Western Corridor Limited

Mutanda to Kaoma Road Project

Stakeholder Engagement Plan

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Table 1. Document Control

REVISION RECORD SHEET

Page	Revision	Description	Date
NA	00	First generated / Draft Issued (as Stakeholder Engagement Framework)	2025/08/01
All	01	Revised to Draft Stakeholder Engagement Plan (SEPP); submitted for lender review	2026/01/15
All	02	Full revision restructured to meet ISS 2023 Operational Safeguard 10 (OS10) content requirements for a Stakeholder Engagement Plan	2026/08/26

Table 2. Revision Record Sheet

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ABBREVIATIONS

Abbreviation	Description
AfDB	African Development Bank
BMP	Biodiversity Management Plan
CBO	Community-Based Organisation
C-ESMP	Contractor Environmental & Social Management Plan
CLO	Community Liaison Officer
CRR	Comments and Response Report
DBSA	Development Bank of Southern Africa
dRWG/RWG	District/Regional Resettlement Working Group
DNPW	Department of National Parks and Wildlife
ECIC	Export Credit Insurance Corporation (South Africa)
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
FC	Financial Close
GBV	Gender-Based Violence
GO	Grievance Officer
GRM	Grievance Redress Mechanism
IESC	Independent E&S Consultant (lenders')
IFC	International Finance Corporation
ISS	Integrated Safeguards System (AfDB)
KII	Key Informant Interview
FGD	Focus Group Discussion
OIP	Other Interested Parties
OS	Operational Safeguard (AfDB ISS)
PAH	Project-Affected Household
PAP	Project-Affected Party/Person

Abbreviation	Description
PS	Performance Standard (IFC)
PSC	Project Steering Committee
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
WCL	Western Corridor Limited
ZEMA	Zambia Environmental Management Agency

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EXECUTIVE SUMMARY

Western Corridor Limited (WCL), the Special Purpose Vehicle delivering the 25-year Mutanda–Kaoma Toll Road Concession (371 km, North-Western and Western Provinces, Zambia), is seeking Financial Close with a lender group comprising the Development Bank of Southern Africa (DBSA, Mandated Lead Arranger), the African Development Bank (AfDB) and the Industrial Development Corporation (IDC), with political risk cover from ECIC. Because AfDB and DBSA are involved, the Project's environmental and social (E&S) risk management must satisfy IFC Performance Standards 1–8, the AfDB Integrated Safeguards System (ISS) 2023, and the DBSA Environmental & Social Policy.

This Stakeholder Engagement Plan (SEP) supersedes the Stakeholder Engagement Framework (SEF, August 2025). While the SEF was a sound engagement framework, it did not meet the full requirements of a Stakeholder Engagement Plan under Operational Safeguard 10 (OS10: Stakeholder Engagement and Information Disclosure) of the ISS.

This revision restructures the document against the OS10 Annex 1 content requirements in full: a stakeholder mapping that separates Project-Affected Parties from other Interested Parties and identifies vulnerable groups (OS7); a detailed power-interest matrix; a three-phase engagement plan (preparation, implementation, completion) specifying methods, participatory planning, expected outputs/KPIs, links to the Grievance Redress Mechanism (GRM), and indicative costs; a GRM with defined committee composition and decision authority at each administrative level, realistic severity-based timelines, and a process schematic; documented evidence of consultation carried out to date; and implementation arrangements, budget, monitoring and reporting provisions.

Subject to WCL confirming the budget estimate in Section 13, populating the outstanding consultation and stakeholder register data flagged throughout this document, and formalising the Resettlement/Grievance Working Group Terms of Reference referenced in Section 11, this SEP is assessed as capable of satisfying the OS10 requirement, and of forming the live, controlled document that governs stakeholder engagement for the balance of the concession.

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1. INTRODUCTION

1.1 Project Background

The Government of the Republic of Zambia (GRZ) has entered into a 25-year Public-Private Partnership (PPP) toll concession, comprising a 2-year Build phase and a 23-year Operations & Maintenance (O&M) phase, with Western Corridor Limited (WCL, formerly Barotse Highway Limited Toll Concession), a Special Purpose Vehicle combining the GRZ Road Development Agency (RDA) and private-sector sponsors, valued at over USD 326 million. The concession covers the rehabilitation and upgrade of the 371 km D301 road between Mutanda and Kaoma, traversing the North-Western and Western Provinces of Zambia. On completion, the corridor forms a critical trade link between the Copperbelt and the Port of Walvis Bay via the Mongu–Sesheke Road, Namibia and Botswana.

The Project is implemented in two phases: Phase 1 (Mutanda to Kasempa, 150 km) and Phase 2 (Kasempa to Kaoma, 221 km). Construction works are contracted to three roadworks EPC packages, plus a separate Building Works EPC contractor, each governed by the E3782 Site Regulations and required to submit a Contractor Environmental & Social Management Plan (C-ESMP) for WCL/Engiage approval prior to mobilisation. The Project Area of Influence spans the districts of Mutanda, Kasempa, Mufumbwe, Kaoma and Kalumbila, an area characterised by rural subsistence livelihoods, floodplain and wetland ecosystems (including the Kasonso-Busanga Game Management Area and Shindondwe Forest Reserve), and Kaonde and Lozi/Barotse traditional governance structures.

The Environmental and Social Impact Assessment (ESIA) has been submitted to and approved by the Zambia Environmental Management Agency (ZEMA). A signed Resettlement Policy Framework (RPF) is in place, with iterative Resettlement Action Plans (RAPs) being prepared, beginning with Early Works. Kongiwe Environmental (Pty) Ltd, building on work by DH Engineering Consultants (DHEC), prepared a Stakeholder Engagement Framework (SEF, August 2025) and a Draft Stakeholder Engagement Plan (SEP, January 2026)

1.2 Purpose of this Revision

The Draft SEP (January 2026) was reviewed against the requirements of a Stakeholder Engagement Plan under ISS 2023, Operational Safeguard 10 (OS10: Stakeholder Engagement and Information Disclosure). While the Draft SEP was a sound engagement framework, it did not meet the OS10 content requirements in full. This document is restructured directly against the OS10 Annex 1 required-contents list, with a consolidated content-gap tracker maintained as a separate controlled document.

2. PURPOSE, PRINCIPLES AND OBJECTIVES OF THE SEP

2.1 Purpose

This SEP establishes how WCL, Engiage and the Project's EPC and O&M contractors will identify, inform, consult, and maintain a functioning grievance channel with all parties affected by or interested in the Project, across the full concession lifecycle: preparation/Early Works, construction/implementation, and operation/completion. It is the primary instrument through which the Project satisfies IFC PS1 (Assessment and Management of Environmental and Social Risks and

Impacts), OS10 (Stakeholder Engagement and Information Disclosure), and equivalent DBSA E&S Policy requirements, and it is the controlling reference for all contractor-level stakeholder engagement obligations passed down through EPC Contract Schedules.

