

GRIEVANCE REDRESS MECHANISM PROCEDURE

MONGOLIA TRANSPORT CONNECTIVITY AND LOGISTICS IMPROVEMENT
PROJECT (P174806), and ADDITIONAL FINANCING

Date: 23 February 2026

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ABBREVIATION LIST

CSC	Construction Supervision Consultant
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service (World Bank)
IPIU	Integrated Project Implementation Unit
MRT	Ministry of Roads and Transport
MTCLIP	Mongolia Transport Connectivity and Logistics Improvement Project
NCAV	National Center Against Violence
OHS	Occupational Health and Safety
PAP	Project Affected Person
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment

1. INTRODUCTION

The Mongolia Transport Connectivity and Logistics Improvement Project (MTCLIP) (P174806), including its Additional Financing, is implemented by the Ministry of Road and Transport Development (MRT) through the Integrated Project Implementation Unit (IPIU). The Project aims to improve transport connectivity, road safety, and logistics efficiency for strategic value chains in Mongolia, while strengthening institutional capacity for road asset management and logistics sector development.

Project activities include:

- Rehabilitation and upgrading of priority road sections along strategic corridors;
- Improvement of last-mile connectivity roads;
- Construction-related activities such as borrow pits, camps, traffic diversions, and material transport;
- Operation and maintenance-related activities; and
- Institutional strengthening, technical assistance, and logistics sector reforms.

While the Project is expected to generate significant positive impacts, such as improved road safety, reduced travel time, lower vehicle operating costs, and enhanced market access, it may also give rise to temporary or localized environmental and social impacts, particularly during the construction phase. These may include dust and noise, traffic disruptions, temporary access restrictions, impacts on pasture use near borrow pits, community health and safety risks, labor-related issues, and concerns related to information disclosure or stakeholder engagement.

In accordance with the World Bank Environmental and Social Framework (ESF, 2018), and specifically Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure, the Project has prepared and is implementing:

- An Environmental and Social Commitment Plan (ESCP);
- A Stakeholder Engagement Plan (SEP);
- Environmental and Social Management instruments (ESMF, ESMPs, LMP, RPF, etc.); and
- This Grievance Redress Mechanism (GRM).

This GRM forms an integral part of the Project's environmental and social risk management system. It establishes a structured, multi-tiered, and accessible process for receiving and addressing grievances, complaints, concerns, and suggestions from Project Affected Persons (PAPs), other interested parties, and project workers in a timely, transparent, inclusive, and culturally appropriate manner.

The GRM applies to all phases of the Project lifecycle, pre-construction, construction, and operation, and to all Project components and packages financed under MTCLIP and its Additional Financing.

The GRM shall be fully operational prior to contractor mobilization and shall remain active throughout Project implementation.

2. PURPOSE AND OBJECTIVES OF THE GRM

2.1 Purpose

The purpose of this Grievance Redress Mechanism is to provide a predictable, transparent, and accessible project-level system for receiving, registering, assessing, and resolving grievances related to environmental, social, labor, occupational health and safety, traffic safety, land access, stakeholder engagement, and other impacts arising from Project activities.

The GRM is designed to:

- Facilitate early identification and resolution of concerns at the lowest appropriate level;
- Strengthen accountability of Contractors, the IPIU, and MRT;
- Prevent escalation of minor issues into larger conflicts; and
- Support continuous improvement of Project performance through systematic feedback and corrective action.

The GRM does not replace judicial or administrative remedies available under the laws of Mongolia. Use of the Project GRM is voluntary and does not preclude access to formal legal channels.

2.2 Objectives

The objectives of the GRM are to:

1. Ensure Accessibility and Inclusiveness. Provide multiple, locally accessible, and free-of-charge channels for PAPs, stakeholders, and project workers to submit grievances, including site-level, local administrative, and centralized Project channels. Particular attention shall be given to vulnerable and disadvantaged groups.
2. Ensure Timely and Fair Resolution. Establish clear procedures, responsibilities, and timeframes for grievance acknowledgment, assessment, investigation, resolution, and closure, consistent with the commitments set out in the SEP and ESCP.
3. Strengthen Trust and Transparency. Promote open communication between the Project and stakeholders, enhance public confidence in Project implementation, and demonstrate responsiveness to community concerns.
4. Prevent and Mitigate Project Risks and promote Adaptive Management. Identify emerging environmental, social, labor, and community safety risks through systematic tracking and analysis of grievances, and inform corrective or preventive actions.

