

Stakeholder Engagement Plan

IFF Line 2 Fertilizer Project

PREPARED FOR



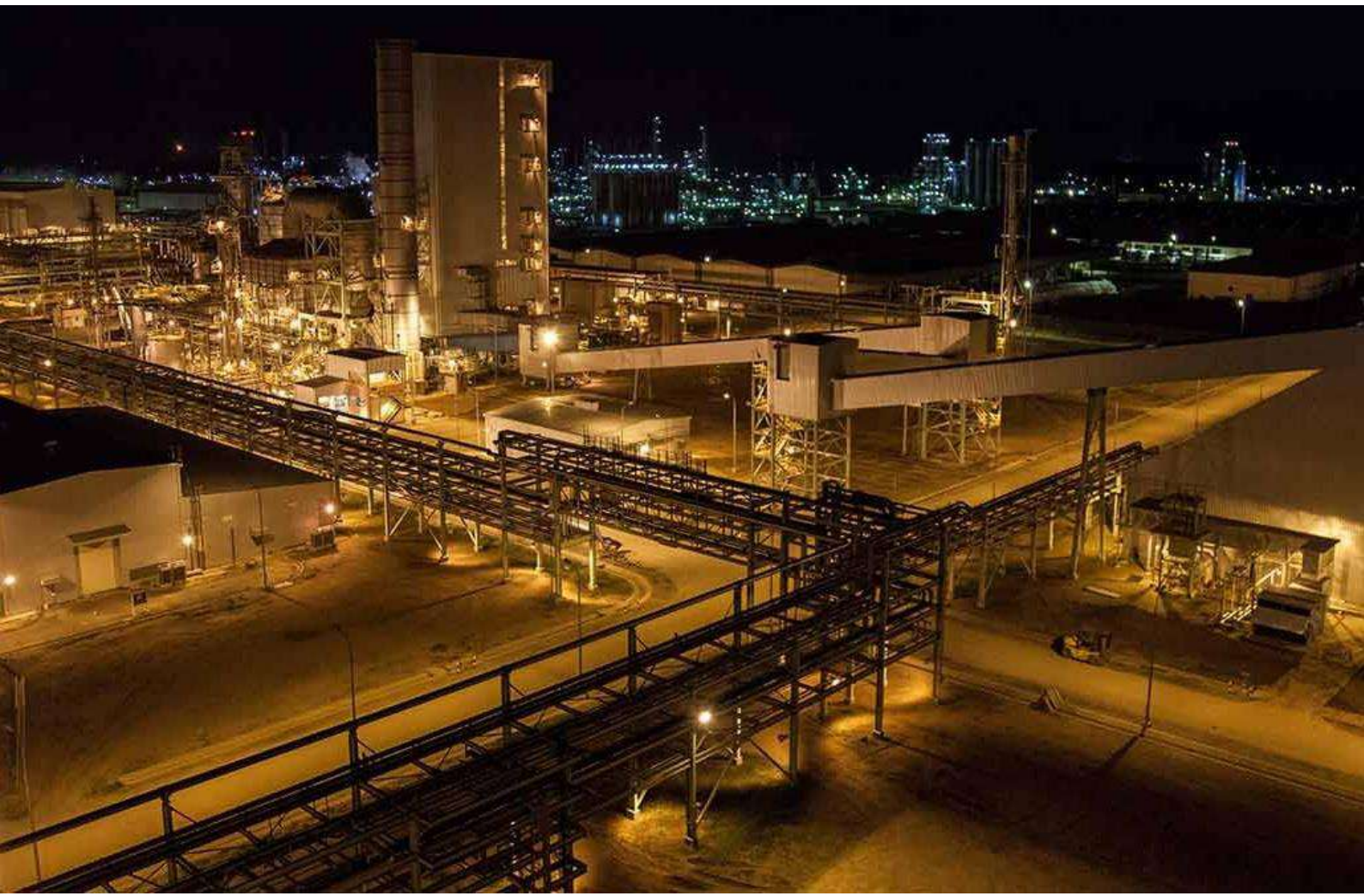
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ACRONYMS AND ABBREVIATIONS

Acronym	Definition
ADI	Area of Direct Influence
AII	Area of Indirect Influence
AA1000SES	Accountability Stakeholder Engagement Standard
CSR	Corporate Social Responsibility
EIA	Environmental Impact Assessment

Acronym	Definition
ESIA	Environmental and Social Impact Assessment
IFC PS1	International Finance Corporation Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
LGA	Local Government Area
M&E	Monitoring and Evaluation
MoU	Memorandum of Understanding
NGO	Non-Governmental Organisation
PIA	Petroleum Industry Act, 2021 (Host Communities)
SEP	Stakeholder Engagement Plan
VPSHR	Voluntary Principles on Security and Human Rights
AfDB	African Development Bank
AoI	Area of Influence
CANMPSSAN	Chemical and Non-Metallic Products Senior Staff Association of Nigeria
CBA	Collective Bargaining Agreement
CDC	Community Development Committee
CR&D	Community Relations and Development (department)
CRO	Community Relations Officer
E&S	Environmental and Social
EPC	Engineering, Procurement and Construction
ESA	Environmental and Social Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
FMEnv	Federal Ministry of Environment
GBV	Gender-Based Violence
GBVH	Gender-Based Violence and Harassment
GIIP	Good International Industry Practice
GMP	Grievance Management Procedure
GRM	Grievance Redress Mechanism
HHSE	Health, Hygiene, Safety and Environment
IBL	Inside Battery Limits
ICP	Informed Consultation and Participation
IEFCL	Indorama Eleme Fertilizer & Chemicals Limited
IFF	Indorama Fertilizer FZE
IFZ	Indorama Fertilizer Zone

Acronym	Definition
ILO	International Labour Organization
IRM	Independent Recourse Mechanism (of the African Development Bank)
ISS	Integrated Safeguards System (African Development Bank, 2023)
KPI	Key Performance Indicator
LIESA	Lender Independent Environmental and Social Advisor
MMSCFD	Million Standard Cubic Feet per Day
MOM	Minutes of Meeting
MTPD	Metric Tonnes Per Day
NESREA	National Environmental Standards and Regulations Enforcement Agency
NPA	Nigerian Ports Authority
NSCDC	Nigeria Security and Civil Defence Corps
NUCECFWW	National Union of Civil Engineering, Construction, Furniture and Wood Workers
NUCFRLANMPE	National Union of Chemical, Footwear, Rubber, Leather and Non-Metallic Products Employees
OBL	Outside Battery Limits
OS	Operational Safeguard (AfDB ISS 2023)
OS1	AfDB Operational Safeguard 1: Assessment and Management of Environmental and Social Risks and Impacts
OS2	AfDB Operational Safeguard 2: Labour and Working Conditions
OS3	AfDB Operational Safeguard 3: Resource Efficiency and Pollution Prevention and Management
OS4	AfDB Operational Safeguard 4: Community Health, Safety and Security
OS5	AfDB Operational Safeguard 5: Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement
OS6	AfDB Operational Safeguard 6: Habitat and Biodiversity Conservation and Sustainable Management of Living Natural Resources
OS7	AfDB Operational Safeguard 7: Vulnerable Groups
OS8	AfDB Operational Safeguard 8: Cultural Heritage
OS10	AfDB Operational Safeguard 10: Stakeholder Engagement and Information Disclosure
PAC	Project Advisory Committee
PS	Performance Standard (IFC, 2012)
RACI	Responsible, Accountable, Consulted, Informed
RSMEnv	Rivers State Ministry of Environment
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
ESG	Environmental, Social and Governance
NDPA	Nigeria Data Protection Act, 2023

Acronym	Definition
NDPC	Nigeria Data Protection Commission
QRA	Quantitative Risk Assessment
USD	United States Dollar
WBG	World Bank Group

EXECUTIVE SUMMARY

ES1 PROJECT AND PURPOSE OF THIS STAKEHOLDER ENGAGEMENT PLAN (SECTION 1)

This Stakeholder Engagement Plan (SEP) sets out the framework for stakeholder engagement for the proposed IFF Line 2 Fertilizer Project of Indorama Fertilizer FZE, located within the existing Indorama Eleme Complex in Eleme Local Government Area, Rivers State, Nigeria. The Project comprises a Feed Conditioning Unit processing approximately 200 MMSCFD of natural gas, a 2,300 MTPD Ammonia Plant, a 4,000 MTPD Urea Plant and a 150 MTPD UFC-85 unit, together with gas receiving, water treatment, effluent treatment, flare, storage and product evacuation infrastructure, and an underground natural gas supply pipeline.

The SEP has two functions. It records the engagement already undertaken during the Environmental and Social Impact Assessment (ESIA) and Project preparation phase (Sections 5.1 and 5.2), and it sets out the forward-looking engagement programme for the remaining feasibility and permitting phase, pre-construction, construction, operations and decommissioning (Sections 5.3 to 5.6). Section 1.3 and Table 1-1 link each principal Project component to the environmental and social risk it generates and to the resulting engagement priority; that linkage drives the stakeholder prioritisation in Section 4, the programme in Section 5, the disclosure content in Section 6 and the indicators in Section 8. The SEP is a live commitment document, reviewed at least annually and revised out of cycle on the triggers in Sections 1.1 and 4.3.1.

ES2 COMPLIANCE FRAMEWORK (SECTION 2)

Section 2 sets out the three compliance streams that govern engagement for the Project: Nigerian national legislation, including the Environmental Impact Assessment Act No. 86 of 1992 (CAP E12 LFN 2004) and the EIA Procedures and Charges Regulations 2021, the Petroleum Industry Act 2021 and the Nigeria Data Protection Act 2023; international requirements, principally the African Development Bank Integrated Safeguards System (2023), and in particular Operational Safeguard 1 and Operational Safeguard 10, together with the IFC Performance Standards (2012) and applicable Good International Industry Practice; and Indorama's own corporate commitments, being the Code of Conduct, the Stakeholder Engagement Strategy, and the Policy Guidelines on Gender-Based Violence and Harassment (2021).

Section 2.3.2 states, for each of the four phases of the Stakeholder Engagement Strategy – Plan, Prepare, Implement, and Monitor and Improve – the Project-specific action taken and the exact section or table of this SEP in which that phase is operationalised.

ES3 PRINCIPLES OF ENGAGEMENT (SECTION 3)

Section 3 establishes that engagement will be meaningful, inclusive, culturally appropriate, free from manipulation, interference, coercion and intimidation, and continuous across the Project lifecycle. It commits the Project to informing stakeholders before decisions are taken, to explaining how their views were considered, and to protecting from reprisal any

person who participates in consultation, raises a concern, lodges a grievance or supports an investigation.

ES4 PROJECT STAKEHOLDERS, PRIORITY GROUPS AND VULNERABILITY (SECTION 4)

Stakeholder identification is founded on an impact-driven Area of Influence comprising an Area of Direct Influence and an Area of Indirect Influence, delineated from the specialist air quality, noise, water, traffic and social studies. Section 4.1 records, for each area of uncertainty or data limitation, the decision taken, why the assumption adopted is conservative, its effect on the Area of Influence boundary, and the additional stakeholders and engagement measures that follow (Table 4-1). Access to the grievance mechanism is not restricted by location.

Seventeen communities are engaged – seven directly affected (Aleto, Okerewa, Agbonchia, Njuru, Akpajo, Elelenwo/Wakoahu and Iriebe) and ten indirectly affected – together with regulatory authorities, traditional institutions, the Project Advisory Committee, women, youth, widows, persons with disabilities, existing natural resource users, workers' organisations, contractors, security providers, civil society, academia, media and lenders. Stakeholders are classified by influence, interest, impact exposure, vulnerability and level of support in Tables 4-6 and 4-8; the differentiated measures applied to vulnerable and disadvantaged groups are at Table 4-7; and Table 4-11 traces each classification through to the engagement approach, minimum frequency, methods, responsible party and the sub-section of Section 5 in which the commitment is made. Directly affected communities, women, youth, widows and persons with disabilities are engaged on a Work Together basis by reason of impact exposure and vulnerability rather than influence alone; existing natural resource users are engaged on a Show Consideration basis.

ES5 ENGAGEMENT PROGRAMME AND CONSULTATION OUTCOMES (SECTION 5)

Twenty engagements involving 632 recorded participants were undertaken between September 2025 and May 2026, comprising regulatory consultation with the Federal Ministry of Environment, community engagements in the directly and indirectly affected communities, focus group discussions with youth, widows, persons with disabilities, hunters and graduates, consultation with the Project Advisory Committee, the public forum of 26 February 2026 and engagement with five additional indirectly affected communities on 29 May 2026 (Table 5-5). Attendance, and the extent to which it was recorded, is set out at Table 5-6. The documentary evidence – signed attendance registers, photographs, minutes and issues raised and responses – is held at ESIA Volume II, Annexure 4-6 (PDF pages 205–361).

Table 5-4 records the historical feedback, action and status position arising from the 2021–2023 engagements, distinguishing commitments absorbed into the host community Memorandum of Understanding from those closed and those carried by the IFF Line 1 project. Table 5-7, the Consultation Outcomes Matrix, records for each substantive issue raised in the current consultation the originating engagement and its evidence page, the

Project response, the ESIA or ESMP element or Project commitment affected, the resulting change or the reason for no change, the owner and the status. Stakeholder feedback has demonstrably shaped the Project: concerns on air emissions, noise, water, effluent and health were carried into the specialist study scope with monitoring points sited at the settlements that raised them; concerns on employment led to written disclosure of quotas, eligibility criteria and selection process; and the widows' and disability consultations led to the recognition of both groups as distinct vulnerable groups with dedicated engagement and direct registration for benefits. Table 5-2 is the operational statement of the forward programme, by phase, with objective, target groups, methods, frequency, responsible personnel and expected outcome.

ES6 COMMUNICATION AND DISCLOSURE (SECTION 6)

Section 6 sets out the disclosure channels, the tailoring of channels to stakeholder characteristics (Table 6-1), language and accessibility arrangements, and the physical and digital disclosure points. Table 6-3 converts Indorama's corporate transparency principles into measurable Project disclosure obligations with a defined frequency or trigger, audience, format and owner, covering monitoring results, ESMP implementation status, material Project changes, MoU delivery and aggregated grievance statistics. Table 6-2 lists the publicly available Indorama corporate policies relied upon, with their version, date and web address. Section 6.4 also defines who may authorise each class of external release, and requires every release to be entered in the Disclosure Register at Appendix D.

ES7 ORGANISATIONAL CAPACITY AND SEP IMPLEMENTATION BUDGET (SECTION 7)

Section 7 defines the roles and accountabilities of the Community Relations Officers, the Site Manager, the HHSE team, the E&S Corporate Team and the Stakeholder Engagement Steering Committee. Section 7.6 presents the tentative SEP implementation budget. The indicative provision is Naira 500 million across the 36-month construction phase and Naira 100 million per annum during operations. The provision is broken down by cost category in Table 7-1, covering consultation and facilitation, disclosure, grievance mechanism operation, dedicated engagement personnel, training and capacity building, monitoring and reporting, and contingency. These costs are funded from the Project construction budget and the annual operating budget and are ring-fenced from the host community MoU community development allocation.

ES8 MONITORING, EVALUATION AND REPORTING (SECTION 8)

Table 8-1 sets out monitoring responsibilities, frequency, data sources, reporting arrangements and the SEP review and revision cycle. Table 8-2 states the key performance indicators against which the quality – not merely the quantity – of engagement is measured, including completion of planned engagement, inclusiveness, timeliness of disclosure, grievance acknowledgement and resolution, stakeholder satisfaction, commitment closure, training completion, the recording of sex-disaggregated attendance, and allegations of retaliation. Performance is reported monthly and quarterly internally, quarterly to the Project Advisory Committee, and annually to lenders and to communities through a public performance summary. Section 8.2 requires approved minutes,

resolutions or a plain-language outcome summary to be issued within ten working days and disclosed to affected stakeholders who were not present through the PAC representatives of each host community.

ES9 GRIEVANCE MANAGEMENT PROCEDURE (SECTION 9)

Section 9 provides a free, accessible, culturally appropriate and confidential grievance mechanism with multiple submission channels, defined acknowledgement, investigation and resolution timelines with named owners and escalation points (Table 9-2), an appeals route, recourse to the courts, and explicit reference to the African Development Bank Independent Recourse Mechanism. A separate confidential, survivor-centred channel operates for complaints of gender-based violence, sexual exploitation and abuse and sexual harassment, with restricted records that are not entered in the general register. Section 9.9.4 sets a single retention schedule, role-based access controls, secure disposal arrangements and a data breach response protocol covering containment, assessment, internal escalation, notification of affected persons, the regulator and lenders where required, corrective action and lessons learned. Templates and registers supporting the procedure are at Appendix C, the Disclosure Register at Appendix D and the Stakeholder Feedback and Commitments Register at Appendix E.

1. INTRODUCTION

This Stakeholder Engagement Plan (SEP) has been developed specifically for the ESIA associated with the Indorama Fertilizer FZE ('Indorama' or the 'Proponent') proposed IFF Line 2 Fertilizer Project in Eleme Local Government Area (LGA), Port Harcourt, Rivers State, Nigeria (hereafter referred to as the Project or IFF Line 2). Moreover, it provides an implementation framework for post-ESIA engagement (i.e., from the remainder of the feasibility and permitting phases, through construction, operation and decommissioning).

The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The SEP seeks to ensure that adequate and timely information is provided to stakeholders, and that these groups are given sufficient opportunity to voice their opinions and concerns, which in turn will have a positive influence on Project execution.

The SEP is a working document that will be updated and adjusted as required during Project development and execution.

This SEP has two distinct but linked functions, which are separated as follows. First, Sections 5.1 and 5.2 present the record of engagement already undertaken during the ESIA and Project preparation phase, including scoping, community consultation, focus group discussions with vulnerable groups, the public forum and regulatory consultation. Second, Sections 5.3 to 5.6 present the forward-looking engagement programme by lifecycle phase – pre-construction, construction, operations and decommissioning – and Sections 5.7 to 5.12 set out the engagement arrangements that apply across all phases, covering the worker grievance mechanism, contractor workforce compliance, security and human rights, anti-retaliation, gender-based violence and harassment, and training. Section 5.13 summarises post-ESIA engagement. Where a section is retrospective it is identified as 'engagement to date'; where it is prospective it is identified by lifecycle phase.

This SEP applies for the full Project lifecycle and remains a live commitment document after ESIA approval. It will be formally reviewed at least annually by the Head of Community Relations & Development, and will be updated out of cycle whenever any of the following occurs: a material change to Project design, footprint, schedule or workforce numbers; identification of new or changed environmental and social risks or impacts; a material change in stakeholder composition, including the emergence of new settlements, in-migration, or newly identified vulnerable or disadvantaged individuals and groups; recurring or escalating grievance patterns; regulatory change; or a lender request. Each revision will be version-controlled, approved by Project management, and the updated SEP disclosed to stakeholders in accordance with AfDB OS10.

It must be noted that this SEP has been developed for the proposed IFF Line 2 Project and as part of the Project ESIA process. This plan aligns with Indorama's operational-level Stakeholder Engagement Strategy (ERM, May 2026).

This SEP draws reference to the following existing Indorama documentation pertaining to stakeholder engagement:

- Indorama Corporation Group Handbook (Version 2, 18 July 2022)
- Social Impact Assessment and Stakeholder Engagement Plan for IFF-Train 2 Fertilizer Project (Indorama Eleme Fertilizer & Chemicals Limited, 19th April 2018)
- Memorandum of Understanding between the Host Communities of Indorama Eleme Complex and Indorama Nigeria (2019)
- Stakeholder / Community Grievance Management Procedure 25th April 2018
- Local Hiring Plan for Construction & Operation phase of IFF Train 3 Project (Indorama Eleme Fertilizer & Chemicals Limited, 3 February 2023)
- Report on Stakeholder Engagement done during ESIA Process of "IFF-Train 3 Project" (17 February 2023)
- Procedural Manual Social Material Topics (Indorama Eleme Fertilizer & Chemicals Limited, 31 July 2022)
- Guidelines for prevention and addressing issues of Retaliation (Indorama Eleme Fertilizer & Chemicals Limited, 1 October 2021)
- Policy Guidelines on Gender Based Violence & Harassment (Indorama Eleme Fertilizer & Chemicals Limited, 2 October 2021)

Consultations undertaken during preparation of this SEP. It was informed directly by the Project-specific consultations undertaken between September 2025 and May 2026, comprising regulatory consultation with FMEnv (11 September 2025), community engagements in directly and indirectly affected communities (October and November 2025), the public forum of 26 February 2026, dedicated focus group discussions with the Eleme Widows Association, the Eleme Physically Challenged Association, the Eleme Hunters Association, the Eleme Graduate Forum and youth (February and March 2026), consultation with the Project Advisory Committee (19 February 2026), and engagement with the five additional indirectly affected communities on 29 May 2026. Full details, dates, venues and participant numbers are provided in Table 5-5, with attendance registers and

photographic records at ESIA Volume II, Annexure 4-6 – Comprehensive Stakeholder Engagement Report (PDF pages 205–361).

Stakeholder views on the SEP itself – specifically on the adequacy of the stakeholder identification, the proposed engagement channels and frequency, and the accessibility of the grievance mechanism – were sought during the February and March 2026 focus group discussions and the PAC consultation, and are reflected in Sections 4.2, 5.3 and 9.6. In accordance with AfDB OS10.

The principal lessons carried forward from the earlier phases are: expectations relating to employment and contracting are the dominant driver of community grievances and require early, explicit and repeated expectation management.

1.1 PURPOSE

The purpose of this SEP is to establish a structured, transparent, and inclusive approach for engaging interested and affected stakeholders including meaningful consultation and participation in E&S decision-making. The aim of the SEP is to describe how the Project will engage external stakeholders during environmental and social impact assessment (ESIA), pre-construction, construction, operations, and decommissioning phases. It demonstrates the commitment of IFF to an 'international best practice' approach to stakeholder engagement. IFF is committed to full compliance with the Nigerian Environmental Impact Assessment (EIA) Regulations, which includes the Environmental Impact Assessment Act, No. 86 of 1992 (amended 2004) and regulations of 2021. In addition, IFF will align with the International Finance Corporation Performance Standards on Environmental and Social Sustainability, 2012 (IFC PSs). IFF will also comply with the African Development Bank Integrated Safeguards System (ISS, 2023), in particular Operational Safeguard 1 (Assessment and Management of Environmental and Social Risks and Impacts) and Operational Safeguard 10 (Stakeholder Engagement and Information Disclosure), together with the disclosure and consultation provisions of OS2 (Labour and Working Conditions), OS4 (Community Health, Safety and Security) and OS7 (Vulnerable Groups). Section 2.2.1 sets out how each applicable AfDB requirement is met by this SEP.

In line with current international best practice, this SEP aims to ensure engagement that is free from manipulation, interference, coercion and intimidation.

Beyond supporting effective Project execution, stakeholder engagement is intended to enable meaningful stakeholder participation in Project decision-making and in the design and implementation of environmental and social mitigation and enhancement measures. Stakeholders are engaged as contributors to Project design, not solely as recipients of information.

Stakeholder concerns, recommendations and feedback are handled through a documented closed-loop process:

- **Capture:** all issues raised at any engagement are recorded verbatim in the meeting record;
- **Assessment:** the Community Relations & Development (CR&D) team, supported by HHSE and the E&S corporate team, assesses each issue for validity, materiality,

feasibility and consistency with the ESIA findings, and routes technical issues to the relevant discipline lead or the EPC contractor;

- **Incorporation:** where an issue is accepted, the resulting action is recorded as a design change, a mitigation, a community development commitment, or a change to the engagement programme.
- **Feedback:** the outcome of every issue – accepted, partially accepted, or not accepted with reasons – is reported back to the originating stakeholder group at the next scheduled engagement and, for host communities, at the quarterly PAC meeting. The Consultation Outcomes Matrix (Table 5-7) is the standing public-facing record of this loop, consistent with AfDB OS10

To this end, this SEP provides the following:

- Requirements for consultation and disclosure;
- Identification and prioritisation of stakeholders;
- Strategy and timetable for sharing information and consulting with stakeholders;
- Identification of structures and processes to deal with conflicts and grievances; and
- Resources and responsibilities for implementing stakeholder engagement activities.

1.2 OBJECTIVES

The objectives of this SEP are as follows:

- To understand the interests, influence, and concerns of various Project stakeholders.
- To ensure effective, transparent, and timely communication between the Project and its stakeholders, to engender an environment of trust and mutual respect.
- To engage stakeholders on their concerns regarding the Project and appropriately address these through dialogue and corrective actions.
- To establish effective means of communication to disseminate information from the Project to stakeholders.
- To design stakeholder engagement mechanisms and standards that respect local traditions and cultural norms.
- To effectively manage the expectations of stakeholders regarding socio-economic benefits derived from the Project.

Commitments, benefits, responsibilities and expectation management: To avoid the expectation gaps that have historically driven grievances at the Complex, this SEP is explicit about what the Project will and will not deliver, and about who is responsible for delivery.

- **What the Project commits to:** preferential recruitment of host community members against the quotas set out in the host community MoU; ring-fencing of defined non-technical and lower-technical-content contracts for indigenous contractors; scholarships; skills acquisition programmes; micro-grants for women; the youth entrepreneurship scheme; community development projects.
- **What the Project does not commit to:** employment or contracting for every applicant; direct cash payments to individuals or groups outside the MoU framework;

the provision of public services that are the statutory responsibility of the Rivers State Government or Eleme Local Government Area; or MoU benefits for communities outside the defined host community set, which retain full access to information and to the grievance mechanism but are not entitled to MoU benefits.

- **Responsibilities:** Indorama is responsible for delivering the MoU commitments, disclosing accurate information and operating the grievance mechanism. The PAC and its sub-committees are responsible for nominating beneficiaries, verifying indigene status and communicating outcomes to their communities. Host communities are responsible under the MoU for maintaining a conducive operating environment and for guaranteeing the performance of community contractors. Contractors are responsible for complying with Indorama's labour, security, human rights, anti-retaliation and GBVH requirements.
- **Expectation-management measures:** the eligibility criteria, quotas, selection process and budget envelope for each benefit stream are disclosed at the point of engagement rather than described in general terms; annual MoU delivery status is reported to the PAC and disclosed to communities; unsuccessful applicants are given the reason for the outcome; and no commitment is made verbally at community meetings unless it is confirmed in writing.
- Establish the appropriate management mechanisms and identify necessary capacity building and training requirements for the effective implementation of the SEP.
- To comply with AfDB ISS Operational Safeguard 10 and Operational Safeguard 1 requirements for meaningful consultation, information disclosure and the informed participation of project-affected parties throughout the Project lifecycle, in a manner free of manipulation, interference, coercion, discrimination, intimidation and reprisal.
- To maintain and a documented record of stakeholder engagement, including the stakeholders consulted, the feedback received, and whether and how that feedback was taken into account, in accordance with AfDB OS10.

1.3 PROJECT DESCRIPTION

The proposed IFF Line 2 development comprises an Inside Battery Limits (IBL) configuration, including a Feed Conditioning Unit designed to process approximately 200 MMSCFD of natural gas, a 2,300 metric ton per day (MTPD) Ammonia Plant, a 4,000 MTPD Urea Plant, and a 150 MTPD UFC 85 unit. Outside Battery Limits (OBL) infrastructure includes natural gas receiving facilities, water treatment and cooling systems, effluent treatment and drainage systems, emergency flares, fire and gas protection systems, product evacuation infrastructure, and a 120,000-ton capacity urea storage building. Natural gas will be delivered via an underground pipeline and processed using established reforming, synthesis, and granulation technologies to produce granulated Urea fertilizer. Finished product will be transported to the MM FZE Port located within the Onne Port Complex, approximately 20 km from the manufacturing site, for storage and export.

The ESIA has been prepared in accordance with the Environmental Impact Assessment Act (CAP E12 LFN 2004) and the Environmental Impact Assessment Procedures and Charges Regulations (S.I. No. 109 of 2021). It also considers applicable international requirements, including the IFC Performance Standards, the World Bank Group General

and sector-specific Environmental, Health and Safety Guidelines (notably the Nitrogenous Fertilizer Production guideline), the African Development Bank Integrated Safeguards System, and Indorama's internal Health, Safety, and Environment policies. These frameworks require assessment of environmental, social, and health risks across the full project lifecycle and the identification of appropriate control and enhancement measures.

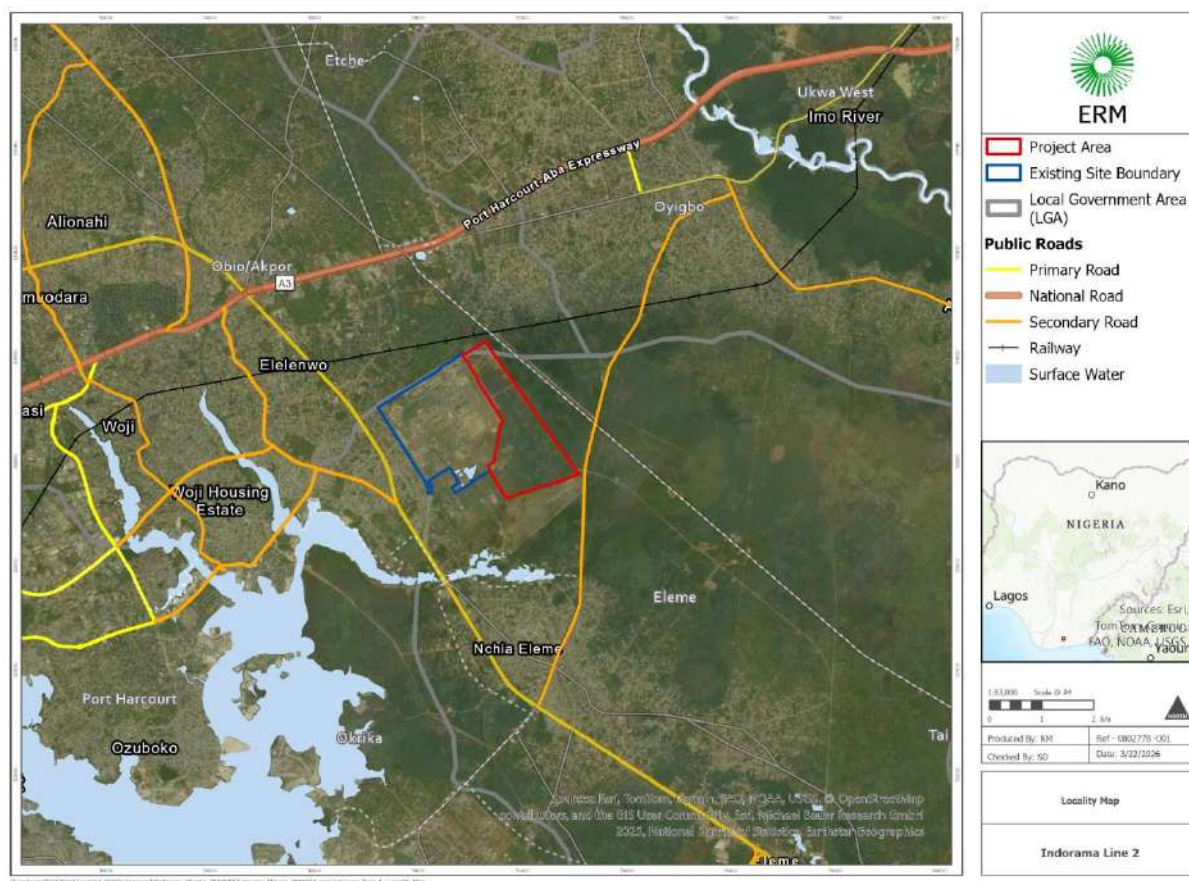


FIGURE 1-1 PROJECT LOCALITY MAP

1.3.1 LINKAGE BETWEEN PROJECT COMPONENTS, ENVIRONMENTAL AND SOCIAL RISKS AND ENGAGEMENT PRIORITIES

Table 1□1 links each principal Project component to the environmental and social risks it generates and to the resulting stakeholder engagement priority. This linkage carries through the document: the risks below determine the stakeholder groups prioritised in Section 4, the engagement objectives, methods and frequency in Section 5, the disclosure content in Section 6, and the monitoring indicators in Section 8.

TABLE 1-1 PROJECT COMPONENTS, KEY E&S RISKS AND STAKEHOLDER ENGAGEMENT PRIORITIES

Project component	Key environmental and social risk	Stakeholder engagement priority
Feed Conditioning Unit and gas	Process safety and loss of containment; flaring and	Off-site emergency preparedness and response engagement with host

Project component	Key environmental and social risk	Stakeholder engagement priority
receiving facilities (200 MMSCFD)	associated noise, light and emissions	communities, Eleme LGA, NSCDC and the Nigeria Police Force (OS4); advance notification of flaring events
Ammonia Plant (2,300 MTPD)	Major accident hazard – ammonia release; NO _x and CO ₂ emissions; steam and cooling water demand	Community chemical emergency response awareness, siren familiarisation and evacuation planning for Aleto, Akpajo, Agbonchia, Alesa and Alode; disclosure of QRA-derived risk information in non-technical form
Urea Plant (4,000 MTPD) and UFC ₈₅ unit (150 MTPD)	Particulate (urea dust) and ammonia emissions; formaldehyde handling	Disclosure of air quality monitoring results to ADI communities; odour and dust complaint route through the grievance mechanism
Emergency flares, fire and gas systems	Noise, light and perceived safety risk	Pre-notification protocol for commissioning and planned flaring; noise complaint channel
Water treatment, cooling, effluent treatment and drainage	Water abstraction; effluent discharge to surface water; impacts on downstream users and fisheries	Engagement with the Eleme Fishing Association, existing natural resource users and downstream AII communities; disclosure of effluent monitoring results
120,000 t urea storage building and product evacuation to MM FZE Port, Onne (approx. 20 km)	Traffic volumes, road safety, dust and community severance along the haulage corridor	Traffic management engagement with Onne, Alode, Ebubu, Ogale, Alesa, Umuebula, Rumukrushi, Woji, Okujagu and Abam-Ama; road safety awareness in schools along the route; NPA and Onne Port Complex liaison
Underground natural gas supply pipeline	Land access and right-of-way; restrictions on land use; third-party interference	Engagement with affected landholders and traditional authorities under OS5; pipeline right-of-way awareness and grievance access
EPC construction workforce and labour influx	Community health and safety; in-migration; SEA/SH; labour disputes; expectation pressure on employment	Contractor code of conduct disclosure; worker and community awareness on GBVH and SEA/SH; dedicated confidential complaint channel (Section 9.6.1); labour union engagement (NUCECFWW); local hiring transparency
Operations – wider Eleme Complex context	Cumulative air, noise, traffic and water impacts across the petrochemical cluster	Cumulative impact disclosure to AII communities and civil society; coordination with neighbouring operators; annual public performance update

Source: ERM, derived from the IFF Line 2 ESIA specialist studies and the Project description.

