

E&S Eligibility Criteria for Geothermal sub-projects/sub-investments

The Environmental and Social (E&S) eligibility criteria herein have been prepared to assist and to support EBRD's partner Financial Intermediaries (FIs) who are considering the provision of financing to sub-borrowers/investees for geothermal power sub-projects/sub-investments.

These criteria set out the specific environmental and social criteria for financial intermediary sub-projects/sub-investments involving geothermal power to qualify for green finance attribution. As such, these criteria correspond to the requirement established in EBRD ESR9 for Financial Intermediaries, which states that "EBRD may require FIs to adopt and implement environmental and social requirements, depending on the nature of the FI, its business activities, and the level of environmental and social risks and impacts associated with its portfolio and sub-Projects, as applicable." Prior to approval for inclusion under EBRD proceeds, all geothermal sub-projects/sub-investments are subject to review by EBRD's Environment and Sustainability Department against these criteria.

Geothermal power sub-project/sub-investments are eligible for GET only if net emission reductions can be demonstrated. This should be based on a comparison of the plant's emissions to the grid emission factor of the country (and its expected trend) for the lifetime of the plant (generally considered to be 30 years).

In the following, the term "sub-project/sub-investment" refers to the geothermal sub-project/sub-investment considered for financing, including all of its associated facilities as defined by the EBRD 2024 Environmental and Social Policy (ESP). This includes typically, but not limited to, access roads, temporary sites, borrow and spoil areas, and the connection to the grid. Also, the "Sub-project/sub-investment" includes four temporal elements: 1) planning and siting of the facility, 2) construction, 3) operation and maintenance, and 4) decommissioning. All four elements are discussed herein. This is specific to new or "greenfield" Sub-project/sub-investments and extensions to or remodelling of existing facilities.

The term "developer / sponsor" refers to the sub borrower/investee that owns the sub-project/sub-investment and receives indirect EBRD financing.

The eligibility criteria are organized with reference to EBRD Environmental and Social Requirements (ESRs), as defined in the 2024 ESP. The key issues identified are typical of sub-project/sub-investments and technologies used in constructing a geothermal sub-project/sub-investment but may not be exhaustive. Proposed sub-project/sub-investments that use atypical construction or operation methods may require additional evaluation.

EBRD ESP 2024	Issue	Eligibility Criteria	Evidence
ESR1: Assessment and management of environmental and social risks and impacts	<i>Regulatory Compliance:</i> The sub-project/sub-investment, or proposed sub-project/sub-investment, may not have all the necessary permissions and permits required under national law.	- The sub-project/sub-investment must comply with all requirements of national environment, health and safety and labour laws. - The sub-project/sub-investment must have obtained all applicable local planning and zoning approvals to allow for the sub-project/sub-investment development.	- If required by law, the developer / sponsor has undertaken an Environmental Impact Assessment (EIA) and the EIA has been disclosed to the public in accordance with national requirements. - The developer / sponsor has obtained the required national licenses and permits to build and operate the sub-project/sub-investment. - The developer / sponsor has obtained the required local planning and zoning board approvals required to build and operate the sub-project/sub-investment. - In case of encroachment or anticipated impact of the sub-project/sub-investment (the plant or its grid connection) on a Natura 2000 site, an Appropriate Assessment must be prepared in line with The Birds Directive (Directive 2009/147/EC), The Habitats Directive (Directive 92/43/EC) and The Bern Convention (June 1979).
ESR1: Assessment and management of environmental and social risks and impacts	Where already operational, the sub-project/sub-investment may not comply with applicable requirements.	The facility will comply / complies with the requirements of national environment, health and safety and labour laws and, in case of category A, with applicable EBRD Environmental and Social Requirements 1-8 and 10.	- The developer has undertaken a review of compliance gaps and has taken corrective actions where gaps were identified. - The developer has undertaken a full Environmental and Social Impact Assessment where it would be required under relevant EU directives or EBRD ESP 2024 (Annex B); that ESIA follows EU standards and has been disclosed to the