2.2 Guiding Principles

- **Targeted -** engagement is prioritised toward those most likely to be affected, with particular attention to Project-Affected Parties (Section 5.1) and vulnerable groups (Section 5.2).
- **Early and continuous -** engagement begins before key decisions are taken and continues throughout the Project lifecycle, not only at ESIA/RAP milestones.
- **Informed and two-way -** stakeholders receive relevant information in advance of consultation and have a genuine channel to influence Project decisions; WCL documents how feedback was or was not incorporated.
- **Free of manipulation, interference or coercion, and gender-inclusive, recognising that men and women often have differing views, needs and access constraints.**
- **Culturally appropriate and localised -** engagement respects Kaonde and Lozi/Barotse traditional governance structures, is conducted in English, Lozi and Kaonde as appropriate, and reflects realistic timeframes for rural, low-connectivity communities.
- **Documented and auditable -** every engagement activity, disclosure and grievance is logged, and the record is available for lender and ZEMA verification.

2.3 Objectives

- Ensure Project-Affected Parties and Other Interested Parties are identified, mapped by influence and interest, and engaged proportionately to their exposure to Project risk (Section 5).
- Disclose Project information — including risks, impacts, mitigation measures and grievance channels — in a form and language accessible to each stakeholder group, differentiated between PAPs and OIPs (Section 7).
- Operate a Grievance Redress Mechanism that is accessible, free, culturally appropriate, and resolves concerns within realistic, severity-based timeframes, with clear committee composition and decision authority at each administrative level (Section 10).
- Support the RAP/RPF consenting process by ensuring PAPs are consulted ahead of the census cut-off date and throughout compensation and livelihood-restoration planning.
- Provide WCL's Board, the Project Steering Committee, and the lender group with monitoring evidence that engagement is occurring as planned and that emerging E&S or political risk — including pre-election sensitivity — is being managed proactively (Section 12).

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3. REGULATORY AND STANDARDS FRAMEWORK

3.1 Zambian Legislation

The following national legislation is directly relevant to stakeholder engagement, consultation, and the treatment of workers and communities on the Project, spanning gender, labour and employment legislation in addition to the environmental and land-related statutes.

Legislation	Relevance to Stakeholder Engagement
Environmental Management Act No. 12 of 2011	Overarching legal framework for ESIA, environmental permits and public consultation during the EIA process.
Environmental Protection and Pollution Control (EIA) Regulations, 1997	Prescribes minimum public consultation requirements before EIS submission: public notice of not less than 15 days, publication in mass media in a language understood by the community, and meetings with affected communities thereafter.
Lands Acquisition Act, Chapter 184	Governs land acquisition and compensation processes for Project-affected communities.
National Policy on Resettlement and Compensation	Guidelines for resettlement and compensation of PAPs; livelihood restoration/improvement principle.
Constitution of Zambia (Amendment) Act No. 2 of 2016	Equality, dignity and non-discrimination guarantees relevant to inclusive stakeholder participation.
Employment Code Act No. 3 of 2019	Fair labour practices and non-discrimination — governs worker-facing engagement and the separate worker grievance channel (Section 10.6).
Gender Equity and Equality Act No. 22 of 2015	Statutory basis for gender-responsive engagement design and monitoring of participation by sex.
Anti-Gender-Based Violence Act No. 1 of 2011	Underpins WCL's zero-tolerance GBV/SEA/SH provisions and the confidential grievance-handling protocols in Section 10.
Persons with Disabilities Act No. 6 of 2012	Requires accessible engagement formats and venues for persons with disabilities — a vulnerable group under OS7 (Section 5.2).
Children's Code Act No. 12 of 2022	Relevant to child-safeguarding in engagement settings and to the Project's child-labour prevention commitments.
HIV and AIDS (Prevention and Control) Act No. 10 of 2013	Non-discrimination and confidentiality provisions relevant to health-related community engagement.

3.2 International Lender Standards

As WCL is seeking international financing, Zambian consultation requirements alone are not sufficient. IFC Performance Standard 1 requires a Stakeholder Engagement Plan proportionate to Project risk, covering stakeholder analysis and planning, information disclosure, consultation, a documented external communications procedure, a Grievance Redress Mechanism, and ongoing reporting to affected communities. The IFC Good Practice Handbook on Stakeholder Engagement additionally expects engagement to be targeted, early, informed, meaningful, two-way, gender-inclusive, localised and free from manipulation or coercion - principles carried into Section 2.2 above.

AfDB Integrated Safeguards System (ISS) 2023

AfDB's Integrated Safeguards System was substantively revised in 2023, moving from a five-safeguard structure to ten Operational Safeguards.

OS	Title	Primary Relevance to this SEP
OS1	Assessment and Management of Environmental and Social Risks and Impacts	Establishes the ESMS and SEP requirement itself; governing standard for this document.
OS2	Labour and Working Conditions	Worker grievance mechanism (Section 10.6); labour-influx and GBV/SEA/SH provisions.
OS3	Resource Efficiency and Pollution Prevention and Management	Community engagement on air, noise, water and waste impacts (addressed in the ESMP; cross-referenced in Section 4).
OS4	Community Health, Safety and Security	Community-facing disclosure on construction traffic, camp and security risk; informs engagement content in Section 8.
OS5	Land Acquisition, Restrictions on Access to Land, and Involuntary Resettlement	Governs the RAP/RPF process; the SEP is the primary engagement vehicle for census, cut-off date and compensation consultation.
OS6	Habitat and Biodiversity Conservation, and Sustainable Management of Living Natural Resources	Engagement on floodplain, wetland and Game Management Area interface (Kasonso-Busanga GMA, Shindondwe Forest Reserve).
OS7	Vulnerable Groups	Directly governs Section 5.2 (vulnerable-group identification) and the differentiated engagement/disclosure measures in Sections 7–8.
OS8	Cultural Heritage	Engagement with Traditional Authorities on chance-find and cultural-heritage protocols.
OS9	Financial Intermediaries	Not directly triggered — WCL is a direct borrower, not a financial intermediary.
OS10	Stakeholder Engagement and Information Disclosure	The primary governing safeguard for this SEP; its Annex 1 required-contents list is the structural basis for this document.