1.3.2 LIFECYCLE LINKAGE BETWEEN E&S RISK, MITIGATION AND ENGAGEMENT

During the remaining feasibility and permitting phase the dominant risks are information asymmetry and expectation formation; the mitigation is early and accurate disclosure, and

the engagement activities are ESIA disclosure, the public forum and PAC consultation. During pre-construction the dominant risks are land access, expectation escalation and contractor mobilisation; the mitigations are the host community MoU, the Local Hiring Plan and contractor pre-qualification, delivered through quarterly PAC engagement and sub-committee engagement on employment and contracts. During construction the dominant risks are labour influx, SEA/SH, traffic, noise, dust and process safety during commissioning; the mitigations are the contractor code of conduct, the GBVH procedure, traffic management, emissions and noise controls and emergency response planning, delivered through monthly Project updates, bi-monthly youth engagement, quarterly PAC engagement and community emergency response drills. During operations the dominant risks are emissions, effluent, the ammonia major accident hazard and cumulative impacts; the mitigations are the ESMP, the emergency response plan and continuous monitoring, delivered through quarterly PAC engagement, disclosure of monitoring results and ad hoc notification of exceedances and corrective actions. During decommissioning the dominant risks are livelihood and income loss and asset condition; the mitigations are advance notice, completion of outstanding MoU commitments and a transition plan, delivered through the announcement protocol and quarterly PAC engagement (Section 5.6).

1.4 STRUCTURE OF THE SEP

The remainder of this Document is structured as follows:

- Section 2: Compliance Framework
- Section 3: Principles of Engagement
- Section 4: Project Stakeholders
- Section 5: Stakeholder Engagement Plan
- Section 6: Communication & Disclosure
- Section 7: Organisational Capacity
- Section 8: Monitoring, Evaluation and Reporting
- Section 9: Grievance management procedure (GMP)
- Appendix A: Key requirements of the EIA Act
- Appendix B: Details of the PAC Agreement
- Appendix C: Grievance mechanism tools and templates
- Appendix D: Disclosure Register
- Appendix E: Stakeholder Feedback and Commitments Register

2. COMPLIANCE FRAMEWORK

The compliance framework for the proposed IFF Line 2 Project is defined by three key compliance structures, namely:

- Nigerian national legislation;
- International lender requirements; principally the African Development Bank Integrated Safeguards System (2023) and the IFC Performance Standards (2012); and
- Indorama Group's corporate commitments.

2.1 NIGERIAN NATIONAL LEGISLATION

Stakeholder engagement in Nigeria is grounded primarily in the Environmental Impact Assessment (EIA) Act of 1992, which formalises public participation as an essential component of project planning and environmental governance. Complementary provisions in the Nigerian Constitution (Section 20), mandates environmental protection, and rights-based clauses that link environmental quality to human dignity, which further reinforces the expectation for inclusive and transparent engagement.

Together, these legal instruments establish a clear obligation for companies operating in Nigeria to conduct meaningful consultations, ensure information accessibility, and incorporate community input into decision-making processes.

2.1.1 EIA ACT NO. 86 OF 1992

The Environmental Impact Assessment (EIA) Act No. 86 of 1992 forms the cornerstone of Nigeria's environmental governance system and establishes the national legal foundation for stakeholder engagement across all sectors and facilities.

As a federal law, it mandates that any public or private undertaking with the potential to significantly affect the environment must be subject to environmental assessment prior to implementation. Although initially designed to regulate project-level decision-making, its principles extend more broadly to organisational, multi-facility, and lifecycle-based engagement approaches. This makes the Act directly relevant to companies operating multiple installations where continuous engagement with communities, regulators, and other stakeholders is necessary.

Beyond procedural obligations, the Act's emphasis on early identification of environmental and social impacts, consideration of alternatives, and engagement with potentially affected communities supports an ongoing (and not solely project-bound) approach to stakeholder management. For companies with multiple operational sites, this means applying EIA principles of consultation and disclosure consistently across facilities, even in the absence of a new project requiring a formal EIA submission. Such alignment ensures coherence with national expectations, reinforces social licence to operate, and strengthens relationships across host communities and government entities.

The EIA Act is complemented by broader constitutional and environmental governance provisions. This includes Section 20 of the 1999 Constitution, which obliges the State to protect the environment, and Nigeria's public information and transparency norms, which

collectively support an environment in which ongoing stakeholder engagement is encouraged and expected.

The key requirements of the EIA Act are provided in Appendix A.

1. Public Notice

Project proponents must issue a public notice informing the public that an EIA is being undertaken. This notice typically includes the project description, location, potential impacts, and opportunities to participate.

2. Opportunity for Public Comments

The Act requires that interested groups and affected communities be given the opportunity to submit comments on the EIA documentation. This ensures that local knowledge, concerns, and suggestions are formally considered.

3. Public Hearings / Consultation Forums

The Act explicitly provides mechanisms such as public hearings, where stakeholders may present views, ask questions, or offer evidence. Public hearings may be mandated in cases of significant environmental concern or where there is substantial public interest.

4. Disclosure of Information

The Act reinforces transparency through requirements for making EIA reports publicly accessible, enabling informed participation. It establishes the creation of a public registry, ensuring that environmental documents are available for inspection.

5. Engagement Throughout the Assessment Process

The broader EIA regulatory framework (as described in Nigerian EIA practice guidance) reinforces that participation must occur across multiple steps, including:

- Project screening and scoping
- Review of the Environmental Impact Statement (EIS)
- Final decision-making

Public participation is not a single event but an ongoing requirement during key stages of assessment.

6. Consideration of Public Input in Decision-Making

The Act prohibits issuing a decision until the required public comment period has elapsed and submissions are considered, i.e. the regulators must consider stakeholder feedback before granting approval.

Public entry points into the EIA process are contained in four distinct stages of the EIA:

- **Scoping Phase:** A scoping workshop must be convened during this stage, particularly where public interest is significant. This workshop should include key stakeholders to ensure early input into project planning.
- **Drafting Phase:** Stakeholders are expected to participate in the preparation of the EIA. Records of consultations, such as proceedings from public forums and surveys,

should accompany the draft EIA to reflect community perspectives and social baseline information.

- **Review Phase:** During the review period, EIA documents may be disclosed for public access for a minimum of 21 working days. Disclosure should occur at designated locations, including Local Government Area offices, State Environmental Protection Agency offices, and the Federal Ministry of Environment headquarters. Additional locations may be considered to enhance accessibility. Project-affected communities should be invited to participate through public notices, such as newspaper advertisements.
- **Public Hearing:** For projects classified under Category 1, a formal public hearing is required to provide an opportunity for stakeholders to comment on the proposed development.

These requirements ensure that communities and stakeholders have a meaningful role in shaping environmentally significant decisions in Nigeria.

2.1.2 NIGERIAN IMMIGRATION ACT, 2015

Nation regulatory framework to include Nigeria Immigration Act. Under PS2 ESMS, may look into the aspects outlined in Table 2-1 below for consideration.

TABLE 2-1 IMMIGRATION-RELATED ESMS CONSIDERATION

Project phase	Immigration-related ESMS consideration
Construction phase	Foreign Engineering, Procurement, Construction (EPC) contractors, vendor specialists, commissioning teams, migrant workers, temporary work permits, expatriate quota positions, worker accommodation, labor influx, community health and safety, and contractor compliance
Operation phase	Long-term expatriate staff, technical operators, maintenance specialists, foreign management personnel, renewal of permits, knowledge transfer, Nigerian understudy arrangements, and ongoing compliance monitoring

2.2 INTERNATIONAL REQUIREMENTS

The following list sets out the engagement-specific requirements aligning to good international practice standards.

The following list highlights the key relevant international conventions and standards:

- International Labor Organisation (ILO) conventions including:
- Core ILO conventions:
- Freedom of Association and Protection of the Right to Organize Convention; 1948 (No. 87); ratified on 6 November 1957;
- Right to Organize and Collective Bargaining Agreement; 1949 (No. 98); ratified on 3 July 1949;
- ILO Forced Labor Conventions; 1930 (No. 29); ratified on 29 November 1955;
- Abolition of Forced Labor Convention; 1957 (No. 105); ratified on 23 October 1958;

- Minimum Age Convention 1973 (No. 138); ratified on 9 June 1999;
- Worst Forms of Child Labor Convention 1999 (No. 182); ratified on 6 May 2002;
- Equal Remuneration Convention 1951 (No. 100); ratified on 26 July 1960;
- Discrimination regarding employment and occupation Convention; 1958 (No. 111) ratified on 10 May 1960.
- Governing conventions:
- Labor Inspection Convention 1947 (No. 81); ratified on 11 October 1956;
- Employment Policy Convention, 1964 (No. 122); not ratified;
- Labor Inspection in Agriculture Convention; 1969 (No. 129); ratified on 20 June 2003; and
- Tripartite Consultation (International Labor Standards) Convention, 1976 (No. 144), ratified on 25 March 1982.
- Other relevant conventions and treaties:
- United Nations Framework Convention on Climate Change (UNFCCC) ratified on 12 May 1994;
- Stockholm convention ratified on 02 May 2003;
- Kyoto Protocol ratified on 12 January 2005;
- Paris Agreement ratified on 12 December 2015;

2.2.1 THE AFRICAN DEVELOPMENT BANK INTEGRATED SAFEGUARDS SYSTEM (2023)

The African Development Bank is a lender to the Project. The Bank's Integrated Safeguards System (ISS, 2023) comprises the Environmental and Social Policy and ten Environmental and Social Operational Safeguards (OS1 to OS10). The Operational Safeguards of primary relevance to stakeholder engagement for this Project are:

- **OS1** – Assessment and Management of Environmental and Social Risks and Impacts, which requires stakeholder engagement to be an integral part of the environmental and social assessment and of project design.
- **OS2** – Labour and Working Conditions, which requires a grievance mechanism for project workers that is separate from the community mechanism, and engagement with workers' organisations.
- **OS4** – Community Health, Safety and Security, which requires engagement with affected communities on emergency preparedness and response and on the conduct of security personnel.
- **OS5** – Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement, which imposes additional disclosure and consultation requirements where land access or use restrictions arise, including for the natural gas supply pipeline right-of-way.
- **OS7** – Vulnerable Groups, which requires the identification of individuals and groups who may be disproportionately affected or less able to benefit, and differentiated engagement measures for them.

- **OS8:** Cultural Heritage, which Requires protection of tangible and intangible cultural heritage and implementation of chance finds procedures where appropriate.
- **OS10** – Stakeholder Engagement and Information Disclosure, which is the principal safeguard governing this SEP and which sets out requirements for stakeholder identification and analysis, the content and disclosure of the SEP, information disclosure, meaningful consultation, engagement during implementation, grievance mechanisms, and organisational capacity and budget.

Independent Recourse Mechanism. Under the ISS, project-affected parties who consider that they are, or are likely to be, adversely affected as a result of the Bank Group's failure to comply with its own policies and procedures may submit a request to the Bank's Independent Recourse Mechanism (IRM).

2.2.2 THE IFC PERFORMANCE STANDARDS

The International Finance Corporation (IFC) Performance Standards (2012) are considered a benchmark for good practice for environmental and social (E&S) risk management in private sector developments. The IFC PSs require that clients engage affected communities through disclosure of information, consultation, and informed participation, in a manner proportional to the risks to and impacts of the project on the affected communities.

The IFC PSs include specific guidance on conducting stakeholder engagement both during the planning phase and throughout the project lifecycle. While IFC has initiated a multi-year update to its Sustainability Framework¹ (launched in April 2025), the 2012 Performance Standards, and their 2021-updated Guidance Notes, currently remain in effect for project-level requirements.

Stakeholder engagement requirements are primarily contained in PS 1: Assessment and Management of E&S Risks and Impacts. Key components relevant to Indorama's operations are as follows:

1. Maintain an up-to-date Stakeholder List

Operations must maintain a current record of all stakeholders within and around the facility, indirectly affected groups, traditional leaders, and vulnerable or disadvantaged people. This list must be reviewed regularly as community structures and settlement patterns change.

2. Provide Regular, Accessible Information

Indorama must share clear, timely, and understandable updates with communities on operational activities. This includes scheduled maintenance, transport movements, emissions or noise-related issues, and any changes that may affect the public. All information must be accessible in appropriate local languages and formats to ensure full understanding.

¹ IFC Performance Standards on Environmental and Social Sustainability: <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards>

3. Conduct Meaningful Routine Consultations

Operational teams should hold predictable engagement sessions (e.g. such as quarterly community meetings or issue-specific discussions) to gather feedback and respond to ongoing concerns. Consultations must be inclusive, culturally appropriate, and proportionate to the level of risk. Where community representatives are used, operations staff must verify that they legitimately represent local views, and vulnerable groups are included or (as a minimum) fairly represented.

4. Operate a Functional Grievance Mechanism

A simple, accessible, and confidential grievance mechanism must be available at all times. Operations must log every grievance, investigate promptly, communicate outcomes, and document resolution steps. The mechanism should be usable by vulnerable groups and must stay active throughout the facility's operational life.

5. Report Back to Communities Regularly

Operations must provide periodic updates to communities on concerns raised, actions taken, monitoring results, and any operational adjustments. This reporting helps maintain trust and ensures transparency around risks, performance, and mitigation measures.

6. Documentation

All engagement activities must be recorded and stored in a manner that protects personal information but is accessible to the teams that require it. This includes meeting notes, disclosure materials, grievance logs, responses, and follow-up actions. These records support compliance with IFC PS1 and provide evidence for internal reviews, lender monitoring, and audits.

2.3 CORPORATE COMMITMENTS

Indorama Group's corporate commitments are anchored in its sustainability vision, ethical business practices, and structured stakeholder engagement approach. These commitments guide operations across all facilities and ensure alignment with international standards, national regulations, and community expectations.

2.3.1 CODE OF CONDUCT

The Indorama Code of Conduct (Version 3, effective 18 July 2024) establishes the ethical foundation for all business activities. It emphasises a culture of integrity, accountability and ethical decision-making, providing clear guidance for employees at all levels. The Code of Conduct is a publicly disclosed corporate document. It is published on the Indorama group policies page at <https://www.indorama.com/about-us/group-policies>. A Nigeria-hosted copy is available at <https://indoramafertilizers.com/images/code-of-conduct.pdf>. Its guiding principles are:

- Integrity and Transparency: Commitment to honesty, fairness, and anti-corruption practices.
- Speak-Up Channels: Multiple confidential reporting mechanisms, including internal hotlines and escalation to the Board.

- **Conflict of Interest Management:** Clear guidance on disclosure and prohibition of personal gain through company dealings.
- **Accountability:** Breaches may result in disciplinary action, with proactive self-reporting considered favourably.

2.3.2 STAKEHOLDER ENGAGEMENT STRATEGY

The Stakeholder Engagement Strategy provides a structured approach for identifying, engaging and monitoring stakeholders. Aligned with the AA1000 Stakeholder Engagement Standard (AA1000SES), it provides a consistent, systematic approach to stakeholder engagement across Indorama's global operations, organised into four sequential phases – Plan, Prepare, Implement, and Monitor and Improve. Each phase is set out below together with the Project-specific action taken and the exact section or table of this SEP in which that phase is operationalised for IFF Line 2.

Phase 1 – Plan

Purpose. Profile and map stakeholders, select engagement methods appropriate to each group, define disclosure boundaries and prepare an engagement plan with objectives, schedule and responsibilities.

Project action and where it is operationalised. Stakeholder profiling and mapping is delivered through the Area of Influence delineation (Section 4.1 and Figures 4-1 and 4-2), the stakeholder identification register (Table 4-2), the influence-interest assessment (Tables 4-3, 4-4 and 4-6) and the impact-support analysis (Table 4-8), with the traceability from classification to commitment shown in Table 4-11. Engagement methods and minimum records per approach are selected in Table 4-5 and Table 4-10, and per phase in Table 5-2. Disclosure boundaries and the information to be released are defined in Sections 6.1 to 6.4 and Table 6-3. The engagement plan itself is Section 5.

Owner and records: Head of Community Relations & Development; stakeholder database, stakeholder register and approved SEP.

Phase 2 – Prepare

Purpose. Allocate resources, build the capacity of the engagement team, and identify and mitigate engagement risks such as miscommunication, exclusion or cultural insensitivity.

Project action and where it is operationalised. Roles, accountabilities and organisational capacity are defined in Sections 7.1 to 7.5; the tentative SEP implementation budget is at Section 7.6. Training and capacity building for Community Relations Officers, grievance handlers, contractors, security personnel and PAC members is set out in Sections 5.12 and 9.9.5. Engagement risk is managed through the conflict-sensitive engagement protocol and the conflict escalation and dispute management protocol (Section 5.2.1), the differentiated measures for vulnerable and disadvantaged groups (Table 4-7) and the anti-retaliation commitment (Section 4.4).

Owner and records: Head of Community Relations & Development and E&S Corporate Team; approved budget, training register and risk log.

Phase 3 – Implement

Purpose. Invite and brief stakeholders through clear and inclusive outreach, engage using culturally appropriate channels, and record the engagement and the insights arising from it.

Project action and where it is operationalised. Outreach, briefing and engagement delivery are set out in the phase-by-phase programme at Sections 5.3 to 5.6 and Table 5-2; the channels selected for each group and the reason for their selection are at Table 6-1; language and accessibility arrangements are at Section 6.2. The minimum record for every engagement – meeting notice, briefing document, minutes or resolution, attendance register disaggregated by sex, and photographic record – is required by Table 4-5, Table 4-10 and Section 8.2, and every external release is entered in the Disclosure Register (Appendix D).

Owner and records: Community Relations Officers, under the accountability of the Head of Community Relations & Development; minutes, attendance registers, Disclosure Register (Appendix D).

Phase 4 – Monitor and Improve

Purpose. Operate a feedback loop so that stakeholder input demonstrably influences decision-making, maintain the grievance mechanism, monitor engagement effectiveness and track responses.

Project action and where it is operationalised. The feedback loop is delivered through the Stakeholder Feedback and Commitments Register (Appendix E), the Consultation Outcomes Matrix (Table 5-7) and the historical feedback, action and status matrix (Table 5-4). The grievance mechanism is Section 9. Key performance indicators, monitoring responsibilities, frequency, data sources and the review and revision cycle are at Section 8, Table 8-2 and Table 8-1, and disclosure of outcomes to stakeholders who were not present is required by Section 8.2.

Owner and records: Grievance Manager and E&S Corporate Team, reporting to the Stakeholder Engagement Steering Committee (Section 7.5); quarterly engagement performance report, grievance analytics and annual SEP review record.

3. PRINCIPLES OF ENGAGEMENT

The key principles guiding the Project's approach to stakeholder engagement are as follows:

- **Transparency:** to be open and transparent with stakeholders.
- **Accountability:** to be willing to accept responsibility as a corporate citizen and to account for impacts associated with the Project activities.
- **Trust:** to have a relationship with stakeholders that is based on mutual commitment to acting in good faith.
- **Mutual Respect:** to respect stakeholders' interests, opinions and aspirations.
- **Collaboration:** to work cooperatively with stakeholders to find solutions that meet common interests.

- **Responsiveness:** to coherently respond in good time to stakeholders.
- **Proactiveness:** to act in anticipation of the need for information or potential issues.
- **Fairness:** to engage with stakeholders such that they feel they are treated fairly, and their issues and concerns are afforded fair consideration.
- **Accessibility:** to be within reach of stakeholders so that they feel heard and to provide meaningful information as needed.
- **Inclusivity:** to proactively anticipate, identify and include all stakeholders.

These principles have informed the Project's approach to stakeholder engagement.

4. PROJECT STAKEHOLDERS

To develop an effective SEP, it is necessary to identify Project stakeholders and understand their interest, priorities and objectives in relation to the Project. For the purposes of this SEP, a stakeholder is defined as any individual or group – including, expressly, vulnerable and disadvantaged individuals and groups – who is potentially affected by the Project, or who has an interest in the Project and its potential impacts.

By classifying and analysing the influence and support of various levels of stakeholders, it is possible to develop a Plan that is tailored to the needs of different stakeholder groups. It is also important to understand how each stakeholder across the project area of influence may be affected by the Project (or perceives they may be affected by the Project) so that engagement can be tailored to address their views and concerns in an appropriate manner.

Stakeholder interests are incorporated into Project design and implementation through four defined routes: (i) issues affecting engineering design, emissions controls, layout, traffic routing or scheduling are referred to the Project engineering team and the EPC contractor for assessment, and where accepted are recorded as design changes; (ii) issues affecting environmental and social management are incorporated into the ESIA mitigation measures and the ESMP as auditable commitments; (iii) issues relating to employment, contracting, skills, education and community infrastructure are referred to the relevant PAC sub-committee and, where accepted, incorporated into the host community MoU and the annual community development budget; and (iv) issues relating to communication, access or the conduct of engagement itself are incorporated into the next revision of this SEP. Every issue and its disposition are recorded in the Stakeholder Feedback Register (Appendix E) and reported back to the originating group (Table 5-7).

METHODOLOGY FOR STAKEHOLDER CLASSIFICATION AND PRIORITISATION

Stakeholders are classified and prioritised using a six-criterion assessment rather than influence and support alone. Each stakeholder cluster is scored on a 1–5 scale against the following criteria, and the resulting composite determines the engagement approach, frequency, method and level of participation set out in Table 4-5 and Table 5-2:

- **Nature of potential impact** – the type of Project impact to which the group is exposed, drawn directly from the ESIA specialist findings (air, noise, water, traffic, process safety, land, livelihood, labour, security).
- **Magnitude of potential impact** – the severity of that impact on the group, assessed as negligible, minor, moderate, major or critical, before mitigation.
- **Likelihood of impact** – the probability of the impact occurring, from remote to certain, so that low-probability high-consequence exposure (for example the ammonia major accident hazard) is captured and not discounted.
- **Vulnerability** – whether the group is more likely to be adversely affected, or more limited than others in its ability to benefit from or participate in engagement, by reason of gender, age, disability, widowhood, literacy, language, income, dependence on natural resources, or exclusion from customary decision-making structures. Vulnerability applies an upward weighting to priority and can raise a group into a higher engagement category irrespective of its influence.

- **Geographical proximity** – residence, land use, livelihood dependence or transit within the Area of Direct Influence or along the product evacuation corridor.
- **Interest and ability to influence** – the group's level of interest in the Project and its ability to affect approvals, mobilise others, or otherwise shape Project decisions.

Where the impact-based criteria and the influence-based criteria point in different directions, the impact and vulnerability criteria prevail for the purpose of setting engagement intensity. This is the basis on which directly affected communities, women, youth, widows, persons with disabilities and existing natural resource users are treated as high-priority stakeholders in Section 4.3, notwithstanding their limited formal influence.

4.1 AREA OF INFLUENCE

The Area of Influence (AoI) for the proposed IFF Line 2 Fertilizer Project was established to provide a credible spatial basis for stakeholder identification and engagement, in line with the intent of IFC Performance Standard 1 (PS1). The delineation also demonstrates alignment with the African Development Bank Integrated Safeguards System (2023), specifically OS1, which requires the environmental and social assessment to establish the project's area of influence including areas affected by associated facilities and by cumulative and induced impacts, and OS10 paragraph 21(a), which requires the area of influence to be disclosed to stakeholders in non-technical form. The AoI defines the geographic areas within which Indorama's operational activities may reasonably result in direct, indirect, or cumulative environmental and social impacts, and therefore where engagement is required.

Rather than applying fixed distance buffers or administrative boundaries, the AoI was determined using an impact-pathway-based approach, aligned with international best practice and lender expectations. The methodology relied on the consolidation and integration of existing specialist studies and professional judgement, without undertaking new fieldwork or modelling.

4.1.1 SPECIALIST AOI DELINEATION

An AoI has been developed for the Eleme Complex. This is based on the consolidation of the findings of biophysical and social disciplines, namely air quality, noise, surface water, groundwater, biodiversity, social, cultural heritage, traffic, and quantitative risk. Each of these have established Areas of Direct Influence (ADI) and Areas of Indirect Influence (AII) based on:

- Review of existing ESIAs, monitoring data, modelling outputs and specialist studies;
- Identification of credible biophysical and social impact pathways (e.g. air dispersion, hydrological connectivity, transport corridors, socio-economic interaction);
- Application of data-driven evidence, supplemented by professional judgement where uncertainty existed;
- Alignment with IFC Performance Standards, AfDB Operational Safeguards, Nigerian regulatory requirements, and recognised international guidance. Specifically, the delineation applies IFC PS1 and AfDB OS1 which require the area of influence to comprise the area affected by the project and the client's associated facilities, impacts from unplanned but predictable developments, and cumulative impacts from existing projects in the area; and AfDB OS1 paragraphs on the scope of the environmental and social assessment, which require the assessment boundary to include the project footprint, associated facilities (here

the natural gas supply pipeline and the MM FZE Port facilities at Onne), the transport corridor, and the areas subject to cumulative effects from the wider Eleme petrochemical cluster.

The ADI reflects areas where direct, measurable impacts may occur during normal operations, while the AII captures broader areas where secondary, cumulative, or low-probability effects may reasonably arise, or where communities may be indirectly affected.

The consolidated AoI was generated by spatially overlaying and amalgamating all specialist-defined ADIs and AIIs. This ensured that the final AoI envelope reflects the maximum credible extent of influence across all relevant impact pathways, rather than being driven by a single environmental or social aspect.

In practice, this meant that:

- Where one discipline identified a wider area of influence (e.g. surface water or biodiversity), this extent informed the consolidated AoI, even if other disciplines had smaller footprints;
- The consolidated ADI represents the union of all discipline-specific direct influence zones; and
- The consolidated AII represents the union of all discipline-specific indirect influence zones, acknowledging cumulative effects across operations.

This integrative approach avoids under-representation of potential impacts and ensures that stakeholder engagement remains inclusive, proportionate, and risk-based.

The AoI and relevant communities (directly and indirectly influenced) are shown in

Figure 4-1 and the transport route is shown in Figure 4-2.

4.1.2 APPLICATION TO STAKEHOLDER ENGAGEMENT

The consolidated AoI forms the spatial foundation for:

- Identification of affected communities and broader stakeholder groups;
- Differentiation between directly affected stakeholders (typically within the ADI) and those requiring contextual or cumulative engagement (within the AII);
- Tailoring engagement approaches, disclosure levels, and grievance access in line with the nature, scale, and likelihood of potential impacts.

Access to the Project grievance mechanism is not restricted by location. The Area of Influence determines the intensity of proactive engagement and the level of disclosure; it does not determine eligibility to lodge a grievance. Any person or group – whether resident within the Area of Direct Influence, the Area of Indirect Influence, or entirely outside the Area of Influence – may lodge a grievance through any of the channels set out in Section 9.6 where a Project-related impact is reasonably alleged, and that grievance will be received, registered, screened and responded to on its merits. Where a grievance is found on screening to be unrelated to Indorama's operations, it will be declared ineligible with reasons recorded and communicated (Section 9.5); it will not be rejected on the ground of the complainant's location.

Where uncertainty or data limitations exist (e.g. groundwater usage beyond the immediate area), conservative assumptions were applied, and these limitations are explicitly acknowledged to support transparency and adaptive management.

4.1.2.1 APPLICATION OF PROFESSIONAL JUDGEMENT AND KEY ASSUMPTIONS

Professional judgement was applied in delineating the Area of Influence where the available information did not allow the spatial extent of an impact pathway to be defined solely from current project-specific modelling or monitoring.

The Area of Influence assessment distinguishes between the Area of Direct Influence (ADI), within which direct and measurable project-related effects may occur, and the Area of Indirect Influence (AII), which captures secondary, cumulative or otherwise indirect influence. Precautionary assumptions are principally applied to the AII and to those discipline-specific screening areas for which the underlying specialist assessment expressly identifies a conservative or provisional boundary.

Table 4-1 records the principal uncertainties and assumptions that materially influence stakeholder identification for the Eleme Complex, associated transport routes and Onne Port operations. The table does not create new Area of Influence boundaries. Rather, it records how the boundaries established in the Area of Influence report are to be translated into stakeholder identification and engagement under this SEP.

Where the spatial boundaries established for different specialist disciplines do not coincide, the consolidated Area of Influence is the spatial union of the applicable discipline-specific ADI and AII boundaries. Accordingly, a community or receptor may fall within the consolidated ADI because of one impact pathway even where it lies within the AII, or outside the influence zone,

for another pathway. Stakeholder classification therefore follows the most relevant applicable impact pathway and is not determined solely by distance from the Complex.

TABLE 4-1 UNCERTAINTIES, CONSERVATIVE ASSUMPTIONS AND THEIR EFFECT ON THE AREA OF INFLUENCE AND ON STAKEHOLDER ENGAGEMENT

Uncertainty or data limitation	Decision / assumption adopted	Precautionary basis	Effect on ADI / AII	Stakeholder identification and SEP action
Air quality — cumulative Complex-wide modelling was available.	Use Train 3, monitoring and cumulative modelling. Complex ADI = 0–3 km; AII = 3–5 km. Port ADI = 500 m.	Modelling indicates negligible impacts beyond 3 km, but 3–5 km is retained for cumulative/uncertain effects.	Maintains a 3 km ADI and 5 km outer AII around the Complex.	ADI communities include Agbonchia, Aleto, Akpajo, Elemenwo, Iriebe and Agbonchia Farms.
Noise — abnormal or construction conditions may differ from normal operations.	Noise ADI = operational footprint, perimeter roads and fence line; AII = approximately 1 km to nearby sensitive receptors.	Modelling predicts compliance at and beyond the site boundary; 1 km captures potentially perceptible noise.	Noise does not extend the ADI to the 3 km air-quality boundary.	Include nearby sensitive receptors, including Iriebe, Umrolu, Elemwo and Akpajo, for issue-specific engagement, grievance access and monitoring follow-up.
Surface water.	Complex ADI = outfall to first Okulu confluence (~2.5 km downstream + 0.3 km upstream); AII = up to 5 km downstream + 1 km upstream beyond ADI. Road and Port corridors follow connected drainage/water pathways.	Uses identifiable hydrological pathways and conservative distance limits pending better flow, tide and drainage data.	Creates a pathway-based, rather than radial, AoI along connected waters.	Aleto and Okerewa are within the Complex ADI; Agbonchia and Njuru within the AII. Include relevant downstream communities, estuarine users and resource users in engagement

Uncertainty or data limitation	Decision / assumption adopted	Precautionary basis	Effect on ADI / AII	Stakeholder identification and SEP action
				and monitoring disclosure.
Groundwater — Community groundwater use, boreholes, shallow wells and the precise outer influence	Apply a 5 km groundwater AoI around the Complex based on abstraction/drawdown evidence.	Appreciable drawdown has been identified several kilometres from the Complex; 5 km provides conservative screening.	Groundwater may extend the consolidated AoI beyond the 3 km air/social ADI.	Indicative receptors include Aleto, Agbonchia and Njuru.
Biodiversity; future expansion impacts are not fully quantified.	Use existing ESIA biodiversity limits: terrestrial indirect influence to approximately 4 km; aquatic direct influence approximately 1 km downstream and indirect influence to 5 km downstream.	Retains established study areas and ecological connections pending additional data.	AoI follows habitat and aquatic connectivity, not only settlement boundaries.	Relevant communities include Agbonchia, Aleto, Okerewa, Njuru and Elelenwo.
Social impacts —future in-migration.	Complex social ADI = 0–3 km; AII = 3–5 km. Road social ADI = approximately 500 m; AII = 500 m–1 km.	Captures indirect effects such as in-migration, service pressure and cumulative socioeconomic change.	Extends social engagement beyond the MoU communities without changing benefit entitlement.	ADI includes Wakoahu, Iriebe, Agbonchia, Aleto, Akpajo, Njuru and Okerewa. AII includes Alesa, Alode, Ogale, Ebubu, Umuebula, Rumukrushu, Woji, Abam-Ama and Okujagu. Engage according to relevant social risks and grievance access.

Uncertainty or data limitation	Decision / assumption adopted	Precautionary basis	Effect on ADI / AII	Stakeholder identification and SEP action
Cultural heritage —no receptors confirmed.	ADI = Complex and Port operational footprints; AII = 500 m around those boundaries.	Provides screening for previously unidentified or contextual heritage effects.	Does not materially extend the consolidated AoI established by other disciplines.	No specific receptor identified.
Traffic and transport — future road conditions may change.	Traffic ADI = primary project routes: Uzaku-Alese Road, East West Road, Onne Road, Federal Ocean Terminal Roadway and roads within Onne Port. AII = intersecting public roads within approximately 1 km.	Captures both direct project traffic and secondary redistribution/congestion effects.	The transport route is a linear ADI, with adjoining/intersecting roads forming the AII.	Relevant indirect receptors include Onne, Ogu and the wider Port Harcourt corridor. Provide traffic-management, road-safety
Quantitative Risk Assessment — QRA results depend on population, meteorological, isolation and detection assumptions.	Use location-specific risk contours. ADI extends up to approximately 250 m north of the Complex; AII up to approximately 1.3 km north-west and 600 m south-west.	Off-site populations were conservatively assumed to be outdoors and key assumptions were sensitivity-tested.	QRA is contour-based and does not determine the wider consolidated AoI where other pathways extend further.	Iriebe is associated with the mapped ADI, while Elemwo and Akpajo are within the AII. Engagement

The AoI for the Eleme Complex has been used as a proxy for the IFF Line 2 Project, as it encompasses the area of potential influence of the proposed project and the potential cumulative impacts of the broader complex activities.