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			public in accordance with EU requirements and EBRD ESR10.
ESR1: Assessment and management of environmental and social risks and impacts	The sub-project/sub-investment (the plant or its grid connection) may fall under the Category A list set out in Annex B of the EBRD ESP (2024)	The developer / sponsor has assessed and demonstrated that the sub-project/sub-investment: - Is not planned to have or likely to have a perceptible impact, including cumulative impact, on sensitive locations of international, national or regional importance - Will not result in significant adverse social impacts to local communities or other sub-project/sub-investment affected parties. - Will not involve significant involuntary resettlement or economic displacement.	- The developer / sponsor has established and maintained an Environmental and Social Management System (ESMS) appropriate and commensurate with the level of its environmental and social impacts and issues in line with Good International Practice (GIP). - The developer / sponsor should obtain annual groundwater abstraction data to determine proper categorization. - If the sub-project/sub-investment falls under Category A, the developer / sponsor will conduct an Environmental and Social Impact Assessment which meets the requirements of the EBRD ESRs 1-8 and 10. - Under EBRD ESR, FI financing of any Category A sub-project/sub-investment is subject to referral to EBRD.
ESR1: Assessment and management of environmental and social risks and impacts	The sub-project/sub-investment may be developed without due consideration of cumulative impacts on the water basin resulting from existing or planned developments or programs.	- Each new sub-project/sub-investment must take into account the local conditions and baseline data, including existing, planned or permitted sub-project/sub-investments and programs related to land or water use. - An assessment must be made of the cumulative impact of the existing and planned geothermal plants in the same catchment area.	The Environmental Impact Assessment demonstrates that the expected overall cumulative impact of developments on groundwater (including the sub-project/sub-investment) have been assessed and are or will be mitigated to an acceptable extent.

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ESR2: Labour and working conditions	Sub-project/sub-investment workers may not be employed in line with national legal requirements, treated fairly or adequately protected.	- An assessment of labour and working conditions has been conducted, including human resources policies, labour management plans, equal opportunity, terms and conditions of employment, and grievance mechanisms. - These aspects should be considered for all sub-project/sub-investment workers, including staff of the developer / sponsor and staff of contractors, sub-contractors, intermediaries and service providers.	- The assessment of human resource and labour management processes for the sub-project/sub-investment has found no significant gaps. - Processes are in place to identify any emerging or ongoing issues, and to monitor if management measures are effective.
ESR2: Labour and working conditions	<i>Labour management procedures:</i> The developer / sponsor must establish labour management procedures which are contractually binding on sub-project/sub-investment contractors and sub-contractors, ensuring that all sub-project/sub-investment workers receive written employment documentation, and have access to an effective grievance mechanism.	- The sub-project/sub-investment implements labour management procedures that ensure compliance with national labour and employment laws, social security laws and any collective agreements to which employing actors on the sub-project/sub-investment (developer / sponsor, contractor, sub-contractor) are a party. - Contractors and sub-contractors are contractually bound to comply with the sub-project/sub-investment's labour management procedures, national labour and employment laws, social security laws and any applicable collective agreements, as well as the requirement for a worker grievance mechanism.	Human resources and labour management requirements have been identified through an assessment process, human resource and labour management policies, plans and processes are in place that address all labour management planning components, including those of contractors, subcontractors, and intermediaries, with no significant gaps.

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		Worker grievance procedures are documented and tracked.	
ESR3: Resource efficiency and pollution prevention and control	Construction of the sub-project/sub-investment and both directly, and indirectly, increase local and regional economic activity which can generate increased levels of pollution to air, water, and land, and consume finite resources in a manner that may threaten people and the environment at the local, regional, and global levels.	- The developer / sponsor will adopt technically and financially feasible and cost-effective measures for minimising its consumption and improving efficiency in its use of energy, water and other resources and material inputs and recovering and re-utilising waste materials. - The developer / sponsor will integrate resource efficiency measures and the principles of cleaner production into product design and production processes	- The developer / sponsor has conducted an evaluation of consumables and wastes and has developed a strategy to minimize energy usage, re-use/recycle waste materials, and minimize carbon emissions. - The developer / sponsor has anticipated the volumes of wastes that will need to be managed and has a strategy to manage wastes through authorised companies.
ESR3: Resource efficiency and pollution prevention and control	Discharges of geothermal fluid or cooling tower blow-down water containing metals could pollute streams and rivers if unmanaged. Additionally, if reinjected improperly, potable groundwater could be polluted. Geothermal fluids contain dissolved gases, mainly carbon dioxide (CO ₂) and hydrogen sulfide (H ₂ S), small amounts of ammonia, hydrogen, nitrogen, methane and radon, and minor quantities of volatile species of boron, arsenic, and mercury.	- Sub-project/sub-investment must provide for proper treatment and/or disposal of wastewater. - Sub-project/sub-investment design must include features that prevent contamination of potable groundwater.	- Laboratory analysis, for the appropriate suite of analytes, of samples of geothermal fluid has been conducted to identify potential contaminants. - The developer / sponsor has developed a water management plan that provides for proper treatment and/or disposal of wastewater. - Sub-project/sub-investment design includes a wastewater reinjection plan which addresses potential for potable groundwater contamination and measures to prevent contamination.
ESR3: Resource efficiency and pollution	Use of geothermal fluids for electrical production can emit contaminants in geothermal fluids. Binary plants have no	Sub-project/sub-investment must include design features to control air	If using flash technology, sub-project/sub-investment design incorporates H₂S vent gas abatement systems.

