



ESIA for Project Anma

Human Resources Policy Appendix 1
Worker Grievance Mechanism

PREPARED FOR

Anma Offshore Wind Energy Co.,
Ltd.

DATE

05 July 2025

REFERENCE

0692794



DOCUMENT DETAILS

The details entered below are automatically shown on the cover and the main page footer. PLEASE NOTE: This table must NOT be removed from this document.	
DOCUMENT TITLE	ESIA for Project Anma
DOCUMENT SUBTITLE	Human Resources Policy Appendix 1 Worker Grievance Mechanism
PROJECT NUMBER	0692794
DATE	05 July 2025
VERSION	Draft
AUTHOR	Mia Park, Yeon Kim, Boeun Yih
CLIENT NAME	Anma Offshore Wind Energy Co., Ltd.

DOCUMENT HISTORY

				APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
Draft	1.0	Mia Park, Yeon Kim	Joseph Park	Seung Hyun Kwak	18 Oct 2024	-
Draft	1.1	Mia Park, Yeon Kim	Joseph Park	Seung Hyun Kwak	29 Oct 2024	
Draft	1.2	Mia Park, Yeon Kim	Joseph Park	Seung Hyun Kwak	31 Oct 2024	
Draft	2.0	Mia Park, Yeon Kim	Joseph Park	Seung Hyun Kwak	6 Feb 2025	
Draft	3.0	Boeun Yih	Seungcheon Baek	Meehee Suk	05 Jun 2025	
Final	3.1	Boeun Yih	Seungcheon Baek	Meehee Suk	05 July 2025	

SIGNATURE PAGE

ESIA for Project Anma

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Suite 1310, Block A, Munjeong Station SK V1,
128 Beobwon-ro, Songpa-gu, Seoul Korea
05854
Tel: 02-406-7888(Operator)

A handwritten signature in black ink, appearing to be 'Meehee Suk', written over a light gray circular background.

Meehee Suk

Partner in Charge

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1. INTRODUCTION

1.1 BACKGROUND

Anma Offshore Wind Energy Co., Ltd. (AWC or the AWC) is developing an offshore wind farm project located adjacent to Anma-do, Yeonggwang-gun, Jeollanam-do, Republic of Korea (the Project). The Project is managed by special purpose company AWC, which is owned by Equis Wind (Korea) Holdings Pte.

This document is a Project specific, standalone Worker Grievance Mechanism (WGM) developed as part of the Project's Human Resources Policy. This WGM document and the SEP have been developed based on the Internationally Recognised Standards (Applicable Standards) that are summarized below:

- Equator Principles 4 (EP4);
- International Finance Corporation (IFC) Performance Standards (PS) 2012; and
- IFC Environmental, Health, and Safety Guidelines, i.e. General EHS Guidelines (2007), Wind Energy (2015) and Electric Power Transmission and Distribution (2007).

As per the IFC PS2, The WGM

provides a formal, transparent and confidential process for all employees and contracted workers of AWC and its subcontractors to raise concerns or complaints related to their working conditions, rights or treatment in the workplace. The process designed to be easily accessible, non-retaliatory and cost-free to the worker.

In alignment with IFC PS 1, this WGM was developed early in the Project lifecycle to proactively manage potential concerns in the workplace and to prevent escalation of issues. The mechanism is designed to support ongoing engagement between AWC and its workforce throughout Project implementation.

1.2 OBJECTIVE

The objective of the WGM document is to establish a structured, fair and confidential process for employees and contracted workers, particularly affected communities, to their working conditions, treatment, or labor rights. The WGM make sures that these grievances are addressed promptly, respectfully, and without retaliation, in line with international labor standards and Korean regulations.

Developed as a stand-alone procedure, the WGM operates independently from the Community Grievance Mechanism to specifically address worker-related issues through a dedicated and accessible process.