Additional international frameworks and good-practice principles applied in this SEP include: Equator Principles 4/5 (a SEP is required to provide a framework for seeking stakeholder opinions and inputs on environmental and social aspects, impacts, cumulative impacts and feasible alternatives); the International Association for Impact Assessment (IAIA) best-practice principles for public participation (context-adapted, informative, proactive, adaptive, communicative, inclusive, educative, cooperative); and the International Association for Public Participation (IAP2) Core Values (inclusiveness, communication, adaptability, meaningful participation).

This SEP is applicable to WCL and to all Project contractors (EPC Lots 1+3a, 2, 3b+4, Building Works, and the O&M Contractor once appointed), and is aligned with a contractor Code of Conduct governing the ethical conduct of all engagement activity with Project-affected communities.

4. PRIORITY ENVIRONMENTAL AND SOCIAL ISSUES REQUIRING STAKEHOLDER ENGAGEMENT

This section describes, project-wide, the priority E&S issues and risks that make stakeholder engagement necessary at each lifecycle stage, drawing on the approved ESIA, the signed RPF, and the Early Works RAP. These are summarised below and form the organising basis for the phased engagement plan in Section 9.

Phase	Priority E&S Issue	Why Engagement Is Required
Preparation / Early Works	Land acquisition, census, cut-off date and compensation planning (RAP/RPF, OS5)	PAPs must be consulted before the cut-off date is fixed and publicised, and throughout asset valuation and entitlement discussions, to protect both PAP rights and the integrity of the compensation record.
Preparation / Early Works	Traditional authority and Barotse Royal Establishment protocol	Land in the corridor falls under Kaonde and Lozi customary governance; Chiefs' consent to process (not veto) and cultural protocol must be observed before household-level engagement in each chiefdom.
Preparation / Early Works	Biodiversity and floodplain/wetland sensitivity (Kasonso-Busanga GMA, Shindondwe Forest Reserve)	DNPW and conservation NGOs (where available) require early engagement on buffer compliance and mitigation before construction affects habitat.
Construction / Implementation	Labour influx, local recruitment expectations and "no hiring at the gate"	Unmanaged expectations around jobs are a leading driver of community grievances and reputational risk; requires proactive, transparent disclosure via CLOs and Ward Development Committees.
Construction / Implementation	Construction nuisance — dust, noise, traffic safety, access disruption	Communities along all 371 km require advance notice of active work zones, haul routes and mitigation measures (Traffic Management Plans, dust suppression).
Construction / Implementation	GBV/SEA/SH and social risk from worker camps and labour influx	IFC PS2/PS4 and AfDB OS2/OS7 both require differentiated, confidential engagement channels for women and vulnerable groups given the elevated risk profile of construction camps.
Construction / Implementation	Compensation payment completion and livelihood restoration monitoring	Lenders require evidence that 100% of displaced households are compensated before displacement/construction commences in each affected section — this is monitored jointly with the RAP (Section 12).
Operation / Completion	Toll pricing, access and community benefit-sharing expectations	Ongoing engagement is required as toll plazas become operational and communities experience both the benefits (access, local content) and costs (tolling) of the completed road.

Phase	Priority E&S Issue	Why Engagement Is Required
Operation / Completion	Long-term GRM continuity through the 23-year O&M phase	The GRM and CLO function must transition from an EPC-embedded structure to an O&M Contractor-embedded structure without a service gap.

5. STAKEHOLDER IDENTIFICATION AND MAPPING

5.1 Project-Affected Parties and Other Interested Parties

OS10 requires stakeholders to be grouped into two broad categories rather than a single undifferentiated list. This SEP adopts that structure:

- **Project-Affected Parties (PAPs):** individuals or groups experiencing actual or potential Project impacts - direct, indirect or cumulative - to their physical environment, health, security, cultural practices, well-being or livelihoods. On this Project, PAPs comprise:
    - Landowners and occupiers with assets within the Project footprint (directly affected — subject to the RAP/RPF).
    - Landowners and occupiers with assets adjacent to the Project footprint (indirectly affected — access, dust, noise, severance).
    - Chiefs and Traditional Leaders whose chiefdoms host the corridor, including customary land administration responsibilities.
    - Project-affected households' vulnerable members specifically (Section 5.2).
    - Workers and prospective local workers/suppliers within the Project Area of Influence (PAI) districts — Mutanda, Kasempa, Mufumbwe, Kaoma and Kalumbila.
- **Other Interested Parties (OIPs):** individuals, groups, businesses or organisations with an interest in the Project due to its location, characteristics, impacts or public-interest role, without necessarily experiencing direct impact. On this Project, OIPs comprise:
    - National and Provincial government agencies
    - District Commissioners, local government Council Chairpersons and Ward Councillors.
    - NGOs and CBOs
    - Agricultural forums and business/industrial organisations along the corridor.
    - Telecommunications and utility providers with infrastructure crossings.
    - The lender group.

5.2 Vulnerable Groups (OS7)

OS7 and IFC PS1 both require vulnerable individuals and groups — those who may be differentially or disproportionately affected by the Project because of pre-existing disadvantage, or whose situation makes them hard to reach or under-represented in standard consultation formats - to be

separately identified, with differentiated engagement measures. Consistent with the signed RPF's vulnerability assessment framework (which references Zambia's Multi-Dimensional Poverty Index methodology), vulnerable groups on this Project include:

- Female-headed households and women more generally, given documented gender gaps in land, employment and decision-making access.
- The elderly and persons with disabilities, who face physical and communication barriers to standard meeting formats.
- Children and youth, particularly regarding child-labour prevention and safe engagement settings.
- Ethnic minorities and remote/low-connectivity households with limited access to radio, phone or written Project information.
- Landless and informal occupants without documented tenure, who are especially exposed in the compensation process.
- Persons living with HIV/AIDS, protected by confidentiality requirements in any health-related engagement.

5.3 Stakeholder Power-Interest Matrix

The power-interest matrix below assigns each stakeholder group to one of four engagement postures and is the basis for the differentiated intensity of engagement set out in Sections 8 and 9. It should be treated as indicative and refined once the detailed stakeholder database (maintained jointly by DHEC and Kongiwe) is next updated.

Engagement Posture	Stakeholder Groups
MANAGE CLOSELY (high influence, high interest)	PAPs with assets within the Project footprint; Chiefs and Traditional Leaders (incl. Barotse Royal Establishment); District Commissioners; RDA; ZEMA; dRWG/RWG members; lender group / IESC.
KEEP SATISFIED (high influence, lower interest)	Provincial Permanent Secretaries; Ministries of Lands, Green Economy & Environment, Infrastructure; ZESCO; DNPW (Protected Area authority).
KEEP INFORMED (lower influence, high interest)	PAPs with assets adjacent to the footprint; Ward Councillors; local NGOs/CBOs (WECZ, Greenspace Zambia, CEJ, Musekese Conservation); agriculture forums; local businesses; prospective local workers.
MONITOR (lower influence, lower interest)	National-level industry associations; academic/research institutions; telecom/utility asset owners with limited crossing points; general public outside the PAI districts.