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prevention and control	significant emissions. Flash plants may emit gases found in the geothermal fluids	emissions to acceptable levels if flash technology is being used.	If mercury is present in geothermal systems, carbon filtration is incorporated in the sub-project/sub-investment emission control design.
ESR3: Resource efficiency and pollution prevention and control	Sub-project/sub-investment site preparation and construction will disturb the ground surface and increase likelihood of soil erosion and sedimentation, potentially polluting streams and rivers and adversely impacting aquatic life.	The sub-project/sub-investment must demonstrate that sediments in stormwater will be managed in a manner that avoids or minimizes impacts to streams and rivers	The sub-project/sub-investment proposes the use of best management practices (BMPs) for soil erosion and runoff (e.g. sediment settling basins, silt fencing, hay bales, physical barriers, grassed swales, etc.).
ESR3: Resource efficiency and pollution prevention and control	Deep drilling required for geothermal wells will produce a large amount of waste material including geothermal fluid and cuttings. Both may contain high concentrations of heavy metals. If not properly managed, these wastes could potentially pollute streams and rivers and adversely impact aquatic life	Sub-project/sub-investment waste materials during sub-project/sub-investment construction must be properly managed by the sponsor.	The developer / sponsor has prepared a waste management plan that adequately addresses the management and disposal of drilling wastes in accordance with national law and international BMPs.
ESR4: Health, safety and security	<i>Workforce Health and Safety:</i> Occupational health and safety hazards specific to geothermal energy facilities and activities primarily include exposure to geothermal gases, confined spaces, heat and noise. There are also risks relating to inadequate worker accommodation.	- Workforce health and safety assessment includes all sub-project/sub-investment workers, including staff of the developer / sponsor and staff of contractors, sub-contractors, intermediaries, suppliers and service providers. - The sub-project/sub-investment ensures compliance with statutory and collectively agreed occupational health and safety requirements. - The developer / sponsor recognises their primary responsibility to provide	- An assessment has been undertaken of sub-project/sub-investment workforce health and safety issues, risks, and management measures, including risks of inadequate or unsafe worker accommodation, with no significant gaps. - A sub-project/sub-investment-specific OSH plan is in place; where appropriate, the OSH plan is integrated into the sub-project/sub-investment ESMS. - The developer / sponsor has, or will have, a procurement system in place that ensures that contractors abide by the provisions of

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		safe and healthy working environments for sub-project/sub-investment workers and informing, instructing, training, supervising and consulting sub-project/sub-investment workers on health and safety.	their health and safety programme and national law. Processes are or will be in place to identify any emerging or ongoing sub-project/sub-investment workforce health and safety issues and risks, and to monitor if management measures are effective.
ESR4: Health, safety and security	<i>Gender-based violence and harassment:</i> Female community members and workers may be at heightened risk of gender-based violence and harassment (GBVH). Risks are heightened at Sub-project/sub-investments situated in remote areas or where there is a significant workforce influx.	- The developer / sponsor will assess sub-project/sub-investment-related risks of gender-based violence and harassment (GBVH) to sub-project/sub-investment-affected persons and communities. - Where appropriate, the sub-project/sub-investment has clear GBVH safeguarding processes in place, including the provision of confidential channels for reporting incidents and providing support. - Where required, the developer / sponsor has relied on work conducted by qualified and experienced specialists to identify and assess GBVH risks.	- The assessment of GBVH safeguarding processes for the sub-project/sub-investment has found no significant gaps. - Processes are in place to identify any emerging or ongoing GBVH related issues, and to monitor if safeguarding measures are effective. - All site-specific GBVH risk assessment and mitigation strategies have been implemented by recognized GBVH experts.
ESR4: Health, safety and security	<i>Community health and safety:</i> Sub-project/sub-investment activities, equipment, and infrastructure may increase the potential for community exposure to health and safety risks and impacts, including those associated with construction, operations, and decommissioning, or of transport of raw and finished materials.	The developer / sponsor must take steps to identify and prevent accidents, injury and disease to workers and affected communities arising from or associated with or occurring during the sub-project/sub-investment activities and prepare and implement preventative measures and	- The developer / sponsor has a documented Health and Safety programme in place that contain employee training, awareness, and reporting elements. - The developer / sponsor has, or will have, a procurement system in place that ensures that contractors abide by the provisions of