FIGURE 4-1 AREA OF INFLUENCE AND RELATED COMMUNITIES

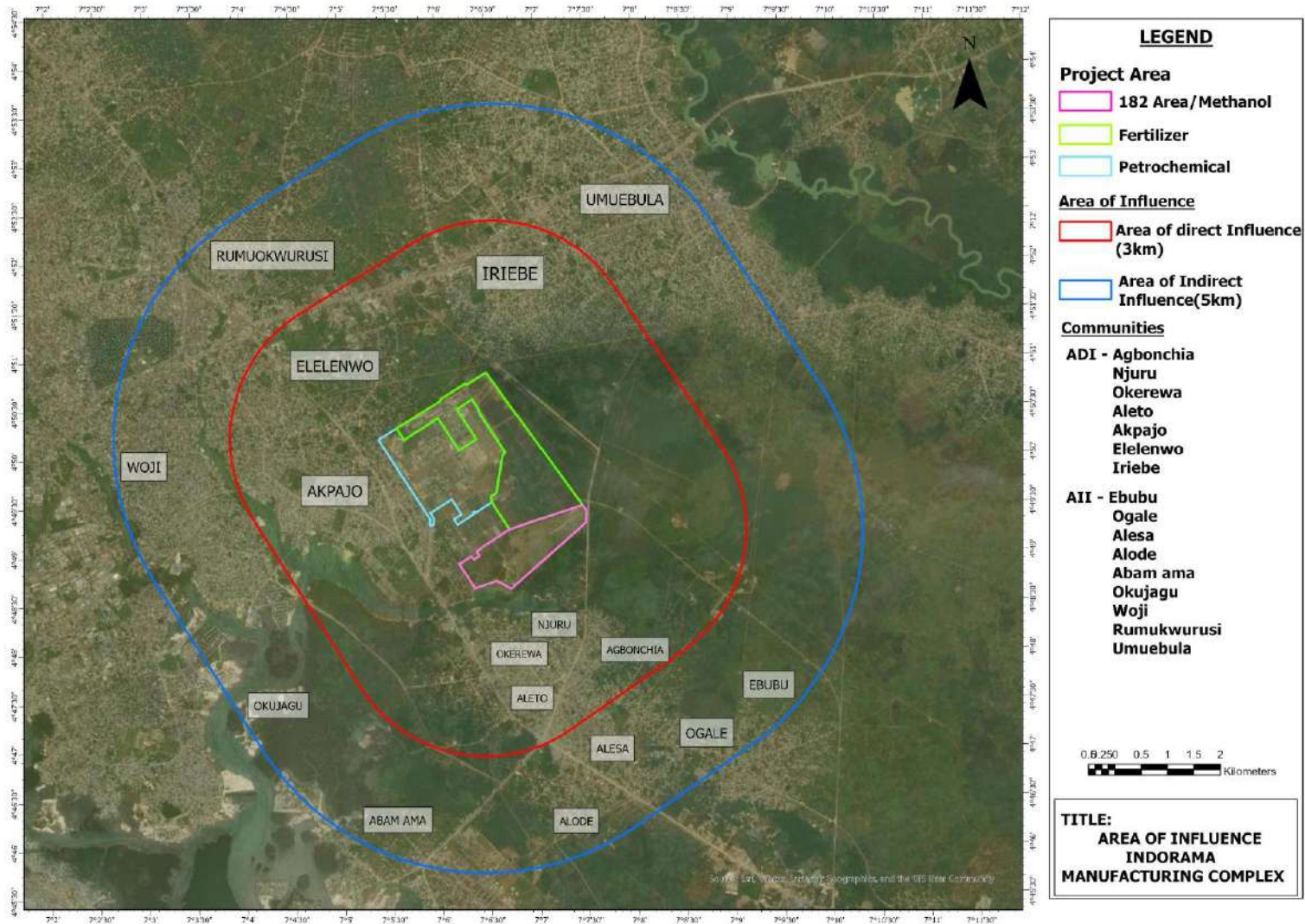
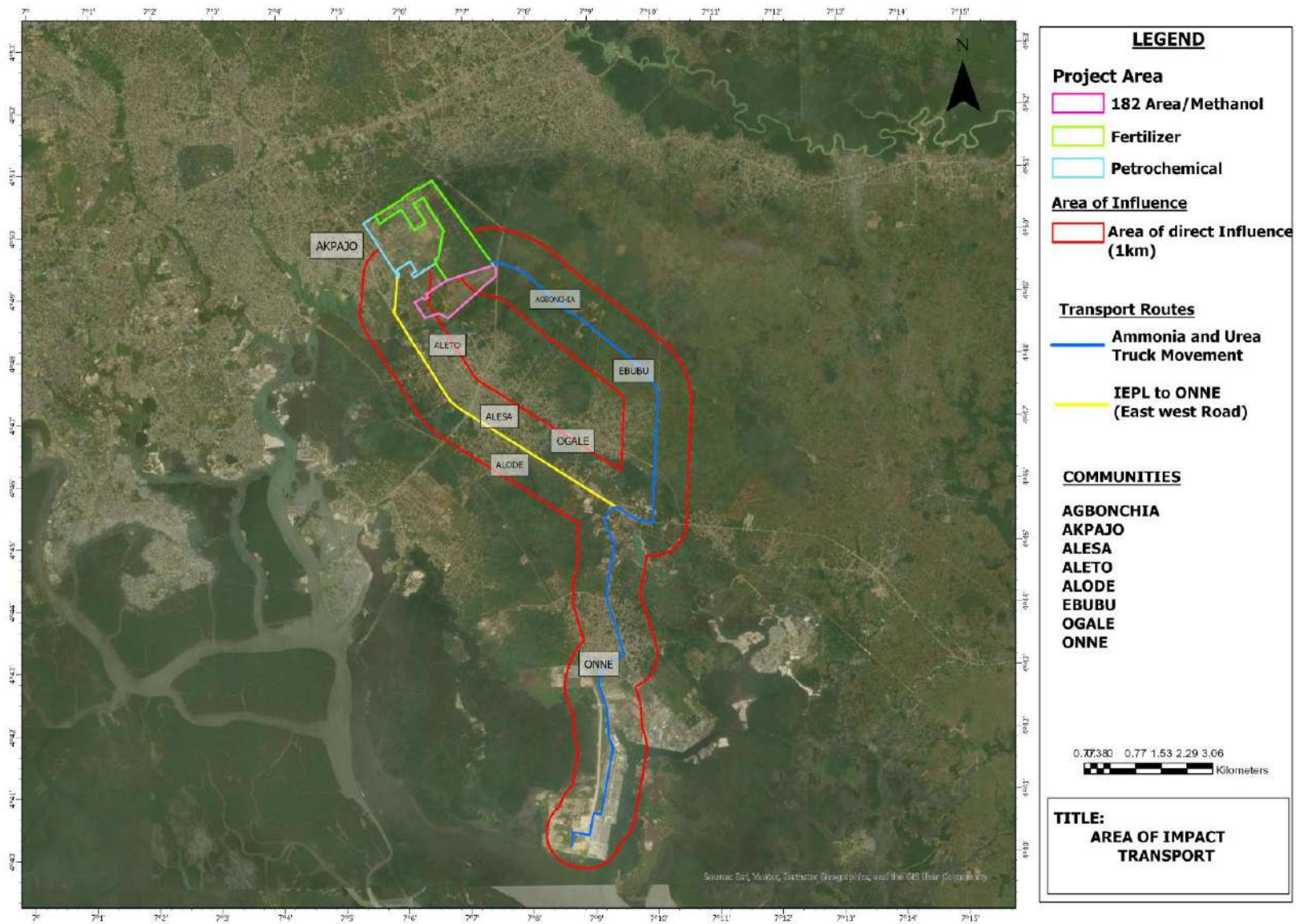


FIGURE 4-2 TRANSPORT ROUTE AND RELATED COMMUNITIES



4.2 STAKEHOLDER IDENTIFICATION AND MAPPING

4.2.1 METHODOLOGY SUMMARY

Indorama's stakeholder identification follows a systematic process in accordance with the requirements of IFC PS1 and is based on previous ESIA processes and Indorama's existing databases.

The process builds on Indorama's existing stakeholder lists and ESIA-phase engagement records but expands and updates them to reflect current operational realities across the Eleme Complex, transport corridors, and Onne Port (**Figure 4-3**).

The methodology also applies the stakeholder identification and analysis requirements of the AfDB Integrated Safeguards System (2023). In accordance with OS10 paragraphs 12 to 14, stakeholders have been separated into project-affected parties – individuals or groups who are, or are at risk of being, affected by the Project directly or indirectly – and other interested parties, who have an interest in the Project but are not affected by it. Within the project-affected parties, and in accordance with OS10 paragraph 13 and OS7, those who may be vulnerable by reason of their particular circumstances have been separately identified, on the basis that they may hold different concerns and priorities regarding Project impacts, mitigation and benefits, and may require different or separate forms of engagement. The level of detail in the analysis has been set so as to determine the appropriate level and form of communication for each group. Where engagement depends substantially on community representatives – which at this Project it does, through the PAC, traditional rulers and community development committees – the verification requirement of OS10 paragraph 19 has been applied through the measures described in Sections 4.5.1 and 5.2.1.

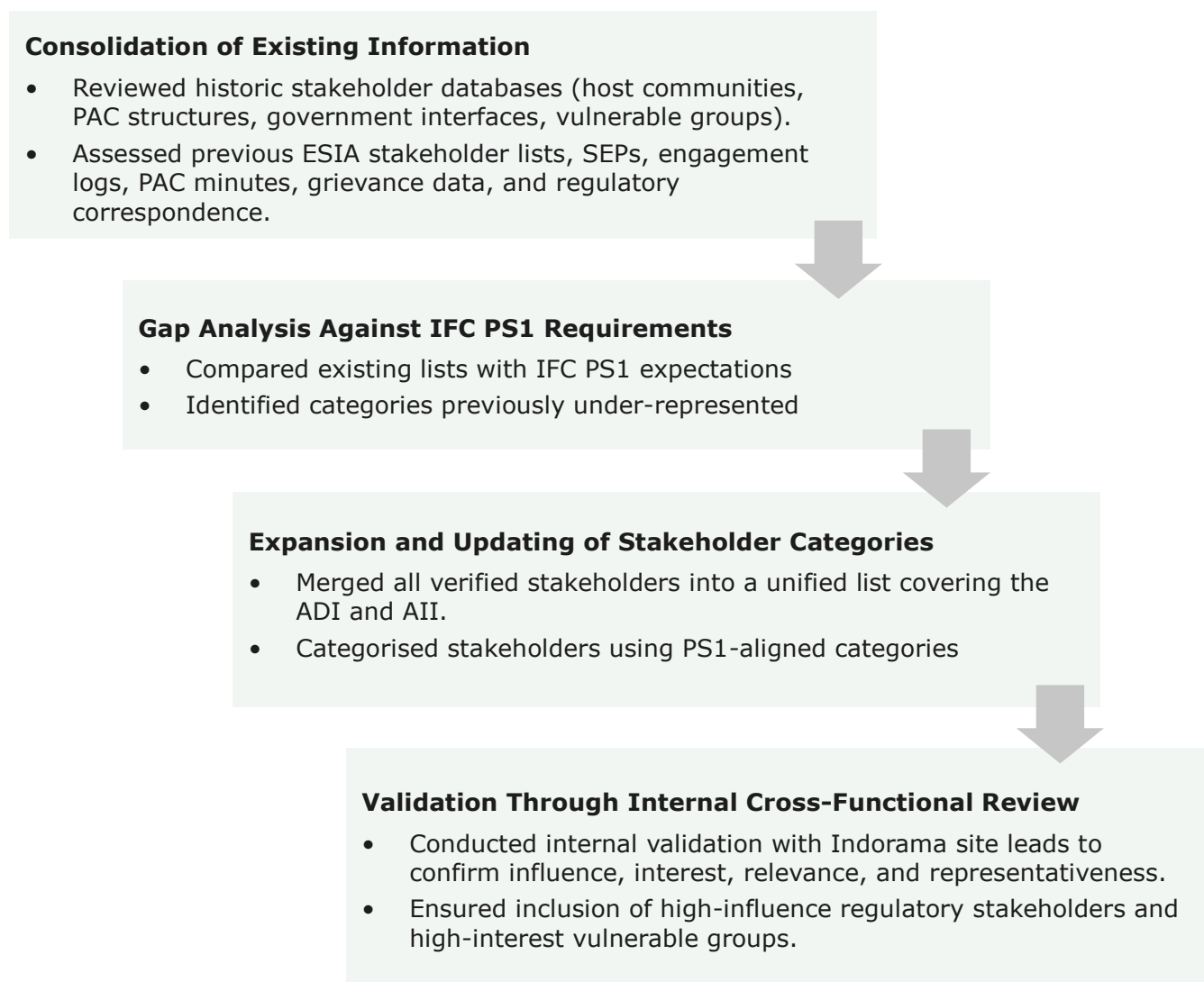


FIGURE 4-3 SUMMARY OF STAKEHOLDER IDENTIFICATION PROCESS

4.2.2 STAKEHOLDER IDENTIFICATION

Given that the Project is an expansion of an existing operational site, the design of the SEP for IFF Line 2 Project will largely build on the activities already undertaken for IFZ Line 1 and Line 2 including IFF Line 1, and the consolidated operational-level stakeholder engagement strategy for the broader Indorama operations in Eleme LGA (ERM, 2026). The stakeholders for the IFF Line 2 Project have therefore been extracted from the existing stakeholder database, as presented in **Table 4-2** below.

As this SEP is a living document, stakeholder identification and mapping will continue through the duration of the ESIA. Should additional stakeholders be identified during the stakeholder engagement for the IFF Line 2 Project, this database will be updated.

A full database of all stakeholders should be maintained separately from the SEP and should be updated as new stakeholders are identified, or at least on an annual basis.

4.2.3 LINKING STAKEHOLDERS TO ENGAGEMENT APPROACHES

Each matrix sections corresponds to a different level of engagement intensity, ranging from collaboration with high-influence/high-interest stakeholders to periodic information sharing with those with lower influence or interest. This link ensures consistency in how Indorama allocates resources, plans meetings, conducts outreach, and monitors commitments.

Table 4-2 provides the outcomes of the influence-interest matrix assessment.

TABLE 4-2 STAKEHOLDER IDENTIFICATION

Stakeholder Category	Stakeholder Groups	Stakeholders	Connection to Project
Government	- Federal Ministry of Environment - Rivers State Ministry of Environment - Rivers State Ministry of Chieftaincy and Community Affairs - Nigerian Ports Authorities - Eleme Local Government	- Director, Environment Assessment Department, Federal Ministry of Environment - Director, Pollution Control & Environment Health Department, Federal Ministry of Environment - Rivers State Commissioner of Ministry of Environment - Director, Pollution Control Department, Rivers State Ministry of Environment - Director, Environment Assessment Department, Rivers State Ministry of Environment - DG, National Environmental Standards and Regulations Enforcement Agency (NESREA) - Director, Planning & Policy analysis, National Environmental Standards and Regulations Enforcement Agency (NESREA) - Rivers State Commissioner of Chieftaincy & Community Affairs - Chief Environment Office, NPA, Onne Port Complex, - Supervisor to Environment, Eleme Local Government	Environmental Regulatory bodies are of primary importance in terms of establishing policy, granting permits or other approvals for the Project, and monitoring and enforcing compliance with Nigerian law throughout all stages of the Project life cycle. Regional and Local Governments may input into the permitting process and may have a role in monitoring the implementation of Project commitments included in the ESMP.

Stakeholder Category	Stakeholder Groups	Stakeholders	Connection to Project
Communities and Leadership	• Eleme Council of Traditional Rulers • Clan Heads and council of chiefs in respective Clan / Communities • Community Development Committees	• King of Eleme • Emere Nchia • Respective Clan Heads of following six (6) Host Communities: ◦ Aleto ◦ Okerewa ◦ Agbonchia ◦ Njuru ◦ Akpajo ◦ Elenwo (Wakoahu Family)	Originally the land was acquired by Rivers State Government in the year 1984. Government has paid compensation to all impacted communities. Since then, communities are not carrying out any socio-economic activities in the said 250 hectares of land. However, there will be social, environmental, and economic impacts connected to project construction and operation of manufacturing facility. Traditional rulers play vital role in community development, civil administration, and socio-economic wellbeing in their domain by interfacing with the government. Traditional rulers are custodian of cultures, customary territorial rights, and privileges of people in their communities. Traditional rulers preside over civil and customary grievance / dispute resolution processes. Traditional rulers represent and protect the socio – economic interest of the communities before government and external agencies. Traditional rulers participate in Public Forum discussions and Technical Panel review as part of ESIA. Traditional rulers' interface with Indorama for MOU and its implementation. Rivers State government has constituted a Project Advisory Committee (PAC). PAC members are nominated by respective host communities. PAC has the primary responsibility to interface with the company and preside over MOU and its implementation. Monitoring implementation of MOU for the following: • Community Development Projects • Contracts and supplies • Employment during construction and operation phase. • Scholarship programmes for youth studying in universities. • Micro Grant for women for micro business

Stakeholder Category	Stakeholder Groups	Stakeholders	Connection to Project
			Skill development programme for young men and women.
Directly Impacted Communities and Leadership	- Communities impacted by operations. - Community Development Committee - Traditional rulers - Youth Representatives	- Aleto - Okerewa - Agbonchia - Njuru - Akpajo - Elenwo - Iriebe	Traditional rulers, members of community development committees, PAC members, youth representatives, women representatives; - Participate in ESIA Public forums to discuss positive / negative impacts of the project and the mitigation measures. - Participation in ESIA Technical Panel review to observe the evaluation process of mitigation measures set out to address the adverse impacts be social / economic / environmental impacts by experts and regulatory authorities. - Manage communications in the communities regarding the outcome of public forums and technical panel review. - Stakeholder Engagement Plan (SEP) – there is a well documented Stakeholder Engagement Plan. - Grievance Management Procedure – there is well laid down Grievance Management Procedure
Indirect Impacted Communities	Communities falling within AII and transport routes	- Onne - Alode - Ebubu - Ogale - Alesa - Umuebula - Rumukrushi - Woji - Okujagu - Abam Ama	- Stakeholder Engagement for communication of unforeseen events and actions - Community Development Committee members participate in Project Scoping, Public Forum, Technical Panel Review - Access to Grievance Management Procedure
Vulnerable Groups	- Women - Youth - Widows - People with disabilities	- Eleme Women Leaders - Eleme Youth Council - Host Community Youth Forum	Women have representation in PAC and Host Community Youth Forum as representative body participate in the discussion and decision-making process of ESIA public forum, technical panel review, adverse impacts / mitigation measures, MOU, community development projects, employment, skill acquisition programme,

Stakeholder Category	Stakeholder Groups	Stakeholders	Connection to Project
			subcontracts & supplies and grievance management process during ESIA / construction / operation phase of the project. Women leaders exclusively participate in discussion and decision-making process of Micró Grant Scheme. Host Community Youth Forum exclusively participates for discussion and implementation MOU for the Youth. Eleme Youth Council exclusive participates for extension of benefits such as office upkeep, subcontracts, surveillance contracts, employment etc.
Civil Society and Interest Groups	- Community-Based Organisations / Association - Non-Governmental Organisations (NGOs)	- Eleme Fishing Association - Eleme Hunters Association - Eleme Graduate Forum	Indigenes have advanced to modern methods of fish farming, poultry, piggyery etc. These groups participate in skill development programmes and receive financial assistance under Youth Entrepreneurship Scheme in collaboration with PAC. Eleme Graduate Forum is a Non-Government Organisation (NGO) which in general represent the interest of members for employment
Community Health, Education and Emergency Service Providers	Healthcare facilities Schools and educational institutions Emergency services	Eleme General Hospital and primary healthcare centres in Aleto, Akpajo, Agbonchia, Alesa, Alode and Ogale Primary and secondary schools within the ADI and along the Rivers State Fire Service; Federal Road Safety Corps (FRSC); Nigeria Security and Civil Defence Corps (NSCDC); Rivers State Emergency Management Agency (SEMA); Eleme LGA Primary Health Care Coordinator	Engaged in support of AfDB OS4 (Community Health, Safety and Security) and OS10. Healthcare facilities are first responders in the event of an ammonia release or a construction or transport incident. Schools within the ADI and along the haulage corridor are sensitive receptors for air quality, noise and road safety, and are the route to child road-safety awareness during construction; school authorities will receive emergency notification and evacuation information. Emergency services are counterparties to the Project emergency preparedness and response plan and to joint drills, and are engaged on incident notification, mutual aid, traffic and haulage incident response and community evacuation.

Stakeholder Category	Stakeholder Groups	Stakeholders	Connection to Project
		Eleme Widows Association; Eleme Physically Challenged Association	Widows and persons with disabilities are engaged separately as vulnerable groups on accessibility of information, benefit access and evacuation assistance needs.
Employment and Business Associations	- Workers Unions - Employment Forums - Business Forums - Business Associations	- Welders and Fitters Association - Indigenous Suppliers Forum	Elected representatives of unions participate in collective bargaining agreements for betterment of condition of service, discussion on betterment of working condition, grievance management process, disciplinary management process, conflict and dispute resolution process during the construction and operation phase of the project. Elected / nominated members of Indigenous Suppliers represent their members for access to information with regards to contracts, supplies, grievance management dispute / conflict resolutions.
Research, Education and Media Stakeholders	- Academia - Media	- Professors / teachers - Radio and Print media	Academic institutions drive knowledge, research, skills development, and innovation aligned with the Project's goals. Media organizations boost public awareness and stakeholder engagement through information dissemination and coverage of key activities. Together, they ensure broad, impactful engagement across education and communication channels.
Lenders and Independent Environmental & Social Consultants	- Development Finance Institutions (DFIs) and lenders - Independent Environmental and Social Consultants (IESCs) - Lender Technical Advisors	- International Finance Corporation (IFC) - African Development Bank (AfDB) - Lender Independent Environmental and Social Advisors (LIESA/SLR and any successor consultants) - Environmental and Social Monitoring Consultants appointed by lenders	Lenders ensure financing and compliance with environmental and social standards during project construction and operation. They review ESIA documents, monitor ESMPs, assess stakeholder engagement, grievance management, and track monitoring results. Oversight includes community relations, security, and adherence to requirements. Independent consultants support via site visits, audits, and reporting, ensuring transparency, accountability, and alignment with sustainability goals throughout the project.
Security Stakeholders	- Public Security Agencies - Private Security Providers	- Nigeria Police Force (Eleme Division and Rivers State Command) - Nigeria Security and Civil Defence Corps (NSCDC)	Security stakeholders are key partners in protecting people, assets, and communities during construction and operation. Their roles span access control, emergency response, incident management, community safety, and infrastructure protection. Engaging them ensures security aligns with laws, human rights, community needs,

Stakeholder Category	Stakeholder Groups	Stakeholders	Connection to Project
	Community Security Representatives	- Rivers State Government Security Agencies - Marine Police, where applicable - Private security contractors engaged by the project - Community vigilante and surveillance groups recognized by host communities	grievance processes, and project procedures. They also support emergency planning, investigations, consultations, and conflict resolution.
Project Partners and Contractors	- EPC Contractors - Project Consultants - Construction Contractors	- Engineering, Procurement, and Construction (EPC) Contractors - Environmental and Social Consultants - Specialist Technical Consultants	They are accountable for implementing project activities and upholding environmental, social, health, and safety requirements. Their performance plays a critical role in ensuring project compliance, maintaining strong stakeholder relationships, safeguarding community health and safety, managing labor and security, and effectively executing mitigation measures.

TABLE 4-3 INFLUENCE-INTEREST MATRIX – INDORAMA OPERATIONS

Stakeholder	Sector	Primary Issues / Topics	Engagement Lead	Frequency
Federal and State Government	A	- Regulatory compliance - Accurate, timely disclosure - Environmental & social performance data	EHS Manager	Monthly updates + decision gates
Local Government Area Representatives	A	- Infrastructure pressures (roads, services) - Community stability & expectation management	Community relation Manager	Monthly updates + decision gates

Stakeholder	Sector	Primary Issues / Topics	Engagement Lead	Frequency
PAC Members (Host Community Forum)	A	- Delivery on commitments (jobs, skills, social benefits) - Fair representation & clarity on obligations	Community relation officer	Monthly updates + decision gates
Community Development Committee (CDC) and representatives	B	- Inclusion beyond PAC structures - Transparent, unbiased engagement	Community relation officer	Bi-annual (Every 6 months)
Traditional Leadership – ADI & PIA Host Communities	B	- Respect for authority & cultural protocols - Role in mobilisation and conflict mediation	Community relation officer	Bi-annual (Every 6 months)
Eleme women leaders (*)	C (B)	- Representation in decisions - Social wellbeing, services, household burden impacts	Community relation officer	Monthly updates + decision gates
Eleme youth council (*)	C (B)	- Employment & training opportunities - Direct engagement and responsiveness	Community relation officer	Monthly updates + decision gates
Civil Society & Interest Groups (*)	D (C)	- Transparency & access to information - Cumulative environmental/social impacts - Strong grievance channels	Community relation officer	Annual
Employment/Business Associations	C	- Fair access to contracting opportunities - Predictability of operations & economic benefits	Community relation officer	Minimum annual engagement, and as needed to resolve specific issues as they arise.
AII Community Members	C	- Disclosure of indirect impacts (air, noise, traffic) - Understanding non-entitlement to benefits - Access to grievance pathways	Community relation officer	Annual

Stakeholder	Sector	Primary Issues / Topics	Engagement Lead	Frequency
Media	D	• Accuracy and consistency of public information • Updates on impacts and operational issues	Community relation officer	Bi-annual (Every 6 months)
General Public	D	• Clear information on safety & environmental impacts • Trust in grievance responsiveness • Understanding broader socioeconomic effects	Community relation officer	Every two years (biennial) + New Projects

**Additional weighting given due to vulnerability*

4.3 STAKEHOLDER ANALYSIS AND PRIORITISATION

It is not practical, and not necessary, to engage with all stakeholder groups with the same level of intensity all the time. Analysing and prioritizing stakeholders is important to determine appropriate engagement methods. Given the dynamic nature of stakeholder and community contexts, stakeholder analysis will be revisited throughout the Project lifecycle.

4.3.1 REVIEW AND UPDATING OF THE STAKEHOLDER ANALYSIS

The Head of Community Relations & Development is the accountable owner of the stakeholder analysis; the Community Relations Officers are responsible for the underlying data; and the E&S Corporate Team verifies completeness and quality before each revision is issued.

- **Frequency** – the stakeholder register (Table 4-2) is reviewed quarterly during construction and annually during operations. The full analysis (Tables 4-3, 4-4, 4-6 and 4-8) is reviewed annually, and in every case before the start of a new lifecycle phase.
- **Triggers for reassessment** – an out-of-cycle review is triggered by any of the following: a material change to Project design, footprint, schedule or workforce numbers; new settlement, in-migration or displacement within the Area of Influence; a change in community leadership, or the emergence or escalation of a leadership or representation dispute; the emergence of a new interest group, association or civil society actor; three or more grievances within a rolling quarter from a single group or on a single theme; a grievance from a group not currently on the register; an incident with off-site consequences; identification of a new vulnerable or disadvantaged group, or evidence that an existing group is not participating effectively; a change in the ESIA findings that alters the impact profile for any group; a regulatory or lender request; and the annual review of the host community MoU.
- **Indicators triggering reclassification** – a group's classification is changed where there is evidence of a change in its exposure to Project impacts; a change in its vulnerability status; sustained non-participation despite invitation; a shift in expressed level of support; the group acquiring or losing the ability to mobilise others or to affect approvals; or recurring grievances indicating that the current engagement approach is not working.
- **Documentation and consequence** – each review is recorded in a dated Stakeholder Analysis Review Note held with the stakeholder database, stating the groups added, removed or reclassified, the evidence relied upon, and the consequential changes to engagement approach, frequency and method. A reclassification is not effective until the corresponding change is made to the engagement programme in Section 5 and to the monitoring indicators in Section 8. Where the change is material the SEP is revised, version-controlled, approved by Project management and re-disclosed to stakeholders; where it is not, it is carried in the review note and consolidated into the next annual SEP revision. Review notes are available for lender and audit review.

4.3.2 ASSESSMENT OF INFLUENCE AND INTEREST

Each stakeholder is assessed against two criteria:

- **Influence:** the stakeholder's ability to shape project decisions, affect approvals, or mobilise others.
- **Interest:** the degree to which the stakeholder is affected by, concerned about, or dependent on the project's activities.

Both factors are scored using a simple, transparent 1–5 scale. Additional tags (e.g., vulnerable groups, proximity, dependence on natural resources) may be applied to ensure equity and inclusion.

4.3.3 MAPPING TO THE INFLUENCE-INTEREST MATRIX

Stakeholders are then placed into a 2×2 matrix, where the intersection of influence and interest determines the appropriate engagement strategy. This mapping is validated internally across Indorama's operational units (CR&D, EHS, Security, Operations, Logistics) to ensure a shared understanding of stakeholder dynamics and risks.

4.3.4 LINKING STAKEHOLDERS TO ENGAGEMENT APPROACHES

Each matrix sector corresponds to a different level of engagement intensity, ranging from collaboration with high-influence/high-interest stakeholders to periodic information sharing with those with lower influence or interest. This link ensures consistency in how Indorama allocates resources, plans meetings, conducts outreach, and monitors commitments.

Rationale for Using the Influence-Interest Matrix

The matrix provides a clear, visual structure for prioritising engagement and maintaining accountability. Its use ensures that:

- Engagement is proportionate: Stakeholders who face major impacts or hold significant influence are engaged more deeply and more frequently.
- Resources are optimised: Effort is focused where it has the most meaningful impact on operational outcomes and social licence to operate.
- Risks are identified early: Mapping helps highlight potential conflict drivers, emerging concerns, or groups requiring special consideration.
- Engagement remains adaptive: As interests and influence shift (especially during construction, expansion, or operational transition) the matrix can be updated to reflect evolving realities.
- Alignment with best practice: The approach mirrors ERM's methodology and IFC PS1 expectations for systematic, inclusive, and responsive stakeholder engagement, and satisfies the stakeholder identification and analysis requirements of AfDB ISS (2023) OS10 paragraphs 12 to 14, the differentiated-measures requirement of OS10 paragraph 18, and the vulnerable group identification requirement of OS7.

TABLE 4-4 INTEREST – INFLUENCE MATRIX METHODOLOGY

Influence	5	6	7	8	9	10
	4	5	6	7	8	9



TABLE 4-5 ENGAGEMENT APPROACH BY SECTION

Section	Objective	Typical Methods	Cadence	Minimum Records
A: Work Together (Collaborate)	Co-decision / co-design	Working groups and sub-committees with terms of reference / Targeted technical workshops / Stakeholder site visits	Quarterly as a minimum, and at every decision gate	Minutes of meetings / Action log / Commitments Register (Appendix E) / Attendance register
B: Keep Engaged (Consult)	Secure approvals / Address critical concerns early / Explain how views were considered	Briefings / Formal submissions / Bilateral regulator and traditional institution sessions	Twice a year as a minimum, and at every decision gate or approval milestone	Briefing packs / Correspondence log / Submission and response tracker
C: Keep Informed	Maintain acceptance / Channel issues into the grievance mechanism and the feedback route	Community meetings / PAC circulars and sub-committees / Noticeboards / WhatsApp and SMS / Radio jingles / Posters	Annually as a minimum, and immediate notification of any event with potential off-site consequence	Attendance register / Photographs / Disclosure Register (Appendix D) / Grievance referrals
D: Show Consideration	Proactively identify the group and take account of its circumstances / Consult on the specific matters affecting the resource or interest concerned	Engagement through the group's own representative body / Disclosure of the monitoring results relevant to that interest / Assisted access to the grievance mechanism	Annual proactive contact as a minimum, plus engagement whenever an activity affecting the resource or interest is planned	Contact log / Record of monitoring results disclosed / Record of assistance provided / Grievance referrals

TABLE 4-6 INDORAMA INTEREST-INFLUENCE ASSESSMENT

Stakeholder	Influence (1–5)	Interest (1–5)	Priority	Sector
Federal Government	5	3	8	A
State Government	5	4	9	A
Local Government Area Representatives	5	5	10	B
PAC Members (Host Community Forum)	4	5	9	A
Non-PAC Leaders and representatives	4	3	7	B
Traditional Leadership	5	3	8	B
Directly affected communities*	3 (4)	5	8 (9)	A
Eleme women leaders*	2 (3)	4	6 (7)	A
Eleme youth council*	2 (3)	4	6 (7)	A
Eleme Widows Association and Eleme Physically Challenged Association*	1 (3)	5	6 (8)	A
Existing natural resource users – fishers, hunters and farmers*	1 (2)	4	5 (6)	D
Civil Society & Interest Groups*	2 (3)	3	5 (6)	B
Workers, contractors and unions	3	4	7	B
Employment/Business Associations	2	3	5	C
AII Community Members	1	3	4	C
Media	3	1	4	C
General Public	1	2	3	C

*Additional weighting given due to vulnerability or to impact exposure. The weighted score is shown in brackets and is the score used to determine the sector.

Note: the sector letters correspond to the engagement approaches defined in Table 4-5 and Table 4-10 – A: Work Together (Collaborate); B: Keep Engaged (Consult); C: Keep Informed; D: Show Consideration. Where impact exposure or vulnerability rather than influence determines the approach, the weighted score in brackets governs. The resulting approach for each cluster is stated in Table 4-8 and traced through to the engagement commitment in Table 4-11.

4.4 APPROACH TO STAKEHOLDER ENGAGEMENT

4.4.1 DIFFERENTIATED MEASURES FOR VULNERABLE AND DISADVANTAGED GROUPS

The groups identified as vulnerable or disadvantaged for this Project, the specific obstacles they face, and the measures adopted, are as follows.

TABLE 4-7 DIFFERENTIATED ENGAGEMENT MEASURES FOR VULNERABLE AND DISADVANTAGED GROUPS

Group	Obstacles to effective participation	Differentiated measures
Women	Customary decision-making structures are male-dominated; women may not speak freely in mixed forums or in the presence of male household heads; unpaid care responsibilities constrain attendance at evening or	Women-only focus group discussions facilitated by a female facilitator in every ADI community, held separately from and in addition to general community meetings. Meetings scheduled by agreement with women's leaders at times and venues that accommodate care responsibilities,

Group	Obstacles to effective participation	Differentiated measures
	distant meetings; lower literacy rates in some communities.	within walking distance where possible, and with transport provided where not. Mandatory representation of at least one woman among the three PAC members from each host community, and a women's sub-committee of the PAC with direct oversight of the micro-grant scheme. Gender-disaggregated recording of attendance and of issues raised, reported against a minimum female participation target (Section 8). A female Community Relations Officer or designated female grievance focal point available to receive complaints, and a confidential channel for GBV/SEA/SH complaints that does not require face-to-face contact (Section 9.6.1).
Youth	High unemployment creates acute expectation pressure and a risk of capture of engagement by organised youth interests; competing youth bodies in some communities; limited formal standing in traditional structures.	Bi-monthly engagement with the Host Community Youth Forum throughout construction, and with community-level youth forums. Engagement with all recognised youth structures where more than one exists, without endorsing any faction (Section 5.2.1.1). Written disclosure of recruitment quotas, eligibility criteria and selection process at each engagement, with reasons given for unsuccessful applications. Youth representation on the PAC employment and contracts sub-committees.
Widows	Loss of access to land and income following bereavement; customary constraints on inheritance and on independent participation; may be excluded from household- and community-level benefit distribution.	Dedicated focus group discussions with the Eleme Widows Association, held separately from women's forums. Direct registration for the micro-grant and community development programmes rather than through household heads. Direct notification of engagement and disclosure through the Association rather than solely through community-wide channels.
Persons with disabilities	Physical inaccessibility of meeting venues; sensory and communication barriers; exclusion from general community forums; specific assistance needs in the event of an emergency evacuation.	Dedicated focus group discussions with the Eleme Physically Challenged Association. Selection of accessible venues; provision of transport; large-print and pictorial materials; verbal briefing of all written material. Identification of assistance needs for emergency evacuation, and inclusion of those needs in the Project emergency preparedness and response plan (OS4). Engagement of organisations representing persons with disabilities as

Group	Obstacles to effective participation	Differentiated measures
		intermediaries, consistent with AfDB OS10 paragraph 18.
Existing natural resource users (fishers, hunters, farmers)	Livelihood dependence on land and water resources within the AoI; may reside outside the six MoU host communities and therefore outside the primary engagement structures; not entitled to MoU benefits.	Direct engagement with the Eleme Fishing Association and Eleme Hunters Association, independent of the PAC. Disclosure of effluent and surface water monitoring results in non-technical form. Explicit clarification of the distinction between grievance access, which is universal, and MoU benefit entitlement, which is not (Section 4.1).
Elderly persons and low-literacy stakeholders	Literacy and language barriers; reliance on oral communication; limited mobility.	All written material accompanied by verbal briefing in Eleme/Ogoni language and Nigerian Pidgin; pictorial and large-print formats; radio jingles on stations with local reach; grievance submission accepted verbally and recorded by the receiving officer on the complainant's behalf.
Communities affected by construction labour influx	Risk of sexual exploitation, abuse and harassment; pressure on services; increased traffic and security risk; asymmetry of power between workers and community members.	Mandatory contractor code of conduct, disclosed to communities so that they know the standard to which workers are held. Community and worker awareness sessions on GBVH, SEA/SH and the prohibition on retaliation. Confidential, survivor-centred complaint channel with a separate entry point not requiring face-to-face contact (Section 9.6.1). Reporting of SEA/SH complaints handled in accordance with procedure as a monitored indicator (Section 8).

Prevention of reprisal. In accordance with AfDB OS10 paragraph 18 and the Indorama Guidelines for Prevention of Retaliation, the Project commits that no stakeholder, worker, contractor employee, complainant, witness or person supporting an investigation will be penalised, threatened, disadvantaged, excluded from Project benefits, or discriminated against for participating in consultation, raising a concern, lodging a grievance, reporting misconduct or cooperating with an investigation. This commitment is disclosed at every engagement, recorded in the meeting record, and its operation is monitored through the grievance mechanism (Section 9.3).