5.4 Stakeholder Register

A detailed stakeholder database has been compiled jointly by DHEC and Kongiwe and is maintained as a live register (Annex A provides the template structure). It records, at minimum, stakeholder

name/organisation, category (PAP/OIP), vulnerability flag, contact details, influence/interest rating, communication preference, engagement history and any Project-specific risk notes.

6. EVIDENCE OF CONSULTATION CARRIED OUT DURING SEP PREPARATION

This section summarises stakeholder engagement already completed and the key issues raised, with evidence (venues, dates, documentation). The record below is drawn from the approved ESIA's stakeholder engagement chapter and from Kongiwe's engagement log; it will be supplemented by the full Comments and Response Report (CRR), which is appended to the ESIA.

Activity	Venue	Date
Provincial authority consultations (Provincial Permanent Secretary, Provincial Planning Office, District Commissioner, RDA) — Western Province	Western Province Provincial Administration offices	11–14 February 2025
Prior consultation — North-Western Provincial Permanent Secretary	North-Western Province Provincial Administration	Prior to February 2025 (exact date to be confirmed)
Public Disclosure Meeting (specialist study findings incl. Heritage Impact Assessment and Biodiversity Study)	Mutanda Nature Lodge	26 February 2025
Public Disclosure Meeting	CRB Office, Kaminzekenzeke	3 March 2025
Public Disclosure Meeting	Kasempa Best Ways Comfort Lodge	5 March 2025
Public Disclosure Meeting	Kaoma Mumu's Chalets and Garden Lodge	7 March 2025
Courtesy/palace visit to His Royal Highness Chief Mumena (in lieu of Public Disclosure attendance)	Chief Mumena's Palace	26 March 2025
Scoping Meeting	Mutanda Nature Lodge	9 December 2025
Scoping Meeting	Kasempa Best Ways Comfort Lodge	11 December 2025
Scoping Meeting	Kamizenkenzeke CRB Offices	13 December 2025
Scoping Meeting	Kaoma Mumu's Chalets and Garden Lodge	16 December 2025

Five Chiefs (Mumena, Kasempa, Ingwe and Mutondo, and representatives of the Barotse Royal Establishment) participated in Public Scoping and Disclosure meetings in person or through designated representatives. Engagement additionally covered the Kaonde traditional leadership of the North-Western Province chiefdoms (including Jivunda, Matebo, Kibizhi, Kasongo, Katanga, Chizela, Musaka and Kaindu), consistent with the ESIA's cultural heritage assessment. Informal engagement continued throughout via telephone, email and physical visits, with Project information disseminated through leaflets, brochures and public notices.

Key issues raised to date, and their treatment in the CRR, should be summarised here once the ESIA's CRR is finalised; this table should be treated as a living record and updated at each SEP review (Section 15).

7. INFORMATION DISCLOSURE PLAN

Disclosure is differentiated between Project-Affected Parties and Other Interested Parties, reflecting their different information needs and access constraints. Both categories receive the same substantive information; the method and intensity of disclosure differs.

Information	Disclosure to Project-Affected Parties	Disclosure to Other Interested Parties
Project purpose, scale, duration and risks/impacts (incl. mitigation)	CLO one-to-one consultation; household-level information sessions/Open Days; site notices; written letters; non-technical summary in English, Lozi and Kaonde	Consultation meetings with government/NGO representatives; project website; formal correspondence
ESIA and specialist study findings	Public meetings/Open Days; hard-copy non-technical summaries (Lozi/Kaonde) at public venues; FGDs	Hard copies (English) at public venues and via formal transmittal to ZEMA, government agencies and NGOs
RAP/RPF — cut-off date, census process, entitlements, compensation	CLO one-to-one consultation; information sessions; hard copies at public venues and FGDs; radio notification of cut-off date	Briefing to District Resettlement Working Group and relevant government agencies
Grievance Redress Mechanism — how to lodge, timelines, rights	CLO one-to-one consultation; site notices in English/Lozi/Kaonde; information sessions; grievance form distributed at all touchpoints	Summary in stakeholder correspondence and project website
Stakeholder database registration and recruitment process	In-person registration via CLO; site notices; radio adverts	Project website; formal notice to Ward/District structures

Written project information is disseminated as hard copies (issued in person or mailed) or electronic copies via the WCL project website where available. The ESIA and RAP reports themselves are produced in English only. Disclosure is ongoing throughout the Project lifecycle, not a one-off event at ESIA submission.

8. STAKEHOLDER ENGAGEMENT TOOLS AND METHODS

Communication channels and engagement tools are deployed in an escalating, context-appropriate manner. Meetings are conducted inclusively, in a language and style stakeholders can understand, with local and traditional leadership structures engaged before wider community communication, respecting the corridor's social and political hierarchy.

Tool	Application
Community Liaison Officer (CLO)	Primary interface for all engagement, from individual consultations to public announcements; recruited from within Project-affected communities, where possible through Ward Development Committee nomination.
Toll-free telephone line and WhatsApp	Dedicated Project enquiry and grievance-intake channel.
Text messaging (SMS)	Follow-up and scheduling with stakeholders who lack reliable internet access.
Email and text notifications	Regular updates to stakeholders with connectivity (where available).
Project website	Publication of Project activities.
Site notice boards / posters	Placed in publicly accessible areas; carry GRM details, personnel contacts and H&S information.
Radio advertisements (Slowezi FCC 89.7 FM)	Broadcast of Information Sessions/Open Days, cut-off dates, compensation notices and GRM details — the primary broad-reach channel for low-connectivity rural communities.
Online meetings (Teams/Zoom)	For stakeholders who prefer or require remote participation (typically government/NGO OIPs).
Letters, background information documents, factsheets/flyers	Distributed ahead of and during consultation meetings.
Consultation meetings	With Government (ministries, departments, utilities), District and local government officials and key NGOs; minutes distributed; comments captured in the CRR.
Focus Group Discussions (FGDs)	With Traditional Authorities and with vulnerable groups specifically; minutes distributed; comments captured in the CRR.
Public meetings / Open Days	With broader communities; minutes distributed; comments captured in the CRR.
Written consultations	Comment sheets included in all distributed documents, or by email; response deadlines set to allow adequate notice.
Grievance Redress Mechanism and submission form	Formal channel for community members to log issues and grievances (Section 10).