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		plans to manage health and safety risks. - The developer / sponsor must provide affected communities with relevant information, guidance, and training. - The sub-project/sub-investment site area should be restricted to avoid unauthorised entrance during construction. - The developer / sponsor must have a system to investigate, document and analyse any sub-project/sub-investment related accident, injury and disease and notify and cooperate with the relevant authorities when required to do so by law.	their health and safety programme and national law.
ESR4: Health, safety and security	Withdrawal of aquifer water could facilitate ground subsidence in certain geology. Additionally, development of geothermal Sub-project/sub-investments using Enhanced Geothermal System (EGS) technology requires hydraulic fracturing to create a reservoir and may produce seismic impacts such as local “micro earthquakes”.	The sub-project/sub-investment design should address measured to manage ground subsidence.	- The sub-project/sub-investment design should incorporate reinjection of used geothermal water into the same aquifer as that from which it was withdrawn to minimize reductions on aquifer pressure and risk of ground subsidence, especially in sedimentary geology. - Where EGS technology is proposed, the sub-project/sub-investment should evaluate the potential for induced seismic activity and stakeholder engagement activities (ESR10) should inform the local community of these risks.
ESR4: Health, safety and security	Drilling and construction activities (and to a lesser extent, operations), increase local	The sub-project/sub-investment must address, and when required by national requirements or international	The selection of the sub-project/sub-investment site has maximized distance from

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	noise than can adversely impact nearby residential communities	standards, include noise abatement measures to eliminate or minimize impacts to nearby communities.	residential communities to the greatest extent possible. • An acoustic study has been conducted to evaluate impacts to nearby communities in accordance with national and international standards. • Where unabated noise from construction and operation of the geothermal plant has been shown to present an unacceptable risk to nearby residents, abatement and management measures have been included to reduce to acceptable levels.
ESR5: Land acquisition, restrictions on land use and involuntary resettlement	A sub-project/sub-investment (the plant or its grid connection) may result in physical displacement (relocation or loss of shelter) and economic displacement (loss of assets or resources, and/or loss of access to assets or resources that leads to loss of income sources or means of livelihood) as a result of sub-project/sub-investment-related land acquisition and/or restrictions on land use.	• The developer / sponsor will identify if land acquisition and/or restrictions on land use for the sub-project/sub-investment, its components or any associated facilities¹ will result in physical displacement, economic displacement or loss of access to assets or resources. • If the sub-project/sub-investment will result in will result in physical or economic displacement a Resettlement Action Plan (RAP) and/or compensation plan is required.	• An assessment of the resettlement implications of the sub-project/sub-investment is undertaken early in the sub-project/sub-investment preparation stage (covering the plant and its grid connection). • An alternatives analysis has been conducted to identify alternative sites and transmission routings. • Where applicable, a Resettlement Action Plan and associated processes are developed in a timely manner for sub-project/sub-investment implementation and operation. • Monitoring is undertaken of implementation of the resettlement plans, and to verify that commitments made to resettles and host

¹ Facilities and Sub-project/sub-investments developed by separate legal entities whose viability and existence are determined by or depend exclusively on the Sub-project/sub-investment and are essential for the successful operation of the Sub-project/sub-investment. This may include e.g. powerlines to connect the Sub-project/sub-investment to the grid where these are not part of the Sub-project/sub-investment.