To comply with IFC PS 1 and 2, AWC has implemented two distinct grievance mechanisms, one for workers and one for communities. Both mechanisms include procedures for addressing sensitive grievances, including those related to Gender-Based Violence and Harassment (GBVH), with strict confidentiality. Anonymous submissions are accepted, and all staff responsible for grievance resolution are trained to manage such cases with care and professionalism. Where needed, grievances may be submitted through female staff or via verbal reporting options to ensure accessibility for all workers.

2. PROJECT DESCRIPTION

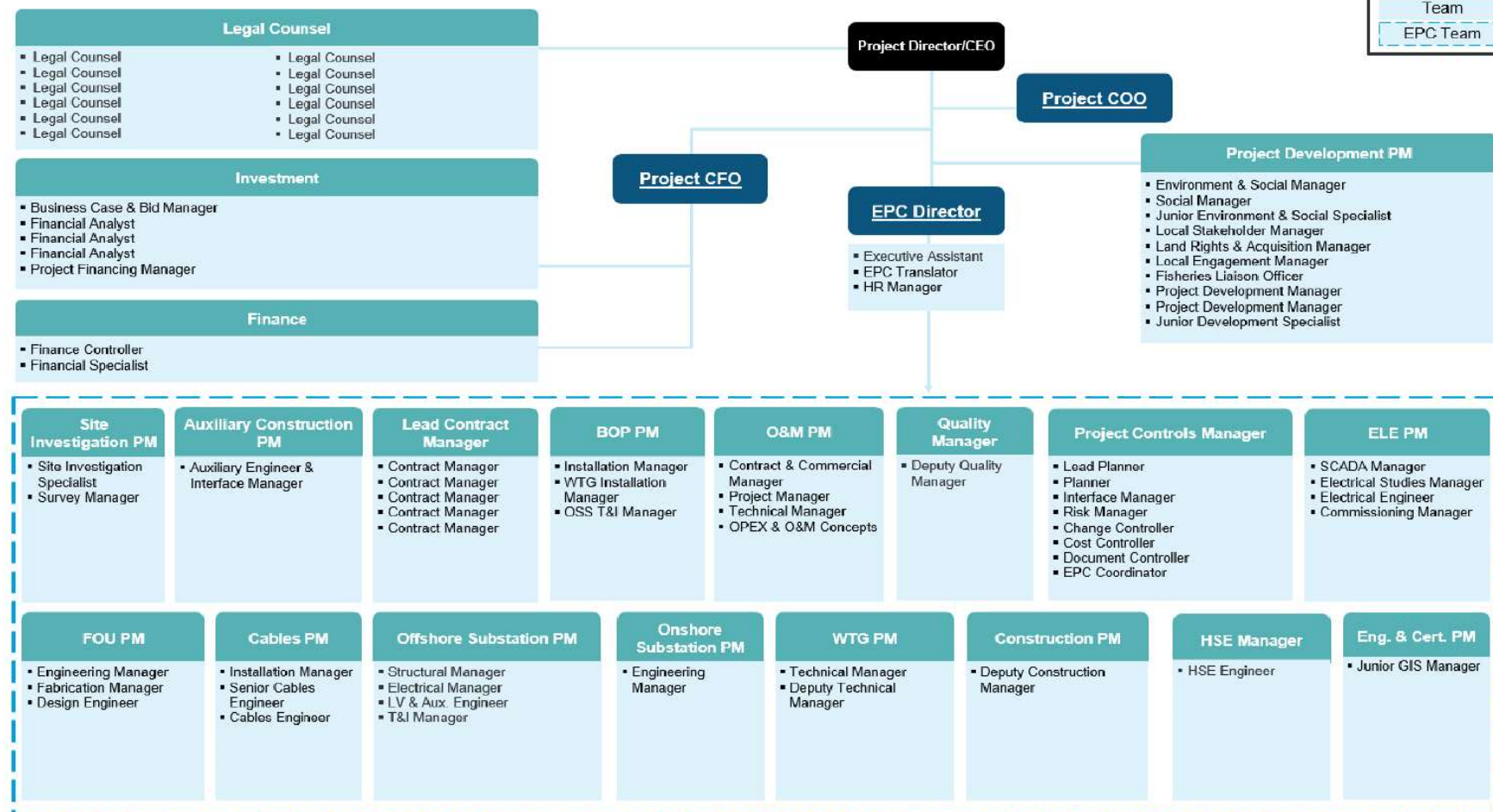
The Project is comprised of the following components:

- Wind Turbine Generators (WTGs);
- Offshore substation (OSS);
- Offshore Export Cable: within this report, when referring to Offshore Export Cable it is included the Inter Array Cable (IAC) as the implications related to physical risks are the same;
- Onshore Substation (ONS);
- Access Road; and
- Onshore Export Cable.