It is not practical, and not necessary, to engage with all stakeholder groups with the same level of intensity all of the time. Analysing and prioritising stakeholders is important to determine appropriate engagement methods. Given the dynamic nature of stakeholder and community contexts, stakeholder analysis will be revisited throughout the Project lifecycle.

Given that the IFF Line1 (Train 3) Project is in the same locality, and designed in the same manner, as IFZ Line2 (Train 2), ERM has adopted elements of the stakeholder analysis

previously conducted for the construction and operation of IFZ Line 2 (Train 2) in 2021. Stakeholder engagement conducted thus far for the ESIA process of IFF Line 1 (Train 3) have also been analysed to update previous analysis. This information builds the base which is further updated with outcomes of Stakeholder engagement conducted so far for the ESIA process of IFF Line 2 project. The broad groups of stakeholders identified in Table 4-2 have been further analysed below in terms of potential influence on Project activities and level of support for the Project (Table 4-8). An engagement approach is also suggested for each category of stakeholder (Table 4-9).

TABLE 4-8 IMPACT-SUPPORT MATRIX

Stakeholder Cluster	Influence Level	Support Level	Engagement Approach
Environmental and permitting authorities (FMEnv, RSMEnv, NESREA)	High	High	Work Together (A)
Federal and State Government	High	High	Work Together (A)
Local Government (Eleme LGA)	High	Medium	Keep Engaged (B)
Traditional Leaders	High	Medium	Keep Engaged (B)
Community Leaders	High	Medium	Keep Engaged (B)
Directly Affected Communities	High (high impact exposure)	Medium	Work Together (A)
Women	Medium (vulnerability-weighted)	Medium	Work Together (A)
Youth	Medium (vulnerability-weighted)	Medium	Work Together (A)
Widows and persons with disabilities	Low (vulnerability-weighted)	Medium	Work Together (A)
Existing Natural Resource Users (fishers, hunters, farmers)	Low (livelihood exposure)	Low	Show Consideration (D)
Civil Society Groups	Low	Medium	Keep Engaged (B)
Workers, contractors and unions	Medium (exposure to labour and safety risk)	Medium	Keep Engaged (B)
Employment and business associations	Low	Medium	Keep Informed (C)
AII community members	Low	Medium	Keep Informed (C)

Stakeholder Cluster	Influence Level	Support Level	Engagement Approach
Media and general public	Low to medium	Low	Keep Informed (C)

Note: Table 4-8 is the controlling classification for this SEP. Table 4-6 sector allocations, the approach definitions in Table 4-5 and Table 4-9, the minimum expectations in Table 4-10 and the traceability in Table 4-11 all use these classifications. Directly affected communities, women, youth, widows and persons with disabilities are engaged on a Work Together basis by reason of impact exposure and vulnerability rather than influence alone; the basis for each is stated in Table 4-11. A change to a classification in this table requires a corresponding change to Table 4-11, to the engagement commitment in Section 5 and to the indicators in Table 8-2, and is not effective until those changes are made.

TABLE 4-9 SUMMARY OF POTENTIAL ENGAGEMENT APPROACHES

Engagement Approach	Process
Work Together (A)	Share information. / Consult on key Project issues. / Collaborate on Project delivery and co-design decisions on matters affecting the group; Informed Consultation and Participation (ICP) applies.
Keep Engaged (B)	Share information. / Consult on key Project issues before a decision is taken, and explain how the views expressed were considered.
Keep Informed (C)	Share information accurately and in good time, with an unrestricted route to be heard through the grievance mechanism and the feedback route.
Show Consideration (D)	Proactively identify the group and its circumstances rather than waiting for it to come forward. / Share information in an accessible form. / Consult on the specific matters affecting the resource or interest concerned. / Assist access to the grievance mechanism where literacy, mobility or distance is a barrier.

4.4.1.1 MINIMUM EXPECTATIONS BY ENGAGEMENT APPROACH

Table 4-10 states, for each engagement approach, the minimum type and frequency of engagement, the level of participation, and the records against which delivery is monitored. These are the minimum commitments against which SEP implementation is assessed under Section 8; they may be exceeded where circumstances require.

TABLE 4-10 MINIMUM ENGAGEMENT EXPECTATIONS BY APPROACH

Engagement approach	Level of participation	Minimum engagement type and frequency	Records and monitoring
Work Together (Sector A – Collaborate)	Collaborate / co-design. Stakeholders participate in identifying options and shaping	Quarterly structured engagement as a minimum, and at every decision gate. Working groups or sub-committees with defined	Minutes of meeting issued within 10 working days; action log; Commitments

Engagement approach	Level of participation	Minimum engagement type and frequency	Records and monitoring
	decisions on matters affecting them; Informed Consultation and Participation (ICP) applies.	terms of reference (PAC and its employment, contracts, CSR, scholarship, micro-grant and grievance sub-committees). Targeted technical workshops on matters of substantive concern; site visits on request. Monthly Project updates during construction. Separate sessions for women, youth, widows and persons with disabilities as set out in Table 4-7.	Register entries with owner and due date; attendance register disaggregated by sex; feedback record showing how input was considered.
Keep Engaged (Sector B – Consult)	Consult. Stakeholders are asked for their views before a decision is taken and are told how those views were considered, but do not co-design the decision.	Twice-yearly engagement as a minimum, and at every decision gate or approval milestone. Briefings, formal submissions and bilateral sessions with regulators and traditional institutions. Ad hoc engagement whenever a material change or exceedance arises.	Briefing packs; correspondence log; submission and response tracker; record of how views were considered.
Keep Informed (Sector C)	Inform, with a guaranteed route to be heard. Stakeholders receive accurate and timely information and have unrestricted access to the grievance mechanism and to the feedback route.	Annual engagement as a minimum, and immediate notification of any event with potential off-site consequence. Community meetings; PAC circulars; noticeboards; WhatsApp and SMS alerts; radio jingles. Issues raised are channelled into the grievance mechanism or the Stakeholder Feedback Register and answered.	Attendance register; photographic record; distribution and disclosure log (Appendix D); grievance referrals.
Show Consideration (Sector D)	Proactively identify and take account of the group's circumstances. The Project seeks the group out rather than waiting for it to come forward, and consults on the specific matters affecting it.	Annual proactive contact as a minimum, through the group's own representative body where one exists, plus engagement whenever an activity is planned that affects the resource or interest concerned. Disclosure of the monitoring results relevant to that interest (for example surface water and effluent results for fishers). Assisted access to the grievance mechanism where literacy, mobility or distance is a barrier.	Contact log; record of monitoring results disclosed; record of assistance provided; grievance referrals.

4.4.1.2 TRACEABILITY FROM STAKEHOLDER ANALYSIS TO ENGAGEMENT COMMITMENTS

The stakeholder analysis in this section is not free-standing. Table 4-11 shows, for each cluster, how the influence, interest, impact exposure, vulnerability and support levels assigned in Tables 4-6 and 4-8 determine the engagement approach, the minimum frequency, the methods, the responsible party and the level of participation, and identifies the sub-section of Section 5 in which the resulting commitment is made. A change to a cluster's classification under Section 4.4 therefore requires a corresponding change to the engagement commitment in Section 5 and to the monitoring indicators in Section 8; a reclassification is not effective until those changes are made.

TABLE 4-11 TRACEABILITY FROM STAKEHOLDER PRIORITISATION TO ENGAGEMENT COMMITMENTS

Stakeholder cluster (Table 4-8)	Influence / support / vulnerability	Engagement approach	Primary methods	Responsible	Level of participation	Section 5 reference
Environmental and permitting authorities; Federal and State Government	High influence / high support	Work Together (A)	Institutional consultation; formal submissions; technical panel review; inspections	EHS Manager / Head CR&D	Collaborate on assessment scope and conditions	5.2, 5.2.5, 5.2.6
Local Government	High influence / medium support	Keep Engaged (B)	Briefings; bilateral sessions; PAC (Deputy Chair)	Community Relations Manager	Consult	5.2, 5.3
Traditional leaders; community leaders	High influence / medium support	Keep Engaged (B)	Palace engagements; PAC; community meetings; conflict-sensitive protocol	Head CR&D / CROs	Consult	4.5.1, 5.2.1, 5.3
Directly affected communities	High influence / medium support / high impact exposure	Work Together (A)	Community meetings; PAC and sub-committees; disclosure sessions; emergency drills; grievance access points	Head CR&D / CROs / Site Manager	Informed Consultation and Participation (ICP)	5.2, 5.3, 5.4, Table 5-2
Women	Medium influence (vulnerability-weighted) / medium support / high vulnerability	Work Together (A)	Women-only focus groups with female facilitator; women's leaders; micro-grant sub-committee; confidential GBV/SEA/SH channel	Head CR&D / female CRO or focal point	Collaborate on matters affecting them	4.4.1 (Table 4-7), 5.2.2, 9.6.1
Youth	Medium influence / medium support / high vulnerability	Work Together (A)	Host Community Youth Forum; community youth forums; PAC employment and contracts sub-committees; written disclosure of quotas	Head CR&D / CROs / HR-IR	Collaborate on employment, skills and enterprise	4.4.1, 5.2.1.1, 5.4.3

Stakeholder cluster (Table 4-8)	Influence / support / vulnerability	Engagement approach	Primary methods	Responsible	Level of participation	Section 5 reference
Widows; persons with disabilities	Low influence / medium support / high vulnerability	Work Together (A)	Focus group discussions through their associations; accessible formats and venues; assisted grievance access	Head CR&D / CROs	Collaborate on access to information and benefits	4.4.1 (Table 4-7)
Existing natural resource users	Low influence / low support / livelihood exposure	Show Consideration (D)	Engagement through the Fishing and Hunters Associations; disclosure of water and effluent monitoring results; assisted grievance access	Head CR&D / HHSE	Proactive identification and consultation on resource matters	4.4.1, 6.1, Table 4-10
Civil society groups	Low influence / medium support	Keep Engaged (B)	Briefings; annual performance disclosure; response to enquiries	Head CR&D / Corporate Communications	Consult	6.1, 6.4.4, 8.2
Employment and business associations	Low influence / medium support	Keep Informed (C)	Indigenous Suppliers Forum; PAC contracts sub-committee; Welders and Fitters Association	Head CR&D / Procurement	Inform, with route to be heard	5.3.4, Appendix B
AII community members	Low influence / medium support	Keep Informed (C)	Community meetings; noticeboards; radio jingles; school road-safety sessions; advance notice of abnormal loads	CROs	Inform, with route to be heard	5.2, 6.1, Table 6□1
Media; general public	Low to medium influence / low interest	Keep Informed (C)	Press notes; annual performance summary; corporate website	Corporate Communications	Inform	6.1, 6.4.4
Workers, contractors and unions	Medium influence / exposure to labour and safety risk	Keep Engaged (B)	Induction and toolbox briefings; noticeboards; separate workers' grievance mechanism; CBA processes	HR/IR / Site Manager	Consult	5.7, 5.8, 9.2

Prioritisation is not based solely on influence. Priority is given to stakeholders that are highly influential, including those that are both supportive and unsupportive; and, equally, to stakeholders who may be particularly vulnerable, who may be disproportionately affected by the Project, or who have a limited ability to participate effectively, regardless of their level of influence. Where influence and impact exposure point in different directions, impact exposure and vulnerability determine priority.

Engaging stakeholders who are unsupportive and influential, or those with deep-rooted challenges, requires engagement with pro-active and hands on approach. Effective engagement typically combines approaches - from informing to activities such as consultation or collaboration. In analysing these stakeholders and developing an approach to engagement, consideration has also been given to:

- Level of interest in the Project construction/operation;
- Anticipated impact of the Project on the stakeholder;
- Vulnerability status of the stakeholder; and
- Relationships with high influence stakeholders, including their ability to influence these stakeholders.

Stakeholders that have low influence but are unsupportive should be monitored closely, with a particular focus on their ability to influence, and their relationships with, other stakeholders. Less intensive forms of engagement such as monitoring or disseminating information will be adequate for engaging less influential, supportive stakeholders. Individual stakeholders can share a collective voice and access to legal guidance and resources thereby becoming more influential. Considering the outcomes of the stakeholder analysis, the high priority stakeholders for this Project are:

- Environmental and Permitting Authorities;
- Federal government;
- State government
- Local government;
- Traditional leaders; and
- Community leaders.
- Directly affected communities (Aleto, Okerewa, Agbonchia, Njuru, Akpajo, Elemenwo and Iriebe);
- Women, including women's leaders and women's economic associations;
- Youth, including the Host Community Youth Forum and community youth forums;
- Widows and persons with disabilities;
- Existing natural resource users (fishers, hunters and farmers dependent on land and water within the Area of Influence); and
- Civil society and community-based organisations.

The basis for prioritising each group is as follows. Environmental and permitting authorities, and the federal, state and local tiers of government, are prioritised because they control the approvals and permits on which the Project depends and monitor

compliance throughout the lifecycle; the federal tier is exercised principally through the Federal Ministry of Environment and NESREA, which are the entities captured under 'Environmental and Permitting Authorities' in Table 4-8, and the two descriptions are now aligned. Traditional leaders and community leaders are prioritised because they are the custodians of customary authority, preside over customary dispute resolution, and are the route through which the host community MoU and the PAC operate. Directly affected communities are prioritised because they are the primary receptors of Project impacts and the counterparties to the MoU. Women, youth, widows, persons with disabilities and existing natural resource users are prioritised on the basis of impact exposure and vulnerability rather than influence, in accordance with Section 4.4.1 and AfDB OS7 and OS10 paragraph 18. Civil society and community-based organisations are prioritised because they aggregate the voice of individual stakeholders, hold the Project to account on cumulative impacts, and provide an independent route through which concerns may surface.

4.5 STAKEHOLDER ENGAGEMENT

Having identified the level of interest of each of the stakeholders in the previous section, the engagement plan attempts to identify a structure through which it is possible to build and maintain constructive relationships throughout project life cycle. The level of engagement with each stakeholder varies in accordance with the interest and influence the stakeholders have on the project. In particular, the stakeholder engagement plan focusses on the following:

- Establish a structure of engagement with each stakeholder.
- Define the process of engagement and engagement methods.
- Define the roles and responsibilities of the engaging parties.
- Strategy and timetable for sharing of information.

For this ESIA process, the stakeholder engagement approach is based on IFC PS1 requirements, and on AfDB ISS (2023) OS10 requirements, including stakeholder identification, information disclosure, meaningful consultation, grievance management, and Informed Consultation and Participation (ICP) with affected communities. The ICP process will ensure that potentially affected stakeholders are provided with timely and understandable information and are afforded opportunities to participate in discussions regarding project risks, impacts, mitigation measures, and project benefits throughout the Project lifecycle (Chapter 5).

The AfDB requirements applied are: engagement throughout the Project lifecycle proportionate to the nature and scale of risk (OS10 paragraph 8); meaningful consultation that is timely, relevant, understandable, accessible and culturally appropriate, and free of manipulation, interference, coercion, discrimination, intimidation and reprisal (OS10 paragraph 9); the seven-element engagement process of identification and analysis, planning, disclosure, consultation, grievance handling, feedback and budget (OS10 paragraph 10); a documented and publicly disclosed engagement record stating whether and how feedback was taken into account (OS10 paragraph 11); differentiated measures for vulnerable groups (OS10 paragraph 18 and OS7); verification that community representatives genuinely represent the views of those they speak for (OS10 paragraph

19); disclosure of the specified non-technical information, including the grievance route and the Bank's Independent Recourse Mechanism (OS10 paragraphs 21 and 22); two-way consultation that informs Project design (OS10 paragraphs 23 and 24); continued engagement and consultation on significant changes during implementation (OS10 paragraphs 25 to 27); and designated competent personnel with defined authority (OS10 paragraph 32). Section 2.2.1 maps each requirement to the section of this SEP in which it is discharged.

4.5.1 HOST COMMUNITY ENGAGEMENT STRUCTURE

The Rivers State Government has constituted a Project Advisory Committee (PAC), which comprises representatives from six (6) Host Communities, Rivers State Govt. and Eleme Local Govt.

Host communities select their representatives for PAC through traditionally established democratic process and make their recommendations to the Ministry of Chieftaincy and Community Affairs. Thereafter, the Hon. Commissioner for Chieftaincy and Community Affairs appointments recommended community representatives as members of PAC.

The PAC is the most important engagement route towards the effective engagement of host communities, and the composition of the committee is provided in Table B-1.

4.5.1.1 STATUS AND LIMITS OF THE PAC AS AN ENGAGEMENT MECHANISM

The PAC is a representative and engagement mechanism, not a substitute for direct engagement. Its role is to provide a standing forum in which the host communities and Indorama negotiate, administer and monitor the host community MoU, and through which Project information is transmitted to and from the six host communities. Its members are nominated by their own communities through customary democratic process and formally appointed by the Rivers State Commissioner for Chieftaincy and Community Affairs.

The following limits apply and are disclosed to stakeholders.

- **The PAC does not replace direct engagement** –Where a matter affects a specific group, that group is engaged directly and not solely through its PAC representative.
- **The PAC is not the sole channel** – the PAC is one of several channels. Stakeholders may also engage through community meetings, focus group discussions, sub-committee engagement, bilateral meetings with the CR&D department, the public forum, and the disclosure and feedback channels in Section 6. No stakeholder is required to route a matter through the PAC.
- **The PAC does not restrict grievance rights** – nothing in the PAC structure or in the host community MoU restricts any individual's or group's right to raise a concern or lodge a grievance directly through the Project grievance mechanism, by any of the channels set out in Section 9.6, including anonymously. A grievance is not required to be endorsed, screened, filtered or transmitted by a PAC member, a traditional ruler or a community development committee before it will be received, and the Project will not decline to register a grievance on the ground that it has not been raised through the PAC. Complainants also retain the right to pursue administrative or judicial remedies and to approach the AfDB Independent Recourse Mechanism (Section 9.7).

The Commissioner of Chieftaincy and Community relations of the Rivers State Government is the Chairman of the PAC while the Chairman of the Local Government is the Deputy Chair. Indorama is represented by the Managing Director, Chief Financial Officer, Head of Community Relations and Head of Human Resources.

Finalisation of MOU between Indorama and host communities is one most important role of PAC on behalf of the communities. MOU provides the framework for the binding covenants for mutual respect and peaceful co-existence for both Indorama and host communities. MOU also sets out commitments for community development projects, employment, contracts and supplies, skill acquisition programmes, micro grant for women, scholarship for university students and youth entrepreneurship scheme, homage for traditional institutions etc.

Further detail on the PAC is provided in **Appendix B**.

5. STAKEHOLDER ENGAGEMENT PLAN

This SEP covers stakeholder engagement activities for the ESIA and includes a framework for post-ESIA engagement (i.e. pre-construction, construction, operational and decommissioning phases) of the Project.

A summary of all engagement activities is presented in Table 5-1. As the SEP is a working document, this Plan will be updated should the need arise for more intensive engagement with certain stakeholder groups or should there be a substantial change to the Project plan.

TABLE 5-1 STAKEHOLDER ENGAGEMENT PHASES AND ACTIVITIES

Engagement Phase	Engagement Activities
ESIA	Public involvement in scoping workshop
	Further public participation and stakeholder engagement
	ESIA disclosure
	ESIA comment and objection
Pre-Construction	Monitor implementation of subsisting MOU (2026)
	Quarterly engagement with PAC
	Provide quarterly project updates
	Engagement with PAC sub committees on employment, community development projects, grievance management, skill acquisition programme, scholarship, micro grant etc.
	Review of grievance and grievance tracking
	Engage local authorities, traditional rulers and community leaders for briefing the completion of ESIA process and commencement of construction phase of the project
Construction Phase	Provide monthly project updates
	Quarterly engagement with PAC
	Bi-monthly engagement with youth (once every two months)

Engagement Phase	Engagement Activities
	Monitoring of grievances
Operational Phase	Quarterly engagement with PAC
	Provide broader project updates as required
	Monitoring of grievances
Decommissioning Phase	Announcement of intended decommissioning
	Quarterly engagement with PAC
	Provide broader decommissioning updates as required
	Monitoring of grievances

Table 5-1 above is a high-level summary. Table 5-2 below is the operational statement of the engagement programme, and is the table against which SEP implementation is monitored. For each Project phase it sets out the engagement objective, the target stakeholder groups, the engagement methods, the frequency and timing, the responsible personnel, and the expected output or outcome together with the means by which effectiveness is tracked. Where a phase requires more detail than the table can carry, that detail is provided in the corresponding sub-section of Sections 5.2 to 5.6, and the minimum expectations for each engagement approach are set out in Table 4-10.

TABLE 5-2 OPERATIONAL STAKEHOLDER ENGAGEMENT PLAN BY PROJECT PHASE

Phase	Engagement objective	Target stakeholders	Methods	Frequency and timing	Responsible	Expected output / outcome and how tracked
ESIA / Project preparation	Establish the scope of assessment with regulators and the public; gather baseline concerns; inform ESIA terms of reference; disclose findings and obtain comment.	FMEEnv; RSMEnv; NESREA; Eleme LGA; 7 directly and 10 indirectly affected communities; traditional rulers; CDCs; PAC; women; youth; widows; persons with disabilities; fishers; hunters; graduates; NGOs; media	Institutional consultation; scoping workshop; community meetings at ruler's palace or community hall; focus group discussions; public forum; statutory 21-working-day disclosure; newspaper notice	Completed Sep 2025 – May 2026; ESIA disclosure and comment period on FMEEnv direction; technical panel review as scheduled by FMEEnv	ERM (facilitation); Head CR&D (accountable); HHSE (technical response)	Issues register; ESIA terms of reference and specialist scope amended where warranted; Consultation Outcomes Matrix (Table 5-7) completed for every issue raised; attendance registers and photographs in ESIA Volume II, Annexure 4-6 – Comprehensive Stakeholder Engagement Report (PDF pages 205–361). Tracked by: number of communities engaged against the 17 identified; percentage of issues with a recorded disposition.
Pre-construction	Convert ESIA commitments into MoU and hiring commitments; manage employment and contracting expectations before mobilisation; establish grievance mechanism awareness ahead of workforce arrival; complete land access engagement for the pipeline right-of-way.	PAC and its sub-committees; traditional rulers; CDCs; women's leaders; youth forums; employment and business associations; indigenous contractors' forum; affected landholders; Eleme LGA; workers' unions (NUCECFWW)	Quarterly PAC meetings; PAC sub-committee sessions on employment, contracts, CSR, scholarship and micro-grant; community briefings on completion of ESIA and start of construction; written disclosure of quotas and eligibility criteria; grievance mechanism sensitisation and logbook placement	Quarterly PAC engagement; sub-committee engagement as required and not less than quarterly; grievance sensitisation completed before contractor mobilisation; community briefing within 1	Head CR&D; CROs; HR/IR (employment); Procurement (contracts); Site Manager	Signed and disclosed 2026–2028 MoU obligations; disclosed recruitment quotas and criteria; Local Hiring Plan applied; grievance logbooks placed and publicised in all host communities; Commitments Register populated. Tracked by: percentage of planned PAC and sub-committee meetings held; percentage of host communities with a

Phase	Engagement objective	Target stakeholders	Methods	Frequency and timing	Responsible	Expected output / outcome and how tracked
				month of ESIA approval		functioning grievance access point.
Construction	Maintain accurate and timely information on construction activity and impacts; manage employment and contracting delivery against quotas; prevent and respond to labour-influx, SEA/SH, traffic and nuisance impacts; maintain community emergency preparedness.	All directly and indirectly affected communities; PAC and sub-committees; youth forums; women's leaders; widows; persons with disabilities; schools and healthcare facilities along the haulage corridor; emergency services; security agencies; EPC contractor and subcontractor workforce; unions	Monthly Project updates via PAC circular, noticeboard, WhatsApp/SMS and radio jingle; quarterly PAC meetings; bi-monthly youth engagement; women-only sessions; contractor toolbox and induction briefings; community and worker GBVH/SEA/SH awareness sessions; school road-safety sessions; joint emergency response drills; advance notification of flaring, heavy lifts, blasting-equivalent activity and abnormal load movements	Monthly updates; quarterly PAC; bi-monthly youth; women-only sessions at least twice yearly per ADI community; emergency drill at least annually with community participation; advance notification not less than 7 days before a planned disruptive activity, and immediately for unplanned events	Head CR&D; CROs; Site Manager / Construction Manager; HHSE; HR/IR; Security Manager; EPC contractor community liaison	Monthly update record; quarterly PAC minutes and action log; local content and employment quota reports tabled at PAC; grievance trend analysis; drill after-action reports; SEA/SH awareness attendance records. Tracked by: KPIs in Table 8-2, including percentage of engagements involving women, youth and vulnerable groups, grievance acknowledgement and resolution rates, and SEA/SH complaints handled in accordance with procedure.
Operations	Sustain accurate disclosure of environmental performance; maintain MoU delivery; sustain emergency preparedness; detect and respond to emerging or cumulative concerns.	All directly and indirectly affected communities; PAC and sub-committees; regulators; fishers and downstream water users; civil society; media; healthcare facilities and emergency	Quarterly PAC meetings; annual community performance update including disclosure of aggregated grievance statistics and monitoring results in non-technical form; ad hoc notification of exceedances, incidents and corrective actions;	Quarterly PAC; annual community and public update; notification of an exceedance or incident with off-site potential within 24 hours; ad hoc	Head CR&D; CROs; HHSE; E&S Corporate Team; Corporate Communications	Annual public performance summary; disclosed monitoring results; exceedance notification records; updated stakeholder register and SEP revision. Tracked by: percentage of scheduled updates disclosed on time; stakeholder satisfaction;

Phase	Engagement objective	Target stakeholders	Methods	Frequency and timing	Responsible	Expected output / outcome and how tracked
		services; workers and unions	annual joint emergency drill; regulatory submissions and inspections	engagement as triggered under Section 5.5.3		grievances outstanding beyond 60 days.
Decommissioning	Give early notice of closure; identify and mitigate livelihood and income consequences; complete outstanding MoU commitments before exit.	PAC; traditional and community leaders; youth leaders; women's leaders; union representatives; workers and contractors; Eleme LGA; Rivers State Government	Formal announcement through PAC, traditional leaders, community leaders, union representatives and youth leaders; quarterly PAC meetings; transition and commitment-completion planning sessions	Announcement not less than three months before decommissioning activities commence; quarterly PAC thereafter; ad hoc engagement as required	Managing Director (announcement); Head CR&D; HR/IR; Site Manager	Decommissioning communication record; commitment completion schedule agreed with the PAC; transition plan. Tracked by: percentage of MoU commitments closed out before exit; grievances arising from decommissioning and their resolution.

Source: ERM. Responsible roles as defined in Section 7; monitoring indicators as defined in Table 8-2.

5.1 SUMMARY OF PREVIOUS ENGAGEMENTS

As the Project is an extension of an existing operational site, stakeholder engagement by Indorama has been ongoing since 2007. Relational contexts, ways of working, and perceptions of the existing operations will all influence the perceptions of the Project, and should be taken into consideration when implementing the SEP.

In terms of engagements specific to the IFF Train 3 Project (now IFF Line 1), Table 5-3 highlights what has taken place to date.

Status of commitments arising from previous engagements. The engagements summarised in Table 5-3 relate to the IFF Train 3 (now IFF Line 1) ESIA process and are presented as historical record. Commitments and action points arising from them fall into three categories, and their status is as follows.

- **Commitments absorbed into the MoU framework** – commitments on employment quotas, local content, scholarships, skills acquisition, micro-grants, the youth entrepreneurship scheme, community development projects and homage to traditional institutions were absorbed into successive host community MoUs and are now carried by the current 2026–2028 MoU. They are live, recurring obligations rather than closed actions, and their delivery is reported to the PAC and monitored monthly for construction workmen quotas and annually for the benefit streams.
- **Commitments closed** – commitments on grievance mechanism improvement, on documentation of engagement, and on reporting back to communities were closed through the revisions to the Grievance Management Procedure made in response to stakeholder, lender and LIESA feedback, and are reflected in Section 9.
- **Commitments carried by the Line 1 project** – items relating to Train 3 mitigation measures and ESMP commitments remain the responsibility of the IFF Line 1 project and are tracked in that project's commitments register; they are not restated as Line 2 commitments.

TABLE 5-3 SUMMARY OF PREVIOUS ENGAGEMENTS

Date	Stakeholder	Purpose	No. of attendees
14 July 2021	Environment Assessment Department (EAD) of Federal Ministry of Environment	Discuss proposed IEFCL Train 3 Project and draft Terms of Reference for Institutional Consultation	10
26 July 2021	Federal Ministry of Environment Rivers State Ministry of Environment	Site verification required for Project categorization	7

Date	Stakeholder	Purpose	No. of attendees
20 August 2021	Federal Ministry of Environment Rivers State Ministry of Environment Eleme Local Government Area Directly Affected Communities Traditional Leaders and Community Leaders Vulnerable Groups Civil Society and Interest Groups	Scoping workshop for ESIA, Terms of Reference and Scope of Work	89
10 November 2021	Agbonchia community stakeholders: The Paramount Ruler of Agbonchia Community Chairman Youth President and Executives Women group Youth Rep. of Eleme Youth Council Agbonchia Community Members	Inform participants of the proposed Train 3 Project scope; environmental, social, economic and health aspects. Discuss possible impacts of the Project and obtain community perspectives (expectations, benefits, perceptions etc.).	77
11/12 November 2021	Njuru and Akpakpan community stakeholders: The Paramount Chief Community Chairman Security Guards Youth President/Leader Women Leader and women groups	Inform participants of the proposed Train 3 Project scope; environmental, social, economic and health aspects. Discuss possible impacts of the Project and obtain community perspectives (expectations, benefits, perceptions etc.).	100
9 November 2021	Okerewa community stakeholders: The Paramount Ruler Chief of Okerewa Community Community Chairman Youth President and Executives Women Leader and Executives Representative of Youths from Eleme Youth Council Cross section of Okerewa Community Members	Inform participants of the proposed Train 3 Project scope; environmental, social, economic and health aspects. Discuss possible impacts of the project and obtain community perspectives (expectations, benefits, perceptions etc.).	99
8 November 2021	Aleto community stakeholders: The Paramount Ruler of Aleto Community Aleto Community Development (CDC) Chairman	Inform participants of the proposed Train 3 Project scope; environmental, social, economic and health	65

Date	Stakeholder	Purpose	No. of attendees
	Fishermen and Hunters Association Host Community Youth President Women Leaders and Executives Cross section of Aleto Community	aspects. Discuss possible impacts of the Project and obtain community perspectives (expectations, benefits, perceptions etc.).	
5 November 2021	Akpajo community stakeholders: The Paramount Ruler of Akpajo Community Development Committee (CDC) Chairman Fishermen and Hunters Host Community Youth President Women Leader	Inform participants of the proposed Train 3 Project scope; environmental, social, economic and health aspects. Discuss possible impacts of the Project and obtain community perspectives (expectations, benefits, perceptions etc.).	102
15 November 2021	Elenwo (Wakoahu Family) Stakeholders: Community Development Committee (CDC) Chairman Host Community Youth President Women Leader Cross section of Wakoahu community Wakoahu Youth Leader and Executive Wakoahu PAC member	Inform participants of the proposed Train 3 Project scope; environmental, social, economic and health aspects. Discuss possible impacts of the Project and obtain community perspectives (expectations, benefits, perceptions etc.).	94
7 December 2021	Project Advisory Committee (PAC)	Inform the PAC of the proposed Train 3 Project scope; environmental, social, economic and health aspects. Clarify the roles and responsibilities of the PAC with regards to the Project.	21

Date	Stakeholder	Purpose	No. of attendees
13 January 2023	FMEEnv, RSMEnv, Eleme LGA and King of Eleme Kingdom with Council of Chiefs, Paramount Rulers of respective Communities, Elders, Women and women leaders, Youths, NGOs, Civil societies, Farmers, Traders, Fishers, students etc.	A broader engagement to further educate participants on the proposed Train 3 project scope, environmental, social, economic and health aspects. Possible impacts of the project and community perspective (expectation, benefits, and perception etc.)	121

Table 5-4 sets out, for each material issue arising from the 2021–2023 engagements summarised in Table 5-3, the response or commitment made, the action owner, the current status and the evidence for that status, together with its relevance to IFF Line 2. Historical commitments are kept separate from the current Line 2 consultation record, which is at Table 5-7, so that the two are not conflated.

TABLE 5-4 HISTORICAL STAKEHOLDER FEEDBACK, ACTION AND STATUS MATRIX (2021–2023)

Date and engagement	Issue or expectation raised	Response or commitment made	Action owner	Status	Evidence, and relevance to IFF Line 2
20 August 2021 – Scoping workshop, FMEnv, RSMEnv, Eleme LGA, directly affected communities, traditional and community leaders, vulnerable groups and civil society (89 participants)	Scope of the environmental and social studies; demand for air quality, water and community health assessment	Air quality, noise, surface water, groundwater and community health retained as full specialist studies in the Terms of Reference	ERM / Head CR&D	Closed	Terms of Reference approved by FMEnv. The same specialist scope has been carried into the IFF Line 2 ESIA (Table 5-7, row 1).
November 2021 – Community engagements at Okerewa, Njuru/Akpakpan, Agbonchia, Akpajo, Aleto and Elenwo (Wakoahu) (537 participants in total)	Employment for community youth, and reservation of contracts and supplies for indigenous contractors	Employment quotas (10% management, 20% senior, 60% junior non-technical) and ring-fenced contract categories confirmed under the host community MoU	Head CR&D / HR-IR / Procurement	Live recurring obligation	Absorbed into successive host community MoUs and now carried by the 2026–2028 MoU (Table B-2). Construction workmen quotas are monitored monthly and reported to the PAC.
November 2021 – Community engagements, as above	Scholarships, skills acquisition with start-up support, micro-grants for women and youth entrepreneurship	Benefit streams confirmed with budgetary allocation under the MoU, administered through the PAC sub-committees	Head CR&D	Live recurring obligation	Carried by the 2026–2028 MoU. 220 skills-acquisition completions were recorded in 2025, of which 57 per cent were women. Delivery is reported annually to the PAC.
8–9 November 2021 – Aleto and Akpajo community	Effect of the operation on fishing and hunting	Surface water and effluent monitoring retained in the assessment scope; associations	HHSE / Head CR&D	Carried forward to Line 2	Existing natural resource users are retained as a distinct stakeholder group with

Date and engagement	Issue or expectation raised	Response or commitment made	Action owner	Status	Evidence, and relevance to IFF Line 2
engagements, at which the Fishermen and Hunters Associations were present	grounds and on surface water quality	to be engaged directly rather than through the PAC alone			differentiated measures (Table 4-7) and a Show Consideration approach (Table 4-8 and Table 4-11). Surface water and effluent results are disclosed to them (Table 6-3).
7 December 2021 – Project Advisory Committee (21 participants)	Clarification of the role of the PAC in relation to the Project, and of the route by which individual concerns are raised	PAC terms of reference and the grievance mechanism explained; commitment given to improve documentation of engagement and to report back on outcomes	Head CR&D	Closed	The Grievance Management Procedure was subsequently revised in response to stakeholder, lender and LIESA feedback (Section 9). The status and limits of the PAC as an engagement mechanism are now stated expressly (Section 4.5.1.1).
13 January 2023 – Broader stakeholder engagement with FMEnv, RSMEnv, Eleme LGA, the King of Eleme Kingdom and Council of Chiefs, paramount rulers, elders, women, youth, NGOs, civil society, farmers, traders, fishers and students (121 participants)	Community development projects, healthcare infrastructure, water supply and electricity	CSR prioritisation through the PAC CSR sub-committee explained, including the budget envelope and carry-forward of unfinished projects; municipal water reticulation and grid electricity identified as the statutory responsibility of Rivers State Government and Eleme LGA	Head CR&D	Live recurring obligation; limits recorded	CSR prioritisation process disclosed to communities. The limit on statutory services is restated in the current consultation record (Table 5-7, row 5) so that the same expectation is not repeatedly reopened.
2021–2023 – Train 3 (now IFF Line 1)	Mitigation and management	Retained by the IFF Line 1 project	IFF Line 1 project team	Tracked in the Line 1	Recorded here for completeness. These commitments are not restated as IFF Line 2

Date and engagement	Issue or expectation raised	Response or commitment made	Action owner	Status	Evidence, and relevance to IFF Line 2
mitigation and ESMP commitments	commitments specific to the Train 3 development			commitments register	commitments and are not monitored under this SEP.

