



Stakeholder Engagement Plan

Western-Siberian Complex for Crude Hydrocarbons Advanced Processing with Conversion into Polyolefins with the annual capacity of 2 million tonnes and necessary utilities and infrastructure facilities

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Acronyms and Abbreviations

Name	Description
EHS	Environmental, health and safety
H&S	Health and Safety
IFC	International Finance Corporation
PAO	Public Joint-Stock Company
SEP	Stakeholder Engagement Plan
OOO	Limited Liability Company

1. INTRODUCTION

1.1 This Document

This document is the updated Stakeholder Engagement Plan (SEP) for the operation of the Western-Siberian Complex for Crude Hydrocarbons Advanced Processing with Conversion into Polyolefins with the annual capacity of 2 million tonnes and necessary utilities and infrastructure facilities (the Project or the Complex).

This Plan is one of the Environmental and Social Management Plans (ESMP) developed to manage selected significant risks and impacts associated with the Project during its operational stage. SEP is a 'living' document that will be updated as the Project progresses, including when changes occur that may lead to the emergence of new stakeholders or changes in the attitude of the existing stakeholders to the Project.

This document is an updated version of the SEP developed at the stage of the environmental and social impact assessment in 2014-2015, and details stakeholder engagement activities for the operational phase of the Project. This Plan includes limited accompanying information, the details of which can be found in the initial SEP of 2014-2015.

1.2 Company's Principles and Approach to Interaction with Stakeholders

The Company recognizes the importance of the interaction with stakeholders in terms of establishing and constantly maintaining constructive relationships throughout the Project implementation. Interaction with stakeholders includes a wide range of activities and approaches, from information exchange and consultation to engagement, negotiations and partnerships. The nature and frequency of the Company's interaction with stakeholders reflects the scale of risks and impacts associated with the Project.

In its activities, the Company is guided by international best practices, including the following principles¹:

- Providing meaningful information in a format and language that is understandable to the relevant stakeholder(s) and responsive to their needs.
- Providing information prior to consultation and decision-making.
- Choosing ways and places to distribute information so that stakeholders are able to access it easily.
- Respect for local traditions, languages, deadlines and decision-making procedures.
- Two-way dialogue that allows both sides to exchange views and information, listen to the other side, communicate their problems and hope for a solution.
- Providing a wide range of opinions, including opportunities for women, vulnerable people and / or minorities to speak out.
- Dismissing intimidation or compulsion.
- Having a clear mechanism for responding to opinions, suggestions and complaints.
- Using feedback when developing a project and providing reports to interested parties.

1.3 Project Overview

The Project is being implemented within the industrial zone of the town of Tobolsk (Figure 1), which is the administrative centre of the Tobolsky District (Tyumen Region, Russia). Project operator is

¹ In accordance with the IFC guide "Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets" (IFC, 2007)

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OOO ZapSibNeftekhim (the Company), a subsidiary production unit of SIBUR Holding, a leading Russian petrochemical corporation.