8.1 Differentiated Methods for Vulnerable Individuals and Groups

Differentiated, targeted methods apply for vulnerable individuals and groups, not only their inclusion in general sessions. The following measures apply in addition to the standard tools above:

- Separate, smaller-format FGDs for women, convened at times and locations that do not conflict with domestic/caregiving responsibilities, facilitated where possible by a female CLO or facilitator.

- Home or household-level visits for elderly or disabled PAPs unable to attend public venues, with materials read aloud where literacy is a barrier.

- Verbal and community-mediated grievance channels for illiterate PAPs, with the CLO transcribing formal submissions on the PAP's behalf and confirming accuracy back to them.

- Confidential, individual-only channels (not group settings) for GBV/SEA/SH-related concerns, consistent with WCL's zero-tolerance policy.

- Independent third-party facilitation for particularly sensitive or high-risk vulnerable-group engagement, where the CLO assesses this is warranted.

- Provision of translated materials and interpretation in Lozi and Kaonde as the primary local languages, with additional interpretation arranged on request.

9. COMPREHENSIVE STAKEHOLDER ENGAGEMENT PLAN

The comprehensive engagement plan below spans the three relevant Project phases — preparation, implementation and completion — specifying for each priority issue: the target stakeholder group, culturally appropriate communication method, participatory planning approach, expected outputs/KPIs, the link to the GRM as the conflict-resolution channel, and indicative individual and overall costs. All grievances arising from any activity below are handled through the single GRM described in Section 10; costed GRM operation itself is budgeted separately in Section 13 rather than repeated per activity below.

9.1 Phase 1 — Preparation and Early Works

Priority Issue / Stakeholder	Engagement Method & Participatory Approach	Expected Output / KPI	Responsible	Timing	Indicative Cost (USD)
Cut-off date definition and disclosure — PAPs within footprint	Public meetings + radio notification (Slowezi FCC 89.7 FM) + written notices at chiefdom and ward level; PAPs invited to raise boundary/asset queries before the date is finalised	Cut-off date publicised ≥15 days ahead per EIA Regulations; % of PAP households confirming receipt of notice	CLO / Resettlement Team	Prior to RAP census (Early Works)	Completed
Census and asset inventory — PAPs within footprint	Household-level KIIs and asset verification visits; joint sign-off of	% of identified PAP households with a jointly-	Resettlement Team / Kongiwe	Early Works	Completed

Priority Issue / Stakeholder	Engagement Method & Participatory Approach	Expected Output / KPI	Responsible	Timing	Indicative Cost (USD)
	asset inventory with PAP present	verified asset inventory			
Chieftaincy and Barotse Royal Establishment protocol engagement	In-person palace/chiefdom visits; FGDs with Chiefs and Induna before household-level engagement begins in each chiefdom	Written or recorded evidence of Chief's process consent obtained per chiefdom prior to household engagement	ESG Director / CLO	Prior to entry into each chiefdom	Completed
Vulnerability assessment and identification — PAPs	Household surveys incorporating MDPI-based vulnerability criteria; separate FGDs for women, elderly, disabled PAPs	Vulnerable-household register cross-referenced to PAP register; tailored support plan per vulnerable household	Resettlement Team / Kongiwe	Early Works census period	Included in RAP budget
Biodiversity/floodplain interface disclosure — DNPW, conservation NGOs	Consultation meetings with DNPW and WECZ/Greenspace Zambia/Musekese Conservation on BAP and buffer compliance	Minutes distributed; BAP comments incorporated into CRR	Environmental Manager	Prior to construction mobilisation in sensitive sections	2,000
CLO recruitment and community information session	Nomination via Ward Development Committee; public information session on CLO role and GRM launch	CLO(s) appointed and introduced in each district within the PAI	WCL HR / ESG Director	Prior to Early Works mobilisation (in process – 1 CLO appointed in early works section)	Staffing cost — see Section 13

9.2 Phase 2 — Construction / Implementation

Priority Issue / Stakeholder	Engagement Method & Participatory Approach	Expected Output / KPI	Responsible	Timing	Indicative Cost (USD)
Local recruitment expectations — PAPs, Ward residents	Public information sessions on tiered recruitment preference (PAPs → within 5 km → district → national); job postings at council offices, chiefdom halls, churches; "no hiring at the gate" messaging via radio/posters	Recruitment process publicised in each active work section before mobilisation; grievances re: recruitment fairness trending down quarter-on-quarter	CLO / EPC Contractor HR	Ongoing, per active work section	1,000 per section (materials/adverts)
Construction nuisance and traffic safety — adjacent landowners, road users	Advance site notices per active work zone; Traffic Management Plan disclosure; toolbox-style community briefings before major traffic diversions	% of active work zones with prior community notice ≥7 days; road-safety-related grievances resolved within target timeframe	EPC Contractor HSES Officer / CLO	Rolling, per work zone	Included in C-ESMP budget
Compensation payment and livelihood restoration monitoring — displaced PAPs	One-to-one CLO consultation on payment status; livelihood restoration	% of PAPs compensated prior to displacement (target 100% prior to construction in that section); livelihood restoration uptake rate	Resettlement Team	Prior to and during construction in each section	Included in RAP budget
GBV/SEA/SH and labour-influx risk — women, host communities	Confidential, women-only FGDs; worker code-of-conduct briefings; dedicated confidential reporting channel distinct	Reporting channel operational before camp mobilisation; zero-tolerance briefing completed for 100% of	GBV/SEA-SH Focal Point / CLO	Prior to and throughout camp operation	Training can be arranged for free (if needed) via NGO engagement

Priority Issue / Stakeholder	Engagement Method & Participatory Approach	Expected Output / KPI	Responsible	Timing	Indicative Cost (USD)
	from general GRM intake	workforce at induction			
Ongoing ESIA/RAP commitment reporting to affected communities	Quarterly community feedback sessions summarising monitoring results and grievance statistics	Quarterly session held in each district within the PAI; attendance register maintained	CLO / Environmental Manager	Quarterly, throughout construction	1,500 per quarter (venue, logistics)