5.2 ESIA PHASE - ENGAGEMENT TO DATE

Stakeholder engagements were undertaken as part of the ESIA study for the proposed IFF Line 2 Fertilizer Project, located within Eleme Local Government Area (LGA), Rivers State. The engagements covered 17 communities (7 directly impacted and 10 indirectly impacted) within the Project's area of influence, as well as other stakeholders.

The primary objective of these engagements was to ensure inclusive participation, transparency, and mutual understanding between the Proponent (Indorama) and the affected communities. Community-level engagements were held between October and November 2025, and again in February 2026. Further engagements were held with the Project Advisory Committee (PAC), the Eleme Graduate Forum, the Eleme Hunters Association, and vulnerable groups (i.e., the Eleme Widows Association and the Eleme Physically Challenged Association). Major concerns and expectations raised centred on employment opportunities, environmental safety, community development benefits, training, and continuous engagement. The engagement process was well received, and stakeholders expressed strong support for the Project, provided that environmental safeguards and community benefits are duly implemented.

Table 5-5 presents a summary of engagements held to date.

TABLE 5-5 SUMMARY OF ENGAGEMENTS UNDERTAKEN

S/No	Date	Location /Venue	Number of Participants	Engagement Type
1	11/09/2025	Conference Room, FMEnv, EA Dept, Abuja	15	Regulatory Engagement
2	29/10/2025	Palace of HRH, The Emere of Okerewa Community	57	Community Engagement
3	30/10/2025	Palace of HRH, the Emere of Njuru Community	26	Community Engagement
4	30/10/2025	Palace of HRH, Emere Joseph Ngeto, King of Agbonchia Clan	26	Community Engagement
5	1/11/2025	Palace of HRH, Emere Olungwe Fineman, JP, the King of Akpajo Clan*	36	Community Engagement
6	1/11/2025	Palace of HRH, Emere Sunday Obo, the King of Akpajo Clan*	11	Community Engagement
7	7/11/2025	Palace of HRH, Emere Engr. Isaac Bajor Osaro, Emere Aleto Community.	11	Community Engagement
8	02/11/2025	Wakoahu Family, Elemenwo Community.	14	Community Engagement

S/No	Date	Location /Venue	Number of Participants	Engagement Type
9	11/11/2025	Iriebe Community, at the Community Development Committee (CDC) office, Iriebe.	12	Community Engagement
10	2/11/2025	Ogale Community at Ogale Community Hall.	13	Community Engagement
11	03/11/2025	Alesa Community, at the residence of the Youth President, Eleme Kingdom, Comr. Prince K. Okereke.	14	Focus Discussion Group with Youths.
12	06/11/2025	Palace of HRH, Emere Godwin Chinwi, the Emere of Ebubu Clan.	4	Engagement with HRH
13	13/11/2025	Alode Community at the Palace of HRH, Emere Loveday O. Osara.	18	Community Engagement
14	26/02/2026	Stakeholders from communities, NGOs, associations, FMEnv, RSMEEnv, Hotel Golden Tulip, Port Harcourt	188	Public Forum
15	29/05/2026	Woji, Rumukrushu, Umuebula, Okujagu and Abam-Ama communities, Hotel Golder Tulip, Port Harcourt	30	Stakeholder Engagement

Engagement with Other Key Stakeholders

1	24/02/2026	Eleme Graduate Forum (EGF)	13	Stakeholder Engagement
2	24/02/2026	Eleme Hunters Association	9	Focus Discussion Group
3	12/03/2026	Eleme Widows Association	103	Focus Discussion Group
4	12/03/2026	Eleme Physically Challenged Association	17	Focus Discussion Group
5	19/02/2026	Project Advisory Committee (PAC)	15	Stakeholder Engagement

*In communities where leadership disputes or competing representation structures were identified, engagement was undertaken using a conflict-sensitive and neutral approach. Consultations were conducted with multiple stakeholder groups and, where necessary, with competing leadership factions to ensure inclusiveness, balanced representation, and adequate capture of community perspectives**

TABLE 5-6 SEX-DISAGGREGATED ATTENDANCE BY ENGAGEMENT

S/N o	Date	Engagement	Reported total	Names on register	Male	Female	Evidence (ESIA Volume II, Annexure 4-6)
1	11/09/2025	Federal Ministry of Environment, EA Department, Abuja – regulatory engagement	15	15	6	9	pp. 209–212; register p. 212.
2	29/10/2025	Okerewa community – Palace of HRH, The Emere of Okerewa	57	57	28	29	pp. 213–224;
3	30/10/2025	Njuru community – Palace of HRH, the Emere of Njuru	26	26	16	10	pp. 225–232; registers pp. 231–232.
4	30/10/2025	Agbonchia community – Palace of HRH, Emere Joseph Ngeto	26	13	8	5	pp. 233–240; register p. 239 (S/N 1–13)
5	01/11/2025	Akpajo community I – Palace of HRH, Emere Olungwe Fineman, JP	36	36	25	11	pp. 241–249; registers pp. 247–249.
6	01/11/2025	Akpajo community II – Palace of HRH, Emere Sunday Obo	11	11	10	1	pp. 250–253;
7	07/11/2025	Aleto community – Palace of HRH, Emere Engr. Isaac Bajor Osaro	11	11	11	0	pp. 254–258; register p. 258.
8	11/11/2025	Iriebe community – CDC office, Iriebe	12	12	12	0	pp. 259–264; register p. 264.
9	02/11/2025	Elelenwo community – Wakoahu Family	14	14	11	3	pp. 265–269; register p. 269 (dated 03/11/2025).

S/N o	Date	Engagement	Reported total	Names on register	Male	Female	Evidence (ESIA Volume II, Annexure 4-6)
10	02/11/2025	Ogale community – Ogale Community Hall	13	13	10	3	pp. 270–275; register p. 275 (dated 01/11/2025).
11	03/11/2025	Alesa community – focus group discussion with youth	14	14	13	1	pp. 276–281; register p. 281 (dated 04/11/2025).
12	06/11/2025	Ebubu community – Palace of HRH, Emere Godwin Chinwi	4	0	–	–	pp. 282–284.
13	13/11/2025	Alode community – Palace of HRH, Emere Loveday O. Osara	18	18	17	1	pp. 285–291; registers pp. 290–291.
14	19/02/2026	Project Advisory Committee	15	18	12	6	pp. 292–297; registers pp. 296–297 (dated 20/02/2026)
15	24/02/2026	Eleme Graduate Forum	13	13	11	2	pp. 298–303; registers pp. 302–303.
16	24/02/2026	Eleme Hunters Association – focus group discussion	9	9	8	1	pp. 304–308; register p. 308.
17	12/03/2026	Eleme Widows Association – focus group discussion	103	103	0	103	pp. 309–322; registers pp. 314–322.
18	12/03/2026	Eleme Physically Challenged Association – focus group discussion	17	17	8	9	pp. 323–328; registers pp. 327–328.
19	26/02/2026	Public Forum, Hotel Golden Tulip, Port Harcourt	188	187	147	40	pp. 329–352; registers pp. 337–352.
20	29/05/2026	Woji, Rumukrushu, Umuebula, Okujagu and Abam-Ama communities, Hotel Golden Tulip, Port Harcourt	30	30	29	1	pp. 353–361

Source: ERM, compiled from the signed attendance registers at ESIA Volume II, Annexure 4-6 – Comprehensive Stakeholder Engagement Report.

5.2.1 CONFLICT- SENSITIVE STAKEHOLDER ENGAGEMENT

In communities where leadership disputes, competing representation structures, or unresolved governance issues were present, the stakeholder engagement process was intentionally conflict-sensitive and impartial. The engagement team maintained neutrality, refraining from endorsing, recognising, or legitimising any specific faction or leadership group. Instead, comprehensive stakeholder mapping identified all relevant leadership structures, community representatives, and interest groups. Where necessary, separate or parallel consultations were held with competing factions to ensure that a broad range of perspectives was captured without intensifying existing tensions. Insights gathered during these consultations were validated through discussions with diverse stakeholder groups, including traditional leaders, community development committees, women, youth representatives, vulnerable groups, and local authorities. This approach ensured that stakeholder representatives accurately reflected the views and interests of affected community members and fostered inclusive participation throughout the ESIA process. Engagement records were maintained transparently, and findings were evaluated based on the substance of stakeholder input rather than the status of individual representatives.

5.2.1.1 CONFLICT ESCALATION AND DISPUTE MANAGEMENT PROTOCOL

In addition to the conflict-sensitive engagement approach described above, the following escalation protocol applies where a dispute arises that has the potential to disrupt engagement, delay the Project, or expose the Project to allegations of partiality. The protocol operates alongside, and does not displace, the grievance mechanism in Section 9.

- **Leadership and chieftaincy disputes** – the Project does not adjudicate, endorse or recognise any faction, and does not make payments, award contracts, or allocate benefits to any party while a leadership dispute is unresolved, save where a distribution is made equally to all recognised factions or is placed in abeyance. Escalation: (1) the CRO records the dispute and notifies the Head of CR&D within 24 hours; (2) the Head of CR&D verifies the position with the Eleme Council of Traditional Rulers and the Rivers State Ministry of Chieftaincy and Community Affairs, which is the competent authority for chieftaincy recognition; (3) engagement continues in parallel with all claimant structures, separately and on identical terms, with records kept of both; (4) where the dispute cannot be resolved, the matter is referred by the Head of CR&D to the PAC Chairman (the Rivers State Commissioner for Chieftaincy and Community Affairs) for direction, and the position is disclosed to the community; (5) benefit allocation resumes only on written direction from the competent authority. Timeline: verification within 10 working days; referral to the PAC Chairman within 20 working days of the dispute arising.
- **Competing youth groups** – where more than one youth body claims to represent a community, the Project engages all recognised bodies without endorsing any, and requires that any allocation of youth benefits (employment slots, surveillance or security contracts, office upkeep, entrepreneurship support) be made through the PAC youth sub-committee against published criteria rather than by direct allocation to a

youth body. Escalation: (1) the CRO documents the competing claims; (2) the Head of CR&D convenes a joint session with all claimant bodies, the community's traditional ruler and the CDC; (3) where no agreement is reached, allocation proceeds on a per-community rather than per-body basis, on published criteria, and is verified by the PAC; (4) unresolved cases are escalated to the PAC and to the Eleme LGA. Timeline: joint session within 15 working days; allocation decision within 30 working days. Where intimidation, threats or obstruction occur, the matter is referred to the Security Manager and, where an offence is alleged, to the Nigeria Police Force, with the human rights safeguards in Section 5.9 applying.

- **Contractor-community disputes during construction** – all contractors and subcontractors are contractually required to route community complaints to the CR&D department and are prohibited from negotiating settlements, making payments or making commitments to communities directly. Escalation: (1) the complaint is registered in the grievance mechanism on the day of receipt and classified for severity; (2) the Site Manager implements interim controls to prevent escalation and, where safety is at risk, suspends the activity; (3) the Head of CR&D, the Site Manager, HHSE and the contractor's community liaison jointly investigate; (4) where the dispute involves the contractor's workforce or labour conditions, HR/IR and the relevant union are brought in; (5) unresolved disputes are escalated to the Stakeholder Engagement Steering Committee (Section 7.5) and, if still unresolved, to a neutral third party under Section 9.7 Step 6. Timeline: acknowledgement within 5 working days; interim controls immediately where safety is affected; investigation completed within 20 working days; escalation to the Steering Committee within 30 working days. Contractor performance on community disputes is a monitored element of contractor evaluation.
- **Common requirements** – in all three categories the Project maintains a written record of the dispute, the steps taken, the parties engaged and the outcome; discloses its own neutrality position to all parties; keeps the grievance mechanism open to individual complainants irrespective of the collective dispute; and does not permit a collective dispute to be used to suppress an individual complaint. Where a dispute results in the suspension of engagement with a community, the reason is recorded, the community is informed in writing, and the suspension is reviewed monthly by the Head of CR&D.

5.2.2 METHODOLOGY OF STAKEHOLDER ENGAGEMENT

The stakeholder engagement process for this ESIA was designed to ensure inclusive, transparent, and culturally appropriate consultation with all relevant stakeholders. The approach was guided by the principles of early engagement, informed participation, and continuous dialogue. Stakeholders were systematically identified based on their potential influence on, and vulnerability to, project impacts. All engagements were conducted in English and local dialects to ensure comprehension and inclusiveness. After introduction and opening prayer, the purpose of the engagement and the content of briefing document was explained to participants and then requested participants to provide their

inputs/concerns/expectations. Responses to the participants were also provided by consultant's team. All stakeholder engagements were properly documented, including:

- Attendance records
- Photographs
- Key issues raised and concerns expressed

The documentary evidence of engagement – signed attendance registers, photographic records, meeting minutes and resolutions, briefing documents issued to participants, and the newspaper notices and disclosure records – is provided at ESIA Volume II, Annexure 4-6 – Comprehensive Stakeholder Engagement Report (PDF pages 205–361). The engagement-specific page ranges are given in the evidence column of Table 5-6. The Corporate Social Responsibility programme records are at Annexure 4-7 (PDF pages 362–407) and the host community Memorandum of Understanding at Annexure 4-8 (PDF pages 408–427). These records are held in ESIA Volume II rather than duplicated in this SEP, so that a single controlled copy of each record exists.

5.2.3 KEY CONCERNS RAISED AND RESPONSES

During the engagement, stakeholders expressed a range of concerns and expectations regarding the proposed IFF Line 2 Project, which is centred on environmental safety; employment and economic expectations; social and infrastructure needs; and community relations. The key concerns raised by stakeholders are summarized:

- Possible pollution of the environment
- Employment for skilled and unskilled youth
- Provision of water and constant power supply
- Enhancement of the company's CSR project
- Specialized training for youths
- Health care infrastructure
- Public safety
- Provide skill acquisition training with a start-up pack and grant for the trainee
- Provision of fertilizer for local farmers
- Continuous engagement
- Support to Widows empowerment
- Consider them in Christmas package through their leadership

In response to these concerns, the consultation team provided information on the Project design, proposed technology, and operational controls intended to minimise environmental impacts. Stakeholders were informed that the Project would be designed, constructed, and operated in compliance with applicable national regulatory requirements and international environmental and social standards, with measures in place to prevent and manage air emissions, effluent discharges, waste generation, noise, and other potential environmental impacts.

With respect to employment, training, local procurement, community development, healthcare, support for vulnerable groups, and other socioeconomic expectations, the consultation team explained the existing and planned CSR and community development initiatives within Indorama's host communities. Stakeholders were informed that concerns, recommendations, and requests raised during the engagement process would be documented and communicated to Project management for consideration during Project planning and implementation. The Project team also reaffirmed its commitment to maintaining ongoing stakeholder engagement and communication throughout the Project lifecycle.

5.2.3.1 CONSULTATION OUTCOMES AND HOW FEEDBACK INFLUENCED THE PROJECT

Table 5-7 records, for each substantive issue raised in the 2025–2026 consultation, the group that raised it and the page of the consultation record at ESIA Volume II, Annexure 4-6 – Comprehensive Stakeholder Engagement Report (PDF pages 205–361).

TABLE 5-7 CONSULTATION OUTCOMES MATRIX

Concern or expectation raised	Raised by, when, and evidence page	Project response	ESIA / ESMP element or Project commitment affected	Resulting change, or reason for no change	Owner	Status and verification evidence
Possible pollution of the environment – air emissions, effluent, odor and dust – and the associated health effects	All ADI communities; community engagements October–November 2025 and the Public Forum of 26 February 2026 (Annexure 4-6, pp. 213–291 and 329–352)	Explained the Project design, the reforming and granulation technology, the emission and effluent controls, and the applicable Nigerian and World Bank Group EHS standards; undertook to disclose monitoring results	ESIA Volume I specialist studies on air quality and climate, noise and vibration, surface water and sediment, groundwater, and community health, safety and security; ESMP air quality, noise, effluent and monitoring programmes	Change incorporated. Each of those specialist studies was retained in full, with ambient monitoring points sited at the settlements that raised the concern. Odor, dust and noise were established as express grievance categories in the Grievance Management Procedure	ERM (assessment); HHSE (monitoring); Head CR&D (disclosure)	Incorporated into the ESIA and this SEP; ESMP commitment open and recurring. Verification: ESIA Volume I specialist study scope and monitoring plan; Table 6-3 disclosure obligation; grievance category list at Section 9.4
Public safety, and the consequences of a major accident at the ammonia facilities	ADI communities and traditional rulers; community engagements October–November 2025 (Annexure 4-6, pp. 213–291)	Explained containment, detection, fire and gas systems and emergency response arrangements; undertook to extend emergency planning beyond the fence line	ESIA Volume I quantitative risk assessment and major accident hazard analysis; Project emergency preparedness and response plan (AfDB OS4)	Change incorporated. The quantitative risk assessment and major accident hazard analysis were retained in the ESIA scope, and off-site emergency preparedness, siren familiarisation and joint community drills were added to the engagement programme	HHSE / Site Manager	Incorporated. The quantitative risk assessment has been shared with lenders. Community emergency response drills are programmed annually (Table 5-2, construction and operations) and are a monitored activity under Table 8-2

Concern or expectation raised	Raised by, when, and evidence page	Project response	ESIA / ESMP element or Project commitment affected	Resulting change, or reason for no change	Owner	Status and verification evidence
Employment for skilled and unskilled youth	Youth forums; Eleme Graduate Forum; Alesa youth focus group discussion, 3 November 2025 (Annexure 4-6, pp. 276–281 and 298–303)	Explained the MoU quotas, the Local Hiring Plan and the route through the PAC employment sub-committee; declined to guarantee employment to all applicants	Host community MoU employment quotas; Local Hiring Plan; this SEP, Sections 5.3.4 and 5.4.3	Change incorporated. Quotas, eligibility criteria and the selection process are now disclosed in writing at each engagement instead of being described in general terms; reasons are given to unsuccessful applicants; construction workmen quota compliance is monitored monthly	Head CR&D / HR-IR	Committed; quota reporting recurring. Verification: written quota disclosure records; monthly quota compliance report to the PAC; Table 6-3 disclosure obligation on MoU delivery
Specialized training for youth, and skills acquisition with a start-up pack and grant	Youth forums and community meetings, October–November 2025 (Annexure 4-6, pp. 213–291)	Confirmed the existing skills acquisition programme under the host community MoU	Host community MoU 2026–2028 socio-economic and capacity-building provisions (Table B-2)	No new commitment required; the existing commitment was confirmed and carried into the 2026–2028 MoU with budgetary allocation	Head CR&D	Ongoing under the MoU. Verification: 220 skills-acquisition completions recorded in 2025, of which 57 per cent were women; annual delivery report to the PAC; CSR programme records at ESIA Volume II, Annexure 4-7 (pp. 362–407)
Provision of potable water and constant power supply	Multiple ADI and AII communities; community engagements	Explained that municipal water reticulation and grid electricity are the	No ESIA or ESMP change. Host community MoU community	No change. Reason: the request is for a statutory public service that is not a Project	Head CR&D	Not accepted as a general Project commitment; eligible for MoU project

Concern or expectation raised	Raised by, when, and evidence page	Project response	ESIA / ESMP element or Project commitment affected	Resulting change, or reason for no change	Owner	Status and verification evidence
	and Public Forum (Annexure 4-6, pp. 213–291 and 329–352)	statutory responsibility of Rivers State Government and Eleme LGA, and that the Project will not assume that responsibility	development project process	impact and not a Project obligation. The limit is stated openly in the expectation-management provisions (Section 1.1) so that it is applied consistently. Water supply infrastructure remains eligible for consideration as a community development project under the MoU where the PAC prioritizes it within the available budget		prioritization. Verification: PAC CSR sub-committee minutes recording the prioritization process; Table 5-4, row 6
Enhancement of CSR projects, and healthcare infrastructure	Community leaders and Community Development Committees, October–November 2025 (Annexure 4-6, pp. 213–291)	Explained the CSR budget process through the PAC CSR sub-committee, including the budget envelope and the carry-forward of unfinished projects	ESIA Volume I community health, safety and security assessment; host community MoU CSR provisions; Project emergency preparedness and response plan	Change incorporated. Healthcare facilities serving the ADI are now engaged directly as stakeholders on emergency response capability under AfDB OS4, and the CSR prioritization process, budget envelope and carry-forward rules are disclosed to communities	Head CR&D / HHSE	Ongoing under the MoU. Verification: healthcare facilities entered in the stakeholder register (Table 4-2); CSR programme records at ESIA Volume II, Annexure 4-7 (pp. 362–407)

Concern or expectation raised	Raised by, when, and evidence page	Project response	ESIA / ESMP element or Project commitment affected	Resulting change, or reason for no change	Owner	Status and verification evidence
Support to widows' empowerment	Eleme Widows Association focus group discussion, 12 March 2026, 103 participants (Annexure 4-6, pp. 309–322)	Accepted. Recognized that widows had limited interaction by the existing engagement structures, however getting benefitted under micro-grant scheme.	This SEP, Section 4.4.1 and Table 4-7; host community MoU micro-grant and community development programmes	Change incorporated. Widows are identified as a distinct vulnerable group with dedicated engagement and differentiated measures; they register directly for the micro-grant and community development programmes rather than through household heads; and they are notified directly through the Association rather than only through community-wide channels	Head CR&D	Incorporated into this SEP. Verification: Table 4-7 differentiated measures; Table 4-8 and Table 4-11 classification as Work Together; dedicated engagement is a monitored indicator under Table 8-2
Accessibility of information and of benefits for people with disabilities	Eleme Physically Challenged Association focus group discussion, 12 March 2026, 17 participants (Annexure 4-6, pp. 323–328)	Accepted	This SEP, Section 4.4.1 and Table 4-7; Project emergency preparedness and response plan (AfDB OS4)	Change incorporated. Persons with disabilities are identified as a distinct vulnerable group; accessible venues, transport, large-print and pictorial materials and verbal briefing of all written material are committed; and the identification of individual assistance	Head CR&D / HHSE	Incorporated into this SEP. The survey of individual assistance needs for emergency evacuation is scheduled for completion before contractor mobilization and is tracked as a commitment in the Stakeholder Feedback and Commitments

Concern or expectation raised	Raised by, when, and evidence page	Project response	ESIA / ESMP element or Project commitment affected	Resulting change, or reason for no change	Owner	Status and verification evidence
				needs for emergency evacuation is included in the emergency preparedness and response plan		Register at Appendix E
Reservation of contracts and supplies for indigenous contractors	Indigenous Suppliers Forum and Community Development Committees (Annexure 4-6, pp. 213–291)	Confirmed the existing MoU ring-fencing of contracts of lower technical content	Host community MoU obligations of Indorama (Table B-2)	No new commitment required; the existing commitment was confirmed. The ring-fenced contract categories are now disclosed in writing rather than described orally	Procurement / Head CR&D	Ongoing under the MoU. Verification: written disclosure of ring-fenced categories; contracts awarded to indigenous contractors reported to the PAC (Table 6-3)
Consideration in the Christmas package through community leadership	Community leaders, October–November 2025 (Annexure 4-6, pp. 213–291)	Explained that seasonal goodwill is administered under the MoU homage provisions through the traditional institutions and is not an individual entitlement	No ESIA or ESMP change. Host community MoU homage provisions (Table B-2)	No change. Reason: the request is for an individual entitlement that the MoU does not create. The limit is recorded in the expectation-management provisions (Section 1.1)	Head CR&D	Clarified; no commitment change. Verification: MoU homage provision at Table B-2; expectation-management record

Source: ERM. Page references are to ESIA Volume II, Annexure 4-6 – Comprehensive Stakeholder Engagement Report (PDF pages 205–361).

5.2.4 FURTHER PUBLIC PARTICIPATION AND STAKEHOLDER ENGAGEMENT

Where the ESIA process has identified information gaps or further public participation requirements, these must be completed by IFF prior to the completion of the ESIA and records and findings should be attached as an addendum to the ESIA document. This should be conducted as per the FMEnv requirements.

Methodology for closing information and participation gaps. Where a gap is identified, it is closed by the following method:

- **Identification** – gaps are identified from three sources: the ESIA specialist teams, where a receptor group or a data set required for impact prediction has not been consulted or surveyed; the engagement record itself, where a community or group identified in Table 4-2 has not been reached, or where attendance at an engagement was materially unrepresentative (for example female participation below 30%); and the FMEnv, technical panel or lender review comments.
- **Logging** – each gap is logged in the Stakeholder Feedback Register with the group concerned, the information required, the reason the gap arose and the responsible owner.
- **Method selection** – the method is selected to fit the gap: a community meeting where a whole community was missed; a focus group discussion where a vulnerable or under-represented group was missed; a household or resource-user survey where quantitative baseline data is missing; a key informant interview where institutional information is missing; and a repeat session with a female facilitator where female participation was inadequate.
- **Conduct** – notice not less than seven days in advance through the community's recognised leadership and by noticeboard and SMS; a briefing document in English with verbal explanation in Eleme/Ogoni language and Nigerian Pidgin; facilitation by ERM with Indorama CR&D present; attendance register disaggregated by sex; photographic record; and verbatim capture of issues raised with responses given.
- **Documentation and closure** – the record of each additional engagement, its attendance register and the issues raised and responses given are compiled as an addendum to the ESIA and submitted to the FMEnv in accordance with its requirements. Issues raised are entered into the Consultation Outcomes Matrix (Table 5-7) and their disposition reported back to the group concerned. The gap is closed in the register only when the record has been compiled and the feedback returned.
- **Accountability** – the Head of Community Relations & Development is accountable for closure of all gaps; ERM is responsible for facilitation and recording during the ESIA phase; and the E&S Corporate Team verifies closure before the ESIA is submitted.

5.2.5 ESIA DISCLOSURE

Following the completion of the ESIA, findings should be disclosed to all stakeholders. In compliance with the EIA Act, No. 86 of 1992, once the ESIA is under review by the FMEnv

the ESIA documents may be requested by the FMEnv to be disclosed publicly for 21 working days. Locations to display the documents should include:

- Eleme Local Government Area offices;
- Obio/Akpor Local Government Area offices;
- Rivers State Ministry of Environment Offices;
- The Federal Ministry of Environment Headquarters; and
- The Federal Ministry of Environment Zonal Office Port Harcourt.

Disclosure to affected communities in accessible form. The Project will disclose the following, in a non-technical form and in a manner that is accessible and culturally appropriate:

- **Radio** – radio jingles and a short radio explanatory item on stations with reach into Eleme and Obio/Akpor, timed to coincide with the statutory disclosure period.
- Hard copies of the ESIA will be lodged at the PAC office, the CR&D office, each host community's traditional council, Eleme LGA and Obio/Akpor LGA offices.

5.2.6 ESIA COMMENT AND OBJECTION

IFF must make reasonable opportunity available to stakeholders to comment or object to the ESIA findings. This will be conducted in compliance with EIA Act of 1992 (amended 2004) and will include advertisements in local newspapers to invite the public to participate in the ESIA review process, where necessary. Where the comments or objections are deemed reasonable and eligible, IFF will endeavour to address them through an updated Project design or through further engagement with the objecting stakeholders.

Criteria and process for determining whether a comment or objection is reasonable and eligible. To avoid the appearance of arbitrary filtering, the following criteria and process apply. Every comment and objection received is registered and receives a written response, whether or not it results in a change; a determination that a comment is not eligible is not a decision to disregard it.

- **Eligibility** – a comment or objection is eligible where it relates to the Project or its associated facilities; relates to a matter within the scope of the ESIA, the ESMP, this SEP or the Project's commitments; is submitted within the statutory comment period or, if late, before the FMEnv decision; and identifies the matter of concern with sufficient particularity to permit a response. Anonymous submissions are eligible. Submissions in local language, verbal submissions recorded by the receiving officer, and submissions made through a representative are all eligible.
- **Reasonableness** – an eligible comment is treated as reasonable, and therefore capable of resulting in a change, where it identifies a factual error, omission or inconsistency in the ESIA; identifies an impact, receptor or pathway not assessed; identifies a mitigation measure that is technically or practically unworkable, or proposes one that is more effective; identifies an accessibility, representation or process defect in the engagement undertaken; or raises a matter that is technically

and financially feasible to address within the Project's scope and does not conflict with a legal or safety requirement.

- **Matters not resulting in change** – a comment will not result in a change to the Project where it seeks a benefit or entitlement outside the Project's scope or the MoU framework; seeks the provision of public services that are the statutory responsibility of another body; is unrelated to the Project; is more appropriately dealt with under another process, including the grievance mechanism, the workers' grievance mechanism, or legal or administrative proceedings; or would require a measure that conflicts with a regulatory, licence or safety requirement. In each case the reason is given in writing.
- **Process, decision-maker and review** – Screening for eligibility is undertaken by the Head of Community Relations & Development. Assessment of reasonableness is undertaken jointly by ERM as ESIA consultant, the relevant discipline specialist, the Project engineering team where design is implicated, and HHSE, and is recorded with the reasoning. The determination is approved by reviewed by the E&S Corporate Team.

5.3 PRE-CONSTRUCTION PHASE

This phase outlines engagements that will be undertaken post the ESIA process but prior to the commencement of construction.

5.3.1 MEMORANDUM OF UNDERSTANDING WITH HOST COMMUNITIES

Indorama has successfully signed seventh (7th) Memorandums of Understandings (MOUs) with host communities since 2007. To ensure continuity and mitigation of potential risks regarding commitments enshrined, the Proponent will ensure implementation of existing MOU (2026 – 2028) during construction, and that this MOU will explicitly govern the construction and operation of the IFF Line 2 Project. The issues to be addressed in the MOU are:

- Preferential recruitment quotas from host communities.
- Skill Acquisition Programmes for host community youth.
- Access to micro-credit schemes for women from host communities.
- Ring-fencing of non-technical and non-core contracts for host community contractors.
- Provision of scholarships to host community students in universities and polytechnics.
- Provision of funds for community development projects in host communities.
- Terms of engagement between the Project and Traditional rulers and community Leaders in the area.

5.3.2 QUARTERLY ENGAGEMENT WITH PAC

During the pre-construction phase, the PAC should be engaged on a quarterly basis to establish the roles and responsibilities of the committee with regards to the Project, as well as to capacitate them to discharge these responsibilities. Furthermore, the PAC will receive updates on the progression of planning for construction commencement. The PAC

will play an important role in continually communicating relevant Project information with communities and other stakeholders.

5.3.3 PROVIDE QUARTERLY PROJECT UPDATES

Indorama will continue to provide feedback and updates to stakeholders regarding the progression of planning for construction commencement, as well as any other pertinent information to be disclosed. This feedback will be provided primarily through the PAC, with the option to include broader engagement with traditional and community leaders where this is considered necessary.

The Project distinguishes between informing stakeholders and enabling them to participate, and commits to the latter for stakeholders assigned 'Work Together' or 'Keep Engaged' in Table 4-8. Participation is treated as meaningful only where the following conditions are met, and each is a monitored element of engagement quality under Table 8-2: information is disclosed in advance of the engagement and in sufficient time for stakeholders to consider it, rather than tabled at the meeting, the engagement is held before the relevant decision is taken, and the decision remains genuinely open to influence; stakeholders are told at the outset which aspects are open to their influence and which are fixed, and why; stakeholders have the opportunity to raise matters not on the Project's agenda, and those matters are recorded; those least able to speak in a mixed forum are engaged separately so that their views are not filtered through others; the Project responds substantively rather than deferring, and where it cannot respond at the engagement it commits to a date by which it will; the disposition of every issue raised is reported back to the group that raised it, with reasons where it was not accepted; and the engagement is free of manipulation, interference, coercion, discrimination, intimidation and reprisal. Where an engagement is limited to information sharing because no decision is open

5.3.4 ENGAGEMENT WITH EMPLOYMENT AND BUSINESS FORUMS

Reference should be made to the *Local Hiring Plan for Construction and Operation phase developed for IFF Train 3 Project* (Indorama Eleme Fertilizer and Chemicals Limited, 3 February 2023) prior to engaging stakeholders on this issue.

5.3.5 GRIEVANCE MANAGEMENT PROCEDURE (GMP)

Indorama has well established Grievance Management (GMP) System since the time of IFZ Line 1 and Line 2. Grievance management system undergone substantial improvements from time based on the feedback received from stakeholders, Lenders and LIESA². Present GMP will be extended to IFF Line 2 during both construction and operation phase. The Grievance Management Procedure is set out in full in Section 9, which addresses purpose and scope, guiding principles, definitions, eligibility, submission channels including the confidential channel for GBV/SEA/SH complaints, the handling procedure and its timelines, the appeals route and the AfDB Independent Recourse

² Lead and Independent Social Advisor

Mechanism, roles and responsibilities, and monitoring and reporting. This sub-section is a cross-reference only and does not restate those provisions.

5.4 CONSTRUCTION PHASE.

5.4.1 PROVIDE PROJECT UPDATES

Periodic updates regarding the progression of construction, as well as any other pertinent information to be disclosed, will be provided through engagements with traditional and community leaders, as well as youth structures, and any other stakeholders deemed necessary as determined by the proposed outcomes of the engagement. These will be supplemented with quarterly engagements with the PAC.

5.4.2 QUARTERLY ENGAGEMENT WITH PAC

Throughout the construction phase, IFF will meet with the PAC quarterly. The PAC will serve as the main vehicle of communication between the Project and host communities. The PAC will, at a minimum, discuss the following issues:

- Employment opportunities for local communities, and monitoring of achievement of quotas.
- Subcontracts / procurement opportunities for contractors from communities, and monitoring of local content achievement.
- Community development projects.
- Provision of scholarships and vocational training.
- Micro Grant for women

Engagement with the PAC will be appropriately documented through capturing of minutes, action items, as well as updating the Project's commitment register.

5.4.3 BI-MONTHLY ENGAGEMENT WITH YOUTH

As a designated vulnerable group, the Project will engage with youth every two months, that is on a bi-monthly basis, to discuss opportunities for empowerment and socio-economic development throughout the construction phase.

5.4.4 MONITORING OF GRIEVANCES

At the commencement of construction, the Project will actively monitor grievances raised against Management or sub-contractor staff, as per the process outlined in Section 9.7 (Grievance Handling Procedure), under the Grievance Management Procedure set out in Section 9. Where recurring grievances are identified, Management will actively engage with stakeholders and aggrieved parties to address the cause of such recurring grievances.