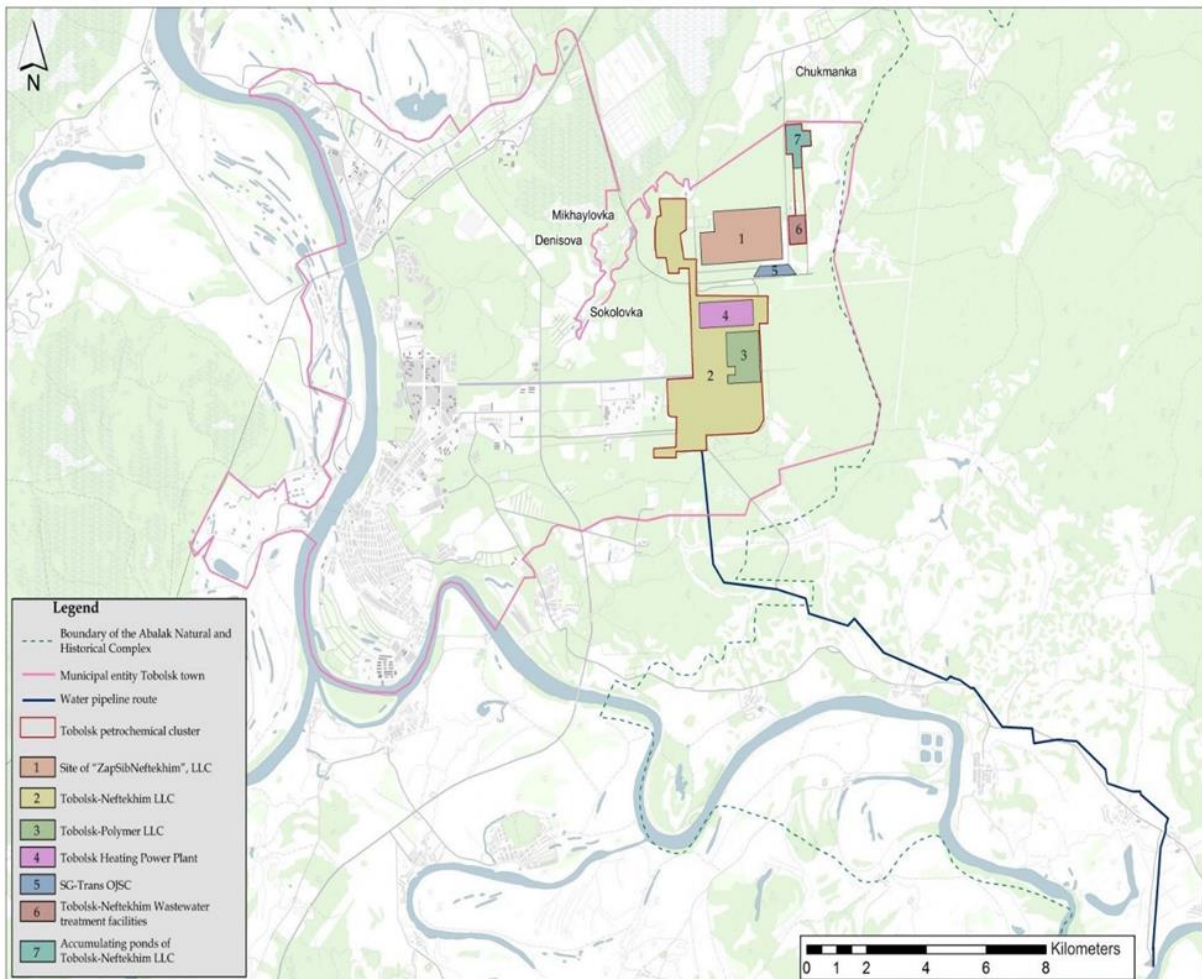


Figure 1: Complex site

The Complex is located within the industrial area of Tobolsk, 8 km to the east of the town's residential areas. Tobolsk is located 210 km to the north-east of the region's centre – the city of Tyumen. The total area of the Complex land plot is 460 hectares. The land plot is sited near operational petrochemical facilities (OOO SIBUR Tobolsk²) and the Tobolskaya Combined Heat and Power Plant (CHPP).

The Complex will process the broad fraction of light hydrocarbons (BFLH) to produce linear low density and high density polyethylene (LLDPE and HDPE) and polypropylene (PP).

The main feedstock for the Complex is processing products of BFLH with methane and ethane content of up to 5%. The feedstock is produced by processing associated petroleum gas at gas processing plants.

Hydrocarbons are supplied to the site by pipeline from the Western Siberian gas processing plants owned by PAO SIBUR Holding and several plants of other companies.

² Formerly, OOO Tobolsk-Neftekhim

2. STAKEHOLDER IDENTIFICATION

The following definition of “stakeholders” is presented in “Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets”, IFC, 2007” (May 2007):

- parties which are or can be influenced by the Project (positively and/or negatively);
- parties showing their interest in the Project;
- parties able to influence the Project.

According to recommendations given in Guidelines, the list of stakeholders and the plan of engagement with various groups will be issued and revised on regular basis. This will ensure that the Project’s operator is aware of those who are interested and/or concerned with the Project and, consequently, should be involved into engagement process.

The preliminary list of stakeholders for the Project was determined during the environmental and social impact assessment performed by ERM in 2014-2015 and later during the development of the first version of the Stakeholder Engagement Plan.