3. ROLES AND RESPONSIBILITIES

This section provides information on the organisational structure of AWC and respective roles and responsibilities in implementing this WGM document. The organisational structure for implementing the WGM document is provided under Figure 3-1.

Project Team



Source: AWF Project Organisation Chart dated 05 July 2025

FIGURE 3-1 ORGANISATIONAL STRUCTURE

The E&S Manager is the main person on AWC side in charge receiving the grievances. Other resources in AWC shared roles and responsibilities in WGM document implementation, and are summarised in Table 3-1.

TABLE 3-1 RESPONSIBILITIES OF EACH POSITIONS

Role	Responsibilities
Project Director	- Overall responsibility for practical implementation of all requirements and commitments described in the GM document; - Ensure sufficient resources and management support are allocated; and - Ensure review of existing plans/procedures and update them as necessary to incorporate any additional requirements contained within the GM document.
EPC Director	- Monthly reporting on key grievances received with status of corrective actions undertaken to the Project Director; and - Liaise with the Project Development Package Manager to ensure effective WGM is implemented throughout the workplace.
Project Development Package Manager	- Monthly reporting of key grievances received with status of corrective actions undertaken to the EPC Director; and - Liaise with the E&S Manager to ensure effective WGM is implemented throughout the Project workplace.
E&S Manager (Designated as WGM Focal Point)	- Overall responsibility on GM document implementation; - Serves as the central point of contact for all worker grievances; - Leads the registration, tracking, and coordination of grievance investigations. Leads the registration, tracking, and coordination of grievance investigations; - Ensures confidentiality and protection from retaliation; - Prepares WGM reports for internal monitoring and senior management; and - In accordance with Article 20 of the Act on the Promotion of Workers' Participation and Cooperation of the Republic of Korea, AWC designates a Grievance Handling Officer to independently and fairly address workplace complaints. This officer operates independently of the complainant's line management and ensures confidentiality and protection from retaliation.
HR Manager (If female, also serves as GBVH Focal Point)	- Receives and manages worker grievances related to employment conditions, workplace behavior, or violations of labor rights, in coordination with the E&S Manager (WGM focal point); - Supports communication with workers regarding the grievance mechanism, rights under Korean labor law, and available redress channels; - Ensures grievance records are maintained confidentially and handled in accordance with internal HR policies and Korean labor standards; - Reports grievance trends and issues to senior management to inform continuous improvement of the workplace environment; - May be designated as the GBVH focal point to handle gender-based or sensitive grievances from workers; - Coordinates referral to support services if needed; and - In compliance with Article 14-2 of the Equal Employment Opportunity and Work-Family Balance Assistance Act, AWC designates a female grievance officer (Social Manager) to receive and manage sexual harassment complaints. This officer ensure a survivor-centered, confidential approach and may coordinate with external support agencies as needed.

Role	Responsibilities
Social Manager	- Assists in receiving grievances and referring them to E&S Manager; - Supports worker communication and feedback collection; - For GBVH cases, coordinate intake and external referral with informed consent. - May act as the designated female grievance handler upon request, applying survivor-centered principles and ensuring confidentiality and psychological safety.
HSE Manager	- Co-operate with E&S Manager of health and safety related grievances received with status of corrective actions ; and - Liaise with E&S Manager for Environmental and Social issue.
HSE Team	- First point of contact for health and safety related grievances on Site(Contractor); and - Report HSE manager of received grievances.
All Employees	- Have the right to raise grievances without fear of retaliation; - Participate in the WGM in good faith and cooperate during investigations; and - Follow procedures and actions listed in the WGM document.