5.5 OPERATIONAL PHASE

5.5.1 QUARTERLY ENGAGEMENT WITH PAC

The Project will continue to engage with the PAC as prescribed in the existing MOU.

5.5.2 PROVIDE BROADER PROJECT UPDATES AS REQUIRED

Management will continue to provide broader feedback and updates to stakeholders beyond the PAC regarding the operation of the Project, as well as any other pertinent information to be disclosed such as environmental exceedances and corrective measures to be implemented. Such engagements will take place on an *ad hoc* basis as the need arises, and the necessary stakeholders will be determined given the engagement objectives.

5.5.3 TRIGGER EVENTS REQUIRING ADDITIONAL STAKEHOLDER ENGAGEMENT

Additional engagement beyond the scheduled programme is required whenever any of the following occurs. The list is not exhaustive; it establishes the minimum circumstances in which additional engagement is mandatory rather than discretionary.

- **Environmental and safety events** – an exceedance of an air, noise, effluent or ambient standard with potential off-site effect; an unplanned emission, flaring event, spill or release; an odour, dust or noise event generating more than one complaint in a week; a fire, explosion, or activation of the emergency siren; any incident requiring off-site emergency response or community sheltering or evacuation; a fatality or serious injury involving a community member, employee or contractor worker.
- **Project changes** – a change in Project scope, capacity, layout or technology; a change to the construction programme that alters the duration or intensity of disruption; a material change in workforce numbers or accommodation arrangements; a change to the haulage route, haulage volumes or hours of operation; introduction of a new activity not assessed in the ESIA; a material change in predicted impacts; an addition to or change in associated facilities.
- **Grievance signals** – three or more grievances within a rolling quarter from a single community or on a single theme; any grievance classified as high or urgent; any allegation of GBV, SEA, SH, retaliation or intimidation; any grievance involving security personnel; a grievance unresolved beyond 60 days; a pattern of grievances indicating that an engagement or disclosure route is not working.
- **Social and stakeholder signals** – a leadership or representation dispute in an affected community; a protest, blockade, work stoppage or threat to Project operations or personnel; the emergence of a new stakeholder group, settlement or in-migration within the Area of Influence; identification of a new vulnerable or disadvantaged group, or evidence that an existing group is not participating effectively; adverse media or civil society attention; a materially unrepresentative engagement, including female participation below 30% at a community engagement.
- **Regulatory and lender triggers** – a new or amended regulatory requirement affecting the Project; a condition attached to an approval that affects communities; a lender, LIESA or Independent Recourse Mechanism request or finding; a corrective action arising from an audit or monitoring visit; commencement of a new lifecycle phase.

Responsibility for determining that additional engagement is required. The Head of Community Relations & Development is accountable for determining whether a trigger has occurred and for authorising and convening the additional engagement. The determination is made on the recommendation of, or on notification from, whichever function first becomes aware of the trigger: the Community Relations Officers for community and grievance signals; the HHSE team for environmental and safety events; the Site Manager or Construction Manager for construction programme and contractor matters; the Security Manager for security-related matters; HR/IR for labour and workforce matters; and the E&S Corporate Team for lender, audit and regulatory matters. Any of these functions may require the Head of CR&D to consider a trigger, and a decision not to convene additional engagement must be recorded with reasons.

Where the trigger involves an event with actual or potential off-site consequence, notification to affected communities is made within 24 hours and the engagement is convened within five working days. For all other triggers the engagement is convened within twenty working days. Where the matter is contested, is likely to affect more than one community, or involves an allegation against Project or contractor personnel, the determination is escalated to the Stakeholder Engagement Steering Committee (Section 7.5). Every trigger event, the determination made and the engagement held are recorded in the Stakeholder Feedback Register and reported in the quarterly engagement report.

5.5.4 MONITORING OF GRIEVANCES

The Project will actively monitor grievances raised against Indorama or sub-contractor staff throughout the operational life of the Project, as per the process outlined in Section 9.7. Where recurring grievances are identified, Management will actively engage with stakeholders and aggrieved parties to address the cause of such recurring grievances.

5.6 DECOMMISSIONING PHASE

This section has been written on the assumption that decommissioning will only apply to the IFF Line 2 Project. Should decommissioning of the entire IFF plant occur, additional planning beyond the scope of this SEP will need to take place. Furthermore, the below should be considered as guidelines which will be further refined based on contextual factors at the time of decommissioning.

5.6.1 ANNOUNCEMENT OF INTENDED DECOMMISSIONING

Stakeholders will be informed of the intended decommissioning as soon as reasonably and practically possible, but no less than three months prior to the commencement of decommissioning activities. IFF will communicate the intended decommissioning via the PAC, traditional leaders, community leaders, union representatives and youth leaders.

5.6.2 QUARTERLY ENGAGEMENT WITH PAC

During the decommissioning process, IFF will meet with the PAC quarterly to discuss the potential impacts of the decommissioning on host communities, as well as how these may be mitigated. Furthermore, IFF will discuss plans with the PAC for the timely completion

of commitments, as stipulated in the relevant MOUs as signed with the host communities, prior to the completion of decommissioning.

5.6.3 PROVIDE BROADER DECOMMISSIONING UPDATES AS REQUIRED

IFF will continue to provide broader feedback and updates to stakeholders beyond the PAC regarding the decommissioning of the Project, as well as any other pertinent information such as anticipated impacts on host communities. Such engagements will take place on an *ad hoc* basis as the need arises, and the necessary stakeholders will be determined given the engagement objectives. Sensitivity will be demonstrated for the potential consequences of decommissioning on livelihoods and socioeconomic opportunities for host communities.

5.6.4 MONITORING OF GRIEVANCES

At the commencement of decommissioning, the Project will actively monitor grievances raised against IFF or sub-contractor staff, as per the process outlined in Section 9.7 (Grievance Mechanism). Where recurring grievances are identified, IFF will actively engage with stakeholders and aggrieved parties to address the cause of such recurring grievances.

5.7 EMPLOYEE GRIEVANCE MANAGEMENT SYSTEM –

Management has well established grievance management procedure to address individual grievances raised by an employee or collective grievances raised by respective unions during construction and operational phase. A detail grievance management procedure is enshrined in employee handbook and collective bargaining agreements.

5.8 CONTRACTOR WORKFORCE ENGAGEMENT AND COMPLIANCE

All contractors and subcontractors shall be required to comply with Indorama's labour, safety, security, human rights, anti-retaliation, GBVH and grievance redressal requirements. Contractor compliance and performance shall be monitored periodically.

5.9 SECURITY AND HUMAN RIGHTS ENGAGEMENT

IFF recognises the importance of Security and Human Rights Engagement, aligned with IFC PS4 AfDB ISS (2023) Operational Safeguard 4 (Community Health, Safety and Security), and the Voluntary Principles on Security and Human Rights (VPSHR). There will be engagement with public and private security agencies, clear protocols for security conduct, screening and training of security personnel, and periodic review of security-related risks to communities, workers, and vulnerable groups.

5.10 ANTI-RETALIATION POLICY AND PROCEDURES

Indorama has well defined anti-retaliation policy and procedures to ensure that no worker, contractor, community member, or stakeholder will be penalised, threatened, disadvantaged, or discriminated against for raising concerns, lodging grievances, participating in consultations, reporting misconduct or cooperating with investigations.

5.11 GENDER-BASED VIOLENCE AND HARASSMENT MANAGEMENT PROCEDURE

Indorama has well defined procedure for managing Gender-Based Violence and Harassment (GBVH), including sexual harassment, exploitation, abuse, intimidation, and other forms of gender-related misconduct. The procedure provides, and shall continue to provide confidential and survivor-sensitive reporting channels, trained focal points, timely escalation, protection from retaliation, referral pathways where appropriate, and disciplinary or corrective action for substantiated cases. This should apply to employees, contractors, security personnel, and community-facing project representatives.

5.12 TRAINING AND CAPACITY BUILDING

IFF understands the importance of training requirements for employees, contractors, security personnel, grievance handlers, and community-facing staff. Indorama shall take necessary steps towards training to cover IFC Performance Standards, the AfDB Integrated Safeguards System (2023), in particular OS1, OS2, OS4, OS7 and OS10, stakeholder engagement requirements, worker grievance handling, anti-retaliation, GBVH, security and human rights, emergency preparedness, cultural sensitivity, confidentiality, and documentation. Refresher training should be provided during construction mobilisation, transition to operations and when monitoring identifies gaps.

5.13 POST-ESIA ENGAGEMENT

A summary of post ESIA engagement activities is presented in Table 5-8. For a more detailed overview of post-ESIA engagement please refer to Sections 5.3 to 5.6 of this SEP. It should be noted that the plan for post-ESIA engagement will be updated should the need arise for more intensive engagement with certain stakeholder groups or should there be a substantial change to the Project plan.

TABLE 5-8 STAKEHOLDER ENGAGEMENT PHASES AND ACTIVITIES

Engagement Phase	Engagement Activities
Pre-Construction	Monitor implementation of subsisting MOU 2023 – 2025
	Quarterly engagement with PAC
	Provide quarterly project updates
	Engagement with employment sub committee
	Engagement with PAC sub committees on employment, community development projects, grievance management, skill acquisition programme, scholarship, micro grant etc.
	Review of grievance and grievance tracking
	Engage local authorities, traditional rulers and community leaders for briefing the completion of ESIA process and commencement of construction phase of the project
	Provide monthly project updates

Engagement Phase	Engagement Activities
Construction Phase	Quarterly engagement with PAC
	Bi-monthly engagement with youth (once every two months)
	Monitoring of grievances
	Engagement with PAC sub committees on employment, community development projects, grievance management, skill acquisition programme, scholarship, micro grant, etc.
Operational Phase	Quarterly engagement with PAC
	Provide broader project updates as required
	Monitoring of grievances
	Engagement with PAC sub committees on employment, community development projects, grievance management, skill acquisition programme, scholarship, micro grant etc
Decommissioning Phase	Announcement of intended decommissioning
	Quarterly engagement with PAC
	Provide broader decommissioning updates as required
	Monitoring of grievances
	Engagement with PAC sub committees on employment, community development projects, grievance management, skill acquisition programme, scholarship, micro grant etc

6. COMMUNICATION AND DISCLOSURE

6.1 INFORMATION DISSEMINATION CHANNELS

- Community: Town-hall briefings, PAC circulars, noticeboards, WhatsApp/SMS alerts, and community information desks at PAC offices.

channels through which the Project discloses information to stakeholders, and through which stakeholders provide feedback other than by grievance, are those listed in this section and in Table 6□1.

- Regulators: Formal letters, email, monitoring data submissions, site inspections.
- Media/General Public: Press notes for major milestones, website/portal PDFs where applicable. , radio jingles and short radio explanatory items in English, Eleme/Ogoni language and Nigerian Pidgin on stations with reach into Eleme and Obio/Akpor, community radio announcements ahead of disruptive activities

6.1.1 TAILORING OF CHANNELS TO STAKEHOLDER CHARACTERISTICS

Channel selection is not uniform. Table 6□1 records, for each stakeholder group, the characteristics and accessibility constraints that bear on how it can be reached, the channels selected in consequence, and the means by which the effectiveness of those channels is assessed. Where a channel is found to be ineffective it is changed, and the change is recorded in the next SEP revision.

TABLE 6-1 COMMUNICATION CHANNELS BY STAKEHOLDER GROUP, WITH EFFECTIVENESS MEASURES

Stakeholder group	Characteristics and accessibility constraints	Channels selected and why	How effectiveness is assessed
Directly affected communities (general population)	Mixed literacy; Eleme/Ogoni language and Nigerian Pidgin predominant; limited internet penetration; high mobile phone ownership; information travels through traditional and church networks	Verbal briefing at community meetings in local language; illustrated leaflets; community noticeboards at the traditional council and market; WhatsApp and SMS alerts; radio jingles. Written English alone is not relied upon.	Attendance against community population; comprehension spot-checks at the close of each meeting (three verbal questions on the key messages); proportion of grievances indicating that information was not received; annual perception question at PAC
Women	Time-constrained by care responsibilities; lower literacy in some communities; may not receive information relayed through male household heads or male leadership	Direct notification through women's leaders and women's economic associations; women-only sessions with a female facilitator; verbal and pictorial materials;	Female attendance as a percentage of total attendance, recorded per engagement (Table 5-6); whether the 30% threshold was met; issues raised by

Stakeholder group	Characteristics and accessibility constraints	Channels selected and why	How effectiveness is assessed
		meeting times and venues agreed with women's leaders	women as a proportion of total issues
Youth	High mobile and social media use; high expectation sensitivity; competing representative bodies in some communities	WhatsApp broadcast groups administered by the CR&D department; written disclosure of quotas and criteria; bi-monthly youth forum sessions; noticeboards at youth forum offices	Read receipts and group membership numbers; attendance at youth sessions; volume and theme of employment-related grievances as a proxy for whether criteria were understood
Widows; persons with disabilities; elderly	Mobility and access constraints; sensory and communication barriers; risk of exclusion from general community channels	Direct notification through the Eleme Widows Association and the Eleme Physically Challenged Association; large-print and pictorial materials; verbal briefing of all written content; accessible venues with transport provided	Attendance at dedicated sessions; confirmation from each association that its members received the information; record of assistance provided
Existing natural resource users (fishers, hunters, farmers)	Dispersed; may reside outside the host community set and outside PAC reach; interest is specific to water, land and resource condition	Direct engagement through the Eleme Fishing Association and Eleme Hunters Association; disclosure of surface water and effluent monitoring results in non-technical form	Contact log against association membership; whether monitoring results were disclosed within the committed interval; grievances on resource condition
Indirectly affected (AII) communities along the haulage corridor	Lower salience of the Project; principal interest is traffic, road safety, dust and noise; not entitled to MoU benefits and at risk of expectation confusion	Annual community meeting; noticeboards; radio jingles; school road-safety sessions; advance notice of abnormal load movements; explicit statement of the distinction between grievance access and MoU entitlement	Attendance; road-safety session coverage against schools on the route; traffic-related grievance volume and trend
Regulators (FMEnv, RSMEnv, NESREA, NPA, Eleme LGA)	Require formal, documented, technically complete submissions with traceability	Formal letters and email; statutory monitoring data submissions; site inspections; bilateral technical sessions	Submission acknowledgement and turnaround; number of information requests indicating that submissions were incomplete; inspection findings

Stakeholder group	Characteristics and accessibility constraints	Channels selected and why	How effectiveness is assessed
Workers, contractors and unions	Reached through the workplace rather than the community; require induction-stage information; fear of retaliation is a barrier	Induction and toolbox briefings; noticeboards at site and accommodation; the separate workers' grievance mechanism (Section 5.7); union branch engagement	Induction coverage as a percentage of the mobilised workforce; worker grievance volume; anonymous channel usage
Media, civil society and general public	Interested rather than affected; require accuracy and consistency; amplify both information and misinformation	Press notes at major milestones; annual public performance summary; corporate website; briefings on request	Accuracy of coverage against the information released; number of corrections required; volume of enquiries indicating information gaps

Effectiveness is assessed by the Head of Community Relations & Development against four tests: reach, being the proportion of the intended audience demonstrably contacted; comprehension, tested by verbal spot-checks at the close of engagements and by the proportion of questions and grievances indicating that a message was not understood; timeliness, being whether the information was issued within the committed interval and before the relevant decision or activity; and responsiveness, being whether the channel generated feedback and whether that feedback was answered.

6.2 LANGUAGE AND ACCESSIBILITY CONSIDERATIONS

Use plain English for formal documentation and locally appropriate language/translation at community sessions; provide large-print and pictorial materials where literacy barriers exist; select accessible venues/times; enable anonymous or third-party grievance submissions.

6.3 DIGITAL AND PHYSICAL DISCLOSURE POINTS

- **Physical:** PAC offices, community noticeboards, CR&D office, LGA/State/Ministry offices during statutory disclosure.
- **Digital:** PDF circulation for policies and plans (e.g., Code of Conduct extracts; grievance mechanism steps), email lists for regulators and PAC reps; internal stakeholder database for auditability.

6.3.1 RETENTION, VERSION CONTROL AND ACCESSIBILITY OF DISCLOSURE MATERIALS

- Retention – engagement records, attendance registers, minutes, briefing documents, disclosure materials and the Disclosure Register are retained for the operating life of the facility plus a minimum of five years thereafter. Grievance records are retained for a minimum of seven years from close-out, and records relating to gender-based

violence, sexual exploitation and abuse, sexual harassment or other sensitive complaints are retained for a minimum of ten years under restricted access. Records relating to land access and the pipeline right-of-way are retained permanently. Retention periods are the longer of the period stated here and any period required by Nigerian law or by the financing agreements. This is the single retention schedule for the Project and it is repeated, without variation, at Section 9.9.4.

- **Custody** – the stakeholder database and the Disclosure Register are held on Indorama systems with access restricted to CR&D, HHSE, HR/IR and the E&S Corporate Team; and the Nigeria Data Protection Act. The registers are made available to lenders, the LIESA and auditors on request.

6.4 INDORAMA'S TRANSPARENCY COMMITMENTS

Indorama's approach to transparency is grounded in its publicly available corporate sustainability and governance framework. The controlling documents are the Code of Conduct (Version 3, 18 July 2024), the Community and Stakeholder Policy, the Environment and Climate Change Policy, the Human Rights and Labour Policy, the Responsible Business Policy and the Health and Safety Policy.

Table 6-2 lists the corporate documents relied upon in this SEP, their version or date, and the web address at which each publicly available document can be obtained.

TABLE 6-2 CORPORATE DOCUMENTS RELIED UPON AND THEIR PUBLIC SOURCES

Document	Version or date	Web address
Indorama Corporation group policies index	Index page	https://www.indorama.com/about-us/group-policies
Indorama Eleme policies index	Index page	https://www.indoramaeleme.com/about-eleme?id=91
Code of Conduct (Nigeria-hosted copy)	As published	https://indoramafertilizers.com/images/code-of-conduct.pdf
Community and Stakeholder Policy	Version 3, 18 July 2024	https://www.indoramaeleme.com/admin/images/Community-and-Stakeholder-Policy-Jul-24.pdf
Environment and Climate Change Policy	Public version, July 2024 (site-level policy IFZ-MGT-0.001C, Rev. 02, 10 January 2026 applies at the Complex)	https://www.indoramaeleme.com/admin/images/Environment-Climate-Change-Policy-Jul-24.pdf
Human Rights and Labour Policy	July 2024	https://www.indoramaeleme.com/admin/images/Human-Rights-Labour-Policy-Jul-24.pdf
Responsible Business Policy	July 2024	https://www.indoramaeleme.com/admin/images/Responsible-Business-Policy-Jul-24.pdf

Document	Version or date	Web address
Health and Safety Policy	July 2024	https://www.indoramaeleme.com/admin/images/Health-Safety-Policy-Jul-24.pdf
Whistleblower Policy	25 September 2024	https://adminwebsite.indorama.com/files/policies/IndoramaCorpWhistleblower%20Policy%20Sept%202024.pdf
Indorama sustainability and ESG framework	Current	https://www.indorama.com/sustainability

6.4.1 TRANSLATION OF CORPORATE COMMITMENTS INTO PROJECT DISCLOSURE OBLIGATIONS

Table 6-3 converts the corporate transparency principles into specific, measurable disclosure obligations for this Project, each with a defined trigger or frequency, audience, format and owner. These are the obligations against which disclosure performance is monitored under Table 8-2.

TABLE 6-3 PROJECT DISCLOSURE OBLIGATIONS

Corporate principle	Project disclosure obligation	Frequency or trigger	Audience and format	Owner
Integrity and honesty in communication	Disclose ambient air quality, noise, surface water and effluent monitoring results, stating the measured value, the applicable standard and whether the standard was met	Quarterly	full data to regulators and Lenders	HHSE / Head CR&D
Non-misrepresentation and completeness	Disclose ESMP implementation status, including measures not yet implemented and the reason	Annually	Lenders	E&S Corporate Team
Proactive disclosure of material information	Disclose changes to Project scope, schedule, workforce numbers or haulage arrangements that alter predicted impacts	Within 30 days of the decision, and before implementation	PAC; affected communities; regulators; lenders. Briefing plus written notice; updated ESMP where required	Head CR&D / E&S Corporate Team
Transparency on commitments	Disclose MoU delivery status – employment against quotas, contracts awarded to indigenous contractors,	Employment and local content monthly to the PAC; full benefit	PAC and sub-committees; host communities. Tabled report plus community briefing	Head CR&D / HR/IR / Procurement

Corporate principle	Project disclosure obligation	Frequency or trigger	Audience and format	Owner
	scholarships, skills places, micro-grants, CSR project progress	streams annually		
Transparency on grievances	Disclose aggregated grievance statistics – number received, categories, resolution status, average resolution time, number outstanding beyond 60 days, and key themes and corrective actions	Quarterly to the PAC; at least annually to communities and the public	PAC; communities; lenders; public. Aggregated and anonymised only	Grievance Manager / Head CR&D

6.4.2 INSTITUTIONAL RESPONSIBILITY AND APPROVAL PROCESS FOR DISCLOSURE

Authority to release Project information externally is defined as follows, so that disclosure is neither delayed for want of an owner nor made without authority.

- **Routine engagement material** – routine community-facing material – meeting notices, PAC circulars, noticeboard items, WhatsApp and SMS alerts, leaflets and radio jingles – is prepared by the Community Relations Officers and approved by the Head of Community Relations & Development.
- **Monitoring and performance information** – environmental and social monitoring results, exceedance notifications and ESMP performance information are prepared by the HHSE team, verified by the E&S Corporate Team for accuracy and completeness, and approved for release jointly by the Head of HHSE and the Head of CR&D.
- **Statutory and lender disclosure** – the ESIA, the Non-Technical Summary, this SEP and its revisions, and the annual public performance summary are approved by the Managing Director on the recommendation of the Head of CR&D and the E&S Corporate Team, and are cleared with the lenders where the financing agreements so require.
- **Media and public statements** – press notes, media responses and website content are prepared by the Corporate Communications Manager and approved by the Managing Director, with technical content verified by HHSE and community content verified by the Head of CR&D.
- **Emergency and incident notification** – notification of an incident or exceedance with actual or potential off-site consequence is authorised by the Site Manager or the Incident Commander without awaiting the routine approval chain, and is issued within 24 hours; the Head of CR&D and the Managing Director are informed concurrently. Speed of warning takes precedence over completeness of information, and the initial notification is followed by a fuller account once facts are established.

- **Grievance information** – aggregated grievance statistics are prepared by the Grievance Manager, reviewed by the Head of CR&D for confidentiality, and approved by the E&S Corporate Team before external release. No release identifies a complainant.

Every external release is entered in the Disclosure Register (Appendix D) with the document reference and version, the approver, the date, the stakeholder group, the method of disclosure and the feedback received. Contractors and subcontractors have no authority to release Project information to communities, the media or regulators, and are contractually required to route enquiries to the CR&D department.

Corporate governance pack transmitted to the Bank. The Code of Conduct (Version 3, 18 July 2024), the Community and Stakeholder Policy, the Environment and Climate Change Policy, the Human Rights and Labour Policy, the Responsible Business Policy, the Health and Safety Policy and the Sustainability Report 2024 are publicly available at the addresses given in Table 6-2.

6.4.3 PRINCIPLES OF TRANSPARENCY

Indorama's corporate principles emphasise:

- **Integrity and honesty** in communication, requiring all business units to provide accurate and verifiable information to stakeholders, regulators, and the public. (Code of Conduct – Integrity & Transparency principles)
- **Non-misrepresentation** and completeness, ensuring that all publicly disclosed information reflects the full context of operations, potential risks, expected impacts, and performance outcomes.
- **Proactive disclosure**, particularly where material (Exceedances and non-compliance, Major incidents, change in the project scope, significant and recurring grievances CAPs etc) environmental, social, safety or governance information has the potential to influence stakeholder perceptions or community well-being.
- **Protection against retaliation**, ensuring that stakeholders may raise concerns, questions, or grievances without fear of adverse consequences, including employees, contractors and community members (Code of Conduct – Speak-Up Channels; Retaliation Prevention).

6.4.4 APPLICATION TO THIS SEP

In line with corporate policy and international good practice standards (IFC PS1), and AfDB ISS (2023) OS10 paragraphs 21, 22 and 25 to 27, Indorama commits that disclosure under this SEP will:

- **Provide timely updates**, particularly on environmental monitoring results, ESMP implementation, and construction/operational performance.
- **Use predictable, structured channels**, including quarterly PAC communiqués, public notices, and community briefings.
- **Ensure accessibility**, including translations, large-print or visual materials, and inclusive formats for women, youth, low-literacy groups, and elders.

- **Be continuous**, with updates provided throughout the lifecycle of all operations, including planning, construction, operations, and decommissioning.
- Include **transparent reporting of grievances**, including aggregated grievance statistics, trends, categories, and corrective actions.

7. ORGANISATIONAL CAPACITY

Indorama will leverage the existing organisational arrangements, particularly the Community Relations & Development (CR&D) function, the Project Advisory Committee (PAC), and site leadership, to resource and deliver this SEP.

Core functions and interfaces are summarised below and align to the responsibilities outlined for stakeholder engagement requirements³.

7.1 COMMUNITY RELATIONS OFFICER

Community Relations Officers (CROs) sit within CR&D and serve as the primary daily interface between Indorama and communities, working through existing structures (PAC, women's leaders, youth forums, traditional authorities).

The key functions of a CRO are:

- Convene/coordinate community meetings, assist with disclosures, and capture minutes and action items for the stakeholder database.
- Receive community feedback and route grievances to the Grievance Manager, using standard forms/logbooks placed in each host community.
- Monitor local content commitments (employment, subcontracting) by liaising with PAC sub-committees (employment, CSR, contracts) and report status during PAC meetings.

7.2 SITE MANAGER

The Site Manager (or delegated Construction/Operations Manager per phase) is the senior site focal point for integrating stakeholder-related controls into day-to-day delivery (permits-to-work, contractor management, site logistics) and for ensuring timely interface with CR&D on emerging issues. This role supports investigations and corrective actions for grievances with potential operational implications.

The key functions of a Site Manager are:

- Ensure contractors and supervision teams can receive complaints at the point of occurrence, pass them to CR&D, and implement interim controls to prevent escalation.
- Provide technical input and site access for grievance investigations (e.g., incident scenes, asset condition, photographic evidence).
- Track closure actions in construction/operations systems and report status to CR&D for inclusion in the grievance database and quarterly summaries.

7.3 HHSE TEAM

Health, Hygiene, Safety and Environment (HHSE) functions embed environmental, safety, and community safeguards into site activities and support Root-Cause Analysis for

³ Aligned with current project-based SEPs

community-related incidents (e.g., dust/noise complaints, traffic safety). They advise on mitigations that reduce recurrence of grievance themes.

The key functions of the HHSE team are:

- Provide technical investigation support and propose corrective actions for Level 2–4 grievances, monitoring implementation effectiveness.
- Supply monitoring results and compliance data to inform community updates and, when relevant, broader operational updates on environmental exceedances and corrective measures.

7.4 E&S CORPORATE TEAM

The E&S corporate function provides governance, resourcing, and group-level oversight to align engagement and grievance practices with corporate policies (e.g., retaliation prevention; GBVH), the MoU framework, and lender expectations. It ensures adequate systems and budget for grievance tracking and reporting.

The key functions of the E&S corporate team are to:

- Maintain auditable, centralised registers (stakeholder database; grievance database) and verify the completeness/quality of entries.
- Review quarterly grievance analytics (volume, type, >60-day aging, repeat issues) and drive integration of lessons into design/management.

7.5 STAKEHOLDER ENGAGEMENT STEERING / GOVERNANCE COMMITTEE

IFF recognises the complexities issues, accordingly, matters arising are jointly discussed with the representatives from HR, EHS, CR&D, Legal, Security, contractor management and relevant project or operations leadership for appropriate resolutions.

7.6 RESOURCES AND BUDGET FOR SEP IMPLEMENTATION

Stakeholder engagement and grievance mechanism costs are provided as a distinct line in the Project construction budget and in the annual operating budget. They are not funded by the host community MoU community development allocation. The MoU allocation funds the commitments owed to host communities only.

The indicative provision is Naira 500 million across the 36-month construction phase and Naira 100 million per annum during operations. These figures are tentative estimates; additional budget will be allocated if required.

Table 7-1 breaks the indicative provision down by cost category. The construction-phase amounts are spread over the 36-month construction period. The operations amounts recur each year. All amounts are funded from the Project construction budget and the annual operating budget. The E&S Corporate Team confirms each year that the provision is still sufficient and escalates any shortfall to the Chief Financial Officer.

TABLE 7-1 INDICATIVE SEP IMPLEMENTATION BUDGET (NGN MILLION)

No.	Cost category	Construction phase (36 months)	Operations (per annum)	Budget owner
1	Stakeholder consultation and facilitation: community meetings, PAC and sub-committee meetings, focus group discussions with vulnerable groups, venue, logistics and transport support.	150	25	Head CR&D
2	Information disclosure and communication: non-technical summaries, translation, printing, noticeboards, radio, annual public performance summary	25	10	Head CR&D / Corporate Communications
3	Grievance mechanism operation: community access points, confidential GBV/SEA/SH channel, investigation, mediation and specialist support	75	15	Community Relation Team
4	Dedicated engagement personnel: additional Community Relations Officers and safeguarding focal point	90	25	Head CR&D
5	Training and capacity building: CR&D staff, grievance handlers, contractors, security personnel and PAC members, including GBVH and SEA/SH awareness	60	10	Head CR&D / HR
6	Monitoring, evaluation and reporting: stakeholder and grievance database, records management, perception survey, quarterly and annual reporting	50	10	E&S Corporate Team
7	Contingency	50	5	Project Director / Site Manager
	Total	500	100	

8. MONITORING, EVALUATION AND REPORTING

To assess the effectiveness of this SEP and associated engagement activities, Indorama will implement a data management and monitoring process as part of the overall monitoring of commitments, grievances, and performance.

8.1 MONITORING RESPONSIBILITIES, FREQUENCY, DATA SOURCES AND REPORTING

TABLE 8-1 MONITORING, REPORTING AND REVIEW FRAMEWORK

Element	Requirement
Responsible personnel	Community Relations Officers collect engagement, attendance and grievance data at source and enter it into the stakeholder and grievance databases.

Element	Requirement
	The Grievance Manager compiles grievance analytics and the quarterly grievance summary. The Head of Community Relations & Development is accountable for the completeness and accuracy of all engagement monitoring data, for the quarterly engagement performance report, and for authorising corrective action. The HHSE team supplies environmental monitoring and incident data used in community disclosure. HR/IR supplies employment, local content and worker grievance data. The E&S Corporate Team verifies data quality, reviews performance against the indicators in Table 8-2, reports to lenders, and is accountable for the SEP revision process. The Stakeholder Engagement Steering Committee (Section 7.5) reviews systemic issues escalated by any of the above.
Monitoring frequency	Monthly: grievance register review; construction workmen quota compliance; engagement activities completed against plan. Quarterly: full indicator set in Table 8-2; grievance analytics including ageing and repeat themes; channel effectiveness assessment (Section 6.1); stakeholder register review during construction. Annually: stakeholder satisfaction assessment; full stakeholder analysis review; MoU delivery review; training completion; SEP review and revision; public performance disclosure. Event-driven: after any trigger event under Section 5.5.3, and after any high or urgent grievance.
Data sources	Stakeholder database (contacts, engagement log, meeting minutes, attendance registers disaggregated by sex). Grievance database and community logbooks. Disclosure Register (Appendix D) and Stakeholder Feedback Register and Commitments Register (Appendix E). Consultation Outcomes Matrix (Table 5-7). HHSE environmental monitoring results and incident reports. HR/IR employment, local content and training records; contractor community liaison reports. Annual stakeholder satisfaction assessment; comprehension spot-check records. PAC minutes and action logs; LIESA and lender monitoring reports; audit findings.
Reporting arrangements	Monthly: engagement and grievance status to the Head of CR&D and the Site Manager. Quarterly: engagement performance report against Table 8-2, and grievance summary, to Project and site management, HR/IR and the E&S Corporate Team; grievance statistics and MoU delivery tabled at the PAC. Annually: consolidated SEP implementation report to senior management and to lenders, and a public performance summary disclosed to communities under Section 6. Event-driven: incident and exceedance notification under Section 6.4.2 and Table 6-3. Reporting to lenders and the LIESA at the frequency required by the financing agreements.
Review and updating of the SEP	Monitoring results are reviewed against the indicators quarterly. Where an indicator is not met, the Head of CR&D records the cause, the corrective action, the owner and the due date in the quarterly report, and verifies closure in the following quarter. Where the cause is a defect in the SEP itself – an ineffective channel, an inadequate frequency, a stakeholder group missed, a barrier to

Element	Requirement
	participation not addressed, or a grievance step that does not work – the SEP is amended rather than the target restated. The SEP is formally reviewed annually and revised out of cycle on the triggers in Section 1 and Section 4.4. Each revision is version-controlled, approved by Project management, and disclosed to stakeholders in accordance with AfDB OS10 paragraph 15. The revision record states what changed, the monitoring finding or trigger that caused the change, and the date of re-disclosure.

Monitoring and evaluation of stakeholder engagement performance will be undertaken using measurable Key Performance Indicators (KPIs) aligned with IFC Performance Standard 1 (PS1). The indicators are also aligned with AfDB ISS (2023) OS10, in particular the requirements for meaningful and inclusive consultation including the participation of women and vulnerable groups (paragraphs 9, 18 and 23), the documented engagement record stating whether and how feedback was taken into account (paragraph 11), timely and accessible disclosure (paragraphs 21 and 22), a proportionate and accessible grievance mechanism (paragraphs 28 to 31), and adequate organisational capacity and budget (paragraphs 10(vii) and 32). The indicators presented in Table 8-2 will assist in tracking the effectiveness of information disclosure, stakeholder consultation, stakeholder participation, grievance management, and the fulfilment of stakeholder commitments throughout the Project lifecycle.

TABLE 8-2: STAKEHOLDER ENGAGEMENT PERFORMANCE INDICATORS

Area	KPI	Target
Stakeholder Engagement	Percentage of planned stakeholder engagement activities completed	≥ 90% annually
Stakeholder Engagement	Number of engagement activities conducted with affected communities	Tracked and reported quarterly
Inclusiveness	Percentage of engagement activities involving women, youth, and vulnerable groups	100% of community engagement programmes
Information Disclosure	Percentage of scheduled project updates disclosed to stakeholders on time	≥ 90%
Grievance Management	Percentage of grievances acknowledged within the specified timeframe	100%
Grievance Management	Percentage of grievances resolved within agreed timeframe	≥ 90%
Grievance Management	Number of grievances outstanding for more than 60 days	0
Stakeholder Satisfaction	Percentage of stakeholders expressing satisfaction with the	≥ 80%

Area	KPI	Target
	engagement process during periodic reviews	
Commitments Management	Percentage of stakeholder commitments and action items completed within agreed timelines	≥ 90%
Capacity Building	Percentage of community relations personnel and relevant staff trained on stakeholder engagement and grievance management requirements	100%
Monitoring and Reporting	Percentage of planned stakeholder engagement and grievance performance reports issued as scheduled	≥ 95%, and 100% for reports required
Inclusiveness	Number of dedicated engagements held with each identified vulnerable group (women, youth, widows, persons with disabilities, existing natural resource users)	≥ 2 per group per annum during construction; ≥ 1 per annum during operations
Grievance management – SEA/SH	Number of SEA/SH complaints received, and number resolved, reported in aggregate and anonymised form only	Tracked and reported quarterly to management; no target, since a low count may indicate under-reporting rather than absence of incidents
Non-retaliation	Number of allegations of retaliation, intimidation or reprisal against complainants, witnesses, whistleblowers, grievance handlers or persons supporting investigations, and number substantiated and acted upon	0 substantiated; 100% of allegations investigated and closed
Inclusiveness	Percentage of engagements for which attendance is recorded disaggregated by sex using the revised attendance register template (Appendix C)	100% of engagements held after the date of issue of this SEP
Disclosure to absent stakeholders	Percentage of engagements for which approved minutes, resolutions or a plain-language outcome summary were disclosed to affected stakeholders who were not present through their PAC representatives, within ten working days, and recorded in the Disclosure Register (Appendix D)	≥ 95%
Resources and capacity	Annual confirmation by the Corporate Team that the budget and personnel provided under Section 7.6 remain sufficient for the engagement programme in	100% – confirmation issued annually; shortfalls

Area	KPI	Target
	Table 5-2 and the training programme in Section 9.9.5, with any shortfall escalated to the Chief Financial Officer	escalated within 30 days of identification
Data protection	Number of personal data breaches affecting stakeholder or grievance records, number notified within the periods required by Section 9.9.4, and number closed with corrective action	0 breaches; 100% of any breach notified and closed within the required periods

8.2 REPORTING

The reporting and monitoring process will include stakeholder participation and ensure that areas of improvement and stakeholder feedback are addressed.