This list was taken as the basis for the new SEP and updated for the operational stage (Appendix A). The key groups of revealed stakeholders are presented in the table below (Table 1).

Table 1: Key groups of stakeholders

Stakeholders	Key groups
1. Communities near the Complex site, associated facilities and water pipeline	1.1. Residents of the villages located near the Complex, associated facilities and water pipeline (residents of certain villages of Bashkovskoye, Priirtyshskoye, Verkhnearemyanskoye, Abalakovskoye, and Zagvazdinskoye municipalities of Tobolsk District), 1.2. Residents of Tobolsk, 1.3. Vulnerable groups, 1.4. Local residents and other people who use the surrounding areas for recreational purposes;
2. Officials and regulatory authorities	2.1. Federal authorities, 2.2. Regional authorities, 2.3. Local authorities;
3. NGO and independent experts	3.1. Special ecological, public scientific and research organizations, experts; 3.2. Public organizations taking part in social programs arrangement; 3.3. Other public organizations in the territory of the Project implementation; 3.4. Trade unions organizations of PAO SIBUR Holding enterprises
4. Mass media	4.1. Print media; 4.2. TV; 4.3. Internet media.
5. Organizations involved into personnel training and selection	5.1. Educational institutions on basis whereof training of personnel for the enterprise is realized; 5.2. Recruitment centres.
6. Organizations involved into the Project implementation and subcontractors	6.1. Organizations involved into the Project implementation; 6.2. Company’s personnel and subcontractors’ employees; 6.3. Consultants involved into the Project implementation
7. Beneficiaries of Company’s social programs	7.1. Organizations – participants of Project’s social programs; 7.2. Beneficiaries of social programs in framework of Company’s current activity

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3. STAKEHOLDER ENGAGEMENT PLAN

No	Measure	Stakeholder engaged	Delivery time	Responsible persons	Reporting
1.	Regular informing of a wide range of stakeholders on the Project progress	<ul style="list-style-type: none"> ■ Residents of Tobolsk ■ NGOs of Tobolsk ■ Residents of Tobolsk district 	Monthly	Corporate Communications Department	Information on the website Articles in the media and social networks
2.	Providing information on the results of environmental monitoring, measures taken by the Project to ensure the safety of local residents; reminding affected communities of the measures provided for in the emergency response plans.	<ul style="list-style-type: none"> ■ Residents of Tobolsk ■ NGOs of Tobolsk ■ Residents of Tobolsk district 	Once every 6 months	Corporate Communications Department / EHS Department	Articles in the media and social networks
3.	Holding meetings and consultations with the representatives of the Public Council of Tobolsk and Tobolsk district in to inform them on the Project progress and the main issues of interest to the local residents	<ul style="list-style-type: none"> ■ Residents of Tobolsk and Tobolsk district ■ NGO ■ Research and educational organizations 	Once every 6 months	Corporate Communications Department	Publications in local media, Minutes of meetings, Grievance Log
4.	Familiarizing local residents and all other stakeholders with the Company's activities during the Open SIBUR tours: on the ecotrail near the ZapSibNeftekhim site and on the enterprises of the Tobolsk industrial site	<ul style="list-style-type: none"> ■ Residents of Tobolsk and Tobolsk district ■ NGO, research and educational organizations 	Weekly (as tour groups are arranged) Publications - twice a year	Corporate Communications Department	Tour reports
5.	Interaction within the charity program "Formula of good deeds" - providing charitable or sponsorship support	<ul style="list-style-type: none"> ■ State and municipal institutions in the social sphere, including those that provide educational, health, sports and cultural services, as well as accommodation and care for certain groups of minors and elderly citizens. ■ NGO 	During the operational stage	Business Support Department	Tour reports