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		Where applicable, the sub-project/sub-investment applies a “mitigation hierarchy” as required by the EBRD ESP, as follows: • Avoid displacement and, where this is not possible, implement additional measures to minimise, mitigate and, as a last resort, compensate for potential residual adverse impacts • Forced evictions are prohibited, in line with international law • Unavoidable residual displacement impacts must be mitigated by (i) timely compensation at full replacement cost and (ii) ensuring meaningful consultation in • Livelihoods must be improved or, at a minimum, restored.	communities have been delivered and are effective, and to identify any ongoing or emerging issues.
ESR5: Land acquisition, restrictions on land use and involuntary resettlement	In some cases, development of geothermal energy may compete with, or adversely impact, tourism associated with use of geothermal springs. Impacts may stem from steam and odours from plants. These risks must be addressed and mitigated.	• The selection of a site for the sub-project/sub-investment should consider nearby recreational uses and maintain local opportunities for tourism.	• An alternatives analysis was conducted to identify alternative sites and minimize current and future impacts on tourism.
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Water Quality:</i> Discharges of geothermal fluid, cooling tower blowdown water, and sediment could pollute streams, rivers as well as groundwater if unmanaged, or during emergencies	• Sub-project/sub-investment must provide for proper treatment and/or disposal of wastewater. • Sub-project/sub-investment design must include features that prevent contamination of potable groundwater.	• The developer / sponsor has developed a water management plan that provides for proper treatment and/or disposal of wastewater/coolants. • The sub-project/sub-investment only uses closed cooling systems and does not

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	The sub-project/sub-investment needs to have contingency measures in place to ensure that in case of an emergency discharge water can be stored on sites and is not released into the environment.	- The sub-project/sub-investment must demonstrate that sediments in stormwater will be managed in a manner that avoids or minimizes impacts to streams and rivers. - Sub-project/sub-investment waste materials during sub-project/sub-investment construction must be properly managed by the sponsor.	discharge any wastewater to the surface or into the groundwater. - Sub-project/sub-investment design includes a wastewater reinjection plan which addresses potential for potable groundwater contamination and measures to prevent contamination. - The sub-project/sub-investment proposes the use of best management practices (BMPs) for soil erosion and runoff (e.g. sediment settling basins, silt fencing, hay bales, physical barriers, grassed swales, etc.). - The developer / sponsor has prepared a waste management plan that adequately addresses the management and disposal of drilling wastes in accordance with national law and international BMPs
ESR6: Biodiversity conservation and sustainable management of living natural resources	The siting and construction of the geothermal plant could adversely impact protected species or their habitat.	- The sub-project/sub-investment must avoid impacts to protected species and their habitats to the greatest extent possible. - The developer / sponsor has identified any potential protected species that may be affected by the proposed development in accordance with national legislation and international treaties.	- The developer / sponsor has relied on work conducted by qualified and experienced specialists to identify protected species that may be affected as part of the ecological baseline with reference to at least national regulations and IUCN and CITES Lists. - An alternatives analysis was conducted to identify alternative sites and minimize current and future impacts on protected species. - Where impacts cannot be avoided, the sub-project/sub-investment sponsor has developed a mitigation strategy to limit the

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			effect of the development on protected species.
ESR6: Biodiversity conservation and sustainable management of living natural resources	The siting and construction of the geothermal plant could adversely impact designated national or international protected areas. Designated areas (e.g. a national park, IBA, a Natura 2000 site/Emerald site (both official and shadow lists) or “Ramsar” sites) are typically listed as such because they contain threatened, rare, or sensitive fauna and flora and geothermal operations in such areas may be detrimental to those species.	- The sub-project/sub-investment must avoid impacts to designated national or international protected areas to the greatest extent possible. - The developer / sponsor has identified any designated national or international protected areas that may be affected by the proposed development in accordance with national legislation and international treaties.	- The developer / sponsor has identified national or international protected areas that may be affected by the sub-project/sub-investment. - An alternatives analysis was conducted to identify alternative sites and minimize current and future impacts on national or international protected areas. - Where impacts cannot be avoided, the developer / sponsor has developed a mitigation strategy to limit the effect of the development national or international protected areas and a full ESIA has been conducted as per Category A Sub-project/sub-investments (see ESR1).
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Auxiliary Facilities:</i> Auxiliary facilities such as roadways to access the plant, and equipment for the transmission of electricity can, both during the construction and operational phases, create impacts on fauna and flora and people.	- Access roads, the site(s) and facilities for distribution of electricity are designed, constructed and operated so as to avoid, and where this is not possible mitigate, adverse environmental impacts. - Potential biodiversity risks of OHV power lines that connect the plant to the substation must be assessed. This assessment should inform how identified risks are mitigated.	- Auxiliary facilities have undergone appropriate impact assessment and any significant environmental or community impacts have been identified. - Any such impacts have been taken into account during siting decisions to preferably avoid, or where this is not possible, mitigate those impacts. Grid connections must be undergrounded or rerouted to avoid the impacts to the extent possible, and bird flight diverters must be installed to mitigate residual impacts. - Evidence of public consultations for the associated infrastructure.