All engagement activities will be documented and appropriately stored to track and refer to records when required and ensure delivery of commitments made to stakeholders. The following stakeholder engagement records and documentation will be used:

- **Minutes of the Meeting (MOM) / Resolutions during Stakeholder Engagement:** The proceedings of stakeholder engagements shall be recorded in MOM / Resolutions. In addition, the grievances raised during stakeholder engagement shall be logged in the grievance register. The Community Relations Officer will monitor a log of actions and progress toward implementing these commitments regularly.
- Copies of the minutes of meeting and of any resolution are made available to the stakeholder representatives present at the engagement. Minutes and resolutions are finalised and issued within ten working days of the engagement, and the date of issue is recorded in the Disclosure Register (Appendix D); timeliness of issue is a monitored indicator under Table 8-2.

Disclosure to affected stakeholders who were not present. Decisions, commitments and resolutions arising from an engagement are not confined to the representatives who attended. Within the same ten working days, the approved minutes or resolution, or a plain-language summary where the minutes are long or technical, are disclosed to the affected stakeholders who were not present through the Project Advisory Committee (PAC) members who represent each host community. The CR&D team issues the approved minutes, resolution or summary to the PAC representatives and undertakes targeted follow-up with them to confirm that the outcome has been relayed to the communities they represent. Any community member may contact the PAC representative for their community to obtain the information they require. Where a stakeholder is unable to obtain the information after making a request, they may contact the Company directly through any of the grievance channels set out in Section 9.6, and the request is handled under the Grievance Management Procedure.

The Head of Community Relations & Development owns this obligation. Before issue, the Head of CR&D reviews the material to ensure that no personal information, and no information capable of identifying a complainant or a survivor, is disclosed. Each issue to PAC representatives, and each targeted follow-up, is recorded in the Disclosure Register (Appendix D) with the document, the PAC representatives and communities concerned, the date and the feedback received, and any action or commitment arising is recorded in the Stakeholder Feedback and Commitments Register (Appendix E) with an owner and a due date. Where a stakeholder responds to a disclosed outcome, the response is treated as feedback under Section 1.1 and answered.

- **Meeting Template:** Used to collect full meeting minutes to be captured within the stakeholder database.
- **Stakeholder Database:** A database of all Indorama operational stakeholders will be maintained throughout the life of the operations. The database includes contact information (name, contact number, email address, and affiliated stakeholder group). The database should also act as the repository for all stakeholder engagement logs and meeting minutes and should be maintained in such a way for ease of reference and auditing purposes.

The stakeholder database exists and is in current use. It was established during the IFZ Line 1 and Line 2 phases, has been maintained since, and was verified and updated during the 2025–26 Project consultations; it is the source from which the stakeholder register at Table 4-2 is drawn. It is maintained by the Community Relations Officers under the accountability of the Head of Community Relations & Development, and its completeness and quality are verified by the E&S Corporate Team. It is held on Indorama systems with access restricted to CR&D, HHSE, HR/IR and the E&S Corporate Team.

- **Grievance Log:** To record all grievances received and progress in resolving them, to identify patterns, avoid recurrent problems and improve Indorama's overall social performance. Grievances are to be addressed as per the requirements included in the Grievance Management Procedure. The grievance monitoring and reporting requirements set out in Section 9.9 are the controlling requirements for grievance data and are not repeated here.

9. GRIEVANCE MANAGEMENT PROCEDURE

Indorama is committed to maintaining transparent, respectful, and constructive relationships with stakeholders across its Port Harcourt operations, including existing facilities and all future expansion projects. This Grievance Management Procedure (GMP) provides a clear, systematic approach for receiving, assessing, resolving, and monitoring grievances raised by external stakeholders who may be affected by Indorama's activities.

The GMP is intended to protect community members' rights to raise concerns and to support Indorama in identifying, managing, and resolving issues before they escalate. It does not cover internal/employee grievances, which are addressed under separate Human Resources procedures.

RELATIONSHIP WITH THE GRIEVANCE MECHANISMS FOR WORKERS, CONTRACTORS AND SUBCONTRACTORS

Three mechanisms therefore operate at this Project, and the boundaries and interfaces between them are as follows.

- **External stakeholder mechanism** – this Grievance Management Procedure. It covers any person or group external to the Project – community members, resource users, road users, landholders, associations, – in respect of the environmental and social impacts of Indorama's operations and of the activities of its contractors, subcontractors, security personnel and transporters. Accountable owner: Head of Community Relations & Development.
- **Contractor and subcontractor worker mechanism** – each contractor and subcontractor is contractually required to establish and operate a grievance mechanism for its own workforce that meets the requirements of IFC PS2 and AfDB OS2, and to make it operational before mobilisation. Indorama does not rely on the contractor's mechanism alone: contractor and subcontractor workers may in addition raise a complaint directly to Indorama through the channels in Section 9.6, including anonymously, and Indorama will receive, register and act on it. Accountable owner: Head of Human Resources & Industrial Relations, with the Site Manager responsible for verifying that each contractor's mechanism is in place and functioning.

9.1 PURPOSE

The purpose of this GMP is to:

- Provide an accessible, fair, and transparent mechanism for stakeholders to lodge concerns.
- Ensure timely acknowledgement, assessment, and resolution of grievances.
- Strengthen trust and build constructive relationships with individuals, communities, and institutions.
- Identify operational risks early and support continuous improvement.
- Demonstrate compliance with IFC Performance Standard 1, AfDB OS1 requirements on stakeholder engagement, grievance mechanisms, and disclosure.

This mechanism addresses external grievances; employee grievances follow dedicated internal procedures. It will be implemented in alignment with Indorama policies on retaliation prevention and GBVH, ensuring confidentiality where requested. Confidential and sensitive complaints, including those involving gender-based violence, sexual exploitation and abuse, sexual harassment and other forms of gender-based violence and harassment, are handled under the dedicated procedure in Section 9.6.1, which provides a separate entry point, a survivor-centred approach, restricted-access records held outside the general grievance register, and referral to medical, psychosocial and legal support.

Quarterly internal reports will track volumes, categories, aging, resolution status, and lessons learned. Records will be maintained in a central database and logbooks for trend analysis and continual improvement.

9.2 SCOPE

This GMP applies to all external grievances related to:

- Environmental and social impacts of Indorama's operations (current and future).
- Impacts arising from contractors, subcontractors, security personnel, transportation routes, or other activities linked to Indorama.
- New project development activities including construction, logistics, land use, traffic, and community engagement.

9.3 GUIDING PRINCIPLES

The GMP is underpinned by internationally recognised principles and IFC PS1 expectations:

- **Accessibility** - The mechanism will be widely publicised and available through multiple channels, at no cost, with options for anonymous submissions.
- **Transparency and Fairness** - Stakeholders will be informed of the process, timelines, investigations, and outcomes.
- **Confidentiality** - Personal information will be protected and anonymity respected where requested. Confidentiality is operationalised as follows. At the point of receipt the complainant is asked to elect one of three levels – open, name withheld from all but the grievance handler, or anonymous – and the election is recorded on the grievance form and honoured; the election may be changed by the complainant at any time. A complainant who elects confidentiality is given a reference number by which to follow the matter without identifying themselves. Identifying information is separated from the substantive record: the general grievance register holds the reference number, date, category, location, status and outcome, but not the complainant's name or contact details, which are held in a separate access-controlled index. Access to the identifying index is limited by name to the Grievance Manager and the Head of Community Relations & Development, with access logged; records of sensitive complaints under Section 9.6.1 are held separately again and are accessible only to the designated focal point and the Head of CR&D. Investigations are conducted so as not to reveal the complainant's identity: interviews are framed around the issue rather than the complaint, several persons are interviewed where doing so avoids

identification, and where the complaint cannot be investigated without disclosure the complainant is told this and decides whether to proceed. The complainant's identity is not disclosed to a contractor, a PAC member, a traditional ruler, a community representative, a line supervisor or an alleged perpetrator without the complainant's written or recorded verbal consent. All personnel handling grievances are bound by a written confidentiality undertaking, and a breach of confidentiality is a disciplinary matter and, for contractors, a contractual non-conformance. Nothing disclosed publicly, including in aggregated grievance reporting under Section 9.9.2, permits identification of a complainant, and reporting is suppressed where a category count is small enough to identify an individual.

- **Protection from Retaliation** - No person will be penalised, threatened, intimidated, harassed, disadvantaged, excluded from Project benefits or discriminated against for their involvement with the grievance mechanism or with consultation. This protection extends to complainants; persons who raise a concern on another's behalf or who assist a complainant to do so; witnesses and any person who gives evidence or provides information; whistleblowers, including employees and contractor personnel who report misconduct; grievance handlers, focal points, Community Relations Officers and any person who receives, records, investigates or determines a grievance; interpreters, facilitators and support persons; representatives of vulnerable groups and community organisations who raise matters collectively; and any person who cooperates with, supports or is otherwise involved in an investigation, audit, monitoring visit or review, including one conducted by a lender, the LIESA or the AfDB Independent Recourse Mechanism. The protection applies whether the grievance is upheld or not, and whether the person is an employee, a contractor or subcontractor worker, a community member or a third party. An allegation of retaliation is itself treated as a grievance, is investigated independently of the person or entity against whom it is made, and where substantiated results in disciplinary action or, for contractors, contractual sanction up to removal of the individual from the Project or termination.
- **Cultural Appropriateness** - Procedures will respect local norms, languages, customs, and literacy levels.
- **Inclusivity** - Women, youth, persons with disabilities, elderly persons, and other vulnerable groups will receive additional support if needed.
- **Non-Interference with Rights** - Use of the GMP does not preclude stakeholders' rights to seek legal or administrative remedies.

9.4 DEFINITIONS

Complaint	An informal concern raised verbally or in writing.
Grievance	A formal, recorded issue or claim (perceived or actual) requiring investigation or resolution.
Grievant / Complainant	An individual, group, community, or institution lodging a grievance.

Complaint	An informal concern raised verbally or in writing.
Stakeholder	Any party affected by, or with interest in, Indorama's operational impacts.
Vulnerable Groups	Individuals or groups who may experience impacts more severely due to socio-economic status, gender, literacy, disability, or other factors.
Anonymous Grievance	A grievance submitted without identifying information.

9.5 ELIGIBILITY CRITERIA

The GMP applies to external complaints (perceived or actual) related to Indorama and its contractors' activities across all operations and phases.

Grievances are considered **eligible** when they are directly or indirectly linked to Indorama's operations. Eligible grievances include:

- Environmental impacts (air emissions, water quality, noise, odour).
- Social impacts (livelihood disturbance, safety, traffic, community relations).
- Land access, damage to property, or loss of assets.
- Conduct of employees, contractors, or security personnel.
- Disturbance along transport routes or port access.
- Non-compliance with commitments, mitigation measures, or ESMPs.

Grievances clearly unrelated to Indorama's operations or are recognisably better handled under other procedures may be deemed **ineligible**, with reasons communicated to the complainant and recorded in the grievance database. Ineligible grievances may include:

- Issues unrelated to Indorama or its contractors.
- Matters more appropriately handled through legal, government, or HR systems.

If a grievance is deemed ineligible, the complainant will be informed respectfully and advised on alternative channels.

9.6 GRIEVANCE SUBMISSION CHANNELS

Indorama will provide multiple free, culturally appropriate channels for lodging grievances:

- **Written or Verbal Submissions**
 - Directly communicated with Indorama's head of external stakeholder engagement.

The following contact points are provided at the PAC office, the CR&D office

- **Grievance owner** – Head of Community Relations & Development, Indorama Eleme Complex, Eleme, Rivers State – [Kendrick Oluka]
- **Grievance email** – [kendrick.oluka@indorama.com]

- **Written correspondence** – Community Relations & Development Department, Indorama Eleme Fertilizer & Chemicals Limited / Indorama Fertilizer FZE, Eleme, Rivers State, Nigeria
- **Confidential GBV/SEA/SH focal point**– [Eva Onyebuoha]
- **Community-level contact** – Community Relations Officer for each community
- **Independent Recourse Mechanism** – African Development Bank Independent Recourse Mechanism – contact details as published by the Bank

All channels are free to the complainant. Where a stakeholder incurs a call cost, it is reimbursed. Contact details are verified for currency at each annual SEP review and updated on the noticeboards within ten working days of any change.

- At Indorama Community Relations & Development (CR&D) offices.
- During community meetings, PAC meetings, town halls, or engagement sessions.
- Through local chiefs, community representatives, PAC members, or local government entities.
- **Digital / Remote Channels:**
 - Dedicated phone line or SMS/WhatsApp line.
 - Dedicated grievance email address.
 - Letters addressed to the CR&D department.
- **Grievance Logbooks:**
 - Visible logbooks placed in accessible community locations (e.g., traditional councils, local government authority offices, PAC members). Logbooks are not a confidential channel. Because they are held in publicly accessible locations and may be seen by community leadership and by other community members, sensitive complaints – in particular those involving gender-based violence, sexual exploitation and abuse, sexual harassment, other forms of GBVH, intimidation, threats, retaliation, or misconduct by security personnel – must not be recorded in them, and complainants are directed instead to the confidential channel in Section 9.6.1. Each logbook carries on its cover a notice, in English and in local language and pictorial form, stating that the logbook is not confidential, identifying the categories of complaint that should not be recorded in it, and giving the confidential channel contact details. Any sensitive matter that is nonetheless entered in a logbook is transferred immediately by the receiving Community Relations Officer to the confidential register, the logbook entry is redacted so that no identifying or substantive detail remains visible, and the complainant is contacted privately and offered the confidential route and referral to support. Logbook custodians are briefed on this requirement, are bound by a written confidentiality undertaking, and are instructed not to read out, discuss or copy entries.
 - Anonymous grievances will also be accepted.

9.6.1 CONFIDENTIAL CHANNEL FOR SENSITIVE COMPLAINTS, INCLUDING GBV, SEA AND SH

A dedicated channel is provided. It is mandatory, operates from before contractor mobilisation, and is available to community members, Indorama employees, and contractor and subcontractor workers alike.

- **Separate entry point not requiring face-to-face contact** – a complaint may be made by a dedicated confidential telephone and SMS number answered only by the designated focal points; by a sealed written complaint deposited in a locked box at a location not controlled by community leadership or by site supervision; through any healthcare provider, women's association, or the Eleme Widows Association or Eleme Physically Challenged Association acting as an intermediary; directly to the designated focal point in person at a private location of the complainant's choosing; or anonymously or through a third party. No sensitive complaint is required to pass through a community logbook, a PAC member, a traditional ruler, a community development committee, a co-worker, a gangmaster or a line supervisor, and none is recorded in a community logbook.
- **Designated trained focal points** – a trained female focal point and an alternative male focal point are designated, so that the complainant may choose the sex of the person to whom they speak. Focal points are trained in survivor-centred handling, confidentiality, referral and the limits of their own role, and are not drawn from line management of the area in which the complaint arises
- **Survivor-centred approach** – the survivor decides whether and how the matter proceeds. Referral to medical care, psychosocial support and legal advice is offered before, and independently of, any internal investigative step, and is not conditional on the survivor agreeing to an investigation, on identifying the alleged perpetrator, or on providing evidence. The survivor is not required to repeat the account more than necessary, is not asked to justify their conduct, and is not required to confront, be interviewed alongside, or be in the presence of the alleged perpetrator at any stage. No mediation, reconciliation or customary settlement between survivor and alleged perpetrator is used, offered or facilitated. Where the Project is subject to an overriding legal obligation to report the matter to an authority, that obligation and its consequences are explained to the survivor at the outset, before any account is taken. Support and referral costs are borne by the Project and not by the survivor.
- **Records held outside the general register** – records of sensitive complaints are held in a separate register with access restricted by name to the designated focal point and the Head of Community Relations & Development. They are not entered in the general grievance register, and no personally identifiable information relating to them appears in the general register, in community logbooks, in PAC papers or in any report. Records are retained for a minimum of ten years under restricted access and are stored so that they cannot be accessed by line management or by contractors. Reporting is in aggregate and anonymised form only, and is suppressed where the number of cases in a category is small enough to permit identification.

- **Protection and interim measures** – interim protective measures are applied immediately on receipt where there is any continuing risk, including separation of the alleged perpetrator from the complainant, suspension of the alleged perpetrator from the Project pending investigation, and removal of any reporting or supervisory relationship between them. Applying an interim measure is not treated as a finding of guilt. The non-retaliation protection applies in full, and any adverse action against a survivor, a witness or a support person is itself a grievance.
- **Disclosure and awareness** – the existence of the channel, the contact number, the identity of the focal points and the assurance of confidentiality and non-retaliation are disclosed at every community engagement, at every worker induction, on noticeboards at site, at accommodation, at gates and in each community, on the cover of every grievance logbook, in the community leaflet and by radio jingle. All contractors and subcontractors are contractually required to disclose the channel to their workforce and are prohibited from operating a substitute that displaces it.
- **Governing instruments and referral pathway** – the applicable Indorama instruments are the Policy Guidelines on Gender Based Violence & Harassment (2 October 2021) and the Guidelines for Prevention and Addressing Issues of Retaliation (1 October 2021), read with the contractor code of conduct.

9.7 GRIEVANCE HANDLING PROCEDURE

The grievance management process follows a structured nine-step procedure is outlined in **Table 9-1**.

TABLE 9-1 GRIEVANCE HANDLING PROCEDURE

Step	Description
Step 1: Publicising the Mechanism	• Indorama will ensure communities understand how to lodge grievances through: • Engagements, community meetings, and sensitisation activities. • Posters, leaflets, or visual materials in local languages. • Explanations during consultations.
Step 2: Receiving and Registering the Grievance	• Upon receipt, the CR&D team will: • Log the grievance in the Grievance Register (database or logbook). • Record date, channel, complainant details (if provided), description, and category. • Provide a grievance reference number.
Step 3: Acknowledgement	• Indorama will acknowledge all grievances within 5 working days, either verbally or in writing. The acknowledgement will include: • Confirmation of receipt. • Explanation of the process. • Expected timelines for investigation and response.

Step	Description
Step 4: Screening and Classification	- Each grievance will be assessed to determine: - Eligibility. - Level of risk (low, moderate, high, urgent). - Whether immediate action is required. - Which internal unit or contractor is responsible. - Complex or serious cases may require escalation to senior leadership.
Step 5: Investigation and Assessment	- Investigations may include: - Site inspections. - Review of records, monitoring data, or incident logs. - Interviews with the complainant, witnesses, or staff. - Contractor follow-up where relevant. - All investigations will be documented.
Step 6: Development of Resolution Options	- Indorama will: - Engage the complainant (unless anonymous) to discuss findings. - Propose resolution measures that are fair, practical, and proportionate to the issue. - Document the rationale and any supporting evidence. - If a mutually agreeable resolution cannot be reached, the case may be referred to a neutral, respected third party. A standing panel of candidate mediators is maintained by the Head of Community Relations & Development. Candidates are drawn from persons and bodies independent of Indorama, of its contractors and of the community leadership structures involved in the matter, and may include the Eleme Council of Traditional Rulers where the dispute does not involve traditional leadership, the Rivers State Ministry of Chieftaincy and Community Affairs, the Eleme Local Government Area, or professional mediation body, the Nigerian Bar Association or the Institute of Chartered Mediators and Conciliators, or an accredited independent mediator. A candidate must have no financial, contractual, employment or family relationship with Indorama, with the contractor concerned, or with any party to the dispute, and must declare any such interest before appointment. - Where the matter concerns land, valuation, environmental measurement or a technical question, a suitably qualified independent specialist may be appointed instead of or alongside a mediator. The complainant is given a meaningful opportunity to participate in the selection: the panel is provided to the complainant with a plain-language explanation of each candidate's background and independence; the complainant may object to any candidate and state the reason, and an objection on reasonable grounds of perceived partiality is accepted without requiring proof; the complainant may propose an alternative candidate not on the panel, which Indorama will accept unless it can demonstrate in writing that the candidate is not independent or lacks the necessary competence; and where a complainant is a vulnerable person or group, or has difficulty engaging with the selection, the Project will facilitate representation or support of the complainant's choosing at the

Step	Description
	Project's cost. Appointment is made only once the complainant has confirmed acceptance of the appointee, and that confirmation is recorded. Where after two rounds no candidate is acceptable to both parties, the appointment is referred to the Chairman of the Project Advisory Committee, being the Rivers State Commissioner for Chieftaincy and Community Affairs, for direction. The cost of the third party is borne entirely by Indorama and is covered by the SEP implementation budget (Section 7.6); no cost is charged to or recovered from the complainant. The third party's terms of reference, the process to be followed and the status of the outcome are recorded in writing and provided to the complainant before the process begins. Referral to a third party does not extinguish the complainant's right to pursue administrative or judicial remedies, or to approach the AfDB Independent Recourse Mechanism.
Step 7: Implementation of the Agreed Resolution	• The CR&D team will coordinate implementation of the resolution, including: • Operational or procedural adjustments. • Repairs or compensatory actions where appropriate (consistent with company policies). • Contractor compliance and corrective actions. • Progress will be tracked until completion.
Step 8: Close-Out and Feedback	• A grievance is considered closed when: • Resolution actions are completed. • The complainant confirms satisfaction (where possible). • A close-out form is completed and logged. • Lessons learned are identified and communicated internally. • Anonymous grievances will be closed once corrective actions have been implemented, if applicable.
Step 9: Appeals Process	• If the complainant is not satisfied: • They may request an internal review by senior management. • They may be referred to independent mediation where appropriate. • They retain the right to pursue administrative or judicial processes. • All appeals will be documented and tracked.
Step 10: Independent Recourse Mechanism and external remedies	Nothing in this procedure limits a complainant's access to external remedies. In addition to the internal appeal in Step 9, the following routes are available and are disclosed to complainants at acknowledgement and at close-out: African Development Bank Independent Recourse Mechanism (IRM). Where a person is, or is likely to be, adversely affected by the Project as a result of the Bank Group's failure to comply with its own policies and procedures, they may submit a request to the Bank's IRM. The requestor should first seek to resolve the matter with Bank Management; if in the requestor's opinion Bank Management has not adequately handled the complaint, the request may be submitted to the IRM. There is no hierarchy between this Project-level mechanism and the IRM, and a complainant may engage with both. A complaint not resolved through this mechanism may be submitted to the IRM

Step	Description
	at any time, after the concerns have been brought directly to the attention of Bank Management and Management has been given an opportunity to respond. Use of this Project mechanism is not a precondition to approaching the Bank, and the Project will not represent that it is.

9.7.1 TIMELINES AND ESCALATION

Table 9-2 states the maximum period for each step, the owner, and the escalation route if the period is not met. Working days exclude weekends and Nigerian public holidays. Where a timeline cannot be met, the complainant is informed before it expires, given the reason and a revised date, and the reason is recorded in the register.

TABLE 9-2 GRIEVANCE HANDLING TIMELINES AND ESCALATION

Step	Action	Timeline	Owner	Escalation if not met
1	Receipt and registration in the grievance register with a reference number issued to the complainant	Same working day where received in person or by telephone; within 2 working days where received by logbook, post or intermediary	Receiving officer / CRO	Grievance Manager notified automatically; Head CR&D informed if not registered within 3 working days
2	Acknowledgement to the complainant, with explanation of process and expected timeline	Within 5 working days of registration	Grievance Manager	Head CR&D
3	Screening, eligibility determination and severity classification (low, moderate, high, urgent)	Within 5 working days of registration; immediately where there is a continuing risk to health, safety or security	Grievance Manager	Head CR&D
4	Interim protective or control measures where there is a continuing risk	Immediately on identification of the risk, and in any event within 24 hours	Site Manager / HHSE / designated focal point for sensitive cases	Head CR&D and Managing Director
5	Investigation completed and findings recorded	Low: 15 working days. Moderate: 20 working days. High: 30 working days. Urgent: 10 working days, with interim measures immediately. Sensitive cases under Section 9.6.1: survivor support and referral offered immediately;	Investigating unit (CR&D / HHSE / Site / Security) under Head CR&D	Head CR&D at 5 working days overdue; HR/IR and E&S Corporate Team at 10 working days overdue

Step	Action	Timeline	Owner	Escalation if not met
		investigation at the pace the survivor is able to sustain, with the position reviewed every 10 working days		
6	Resolution proposed to and discussed with the complainant	Within 10 working days of completion of the investigation	Head CR&D	HR/IR
7	Referral to a neutral third party where no mutually agreeable resolution is reached	Within 15 working days of the failure to agree; third party appointed within a further 20 working days	Head CR&D	Stakeholder Engagement Steering Committee (Section 7.5)
8	Implementation of the agreed resolution	Within the period agreed with the complainant and recorded in the resolution; where no period is agreed, within 30 working days	CR&D with the responsible operational unit	Head CR&D; Senior leadership where the delay exceeds 30 working days
9	Close-out, complainant confirmation and completion of the close-out form	Within 10 working days of completion of the resolution actions	Head CR&D	E&S Corporate Team
10	Appeal: internal review by senior management	Appeal to be lodged within 30 working days of the close-out communication; internal review determined within 20 working days of the appeal	Senior leadership	Managing Director
-	Overall: registration to close-out	Target 60 calendar days for all categories other than high-severity and sensitive cases; any grievance open beyond 60 days is reported by exception to management monthly and is a monitored indicator (Table 8-2)	Head CR&D	HR/IR and E&S Corporate Team

9.8 ROLES AND RESPONSIBILITIES

Table 9-3 outlines the roles and responsibilities, and **Table 9-4** outlines the Responsible, Accountable, Consult, Inform (RACI) Matrix.

TABLE 9-3 INDORAMA ROLES AND RESPONSIBILITIES.

Role	Responsibilities
Corporate-level governance (Parent Company Oversight)	
Head – Human Resources & Industrial Relations (HR/IR)	Ensures the GMP is applied across all Indorama and contractor departments; implements controls to minimise grievance risks; supports resolution of high-profile cases with national/international implications; sponsors resources and budget for the grievance mechanism.
E&S Corporate Team	Ensures alignment with corporate policies (e.g., retaliation prevention, GBVH), lender expectations, and MoU commitments; ensures records, systems, and reporting remain audit-ready.
Facility-level Responsibilities	
Head – Community Relations & Development (CR&D)	Accountable for implementing the GMP; promotes uptake of grievance processes; coordinates investigations and redress; facilitates inputs from site, HHSE, contractors, and leadership.
Corporate Communications Manager	Leads information disclosure and media/government liaison; supports documentation and messaging on engagement activities and grievance outcomes.
Site Manager / Construction or Operations Lead	Ensures contractor awareness of grievance procedures; supports and enables grievance investigations; implements corrective actions linked to community complaints.
Community Relation Officers (CROs)	Receive, record, and escalate community issues/grievances using standard grievance forms/logbooks; ensure entries are transferred into central systems; coordinate with PAC and PAC sub-committees (employment, CSR, contracts) to address recurring themes and prevent future grievances. CROs, and any other personnel designated to receive grievances – including grievance focal points, logbook custodians, security personnel at points of public contact, and contractor community liaison staff – must complete training before being assigned that role, and annual refresher training thereafter. The training covers: the grievance management procedure, eligibility screening and severity classification; how to record a complaint accurately and without leading the complainant; confidentiality, the three levels of complainant election and the operation of the separate identifying index (Section 9.3); the prohibition on retaliation and its extended scope (Section 9.3); cultural sensitivity, customary protocol and engagement in local language; inclusive handling for women, youth, widows, persons with disabilities, elderly and low-literacy complainants, including recording a verbal complaint on the complainant's behalf; and the appropriate handling and referral of GBV, SEA, SH and other GBVH complaints, comprising immediate direction to the confidential channel in Section 9.6.1, survivor-centred conduct.
Reporting Lines & Accountability	
Grievance Pathway	Complaint flows from: Front-line receiver (CRO / contractor / site) → Grievance Manager (CR&D) → Head CR&D (accountable) → HR/IR (governance & escalation) → Senior leadership (for Level-4 grievances). Closure sign-off recorded in the grievance log/database; dissatisfaction triggers escalation, third-party mediation, or judicial routes.

Role	Responsibilities
Quarterly Analytics (Grievance Manager)	Issues quarterly grievance summaries to management; compiles performance metrics; ensures records are available for external review when required.

TABLE 9-4 RACI MATRIX

Activity / Decision	Responsible (R)	Accountable (A)	Consult (C)	Inform (I)
Publicise grievance mechanism across six host communities Place logbooks	CROs / Corporate Comms	Head CR&D	PAC reps; Traditional leaders	All communities; Contractors
Receive and log grievances (all channels)	CROs / Contractors / Site teams Contractors and subcontractors are accountable for: receiving any complaint presented to their personnel at the point of occurrence and transmitting it to the CR&D department on the same working day; recording it in their own log and reporting it to Indorama monthly; operating a worker grievance mechanism meeting Section 9.2 requirements from before mobilisation; ensuring their personnel are trained and know that they must not investigate, settle, mediate or make payment in respect of a community complaint; not obstructing, discouraging or	Grievance Manager	Head CR&D	Complainant; PAC; Management

Activity / Decision	Responsible (R)	Accountable (A)	Consult (C)	Inform (I)
	filtering a complaint, and not requiring that it be raised through them; immediately referring any GBV, SEA, SH or other GBVH matter to the confidential channel in Section 9.6.1 without investigating it; and implementing corrective actions assigned to them. Failure to transmit a complaint, suppression of reporting, retaliation against a complainant or witness, or investigating a sensitive matter internally is a contractual non-conformance for which Indorama may require removal of the responsible individual, suspension of work or termination. Contractor grievance performance is a reported element of contractor evaluation. Indorama remains accountable to stakeholders for grievances arising from contractor activity and does not discharge that accountability by delegation.			
Acknowledge receipt within 5 working days	Grievance Manager	Head CR&D	Site/HHSE (if relevant)	Complainant

Activity / Decision	Responsible (R)	Accountable (A)	Consult (C)	Inform (I)
Assess eligibility & severity Set timeline	Grievance Manager	Head CR&D	HHSE; Site; HR/IR	Management; Complainant
Investigate (site visit, evidence, options)	HHSE / Site / CR&D	Head CR&D	Contractors; PAC (as needed) Also consulted, where the nature of the grievance requires their involvement: Legal (where there is a contractual, land, statutory or litigation dimension, or where a regulatory notification obligation may arise); HR/IR (where the grievance concerns an employee, a contractor worker, recruitment, quotas, discipline or working conditions); Security (where the grievance concerns the conduct of public or private security personnel, use of force, access control or an alleged human rights violation, with VPSHR requirements applying); and the designated safeguarding focal point under Section 9.6.1, who leads on any grievance involving GBV, SEA, SH, other GBVH, or a complaint involving a minor, and to whom such matters are referred immediately rather than being investigated by the ordinary investigating unit. Where a minor is involved, or where an allegation may constitute a criminal offence, Legal and the safeguarding focal point are consulted before	Complainant; Management

Activity / Decision	Responsible (R)	Accountable (A)	Consult (C)	Inform (I)
			any investigative step is taken.	
Define/agree resolution; interim updates	CR&D / Site / HHSE	Head CR&D	HR/IR; Legal/3rd-party mediator (if needed)	Complainant; PAC; Management
Closure & sign-off; escalation if dissatisfied	Head CR&D	Senior leadership (for escalations)	Mediator/Authorities (if applicable)	Complainant; Database update
Quarterly monitoring & reporting	Grievance Manager	HR/IR & E&S Corporate	Head CR&D; Site; HHS	

9.9 MONITORING, REPORTING AND CONTINUOUS IMPROVEMENT

Indorama will continuously monitor, analyse, and report on grievance trends and stakeholder engagement performance to strengthen internal accountability and promote ongoing learning.

9.9.1 INTERNAL MONITORING

Internal monitoring will include:

- A monthly review of all grievances received, investigation timelines, response quality and emerging patterns that may indicate recurring issues or systemic risks.
- Operational units and CR&D will use these reviews to identify root causes and determine whether procedural changes or targeted interventions are required.

9.9.2 EXTERNAL MONITORING & REPORTING

For external reporting, Indorama will provide:

- Periodic updates to affected communities through established platforms such as PAC meetings and other structured engagements.
- At least once per year, the company will disclose aggregated information to ensure transparency while maintaining confidentiality requirements, including the number of grievances, categories of issues raised, resolution status, and key themes. The method and audience for external grievance reporting are as follows. Audience and channel: the Project Advisory Committee, quarterly, by report and verbal presentation; host and indirectly affected communities, at least annually, through community meetings, PAC circulars, in non-technical form and with verbal explanation in local language; regulators, on request and in statutory returns; lenders and the LIESA, at the frequency required by the financing agreements; and the general public via corporate website.

- Confidentiality safeguards on external reporting: all external reporting is aggregated and anonymised; no report identifies a complainant, discloses their community where the community is small enough for that to identify them, or discloses the location, date or circumstances of an individual complaint in combination such that the complainant could be identified; where the number of complaints in a category is small enough to permit identification, the category is merged into a broader heading or the count is suppressed and the suppression noted; complaints under Section 9.6.1 involving GBV, SEA, SH or other GBVH are reported only as a total count with no category, location or circumstantial detail, and are reported to management and lenders rather than in community or public disclosure, save as a bare statement that the confidential channel is operating; and no external report is issued without review by the Head of Community Relations & Development for confidentiality and approval by the E&S Corporate Team (Section 6.4.2). Where a complainant has consented in writing to their case being described, it may be described to the extent of that consent and no further.

9.9.3 CONTINUOUS IMPROVEMENT

Indorama is committed to continuous improvement, using lessons learned from monitoring, community feedback, audits, and operational experience to refine procedures. The Grievance Management Procedure (GMP) will be updated as operational conditions evolve, new risks emerge, or enhancements to the grievance mechanism are required to align with IFC PS1 and corporate standards.

9.9.4 CONFIDENTIALITY AND DATA MANAGEMENT

All personal information collected through the grievance process will be stored securely and accessed only by authorised personnel. The following arrangements apply to grievance records, and are additional to the confidentiality measures in Section 9.3.