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№	Measure	Stakeholder engaged	Delivery time	Responsible persons	Reporting
6.	Maintaining the Grievance Mechanism	<ul style="list-style-type: none"> ■ All stakeholders 	During the operational stage	Stakeholder Engagement Team	Grievance Mechanism reporting within the AMR
7.	Publishing the AMR Summary: <ul style="list-style-type: none"> ■ On the Company's website, ■ In the Company's Public Liaison Offices 	<ul style="list-style-type: none"> ■ Residents of Tobolsk ■ NGOs of Tobolsk ■ Residents of Tobolsk district 	Update once a year during the operational stage	Corporate Communications Department	AMR Summary
8.	Informing stakeholders about the availability of the Summary via: <ul style="list-style-type: none"> ■ Information on Bulletin boards on the Company's site; ■ Publications in corporate media; ■ Informing via the corporate web portal (opens as the start page on all Company computers); ■ Publications in local print media; ■ Publications in the Company's official social media accounts. 	<ul style="list-style-type: none"> ■ Residents of Tobolsk ■ NGOs of Tobolsk ■ Residents of Tobolsk district 	Publishing ads in parallel with the AMR Summary disclosure	Corporate Communications Department	Published ads

4. ALLOCATION OF RESPONSIBILITIES

The Company has a dedicated Stakeholder Engagement Team responsible for implementing the Grievance Mechanism and interacting with stakeholders within the SEP framework. The Stakeholder Engagement Team comprises of various specialists but not allocated as a stand-alone structural unit.

5. REPORTING

5.1 External reporting

In accordance with the Investment Agreement, the Company prepares and submits an Annual Monitoring Report (AMR) once a year. This report contains information required for the assessment of the Project's environmental and social performance by the Lenders.

The AMR contains information on the progress of the stakeholder engagement, including information on the involvement of stakeholders in the interaction process, feedback received during the stakeholder engagement, activities implemented during the reporting period, etc.

5.2 Reporting to external stakeholders

As part of the AMR preparation, the Company develops an AMR summary that is accessible to public and does not contain confidential information.

The AMR summary is published on the Company's website in accordance with the Stakeholder Engagement Plan (Section 3).

APPENDIX A STAKEHOLDER LIST

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№	Stakeholder group	Cooperation directions
1.	Local residents who live near Complex' site, associated facilities and water pipeline	
1.1.	Residents of the villages located near the Complex, associated facilities and water pipeline (2284 people in total): <ul style="list-style-type: none"> ■ Denisovka village, Mikhailovka village, Sokolovka village of Bashkovskoye municipality – 341 residents in total ■ Chukmanka, Klepalovka, Potapova, Rovdushka villages of Verkhnearemyzanskoye municipality – 130 residents in total ■ Abalak village, Preobrazhenka village of Abalaskoye municipality – 1000 residents in total ■ Sibiryak village of Priirtyshskoye municipality – 300 residents in total ■ Zagvazhdina village, Vakhrusheva village, Epanchina village of Zagvazhdinskoye municipality – 500 residents in total 	<ul style="list-style-type: none"> ■ Work performance informing; ■ Informing on undertaken measures to assure local residents security; ■ Possibility to receive grievances and suggestions from the local residents; ■ Informing on new working places available. ■ Informing on social projects of Company
1.2.	Residents of Tobolsk (101.8 thousand in total).	
1.3.	Vulnerable groups of local population of the nearest settlements: senior citizens, disabled people, multi-child families, single-parent families (not less than 12.5 thousand people in Tobolsk Town and not less than 3 thousand people in Tobolsky district)	<ul style="list-style-type: none"> ■ Company social projects implementation ■ Work performance informing.
1.4.	Local residents and other citizens using the adjacent territories in recreation purposes (the exact number is unknown)	<ul style="list-style-type: none"> ■ Informing about work performance on environmental and local residents safety
2.	Official and regulatory authorities	
2.1.	Federal government authorities	<ul style="list-style-type: none"> ■ Permits obtaining
2.2.	Regional authorities	
2.3.	Municipal authorities (local authorities) <ul style="list-style-type: none"> ■ Tobolsk Town Administration ■ Tobolsk Town Duma ■ Tobolsk District Administration ■ Bashkovskoye Municipality Administration ■ Verkhnearemyzanskoye Municipality Administration ■ Abalaskoye Municipality Administration ■ Priirtyshskoye Municipality Administration ■ Zagvazhdinskoye Municipality Administration 	<ul style="list-style-type: none"> ■ Permits obtaining ■ Solving social and employment issues; ■ Implementation of the Company's social projects ■ Informing on the Project progress
3.	Non-governmental organizations and independent experts	
3.1.	International and federal environmental organizations: <ul style="list-style-type: none"> ■ WWF ■ All-Russian Society of Nature Conservation 	<ul style="list-style-type: none"> ■ Work performance informing; ■ Environmental issues and enterprise scope concern