9.3 Phase 3 — Operation and Completion

Priority Issue / Stakeholder	Engagement Method & Participatory Approach	Expected Output / KPI	Responsible	Timing	Indicative Cost (USD)
Toll pricing, access arrangements and community benefit-sharing	Public information sessions ahead of toll go-live per plaza; local content/CSR reporting to communities	Toll go-live communicated ≥30 days ahead per plaza; community benefit-sharing report published annually	O&M Contractor / CLO	Ahead of each toll plaza commissioning; annually thereafter	2,000 per plaza launch
GRM and CLO continuity through EPC-to-O&M transition	Formal handover briefing to communities and dRWG on new O&M-phase CLO/GRM contacts	Zero service gap in GRM availability during transition; updated contact details disseminated via all channels used during construction	ESG Director / O&M Contractor	At EPC-to-O&M handover	1,000 (transition communications)
Long-term monitoring of livelihood restoration outcomes	Annual participatory review with RWG and affected households against RAP livelihood-	Annual livelihood-restoration review completed and reported to lenders	Resettlement Team (O&M phase)	Annually, O&M phase	3,000 – 5,000 per annum

Priority Issue / Stakeholder	Engagement Method & Participatory Approach	Expected Output / KPI	Responsible	Timing	Indicative Cost (USD)
	restoration targets				
Routine community liaison and feedback	Standing CLO office hours; periodic radio updates; annual public meeting per district	Community satisfaction with engagement tracked via periodic survey (Section 12)	O&M CLO	Throughout O&M phase (23 years)	Included in O&M budget

10. GRIEVANCE REDRESS MECHANISM

10.1 Purpose and Principles

The GRM provides a structured process for Project-Affected Households and any other stakeholder to raise concerns and complaints about the Project's environmental and social impacts, and ensures these are addressed fairly, promptly and effectively. Consistent with OS10 and IFC PS1, the GRM is: proportionate to Project risk; accessible, inclusive and free of cost and retribution; culturally appropriate; transparent in its timelines and process; confidential where required (including an anonymous option); and does not in any way restrict a complainant's access to judicial or administrative remedies. Sections 10.2–10.5 below set out the committee structure, decision authority and timelines at each administrative level.

10.2 Publicising the GRM

The GRM is publicised among affected communities on an ongoing basis, detailing: its purpose and benefits; where, when and how PAHs can file complaints; who is responsible for receiving and responding to complaints, and what external recourse is available; what response complainants can expect, including timing; and what protections against retaliation are guaranteed. All Contractors are required to brief workers on the GRM at site induction and to display GRM contact information at site entrances and worker accommodation in English, Lozi and Kaonde.

10.3 Grievance Categories and Severity-Based Timelines

Resolution timelines are set at realistic, severity-based intervals. This SEP adopts the Site Regulations' differentiated matrix as the controlling standard.

Severity	Acknowledgement	Target Resolution	Example Grievance Types
Low	3 working days	15 working days	General information queries, minor nuisance complaints
Medium	2 working days	10 working days	Asset damage, temporary access disruption

Severity	Acknowledgement	Target Resolution	Example Grievance Types
High	24 hours	5 working days, with escalation to the Employers' Representative	Resettlement/compensation disputes, bodily injury, significant environmental harm
Critical	Immediate	Immediate escalation to the Employers' Representative and Legal	Sexual exploitation or abuse, child labour, threat to life, politically sensitive grievances

WCL will issue a controlled-document update reconciling the above.

10.4 Grievance Management Committee Composition by Administrative Level

CLOs do not carry sole decision authority over grievances with Project implications. The table below sets out composition, mandate and decision authority at each administrative level, consistent with the escalation route already defined in the Grievance Management Procedure (E3782_PR_302) and the CSR governance structure.

Level	Composition	Mandate / Decision Authority
Site / Level 1	Community Liaison Officer (CLO) acting as Grievance Officer (GO), supported by relevant technical, resettlement or HSE staff as needed	Intake, logging, screening, categorisation, investigation and resolution of Low/Medium-severity grievances. No authority to make decisions with compensation, resettlement or contractual implications — these are escalated by default, not at the CLO's discretion.
Project Management / Level 2	Project Manager and/or Environmental & Social Manager (ESM)	Senior decision authority for High-severity grievances and any Medium-severity grievance the complainant has not accepted at Level 1; authority to commit Project resources to a resolution within delegated limits.
District/Regional Resettlement Working Group (dRWG/RWG) / Level 3	Representatives of WCL, Specialist Consultant (technical advisory), relevant government officials (District Commissioner's office, RDA), affected-community representatives, and Chiefs/Traditional Leaders — membership formalised under a Terms of Reference (TOR) covering roles, responsibilities and code of conduct	Complex or unresolved grievances, particularly compensation and resettlement disputes; provides community-anchored legitimacy to the resolution and participatory monitoring of outcomes.
Project Steering Committee (PSC) / Level 4	ESG Director (Engiage), WCL Project Manager, and WCL Board representation as required	Final internal decision authority; approves resolutions with material budget, precedent or reputational implications; authorises engagement of external mediation where warranted.

Level	Composition	Mandate / Decision Authority
External Recourse (at complainant's option, any stage)	Independent mediation services; Zambian judicial process	Available at the complainant's initiative at any point; the GRM's existence and use never restricts or delays access to this recourse.

10.5 GRM Process Schematic

The diagram below sets out the end-to-end GRM process, including the standard resolution path, the four-tier escalation route, and the parallel fast-track for Critical and election-sensitive grievances.