4. GRIEVANCE MECHANISM PROCESS

The following key elements were considered in establishing the WGM to support the fair and timely resolution of workplace-related concerns, as summarized from the IFC Good Practice Note on Addressing Worker Grievances and relevant Korean labor standards:

- Ensuring proportionality;
- Ensuring procedural fairness and confidentiality;
- Ensuring accessibility for all employees and contracted workers;
- Ensuring transparency and accountability to complainants; and
- Ensuring protection from retaliation and enabling workers to express their concerns freely.

4.1 COMMUNICATION OF THE GRIEVANCE MECHANISM

The WGM has been communicated through formal and informal channels to all Project workers, all employees and contracted workers. Communication methods include onboarding orientations, toolbox talks (TBTs), regular team briefings, and distribution of printed guides and posters at site offices. These ensure that all workers are aware of their rights and the process for raising grievances.

These communication efforts apply to all project workers, including employees, contractor and subcontractor personnel. For workers on vessels involved in construction activities, the WGM will be disseminated through on-board safety briefings, visual posters in crew common areas, and direct communication by vessel supervisors.

The following information has been communicated by the AWC to all Project workers:

- Who can raise complaints (all employees and contracted workers, including third-party personnel);
- Where, when, and how workers can log complaints;
- Who is responsible for receiving and responding to complaints, and whether any supervisors can support the process;
- What type of responses complainants can expect from the Project including timing of responses; and
- The benefits that worker can receive from using the grievance mechanism, including protection from retaliation.

It is essential that all the employees of AWC and the contractor workers fully understand the grievance mechanism, so that they can guide other workers in the grievance lodging process to the affected people, particularly in the case where the grievances are submitted directly to them for resolution.

Grievance channels include the following: the Project-specific website (<https://anmawind.com/ko/community-ko/>) and the dedicated email address (contact@anmawind.com) for grievance submission).

4.2 GRIEVANCE HANDLING

4.2.1 GENERAL GRIEVANCE MECHANISM HANDLING

This WGM is applied to all employees and contracted workers of AWC and its subcontractors. It ensures that any concerns raised regarding working conditions, treatments, or labor right are handled confidentially, and in accordance with AWC's Human Resources Policy applicable Korean regulations.

If a grievance relates to GBVH, it will be handled using a survivor-centered approach that ensures confidentiality, dignity, and protection from retaliation. Complainants may choose to report to a trained female grievance handler. Where appropriate, AWC will coordinate with external support services such as legal counsel, psychosocial specialists, or national GBVH hotlines. Only personnel with specific GBVH training will manage these cases.

Any grievances/complaints received will be addressed through the procedures outlined in Table 4-1 Summary of Grievance Handling Process.

TABLE 4-1 SUMMARY OF GRIEVANCE HANDLING PROCESS

Phases	Description	Timeline	Responsibility
Receipt of Grievance	- Complaints can be received in an official grievance form, website, suggestion box or verbally. - Grievance Channels; - Anonymous online platform: https://anmawind.com/ko/community-ko/ - Suggestion box: AWC Local Office - Verbal filing: - E&S Manager - HR Manager for the Company employee	Within 2 working days-	E&S Manager (WGM Focal Point)
Record/ Delegate	- Upon receiving grievances, AWC shall: - Acknowledge with a formal confirmation the collected grievances, record them, register them and track them throughout the processing cycle, providing status updates to the complainants. Even in the case of oral grievance/communication received face-to-face, AWC's staff/contractor shall be in charge to write down the grievance and provide a formal confirmation to keep track of all communications from the least to the most formalized. All grievances should be recorded using the Template for the Worker Grievance Submission Form as presented in Appendix B of the SEP. - If the grievance is outside the scope of the WGM, workers will be directed to the appropriate external channel. (e.g. criminal offenses or disputes unrelated to employment) - When a grievance is identified, it is recorded and the date noted in the grievance register. - Delegation of the grievance for review and follow-up shall be completed within seven (7) working days of receipt to allow sufficient time for investigation and resolution.	Within 7 working days	Project Grievance Redress Team
Review / Investigation	- All grievances must undergo some degree of review and investigation. However, depending on the type of communication and its clarity, the amount of time and investigation will depend. Therefore, AWC shall: - Analyze the grievance and classify it as - A Simple Grievance in case of minor and straightforward issues that can be handled easily by providing information directly on the workplace. - A Complex Grievance if it is a less clear, more problematic issue or a group grievance.	7 working days, with the possibility of extension if necessary	Project Grievance Redress Team

