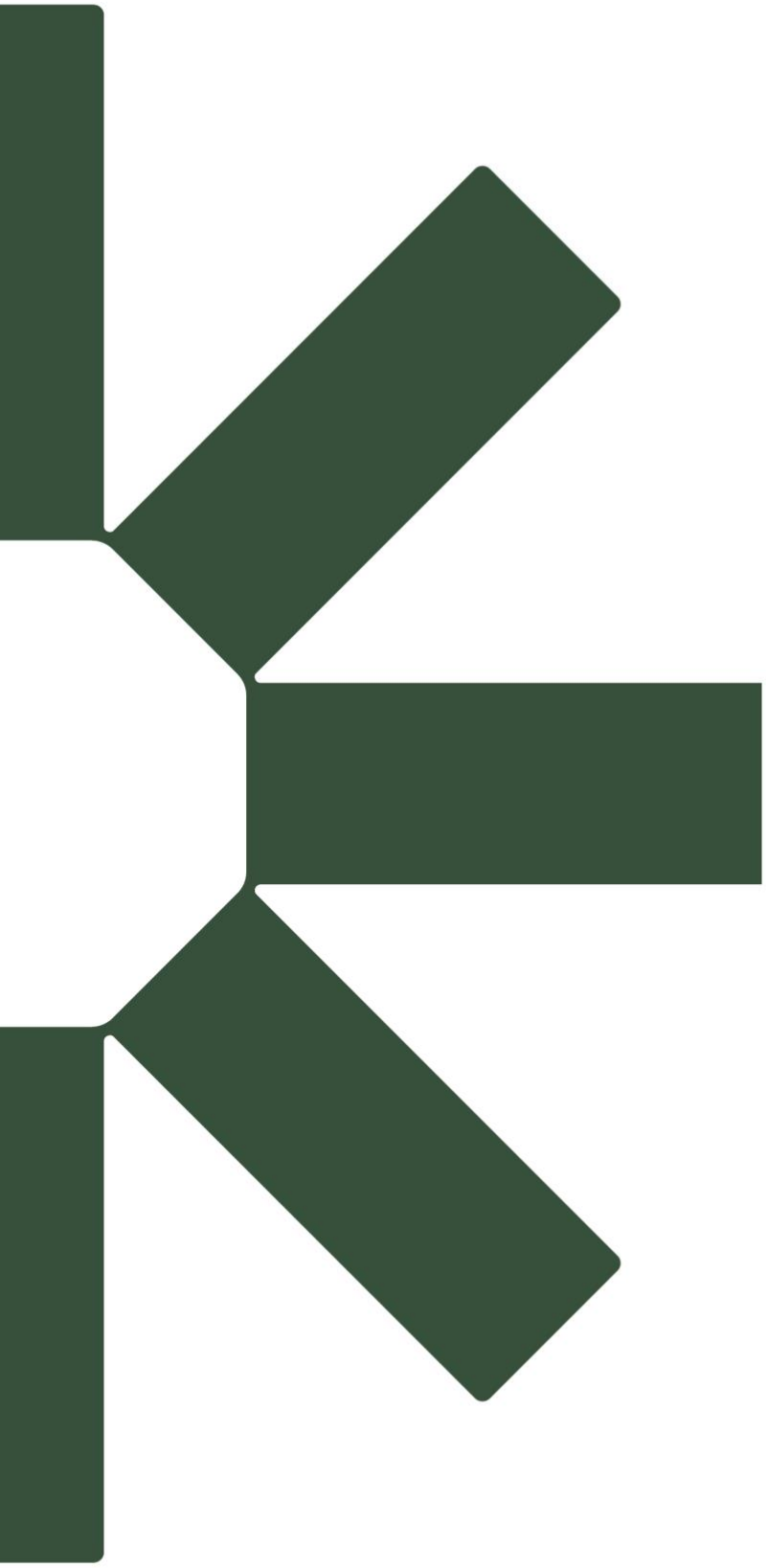
COMMENTS AND RESPONSE REPORT			
Date		**Venue**	
Time		**Meeting**	

Surname	Forename	Gender	Position/Title	Comment	Response

GRIEVANCE REDRESS MECHANISM (to be completed in database format)

Date	Name	Address	Gender	Telephone	Grievance	Category*	Response Days Allocated	Response	Response Accepted	Subsequent Steps Taken to Address	Closed	Date Closed
							14 / 28		Y / N		Y / N	
							14 / 28		Y / N		Y / N	
							14 / 28		Y / N		Y / N	
							14 / 28		Y / N		Y / N	
							14 / 28		Y / N		Y / N	
							14 / 28		Y / N		Y / N	
							14 / 28		Y / N		Y / N	
							14 / 28		Y / N		Y / N	
							14 / 28		Y / N		Y / N	

**N.B. categories to potentially include Employment, Community Development, Resettlement, Water etc.*



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