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№	Stakeholder group	Cooperation directions
	<ul style="list-style-type: none"> ■ Environmental Journalism Association of the Journalists Union of Russia ■ Russkiy Uglerod environmental projects development and support fund 	<ul style="list-style-type: none"> ■ Company's environmental projects monitoring ■ Training of specialists for a new enterprise. ■ Implementation of the Company's social project
3.2.	<p>Regional and local environmental organizations:</p> <ul style="list-style-type: none"> ■ Tobolsk Complex Scientific Station of Ural Department of Russian Academy of Sciences ■ Biology and Chemistry department of Tobolsk State Social and Pedagogical Academy n.a. D. I. Mendeleev ■ Tyumen Regional Unit of Environmental Policy and Culture Centre ■ Sozvezdie Club Municipal Autonomous Enterprise 	<ul style="list-style-type: none"> ■ Vulnerable groups support in Tobolsk city and Tobolsky district ■ Subcontracting local businesses. ■ Providing information about tourist services and developing the region's tourism potential
3.3.	<p>Public organisations functioning within the Project implementation territory:</p> <ul style="list-style-type: none"> ■ Tourist organisations: <ul style="list-style-type: none"> ○ Tyumen Region Informational and Tourist Centre non-commercial partnership ○ Young Tourists Station municipal autonomous institution of supplementary education for children ■ Organisations supporting Town enterprises economic development: <ul style="list-style-type: none"> ○ Opora Rossii – Tobolsk entrepreneurs association, ■ Ethno-cultural public organizations: <ul style="list-style-type: none"> ○ National and cultural autonomy of the Siberian Tatars and Tatars residing in Tobolsk town ○ Tobolskoe Zemlyachestvo Tyumen organization ■ Public social organisations <ul style="list-style-type: none"> ○ V Zashchitu Zhizni public organisation ○ Veterans' Council ○ Vozrozhdenie Tobolska public charity fund ○ Tobolyacka multi-child families union ○ Sestry Miloserdiya autonomous non-commercial organisation ○ Youth and Prevention Programmes Centre municipal autonomous institution ○ Ravnye Vozmozhnosti disabled people club ○ Molodaya Semia ○ Rovesnik ○ Society of the Deaf ○ Lagar Afganistan Veterans society ○ Novoe Pokolenie charity fund ○ Low-Income Women Support Fund ○ Society of the Blind ○ Nika charity fund ○ Tobolsk Juvenile Social and Rehabilitation Centre ○ Disabled People Society ○ Prevention and Rehabilitation Region Centre ○ Zhivoe Pravo Tyumen regional human rights social movement 	

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№	Stakeholder group	Cooperation directions
3.4.	OJSC SIBUR Trade Union Organisation: <ul style="list-style-type: none"> ■ Tobolsk-Neftekhim, LLC primary trade union organisation ■ Tobolsk-Polymer, LLC primary trade union organisation 	<ul style="list-style-type: none"> ■ Provision of employees unhampered integration into the trade union movement ■ Labour legislation observation, fixed salary, labour safety ■ Training of talented employees at the enterprise ■ Employment creation, universities graduates employment
4.	Mass Media and communication	
4.1.	Printed Mass Media: <ul style="list-style-type: none"> ■ Federal printed Mass Media: <ul style="list-style-type: none"> ○ Expert (magazine; «The Expert-Ural», «The Expert-Sibir») ○ Rossiyskaya Gazeta ○ Nedra and TEK Sibiri ■ Regional printed Mass Media <ul style="list-style-type: none"> ○ Tyumenskaya Pravda newspaper (Federal State Unitary Enterprise) ○ Tyumenskie Izvestiya newspaper ○ Tyumenskaya Oblast Segodnya newspaper ○ Tyumenskiy Business Magazine ○ Moskovskiy Komsomolets v Tyumeni newspaper ○ Regional versions of federal newspapers KP, AIF in Tyumen ■ Local printed Mass Media <ul style="list-style-type: none"> ○ Tobolskaya Pravda newspaper ○ Tobolsk-Sodeystvie newspaper ○ Delovoy Prospekt newspaper ○ Dyuzhina newspaper ○ Grad Tobolsk, magazine 	<ul style="list-style-type: none"> ■ Work performance informing ■ Informing about work performance on environmental and local residents safety
4.2.	Television: <ul style="list-style-type: none"> ■ Regional television <ul style="list-style-type: none"> ○ Region – Tyumen State Television and Radio Company ○ STS Ladiya (Tyumen) ○ Tyumenskoe Vremya Television Company ■ Local television <ul style="list-style-type: none"> ○ Tyumenskoe Vremya Television Company 	
4.3.	Internet-resources: <ul style="list-style-type: none"> ■ Federal Internet resources <ul style="list-style-type: none"> ○ Rupec.ru 	