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ESR8: Cultural heritage	Sub-project/sub-investment construction may cause damage or disturbance to irreplaceable sites (areas of archaeological or historic interest to local communities), features, or practices of tangible or intangible cultural heritage value.	- The sub-project/sub-investment must avoid impacts to cultural heritage assets to the greatest extent possible. - The developer / sponsor has identified any potential tangible and intangible heritage that may be affected by the proposed development in accordance with national legislation and international treaties. - The developer / sponsor has relied on work (e.g. archaeological surveys as appropriate) conducted by qualified and experienced specialists to identify and assess heritage that may be affected.	- The sub-project/sub-investment avoids impacts to cultural heritage assets wherever possible - Where impacts cannot be avoided, the developer / sponsor has developed a mitigation strategy to limit the effect of the development on heritage. - All site-specific cultural studies and mitigation strategies have been implemented by recognized archaeologists or cultural historians in accordance with international standards.
ESR10: Stakeholder engagement	Identification of and engagement with stakeholders is an integral part of a sub-project/sub-investment's preparation, environmental and social assessment and management. The scope and depth of the required stakeholder engagement and information disclosure is proportionate to the Sub-project/sub-investment's environmental and social risks and impacts. Stakeholder engagement activities should be used to inform the contextual risks associated with the sub-project/sub-investment and the sub-project's/sub-investment's social licence to operate.	- The sub-project/sub-investment has a systematic approach to stakeholder engagement that will help the developer / sponsor / sponsor build and maintain a constructive relationship with their stakeholders - The sub-project/sub-investment provides the means for effective and inclusive engagement with sub-project/sub-investment stakeholders throughout the sub-project/sub-investment cycle. - The sub-project/sub-investment ensures that appropriate E&S information is disclosed, and meaningful consultation is held with the Sub-project/sub-investment's	- The affected community has been identified, notified and consulted prior to the development of the facility. - For higher-risk sub-projects/sub-investments involving large-scale land acquisition, or with significant community concerns or complex issues, a stakeholder engagement and community liaison function is established by the developer / sponsor, with dedicated personnel. - Information on monitoring results should be provided to local stakeholders if necessary, or as part of the annual sustainability reporting. - The developer / sponsor publishes an NTS for the sub-project/sub-investment and makes it available to the local community.

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		stakeholders and where appropriate, and that feedback provided through the consultation is taken into consideration. • The sub-project/sub-investment ensures that grievances from stakeholders are responded to and managed appropriately. • The sub-project/sub-investment develops a Non-Technical Summary (NTS) outlining project impacts and monitoring to allow for meaningful stakeholder engagement, communication and provision of information on project assessment and mitigation measures.	• The sub-project/sub-investment has implemented a Stakeholder Engagement Plan (SEP) or equivalent documented process proportionate to the nature and scale or the risks, impacts and development stage of the sub-project/sub-investment ensuring data protection and confidentiality, non-reprisal, establishing processes for information disclosure, meaningful consultation, feedback on consultation and documentation and access to the sub-project/sub-investment grievance mechanism. • An effective grievance mechanism has been developed and implemented by the developer / sponsor as early as possible in the sub-project/sub-investment cycle, to cover both the construction and operational phases of the sub-project/sub-investment. The mechanism is publicised and disclosed in a format and language that is readily understandable to the affected stakeholders. Monitoring of grievances is undertaken on a periodic basis against clear indicators. • Contractors' roles and responsibilities for receiving grievances, supporting the investigation and resolution of grievances and abiding by the sub-project/sub-investment grievance mechanism are clearly set out in the grievance procedure and stipulated in the contractor's contract.