Phases	Description	Timeline	Responsibility
	- Provide a thorough and fair process of all communication reviews, developing a clear list of tasks and outcomes that an investigation is expected to achieve (develop an investigation plan, assess the needs for safety and confidentiality, collect evidence and produce an investigation report). - When the grievance needs a more detailed review prior to action, staff involved may need to seek advice internally and in some cases even seek support from a third party and involve the senior management and project managers. Furthermore, AWC shall conduct, when necessary, meetings with the complainants and visit the workplace to gather evidence for a thorough review.		
Resolution or Appeal	- Once the grievance review and investigation have been completed, resolution options can be developed taking into consideration workers concerns, project policy, past experience, current issues and potential outcomes. AWC shall: - After a thorough review, if the grievance is rejected, provide an answer to the complainant that advises the complainant of the findings and outcome with a comprehensive explanation of the reasons for the rejection. The answer shall be respectful and presented in a professional and appropriate manner. - If the grievance is accepted: - AWC shall propose a solution resolving the issue unilaterally. - If it is not accepted by the complainant, AWC and the complainant shall try to reach a solution through negotiation or discussion finding a solution bilaterally. - If they are not able to find a solution bilaterally, then a third party can be invited to mediate or AWC shall approach the resolution process through internal escalation procedures. - Third-Party Mediation: Where deemed necessary, AWC may engage a neutral third party, such as external labor consultants, legal advisor or an officially recognized labor mediation body. - External Mechanism: In exceptional circumstances, such as failure to resolve the issue, and if specifically required by local labor regulations or legal obligations, the grievance may be escalated to external bodies, such as local authorities. - Documentation and Communication: All steps undertaken, whether internally or through third-party facilitation, will be documented for transparency and shared with the complainant.	7 working days, with the possibility of extension if necessary	Project Grievance Redress Team

Phases	Description	Timeline	Responsibility
	AWC shall make sure all internal resolution options are exhausted before referring to external mechanisms. ○ The response procedure in case the claim is accepted shall include a preliminary response presenting the next steps, a concrete timeline; and a final response documenting the proposed resolution. • If it is expected that resolving the issue will take a long time, AWC plan to minimize the complainant's inconvenience through temporary measures. For example, temporary job reassignments, adjusted working conditions, or provision of interim support may be considered depending on the nature of the issue. • In the event that a worker has experienced actual harm or a violation of workplace rights or policies appropriate corrective or compensatory actions will be undertaken through consultation with the complainant, in accordance with applicable Korean labor laws and internal procedures. • When the final response is accepted by both parties, record all evidence of negotiation efforts or corrective actions taken, signed agreements and acceptance by the complainants to keep track of all grievances and resolutions. Once a grievance has been resolved, the complainant shall be invited to give feedback about the resolution process and asked to indicate their level of satisfaction with the mitigation measures once such measures have been implemented.		
Feedback/ Close out	• After the accepted resolution has been implemented, the complainant will be regularly updated on the progress of resolving the issue. To maintain transparency and trust in the resolution process, provide detailed explanations of the progress. • The cause of the complaint and the resolution process will be documented to identify root causes, establish preventive measures, and avoid similar issues in the future. • Continuous communication with workers will be maintained after a grievance is filed to enhance their understanding of workplace policies and procedures, and to actively gather their feedback as a preventive and improvement measure.	15 working days	Project Manager / Senior Management

Source: Yeonggwang Anma Offshore Wind Farm Project Development Permit Application (Transmission Line) dated August 2024.