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№	Stakeholder group	Cooperation directions
	<ul style="list-style-type: none"> ○ Interfax ○ Kommersant ○ ITAR-TASS ○ Expert magazine internet issue ○ RIA Novosti ○ UralPolit.ru ■ Regional Internet resources <ul style="list-style-type: none"> ○ Samotlor.express ○ Vsluh.ru ○ Tyumenskaya Liniya ○ TyumenMedia ○ NewsProm.Ru ■ Local Internet resources <ul style="list-style-type: none"> ○ Tobolsk-Inform city Internet newspaper ○ Tobolsk.ru website 	
5.	Organisations specialising in staff training and recruitment	
5.1.	<p>Educational institutions which are the basis for the enterprise staff training</p> <ul style="list-style-type: none"> ■ General education institutions: <ul style="list-style-type: none"> - Schools №№ 9,18,16 in Tobolsk; Professional Collage (Tobolsk).Higher education institutions: <ul style="list-style-type: none"> ○ Secondary Professional Education Department of Tobolsk State Pedagogical Institute n.a. D. I. Mendeleev ○ Tobolsk Industrial Institute (TII) Tyumen State Oil and Gas University branch ○ Tyumen State Oil and Gas University branch in Tobolsk ○ Tobolsk State Social and Pedagogical Academy n.a. D. I. Mendeleev State Educational Institution of Higher Vocational Education; Western-Siberian Humanitarian Institute <ul style="list-style-type: none"> ○ Tobolsk Complex Scientific Station of the Russian Academy of Sciences Ural Department Federal State Budget Scientific Institution 	<ul style="list-style-type: none"> ■ Teaching students according to perspective employment expectations at the enterprise ■ New technologies development and implementation, joint scientific programs implementation issues ■ Employment creation, universities graduates employment ■ Project influence on the environment and population health
5.2.	<p>Recruiting Centres:</p> <ul style="list-style-type: none"> ■ Tobolsk City and Tobolsk District Employment Centres 	<ul style="list-style-type: none"> ■ Staff recruiting ■ Skills upgrading and occupational retraining ■ Social projects implementation support
6.	Project implementation organisations and subcontractors	

STAKEHOLDER ENGAGEMENT PLAN

REPORTING

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№	Stakeholder group	Cooperation directions
6.1.	Company staff and contracting organisations employees <ul style="list-style-type: none"> ■ Company staff ■ Contracting organisations staff <ul style="list-style-type: none"> - Contracting organisations employees responsible for works at the construction stage - Contracting organisations employees responsible for works at the maintenance stage 	<ul style="list-style-type: none"> ■ Feedback possibility ■ Company social programs ■ Career growth and skills improvement possibilities ■ Labour safety
6.2.	Project implementation consultants	<ul style="list-style-type: none"> ■ Consultancy services
7. Company social programs beneficiaries		
7.1.	Vulnerable groups – SIBUR social and environmental programs participants	<ul style="list-style-type: none"> ■ Vulnerable groups support ■ Enterprise staff training
7.2.	SIBUR educational programs participants in Tobolsk town and Tobolsky district	

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