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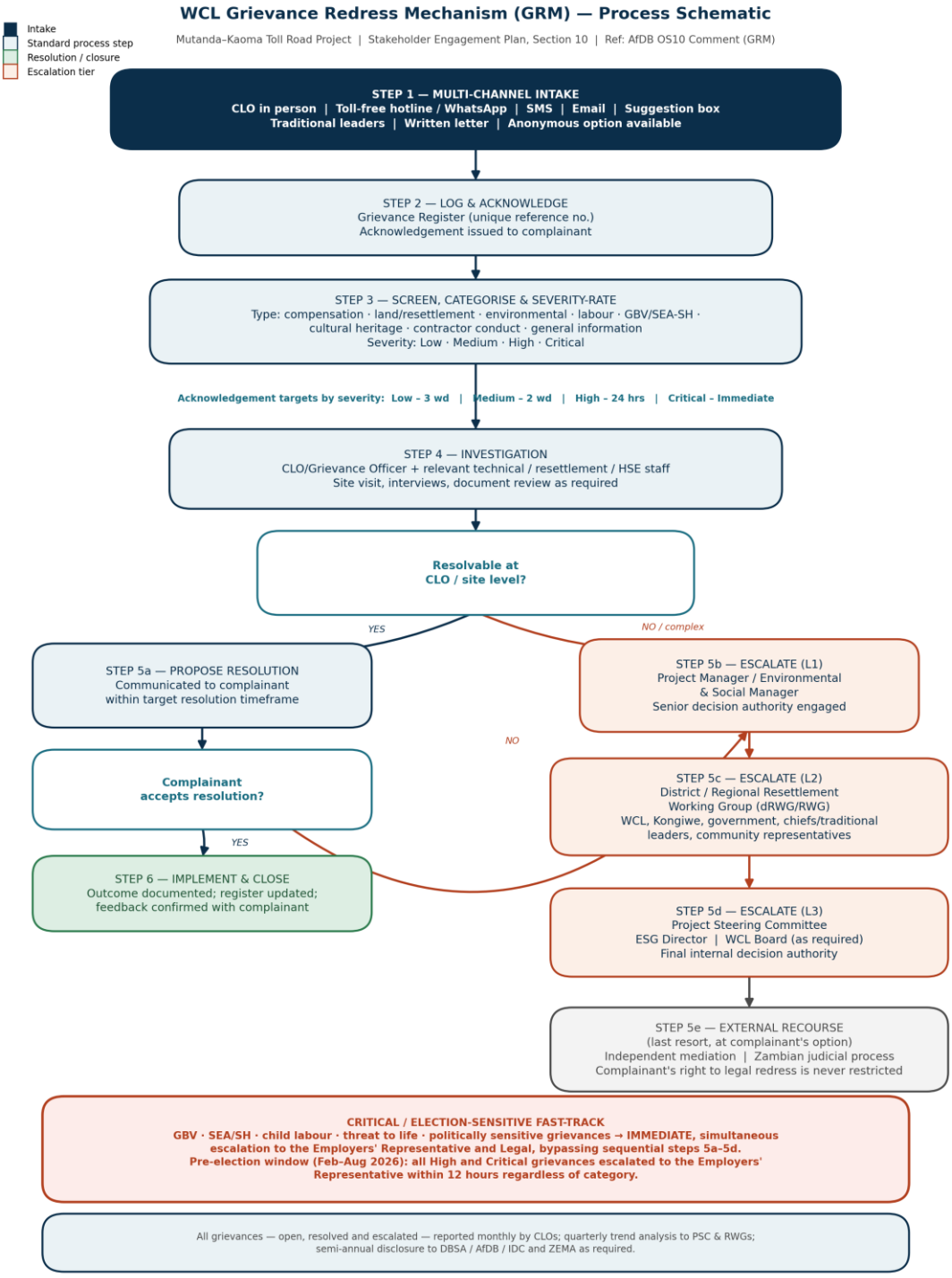


Figure 1: WCL Grievance Redress Mechanism — process schematic (Section 10.5).

10.6 Worker Grievance Mechanism

A separate Internal Grievances Management Procedure exists for Project workers (WCL employees and contractor personnel at all tiers) to raise concerns on working conditions and safety, wages and benefits, discrimination or harassment, management practices, and contractual issues. This channel is kept distinct from the community GRM described above, consistent with OS2/IFC PS2, but both feed the same monthly reporting cycle (Section 12) and are subject to the same zero-tolerance-on-retaliation principle.

10.7 Election-Period Protocol

During the pre-election period (February–August 2026), all High- and Critical-severity grievances are escalated simultaneously to the Employers' Representative within 12 hours, regardless of category, reflecting the elevated political sensitivity of community, resettlement or environmental disputes in Western and North-Western Provinces ahead of the August 2026 general election. The ESG Director maintains a standing watch brief on community and political developments in the corridor districts for the duration of this window (see also the Election Risk Monitoring function under the E&S workstream).

10.8 Grievance Categories

Grievances are recorded and categorised by type to support trend analysis: compensation and resettlement; land tenure and access; employment and procurement; environmental impacts (dust, noise, water, waste); community health and safety; contractor conduct; cultural heritage; GBV/SEA/SH; and general project information.

11. IMPLEMENTATION ARRANGEMENTS — ROLES AND RESPONSIBILITIES

This section sets out the arrangements governing successful SEP implementation within the Project's institutional structure.

Role	SEP Responsibility
WCL Board	Ultimate accountability for stakeholder engagement and GRM performance; approves the SEP and its budget; receives escalated Level 4 grievances via the PSC.
ESG Director (Engiage Project Managers)	Strategic oversight of the SEP as Owner's Engineer function; interface with the lenders' IESC on stakeholder engagement and grievance matters; chairs/attends the Project Steering Committee; owns the Election-Period Protocol (Section 10.7).
Environmental & Social Manager (ESM)	Day-to-day SEP implementation oversight; Level 2 grievance decision authority; leads CRR compilation; coordinates M&E reporting (Section 12).
Community Liaison Officers (CLOs) — per district/Lot	Primary community interface; Level 1 grievance intake and resolution; stakeholder register maintenance; recruited where possible via Ward Development Committee nomination; report to the ESM.
Resettlement Team (technical advisory)	RAP/RPF-linked engagement (census, vulnerability assessment, entitlements); technical support to CLOs and the dRWG/RWG.

Role	SEP Responsibility
District/Regional Resettlement Working Groups (dRWG/RWG)	Level 3 grievance escalation; community representation and participatory monitoring; endorsement of RAP/CSR initiatives; formal TOR-governed membership (Section 10.4).
Project Steering Committee (PSC)	Level 4 grievance decision authority; SEP budget approval; adaptive management decisions on engagement strategy.
EPC Contractors (Lot 1+3a, Lot 2, Lot 3b+4, Building Works)	Implement C-ESMP stakeholder engagement obligations; brief workers on the GRM at induction; log and forward community complaints to Engiage E&S within 24 hours; monthly local-content and engagement reporting; provide HSES Officer per Lot.
O&M Contractor (from concession handover)	Assumes CLO/GRM continuity obligations through the 23-year O&M phase per Section 9.3; CSR and community-benefit reporting.
GBV/SEA-SH Focal Point	Confidential intake and referral for GBV/SEA/SH-related concerns; works alongside but independent of the general GRM intake.

12. MONITORING, EVALUATION AND REPORTING

12.1 Monitoring Engagement Activities

Monitoring tracks how stakeholders are being engaged, the effectiveness of that engagement, and adjustments needed to improve outcomes, against the following indicative KPIs:

- Number and category of stakeholders contacted, and whether all PAP/OIP and vulnerable-group categories are represented fairly in the record.
- Number of stakeholders receiving Project information, disaggregated by disclosure channel.
- Attendance registers and photographic evidence for all consultation meetings, FGDs and Open Days.
- Materials disseminated — type, frequency, location and language.
- Number and category of stakeholders contributing feedback, and the proportion whose feedback is evidenced as incorporated (or given a documented reason for non-incorporation) in the CRR.
- Number and type of grievances received, by category and severity, and the resolution rate and average time-to-resolution against the Section 10.3 targets.
- Compensation completion rate — % of PAPs compensated prior to displacement.