Retention. Grievance records are retained for a minimum of seven years from close-out; records of sensitive complaints under Section 9.6.1 for a minimum of ten years under restricted access; and records relating to land, property damage or loss of assets permanently. This is the same retention schedule as that stated at Section 6.3.1 and it is the only retention schedule applicable to Project engagement and grievance records. The retention period is the longer of the period stated here and any period required by Nigerian law, including the Nigeria Data Protection Act 2023, or by the financing agreements.

Storage and disposal. Electronic records are held on Indorama systems with access control, encryption at rest and routine backup. Paper records, including logbook originals and sealed written complaints, are held in locked storage at the CR&D office and are not left at community access points beyond collection. At the end of the retention period records are securely disposed of – paper by cross-cut shredding or incineration, electronic by secure deletion – and the disposal is recorded in a disposal register stating what was disposed of, when, by whom and by what method. Personal data is processed in accordance with the Nigeria Data Protection Act 2023. Any information disclosed publicly is anonymised and aggregated so that no complainant can be identified, whether in reports, at PAC sessions or in community updates.

Role-based access. Access to grievance records is limited to defined roles, and is recorded in an access log. Access is granted by role, not by individual name, and is withdrawn when the role changes.

- Receiving officer – may create a record and view only the grievance he or she received, until it is transferred.
- Grievance Manager – full access to the general grievance register and to the case files needed to manage investigation and close-out.
- Head of Community Relations & Development – full access to the general register, and to aggregated data for reporting.
- Investigating unit (HHSE, Security, HR/IR or Procurement, as applicable) – access limited to the individual case assigned to it, for the duration of the investigation.
- Legal and Data Protection function – access as required for legal advice, regulatory notification and data protection compliance.
- Restricted safeguarding focal point – sole access, with the Head of CR&D, to the separate confidential register for complaints of gender-based violence, sexual exploitation and abuse and sexual harassment under Section 9.6.1. The general register carries only a coded reference, the date and the words “transferred to the confidential register under Section 9.6.1”, with no personally identifiable information and no description of the allegation.
- E&S Corporate Team, lenders, the Lender Independent Environmental and Social Advisor and auditors – access to aggregated and anonymised data, and to individual files only where the file has been redacted or the complainant has given informed consent.

Data breach response protocol. A personal data breach is any loss, theft, unauthorised access, unauthorised disclosure, alteration or destruction of stakeholder or grievance data, whether electronic or paper, and whether accidental or deliberate. The following steps apply, and are additional to any requirement of the Nigeria Data Protection Act 2023.

- Step 1 – Detect and report. Any employee, contractor or agent who becomes aware of an actual or suspected breach reports it immediately, and in any event within 24 hours of becoming aware of it, to the Grievance Manager and the Head of Community Relations & Development. No person may attempt to resolve a breach without reporting it. Failure to report is a disciplinary matter.
- Step 2 – Contain. The Grievance Manager, with IT where the breach is electronic, takes immediate containment action – revoking or suspending access, isolating the affected system or account, recovering or securing paper records, and halting any further distribution. Containment action is taken within 24 hours of the report.
- Step 3 – Preserve evidence. System logs, access records, correspondence and the affected records are preserved in their existing state. Nothing is deleted, overwritten or corrected until the assessment at Step 4 is complete.
- Step 4 – Notify internally and assess. The Head of CR&D notifies the Legal and Data Protection function, the E&S Corporate Team within 48 hours of the report. Where the

breach concerns a complaint under Section 9.6.1, the restricted safeguarding focal point is notified and no other person is given access. Within five working days, the Legal and Data Protection function, with the Head of CR&D, assesses the categories and volume of data affected, the individuals affected, the likelihood and severity of harm – with particular regard to the risk of retaliation, intimidation or stigmatisation of a complainant, witness or survivor – and whether the breach is likely to result in a risk to the rights and freedoms of those individuals.

- Step 5 – Notify externally where required. Where the assessment concludes that the breach is likely to result in a risk to the rights and freedoms of the individuals affected, the Nigeria Data Protection Commission is notified within 72 hours of Indorama becoming aware of the breach, in the form required by the Nigeria Data Protection Act 2023. Where the risk is high, the affected individuals are notified directly and without undue delay, in plain language, stating what happened, what data was involved, what is being done and what they can do; where direct notification is not possible, a public communication of equivalent effect is used. Lenders and the Lender Independent Environmental and Social Advisor are notified of any breach affecting Project grievance or stakeholder data within five working days, in accordance with the financing agreements. Where the breach may expose a person to risk of retaliation or harm, protective measures under Section 9.3 are put in place before notification is made.
- Step 6 – Document. Every breach, whether or not notifiable, is recorded in the data breach log at Appendix C, which records the incident reference and date, the data affected, how the breach was detected, the containment action, the risk assessment and its conclusion, the internal notifications made, the decision on notifying the regulator, the lenders and the affected persons together with the reasons for that decision, the corrective action, the closure date and the lessons learned. The log is held by the Grievance Manager under the accountability of the Head of CR&D.
- Step 7 – Correct and learn. Corrective action is assigned to a named owner with a due date and is verified as closed by the E&S Corporate Team. Where the breach discloses a defect in this procedure, in the access controls, in the storage arrangements or in training, the procedure is amended rather than the incident merely closed. Breach incidents and the corrective action taken are reported in the quarterly engagement performance report, and in aggregated form to lenders annually.
- Step 8 – Where no internal corporate procedure applies. Where Indorama's corporate data protection procedure is unavailable, silent on a matter or inconsistent with this protocol, this protocol applies to Project stakeholder and grievance data, and the Legal and Data Protection function determines the position, records the determination and, where necessary, initiates amendment of the corporate procedure.

9.9.5 TRAINING AND CAPACITY BUILDING

To ensure consistent and effective implementation of the SEP and GMP, Indorama will invest in regular training and capacity building. Annual training will be provided for CR&D teams, contractors, and key operational staff to reinforce roles, responsibilities, and procedural requirements. Community structures such as PACs and local leaders will also

be sensitised on how to support fair, transparent, and consistent grievance handling. Additional training refreshers will be delivered during expansion phases, major operational changes, or when monitoring identifies the need for strengthened competencies. Training and capacity building for stakeholder engagement and grievance management, including induction and annual refresher training for Community Relations Officers, grievance handlers and focal points, security personnel, site supervision and contractor community liaison staff; sensitisation of PAC members, traditional rulers and community grievance focal points; community and workforce awareness sessions on GBVH and SEA/SH; and external specialist trainer costs, are provided for within the SEP implementation budget at Section 7.6, which is funded from the Project and operating budgets and not from the host community MoU community development allocation. Training completion is a monitored indicator under Table 8-2, and the E&S Corporate Team confirms annually that the budget provision remains sufficient for the training programme required by this SEP.

9.9.6 GMP SUPPORT MATERIALS

Appendix C provides the suite of templates and tools that Indorama will use to implement the Grievance Management Procedure. These materials ensure consistency, quality, and traceability across all grievance-related activities. The support materials include:

- Grievance Form
- Grievance Register Template
- Acknowledgement Letter Template
- Investigation Checklist
- Close-Out Form
- Stakeholder Engagement Attendance Register (
- Data Breach Log
- Related to Grievance Mechanisms

APPENDIX A KEY REQUIREMENTS OF THE EIA ACT

1. Public Notice

Project proponents must issue a public notice informing the public that an EIA is being undertaken. This notice typically includes the project description, location, potential impacts, and opportunities to participate.

2. Opportunity for Public Comments

The Act requires that interested groups and affected communities be given the opportunity to submit comments on the EIA documentation. This ensures that local knowledge, concerns, and suggestions are formally considered.

3. Public Hearings / Consultation Forums

The Act explicitly provides mechanisms such as public hearings, where stakeholders may present views, ask questions, or offer evidence. Public hearings may be mandated in cases of significant environmental concern or where there is substantial public interest.

4. Disclosure of Information

The Act reinforces transparency through requirements for making EIA reports publicly accessible, enabling informed participation. It establishes the creation of a public registry, ensuring that environmental documents are available for inspection.

5. Engagement Throughout the Assessment Process

The broader EIA regulatory framework (as described in Nigerian EIA practice guidance) reinforces that participation must occur across multiple steps, including:

- Project screening and scoping
- Review of the Environmental Impact Statement (EIS)
- Final decision-making

Public participation is not a single event but an ongoing requirement during key stages of assessment.

6. Consideration of Public Input in Decision-Making

The Act prohibits issuing a decision until the required public comment period has elapsed and submissions are considered, i.e. the regulators must consider stakeholder feedback before granting approval.

Public entry points into the EIA process are contained in four distinct stages of the EIA:

- **Scoping Phase:** A scoping workshop must be convened during this stage, particularly where public interest is significant. This workshop should include key stakeholders to ensure early input into project planning.
- **Drafting Phase:** Stakeholders are expected to participate in the preparation of the EIA. Records of consultations, such as proceedings from public forums and surveys,

should accompany the draft EIA to reflect community perspectives and social baseline information.

- **Review Phase:** During the review period, EIA documents may be disclosed for public access for a minimum of 21 days. Disclosure should occur at designated locations, including Local Government Area offices, State Environmental Protection Agency offices, and the Federal Ministry of Environment headquarters. Additional locations may be considered to enhance accessibility. Project-affected communities should be invited to participate through public notices, such as newspaper advertisements.
- **Public Hearing:** For projects classified under Category 1, a formal public hearing is required to provide an opportunity for stakeholders to comment on the proposed development.

APPENDIX B DETAILS OF PAC AGREEMENT

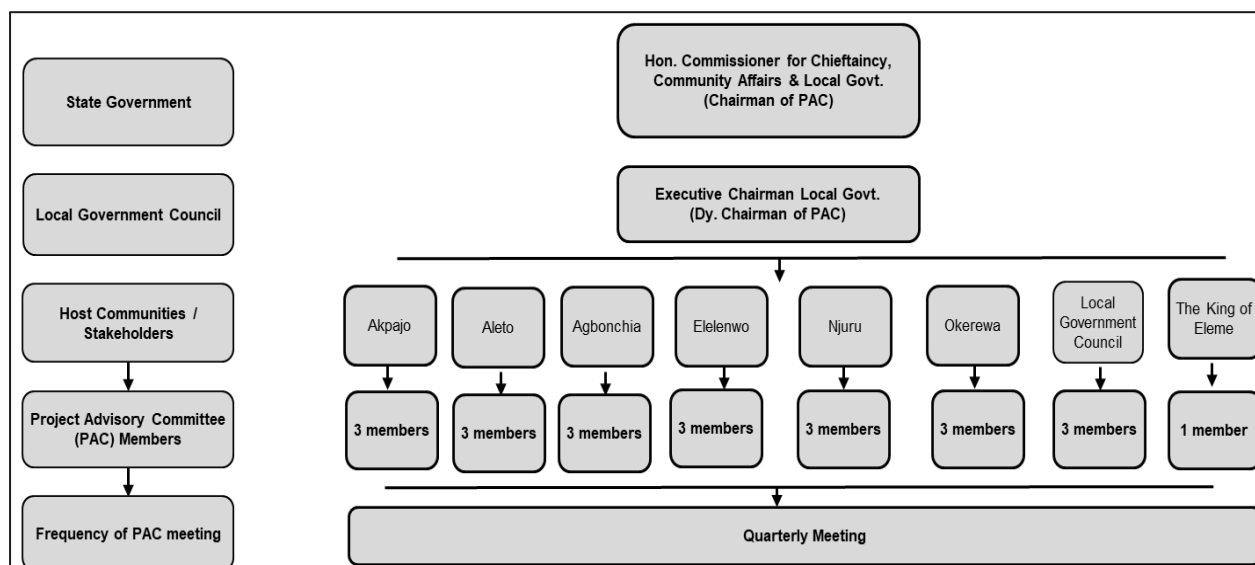


FIGURE B-1 HOST COMMUNITY ENGAGEMENT STRUCTURE

TABLE B-1 COMPOSITION OF THE PAC

Representing Body	No of members
Communities	18 in Total (3 members per each community representing six host communities. It is mandatory that 1 member is a woman from each community)
Palace of Eleme King	1
Local Government	3
Chairman of Local Government	1
Rivers State	1
Company	4
Total	28

Memorandum of Understanding with Host Communities

As described in the stakeholder identification, the host communities are the communities whose rights of occupancy of the 903 hectares (which includes 250 hectares where IFF LINE 2 is being proposed) of farmland were revoked by the Rivers State Government for Nigerian National Petroleum Company in 1984. The revocation was to facilitate NNPC to establish erstwhile Eleme Petrochemicals (EPCL). Subsequent the acquisition of EPCL by Indorama, IFF (now IFZ) continues to recognize them as the host communities.

Indorama and the Host Communities signed the first Memorandum of Understanding (MoU) in 2007. The present MOU, for the period 2026 – 2028, is the 7th MOU and a testimony of commitment towards collaboration for mutual coexistence and sustainable development. This MOU includes the following key agreements:

1. Definition of duties and obligations of both parties for a conducive working blueprint;
2. An outline of the obligations of both Indorama and the Communities (as per Table B-2); and
3. A dispute resolution mechanism.

TABLE B-2 KEY OBLIGATIONS AS PER THE HOST COMMUNITY MOU

Obligations of Indorama	Obligation of the Host Communities
Recruitment of eligible staff from host communities covering a minimum of 10% management staff, 20% senior staff and 60% Junior Non-technical Staff	No interruption or disruptions to the operations of Indorama . Ensure that no assets of Indorama shall be seized or encroached upon at all times
- Organize career development programs to guide youths in host community. - Budgetary provision for following socio economic and capacity building programmes: - community development projects - Micro Grant for women - Scholarship for students studying in universities and polytechnics. - Skill Development Programmes for young men and women - Youth Entrepreneurship Scheme for startups.	Indigenes of the Host Community including Contractors shall remain committed to the MOU.
Reserve contracts of lower technical content exclusively for indigenous contractors. Examples of contracts – Cleaning, Housekeeping, Grass cutting, non-industrial waste disposal, bagging operations, fumigation, forklift operation, loading and offloading, preferential award of contracts for catering, security services, transportation etc.	Guarantee the performance of all host community contractors.
In line with Company's deep respect, admiration and appreciation for the host communities' traditional institutions, Company shall pay annual homage to the host communities through their Chiefs and Traditional rulers	- Provide conducive and congenial atmosphere to Indorama to operate. - No disturbance or harassment of third-party contractors of Indorama .

Process of Engagement on Employment

As part of the guidelines, IFF notifies the PAC regarding the projects having the potential to provide additional employment. The notification includes employment requirements and qualification criteria. Due to administrative reasons, an employment subcommittee is formed with representation from each community to interact on employment matters. The subcommittee send CVs of prospective candidates to the Community Relations and

Development Department (CR&D). The CR&D prepares the list of shortlisted candidates to project team to carry out the recruitment process in accordance with HR guidelines. It is to be noted that the indigene candidacy is always retained, and preferential allotment is maintained.

For major construction activities, the employment engagement philosophy is the same as described above. Instead notifying the project team CR&D sends the CVs to the construction contractor directly.

The following guideline is followed for community workmen:

- Unskilled: 60% from Host Communities
- Semi-Skilled: 40% from host communities
- Skilled: 20% from Communities

IFF monitors the compliance of the above on a monthly basis from the reports of the Construction Contractor and reports the same in the PAC meetings.

Process of Engagement on Subcontracting and Supplies

All the subcontracting for non-technical works such as catering services, providing helpers, horticulture etc are awarded to host communities thru the subcommittee on Contracts within the PAC in accordance with the MOU. The subcommittee engages the indigenous contractor's forum, and the engagement process is similar as described in previous section.

During the construction, the supply of aggregates, sand etc are supplied **through** host community contractors. PAC notifies the details of such contractors to the construction contractor for further direct engagement.

It may also be noted that IFF monitors the compliance of the above on monthly basis.

Process of Engagement of CSR Projects

PACs subcommittee on CSR projects receives the details of CSR projects from communities which are passed on to IFF. After the assessment of the projects establishing the feasibility in line with the MOU, Communities nominate a contractor within their community for execution of the project. Company provides advance payments as well further milestone payments in line with project progress.

Any spill over / unfinished CSR budget within the MOU term is continued and carried forward for completion. In other words, the unfinished projects of the previous MOU are also monitored by IFF for culmination.

Process of Engagement for providing Scholarship

PACs subcommittee on scholarship oversee the awarding of scholarship to meritorious students from host communities. Scholarship is granted through the process of qualifying test. Since 2009 company has granted more than 906 scholarships for young men and women. The year wise overview of scholarship granted is given below:

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Total	
	2 Student/Host Comm. + 2 LGA				3 Student/Host Comm. + 3 LGA							4 Student/Host Comm. + 4 LGA							
Batch 1	14	14	14	14								No batch due to COVID-19	Asuu strike					56	
Batch 2		14	14	14	14														56
Batch 3			14	14	14	14													56
Batch 4				14	14	14	14												56
Batch 5					21	21	21	21											84
Batch 6						21	21	21	21										84
Batch 7							21	21	21	21									84
Batch 8								21	21	21	21								84
Batch 9									21	21	21								63
Batch 10										21	21								42
Batch 11													28		28	28	3	87	
Batch 12															28	28	20	76	
Batch 13																28	22	50	
Batch 14																	28	28	
No. of Studnts	14	28	42	56	63	70	77	84	84	84	63	0	28	0	56	84	73	906	
Budget (N' Mn.)	1	3	4	6	6	7	8	8	8	8	6	0	4	0	11	17	14.4	111.4	

Process of Engagement for Skill Development Programme:

MOU makes budgetary allocation for skill acquisition programmes. During 2025 more than 220 young men and women successful completed skill acquisition programmes in various vocational trades such as Photography, Baking, Data Analytics, Web design , Paint Production and Painting, , Cake Baking and Pastry, Fashion design etc. with over 57% of them being women.

Process of Engagement for providing Micro Grant:

The object of this programme is to empower women enterprises by providing micro-grants small scale and micro-businesses such as home bakeries, grocery shops, tailoring, food stalls, etc.; women subcommittee of PAC directly supervises the selection of deserving beneficiaries in consultation with council of chiefs in their respective communities.

Process of engagement for Youth Entrepreneurship Scheme:

The PAC directly supervises and directly identifies youth entrepreneurs who are self-employed and managing small business and provided working capital support for further expansions such as Paint Production, welding and fabrication workshop, motor repair workshops, bakery, fish farming, poultry etc

PAC meetings

PAC meetings have a structured agenda mainly covering the major deliverables as per the MOU in the engagement structure described earlier. The minutes of the previous meeting is read out and accepted after incorporating all comments. This is followed by the agenda items which are concluded under the guidance of the Commissioner of Chieftaincy.

Engagement of Host Community Youth

Youth is identified as one of the vulnerable groups. In view of this company has developed systems for focussed engagement with the youth. The engagement structure of the youth forum is therefore directly by the Community Relations and Development Department of IFF (CR&D).

Structure of the Youth Forum

Youth forum exists in each community. The presidents of each youth forum come together alongside few more members (two members from each community) nominated by the host community chiefs to form the host community youth forum. The objective of the youth forum is primarily for their empowerment.

Process of Engagement

There is a focused of MOU between IFF and host community youth forum. The primary aspiration of the youth forum is office upkeep, employment, contracts / supplies during construction.

Engagement of Women

To promote gender diversity and enhance participation women in collective decision-making process it has been made mandatory that all six (6) host communities must nominate one (1) woman members in Project Advisory Committee (PAC)

Process of Engagement with Union during construction phase

Trade Unions Act (Amended) 2005, Third Schedule provides the jurisdictional scope for National unions. In line the with jurisdictional scope provided in Trade Unions Act National Union of Civil Engineering, Construction, Furniture and Wood Workers (NUCECFWW) has the right to organise workmen in IFF Train 2 during construction phase. The constitution of the unions provides for an elected Branch Executive Committee to represent the employees and negotiate Collective Bargaining Agreement. NUCECFWW will organise the workmen connected to IFF train 2 construction.

Process of engagement of Unions during Operation Phase

Trade Unions Act (Amended) 2005, Third Schedule provides the jurisdictional scope for National Union of Chemical, Footwear, Rubber, Leather and Non-Metallic Employees (NUCFRLANMPE) and Non-Metallic Senior Staff Association (CANMPSSAN) to organise the junior and senior employees respectively. NUCFRLANMPE and CANMPSSAN has inaugurated elected Branch Elected Committee (BEC) in IFF since 2018. Company successfully finalised four (4)) collective bargaining agreements (CBAs)

Engagement of Welders and Fitters Association

Each contractor needs large numbers of welders and fitters for every project. All welders and fitters in the host communities gets affiliated to the "Welders and Fitters Association". This is an independent organization for the welders and fitters, and CR&D liaises between the association and construction contractors. The contractors further negotiate the rates with the association along with productivity commitments.

Engagement of other stakeholders

The professors / teachers are periodically engaged to bridge the gap between theory and practical through industrial visit / trainings, engaged for requirement process and support for research and development.

The media group is being engaged to provide info from source and for coverage of CSR activities /projects.

APPENDIX C GRIEVANCE MECHANISM TOOLS & TEMPLATES

- Grievance Form
- Grievance Register Template
- Acknowledgement Letter Template
- Investigation Checklist
- Close Out Form
- Stakeholder Engagement Attendance Register
- Data Breach Log

1. GRIEVANCE FORM (TEMPLATE)

Grievance Number: _____

Date Received: _____

Complainant Details

Name: _____

Address/Location: _____

Contact Details (Phone/Email): _____

Preferred Method of Contact: _____

Representation

Submitted by complainant / representative / anonymous

Name of representative (if applicable): _____

Grievance Details

Description of the issue (include location, people involved, time):

Category (environmental / social / safety / security / other):

Does the complainant request confidentiality? Yes / No

CONFIDENTIALITY ELECTION (tick one, and read the notice below to the complainant):

☐ Open – my name may be disclosed to those who need it to resolve the matter

☐ Name withheld – my name is to be known only to the grievance handler

☐ Anonymous – I do not wish to give my name at all The election may be changed at any time by contacting the grievance line. A reference number will be given so that the matter can be followed without identifying the complainant.

SENSITIVE COMPLAINT SCREENING – to be completed by the receiving officer before any further detail is recorded:

Does this complaint concern, or may it concern, any of the following?

☐ Gender-based violence (GBV)

☐ Sexual exploitation or abuse (SEA)

☐ Sexual harassment (SH)

☐ Other gender-based violence or harassment (GBVH)

☐ Harassment, bullying or intimidation

- ☐ Threats or retaliation against a complainant, witness or whistleblower
- ☐ Misconduct, use of force or human rights concern involving security personnel
- ☐ A complaint involving a person under 18 years of age

IF ANY BOX ABOVE IS TICKED, STOP. Do not record further detail on this form. Do not record the complaint in a community logbook. Do not investigate, mediate or attempt to resolve the matter. Do not discuss it with community leadership, the PAC, a supervisor or a contractor. Transfer the matter immediately to the designated confidential focal point under Section 9.6.1, offer the complainant the confidential channel and the choice of a female or male focal point, and offer referral to medical, psychosocial and legal support. Record only the reference number, the date and the fact of transfer on this form; all substantive detail is recorded by the focal point in the separate restricted-access register. Give the complainant the confidential line number before they leave.

NOTICE TO BE READ TO EVERY COMPLAINANT: This mechanism is free of charge. No person will be penalised, threatened, disadvantaged or discriminated against for making a complaint, giving evidence or assisting an investigation. Using this mechanism does not prevent you from pursuing legal or administrative remedies, from approaching the Federal or Rivers State Ministry of Environment or NESREA, or from submitting a request to the African Development Bank Independent Recourse Mechanism. Anonymous complaints are accepted and will be investigated.

Receiving Officer

Name: _____

Position: _____

Signature: _____

Witness (if applicable)

Name & Contact: _____

SIGNATURE: _____

2. GRIEVANCE REGISTER TEMPLATE

May be an excel or similar spreadsheet.

Field	Entry
Grievance Number	
Date Received	
Complainant Name / Anonymous	
Category (Env/Social/Security/Other)	
Brief Description	
Location	
Confidentiality Requested (Y/N)	
Assigned Investigating Unit (CR&D / EHS / Security / Other)	
Priority Level (Low/Medium/High)*	
Date Acknowledged	
Date Investigation Started	
Actions Taken	
Proposed Resolution	
Date Communicated to Complainant	
Status (Open / Under Review / Closed)	
Close-Out Date	
Lessons Learned / Notes Confidentiality Election (Open / Name Withheld / Anonymous) Sensitive Complaint? (Y/N) – if Yes, record ONLY the reference, date and 'transferred to confidential register under Section 9.6.1'. No personally identifiable information, and no description of the allegation, is to be entered in this register. Date transferred to confidential register (sensitive cases only) Retaliation Allegation? (Y/N) and date referred for independent investigation Sex of complainant (for disaggregated reporting; optional and may be left blank) Vulnerable group (woman / youth / widow / person with disability / elderly / natural resource user / not stated) Support or assistance provided to enable the complaint to be made (interpretation, transport, verbal recording, representation) Complainant informed of the Project mechanism AND of the AfDB Independent Recourse Mechanism (Y/N) Note: this register is the general grievance register. Sensitive complaints under Section 9.6.1 are recorded in a separate restricted-access register held by the designated focal point and the Head of CR&D, and are reported here only as a count.	

3. ACKNOWLEDGEMENT LETTER TEMPLATE

[Indorama Letterhead]

Date: _____

Dear [Complainant Name / "Community Member" if anonymous],

Thank you for submitting your grievance on [date]. This letter confirms that Indorama has received your concern and logged it as Grievance Number [XXX].

Our Community Relations & Development (CR&D) team will now review the details and initiate the appropriate investigation. You can expect an update within [X] working days, and we will inform you of any further information needed.

If you have additional documentation or clarification you would like to provide, please contact _____ us _____ at:

[Grievance Email / Hotline / Office Address]

We appreciate your engagement and commitment to helping us improve our operations.

Sincerely,

Name:

Position (CR&D / *Grievance Manager*):

Indorama

4. INVESTIGATION CHECKLIST

Investigation Steps		Log/Check
1. Initial Review	Confirm grievance eligibility (related to Indorama operations).	
	Classify priority level (Low / Medium / High).	
	Verify confidentiality requirements.	
2. Information Gathering	Interview complainant (if not anonymous).	
	Interview receiving officer.	
	Collect supporting documents, photos, or evidence.	
	Conduct site visit (if applicable).	
	Consult relevant operational units (EHS, Security, Plant Management).	
3. Assessment	Identify root cause.	
	Determine whether the grievance indicates a systemic issue.	
	Assess relevant regulatory or IFC PS1 requirements.	
4. Proposed Actions	Immediate corrective actions required?	
	Longer-term mitigation or process changes?	
	Need for senior management involvement (for high-risk cases)?	
5. Documentation & Tracking	Enter all findings in the Grievance Register.	
	Maintain investigation notes, evidence, and communication logs.	
6. Communication	Prepare a clear response for CR&D to convey to the complainant.	
	Provide expected timelines for resolution.	

5. CLOSE-OUT FORM

Grievance Number:	
Complainant Name / Anonymous:	
Date Received:	
Date Closed:	
Summary of Grievance:	
Actions Taken:	
Outcome / Resolution:	
Complainant Response:	
Satisfied / Not Satisfied	
Comments:	
Follow-Up Required:	
Yes / No	
Description:	
Sign-Off	
Investigating Officer: (Signature / Date)	
CR&D Manager: (Signature / Date)	

6. STAKEHOLDER ENGAGEMENT ATTENDANCE REGISTER (TEMPLATE)

This template replaces the register form used for the 2025–2026 engagements. The sex, age band and disability fields are voluntary; the receiving officer explains that they are collected only to demonstrate that engagement has been inclusive, that they are not used for any other purpose, and that a participant may decline without any consequence. Where a participant declines, the field is marked “prefer not to say” and is counted in the “not recorded” column of the attendance summary.

S/N o	Name	Community / organisation	Position or role	Sex	Age band	Disability	Phone and signature

Options: Sex – M, F or prefer not to say. Age band – 18–35, 36–60, 60+ or prefer not to say. Disability – Yes, No or prefer not to say. All three fields are voluntary.

7. DATA BREACH LOG (TEMPLATE)

Every personal data breach affecting stakeholder or grievance records is recorded in this log, whether or not it is notifiable, in accordance with the breach response protocol at Section 9.9.4.

Incident reference and date	Data affected (categories, volume, individuals)	How detected	Containment action and date	Risk assessment and conclusion	Internal notifications (role and date)	Regulator / lender / affected-person notification: decision, date and reasons	Corrective action, owner, closure date and lessons learned

APPENDIX D DISCLOSURE REGISTER

This appendix is the controlled Disclosure Register required by AfDB Operational Safeguard 10 and referred to throughout Sections 6 and 8. Every external release of Project information – a document, a notice, a monitoring result, a set of minutes, a policy transmittal or a public statement – is entered in the register by the officer who made the release, on the day of release. The register records, as a minimum, the fields required by the Bank: the document, the stakeholder group, the date issued, the method, and the feedback received; and, in addition, the version, the language and format, the owner and approver, the evidence reference and the follow-up status.

The entries below are those supported by an existing disclosure record at the date of issue of this SEP. Entries are not backfilled where the supporting evidence of the date, audience or method is not held; those disclosures made before the register was established are evidenced by the consultation record at ESIA Volume II, Annexure 4-6 – Comprehensive Stakeholder Engagement Report (PDF pages 205–361).

TABLE D-1 DISCLOSURE REGISTER

ID	Document or disclosure item	Version / date of document	Stakeholder group	Date issued	Method, channel, language and format	Owner / approver	Feedback received	Evidence reference and follow-up status
D-01	IFF Line 2 Project briefing document and non-technical Project description issued at community engagements	Rev. 0, Oct 2025	7 directly affected and 10 indirectly affected communities; traditional rulers; CDCs	29 Oct – 13 Nov 2025	Hard copy issued at engagement; verbal briefing in English, Nigerian Pidgin and Eleme dialect	Head CR&D / ERM	Issues and expectations recorded and answered at the engagement; see Table 5-7	pp. 213–291. Status: closed
D-02	Public Forum notice and Project disclosure pack	Feb 2026	All stakeholder groups; FMEnv; RSMEnv; NGOs; associations; media	26 Feb 2026	Newspaper notice; invitation letters; public forum presentation	Head CR&D / Corporate Communications	188 participants; issues recorded and answered; see Table 5-7	pp. 329–352. Status: closed
D-03	Project briefing to five additional indirectly affected communities (Woji, Rumukrushu, Umuebula, Okujagu, Abam-Ama)	May 2026	All community members and leaders	29 May 2026	Invitation letters; briefing session; hard copy handout	Head CR&D	Issues recorded; traffic and haulage concerns carried into the corridor engagement programme	pp. 353–361. Status: closed
D-04	Focus group briefing materials for the Eleme Widows Association and the Eleme Physically Challenged Association	Mar 2026	Widows; persons with disabilities	12 Mar 2026	Verbal briefing; large-print and pictorial materials; delivery through the associations	Head CR&D	Requests for direct registration for benefits and for accessible formats accepted; see	pp. 309–328. Status: closed

ID	Document or disclosure item	Version / date of document	Stakeholder group	Date issued	Method, channel, language and format	Owner / approver	Feedback received	Evidence reference and follow-up status
							Table 5-7, rows 7 and 8	
D-05	Indorama Code of Conduct (Version 3, 18 July 2024)	Version 3, 18 Jul 2024	General public; workers; contractors; communities; lenders	Published ; URL verified 27 Aug 2026	Corporate website; PDF circulation; extracts posted at community access points	Corporate Communications	No feedback received to date	Table 6-2. Status: open and continuing
D-06	Community and Stakeholder Policy; Environment and Climate Change Policy; Human Rights and Labour Policy; Responsible Business Policy; Health and Safety Policy	July 2024 versions	General public; communities; lenders	Published ; URLs verified 27 Aug 2026	Corporate website (Indorama Eleme policies index)	Corporate Communications	No feedback received to date	Table 6-2. Status: open and continuing
D-07	Stakeholder Engagement Plan, IFF Line 2 Fertilizer Project – this revision	Rev. 03	African Development Bank; lenders; Lender Independent Environmental and Social Advisor	On issue	Controlled electronic copy under covering letter	E&S Corporate Team	AfDB review comments and this response	Status: current. Version log at the front of this document
D-08	Draft ESIA, including the Non-Technical Summary, for statutory public display	As submitted to FMEnv	General public; FMEnv; RSMEnv; Eleme LGA; communities	Pending – on FMEnv direction, for the statutory 21	Display at FMEnv headquarters, RSMEnv, Eleme LGA offices and the CR&D office; newspaper	Head CR&D / ERM	Comments and objections to be recorded and answered under Section 5.2.6	Status: pending. Section 5.2.6

ID	Document or disclosure item	Version / date of document	Stakeholder group	Date issued	Method, channel, language and format	Owner / approver	Feedback received	Evidence reference and follow-up status
				working days	notice; community noticeboards			

APPENDIX E STAKEHOLDER FEEDBACK AND COMMITMENTS REGISTER

This appendix is the controlled Stakeholder Feedback and Commitments Register referred to in Sections 1.1, 2.3.2, 5, 8 and 9. It is the operational tracking log through which every issue raised by a stakeholder, and every commitment made in response, is followed to closure and fed back to the person or group that raised it. It sits behind, and is consistent with, the summary matrices at Table 5-4 and Table 5-7: those tables present the position at the date of issue of this SEP, while this register is maintained continuously.

TABLE E-1 STAKEHOLDER FEEDBACK AND COMMITMENTS REGISTER

ID	Source, date and stakeholder	Issue or feedback	Project response	Agreed action	Owner	Due date	Status	Closure evidence and date fed back
E-01	Eleme Physically Challenged Association, focus group discussion, 12 Mar 2026	Individual assistance needs of persons with disabilities in the event of an emergency evacuation are not identified	Accepted. Assistance needs to be surveyed and incorporated into the Project emergency preparedness and response plan (OS4)	Complete the assistance-needs survey and incorporate the findings into the emergency preparedness and response plan	Head CR&D / HHSE	Before contract or mobilisation	closed	emergency response plan
E-02	Youth forums and Eleme Graduate Forum, Nov 2025 – Feb 2026	Employment expectations, and the absence of written criteria for selection	Accepted. Quotas, eligibility criteria and the selection process to be disclosed in writing at each engagement, with reasons given to unsuccessful applicants	Issue written quota and criteria disclosure at each engagement; report monthly on construction workmen quota compliance	Head CR&D / HR-IR	Recurring – monthly from mobilisation	Open – recurring	quota report tabled at the PAC
E-03	Eleme Widows Association, focus group discussion, 12 Mar 2026	Widows excluded from benefit distribution routed through household heads	Accepted. Direct registration for the micro-grant and community development programmes, and direct notification through the Association	Amend the registration process; establish direct notification through the Association	Head CR&D	Before the next micro-grant cycle	Open	amended registration



ERM HAS OVER 140 OFFICES ACROSS THE FOLLOWING
COUNTRIES AND TERRITORIES WORLDWIDE

Argentina

Australia

Belgium

Brazil

Canada

China

Colombia

Denmark

France

Germany

Hong Kong

India

Indonesia

Ireland

Italy

Japan

Kazakhstan

Kenya

Malaysia

Mexico

Mozambique

The Netherlands

Peru

Poland

Portugal

Romania

Singapore

South Africa

South Korea

Spain

Switzerland

Taiwan

Thailand

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