Note: Timeline per phase can be extended or shortened depending on level of grievance

4.2.2 HANDLING OF SENSITIVE GRIEVANCES (E.G. GBVH)

Sensitive grievances, including those related to GBVH, can be submitted confidentially or anonymously through any of the existing grievance channels. Complainants may request to speak with a trained female staff member.

Upon receipt, the grievance will be registered confidentially. Complainants may request assistance from appropriate support services. In such cases, and with the complainant's consent, the Social Manager will be responsible to refer the case to relevant support services, such as local women's centers or national hotlines.

External GBVH support resources:

- Yeonggwang Women's Hotline:
 - Phone: 061-352-1321
 - Hours: Weekdays 9:00 AM – 6:00 PM (Lunch break: 12:00 PM – 1:00 PM)
 - Services: Telephone consultation, in-person and remote counselling, and free legal advice, etc
 - Website: <http://ykwahl.or.kr/>
- National GBV Hotline:
 - Phone: Dial 1366
 - Hours: 24-hour service
 - Services: Telephone, Chat, Message board consultation, etc
 - Website: <https://women1366.kr/>
- Korea Sexual Violence Relief Center:
 - Phone: 02-338-5801
 - Hours: Weekdays 10:00 AM – 5:00 PM (Lunch break: 1:00 PM – 2:00 PM)
 - Services: Telephone consultation, in-person and remote counselling, Psychological and emotional support, Medical support etc
 - Website: <https://www.sisters.or.kr/>

The procedures for handling sensitive grievances are further detailed in Table 4-2 and Figure 4-1. These ensure that all GBVH-related grievances are addressed in a survivor-centered, confidential, and rights-respecting manner, in line with international good practice.