Discrepancies between planned and actual engagement identified through these KPIs are addressed through revised strategies, and monitoring findings are communicated back to affected stakeholders, closing the feedback loop required under OS10.

12.2 Evaluating Outcomes and Impact

Evaluation assesses the effectiveness of communication strategies and engagement activities; stakeholder contentment with the Project and its processes; the extent to which engagement has influenced Project decisions and outcomes; reporting requirements achieved (monthly progress updates, quarterly lender reports, stakeholder meeting documentation, grievance resolution status); and the overall impact of the engagement plan on Project success. An annual evaluation report captures findings, successes, challenges and areas for improvement.

12.3 Reporting Requirements

Report	Frequency	Audience
CLO grievance log summary	Monthly	ESM / Project Manager
Quarterly local-content and engagement report (Contractor)	Monthly reporting, quarterly review	Concessionaire / PSC
Semi-annual E&S monitoring report (post-FC)	Semi-annual	DBSA, AfDB, IDC / IESC
Annual SEP evaluation report	Annual	WCL Board, PSC
ZEMA compliance reporting	Per approval conditions	ZEMA

13. INDICATIVE BUDGET FOR SEP IMPLEMENTATION

Estimated individual and overall SEP costs are set out below. The figures are an order-of-magnitude estimate prepared by Engiage for WCL Finance/Board confirmation and formal budget allocation — **they are indicative only**, are not a committed cost position, and should not be read as a lender commitment or as overcommitting WCL's E&S budget ahead of Board approval. Where a cost is already carried within another approved budget line (e.g. the RAP or a Contractor's C-ESMP), it is noted as such rather than double-counted.

Budget Line	Construction Phase (2 yrs, indicative)	O&M Phase (annual run-rate, indicative)	Basis / Note
CLO staffing (3 positions — Mutanda/Kasempa, Kaoma, plus mobile support)	72,000	24,000	Local salary bands + transport/communications allowance
GRM platform — toll-free line, WhatsApp integration, register/database (Smartsheet per ESMS)	4,000 (setup + subscription)	3,000	NA
Translation and interpretation (Lozi, Kaonde)	2,000	2,000	Non-technical summaries, GRM materials, meeting interpretation

Budget Line	Construction Phase (2 yrs, indicative)	O&M Phase (annual run-rate, indicative)	Basis / Note
Radio advertising (Slowezi FCC 89.7 FM)	2,000	2,000	Cut-off date, Open Day and GRM notices
Public meetings / Open Days / FGD logistics (incl. vulnerable-group sessions)	10,000	10,000	Venue hire, transport, per-diem, materials
Signage, printing, site notices	4,000	2,000	Multi-language site notices, posters, flyers
GBV/SEA-SH Focal Point support and training	4,000	3,000	Confidential channel and induction training
Independent mediation contingency	10,000 (contingency, drawn only if triggered)	5,000 (contingency)	Section 10.4 external recourse tier
Contractor C-SEP monitoring and NCR follow-up (Engiage oversight)	Included in Engiage O.E. scope	Included in Engiage O.E. scope	Not a separate WCL cash cost
INDICATIVE TOTAL (excl. RAP/compensation and C-ESMP-embedded costs)	108,000	51,000	Order-of-magnitude — WCL Finance to confirm

14. RECORD KEEPING AND DATA PROTECTION

Effective stakeholder engagement requires organised, accessible record-keeping that supports reporting and analysis. A stakeholder register (Annex A) and an engagement/grievance tracker are the core tools: the register holds stakeholder name, contact information, PAP/OIP category, vulnerability flag, role, level of influence/interest, communication preference and risk notes; the tracker logs every interaction — meetings, calls, emails, feedback — and every grievance's date received, response timeline, resolution status and supporting documentation. Both are maintained by the CLO, Environmental & Social Manager and Concessionaire, with monthly grievance summary reports prepared by the CLOs.

The integrity and confidentiality of personal information held by the Project team is protected through reasonable technical and organisational measures against loss, damage, unauthorised destruction or unlawful access or processing, consistent with Zambian data protection requirements. Personal information is processed only to the extent necessary to pursue the legitimate interests of the party to whom it is supplied, and Engiage review security controls and procedures on an ongoing basis to keep it secured.

15. REVIEW AND UPDATE

This SEP is a living document. Once approved, it is subject to monthly tracking by each Contractor and undergoes formal quarterly review and update in collaboration with WCL, Specialist Consultant/s, community representatives and relevant stakeholders. Revisions are documented,

justified and validated through an inclusive review process to maintain alignment with community needs, OS10, and evolving Project risk — including any material change in the pre-election political-risk environment. All Contractor engagement activity feeds into this project-level SEP and forms part of monthly Contractor reporting.

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ANNEXURE A — STAKEHOLDER REGISTER TEMPLATE

Minimum field structure for the live stakeholder database (Section 5.4):

Field	Description
Stakeholder ID	Unique reference number
Name / Organisation	Individual or organisation name
Category	Project-Affected Party (PAP) or Other Interested Party (OIP)
Sub-category	e.g. landowner within footprint, Chief/Traditional Leader, government agency, NGO
Vulnerability flag	Yes/No, with vulnerability type(s) per Section 5.2
District / Chiefdom	Location within the Project Area of Influence
Contact details	Phone, WhatsApp, email, physical address as available
Influence rating	High / Low (per power-interest matrix, Section 5.3)
Interest rating	High / Low (per power-interest matrix, Section 5.3)
Communication preference	Preferred channel and language
Engagement history	Log of consultations/FGDs/meetings attended
Risk notes	Any Project-specific sensitivity (e.g. compensation dispute history, political role)

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ANNEXURE B — GRIEVANCE SUBMISSION FORM TEMPLATE

Field	Detail
Reference number	Assigned by CLO/GO on logging
Date received / channel	Date and intake channel (in person, hotline, WhatsApp, letter, suggestion box, traditional leader referral)
Complainant details	Name and contact (or 'anonymous' if requested); confidentiality preference noted
Grievance category	Per Section 10.8 categories
Description of grievance	In complainant's own words, translated if necessary
Severity rating	Low / Medium / High / Critical (Section 10.3)
Assigned responsible personnel	Name and role
Investigation notes	Site visits, interviews, documents reviewed
Proposed resolution	Description and date communicated to complainant
Complainant acceptance	Accepted / Escalated (with date and reason if escalated)
Escalation level reached	Level 1 (CLO) / Level 2 (PM/ESM) / Level 3 (dRWG/RWG) / Level 4 (PSC) / External
Closure date and outcome	Final outcome and confirmation of feedback to complainant

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