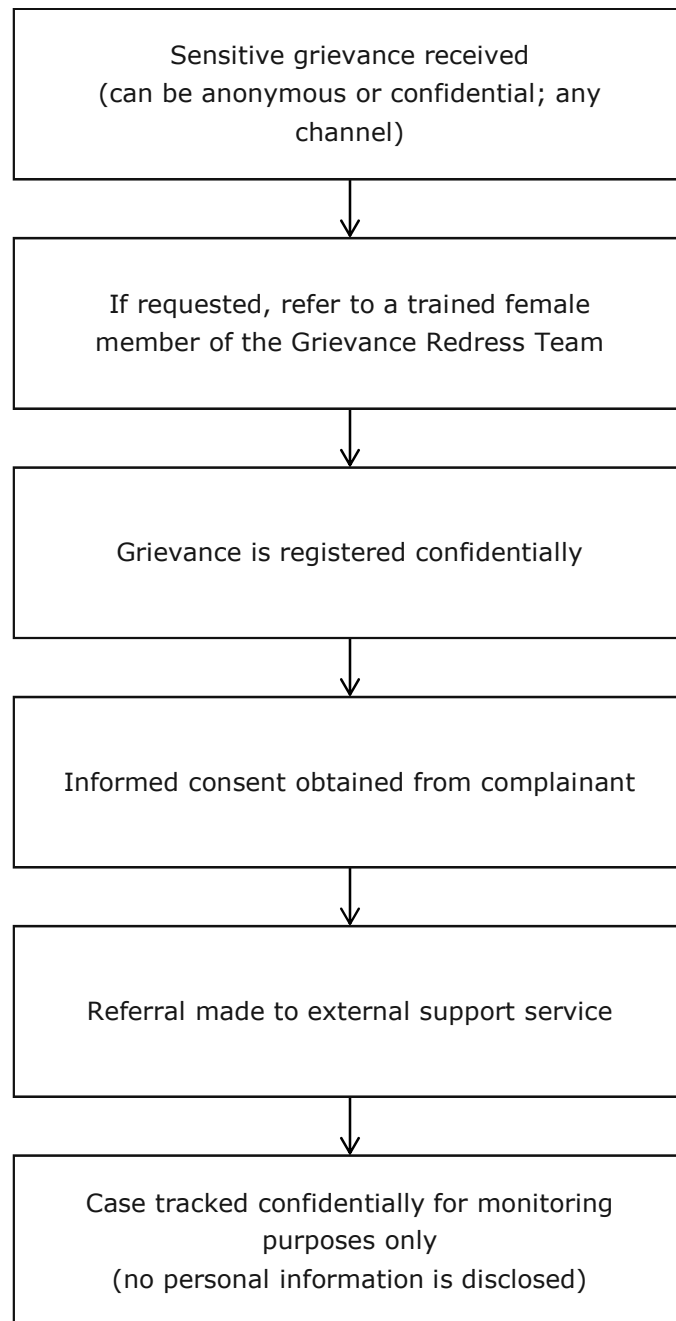


FIGURE 4-1 FLOWCHART: HANDLING OF SENSITIVE GRIEVANCES (E.G. GBVH)

TABLE 4-2 SUMMARY OF SENSITIVE GRIEVANCE HANDLING PROCESS

Phases	Description	Timeline	Responsibility
Receipt of Grievance	- Complaints can be received in an official grievance form, website, suggestion box or verbally. - Grievance Channels; - Anonymous online platform: https://anmawind.com/ko/community-ko/ - Suggestion box: AWC Local Office - Verbal filing: - E&S Manager - Social Manager or a trained female staff member, if preferred by the complainant - For sensitive grievances, such as those related to GBVH, complainants may submit their concerns confidentially or anonymously. Such grievances will be handled using a survivor-centered approach, ensuring confidentiality, psychological safety, and protection from retaliation.	Within 2 working days	E&S Manager (WGM Focal Point), or trained female staff member if requested by the complainant
Record/ Delegate	- Acknowledge the grievance, record it confidentially, register it, and track it through the process. Even in the case of oral grievance/communication received face-to-face, AWC's staff/contractor shall be in charge to write down the grievance and provide a formal confirmation to keep track of all communications from the least to the most formalized. - This process shall be completed within 7 working days to ensure timely delegation and allow sufficient time for investigation and resolution.	Within 7 working days	Social Manager (or trained female staff)
Review / Investigation	- Sensitive grievances, such as those related to Gender-Based Violence and Harassment (GBVH), will be reviewed using a survivor-centered approach, ensuring confidentiality, psychological safety, and protection from retaliation. - Complainants may request to speak with an appropriate female grievance handler, and only personnel with relevant qualifications or competencies will be assigned to manage such cases. - If needed, AWC will coordinate with specialized external agencies (e.g., legal or psychosocial support services, or national GBVH hotlines) to support investigation and resolution.	As applicable, based on complainant's consent and availability of external support services	Social Manager (or trained female staff)

Phases	Description	Timeline	Responsibility
	The Social Manager will coordinate the intake and referral process and ensure that informed consent is obtained prior to external referral.		
Resolution or Appeal	- Once a GBVH-related grievance is referred to external services, AWC will maintain regular communication with the complainant (if they consent) to track the referral status and ensure survivor protection. - The case may be tracked anonymously for internal monitoring. - All actions taken to coordinate the referral process will be documented confidentially.	As applicable, based on complainant's consent and availability of external support services	Social Manager (or trained female staff)
Feedback/ Close out	- With the complainant's consent, AWC may follow up to confirm that the referral has been completed. The case will be tracked anonymously for internal learning. - Complainants may voluntarily provide feedback on the referral experience or support received, if they are willing. - Any grievance not resolved within this timeframe shall be tracked as an open grievance, with the reason for delay documented.	As applicable, based on survivor consent and referral status	Social Manager, with support from E&S Manager for documentation only

5. MONITORING AND REPORTING

The WGM will be monitored regularly to ensure its effectiveness, transparency, and responsiveness. All received grievances will be recorded with detail including the date of submission, category, actions taken, and resolution status.

As part of the ESMS, a report will be prepared summarising the number of grievances received, the types of issues raised, the response times, and the outcomes, which will be developed by the E&S Manager and reported to the Project Director through the EPC Director and Project Development Package Manager.

Continuous improvements will be made based on the trends, recurring issues and feedback collected through the grievance process.