5. Support Contractor Accountability. Require Contractors to establish and maintain site-level grievance intake mechanisms and to respond promptly to grievances within their area of responsibility.
6. Ensure Confidential and Survivor-Centered Handling of Sensitive Cases. Provide safe, confidential, and survivor-centered pathways for grievances related to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Gender-Based Violence (GBV), in accordance with World Bank Good Practice guidance.
7. Enable Escalation and Appeals. Establish a structured escalation pathway within the Project and inform complainants of their right to access external grievance mechanisms, including national authorities and the World Bank's Grievance Redress Service (GRS).

3. GRM PRINCIPLES

The GRM shall be implemented in accordance with the following principles, which guide the receipt, assessment, and resolution of grievances related to the Project:

- **Awareness and Accessibility:** Stakeholders shall be informed about project activities and the GRM through appropriate communication channels. The GRM shall be accessible to all affected parties, free of charge, and allow submission of grievances in verbal, written, or electronic form, without fear of retaliation.
- **Relevance to Project Impacts:** The GRM shall address environmental, social, labor, public health, and safety issues arising from or related to Project activities.
- **Transparency, Timeliness, and Clear Communication:** Grievances shall be handled in a transparent and timely manner, in accordance with defined procedures and timelines. Complainants shall be informed of the process, outcomes, and any delays at each stage.
- **Equity, Respect, and Cultural Appropriateness:** The GRM shall be culturally appropriate, gender-responsive, non-discriminatory, and respectful of human rights, ensuring fair and equitable treatment of all complainants.
- **Confidentiality and Data Protection:** Confidentiality of complainants and sensitive information shall be maintained in accordance with applicable laws and Project procedures.
- **Evidence-Based and Good-Faith Resolution:** Grievance handling shall be based on adequate information and verifiable evidence, promote constructive dialogue, and seek mutually acceptable solutions where feasible.
- **Documentation and Accountability:** All grievances, actions taken, and decisions made shall be properly recorded and maintained to support monitoring, accountability, and continuous improvement of Project implementation.

4. SCOPE AND TYPES OF GRIEVANCES

4.1 Eligible Complainants

The GRM is open to all individuals and entities affected by, or having an interest in, the Project. Eligible complainants include:

- Project Affected Persons, including individuals, households, communities, and vulnerable groups (such as persons with disabilities, women, elderly persons, low-income households, and, where applicable, ethnic minority groups);
- Local residents, road users, and users of transport infrastructure, including passerby affected by construction or operational activities;
- Project-affected public and private entities, including local businesses and service providers;
- Community representatives and civil society organizations acting on behalf of affected persons, provided such representation is legitimate and undertaken with the consent of those represented; and
- Project workers, through the separate Workers' Grievance Redress Mechanism, where applicable.

4.2 Types of Grievances

The GRM covers grievances, complaints, concerns, and suggestions related to Project planning, construction, operation, and maintenance activities, including but not limited to:

- Environmental impacts, such as dust, noise, vibration, waste management, water pollution, and impacts on natural resources;
- Social and community impacts, including access restrictions, land use and land management issues, impacts on livelihoods, and community health and safety;
- Labor and working conditions, excluding individual labor disputes that are addressed through the Workers' GRM in accordance with ESS2;
- Occupational health and safety (OHS) issues affecting workers or the public;
- Traffic management and road safety, including impacts on pedestrians, road users, and transport services;
- Information disclosure, consultation, and stakeholder engagement, including concerns related to the adequacy or timing of information sharing; and
- Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) associated with Project activities.

4.3 Engagement Channels

To ensure accessibility, inclusiveness, and responsiveness, the Project has established a multi-tiered grievance intake system with local, project-level, and national entry points.

Stakeholders may submit grievances through any of the channels listed below, free of charge and without fear of retaliation. Anonymous submissions will be accepted and addressed to the extent possible. All Project-related grievances, regardless of entry channel, shall be recorded in the centralized GRM database maintained by the IPIU.

4.3.1 Tier 1 – Local-Level (Site and Community-Level Channels)

Local channels are the primary and preferred entry points during construction and operation phases, particularly for communities along road corridors.

(a) Contractor Site-Level Channels

Each Contractor shall establish and maintain accessible grievance intake channels at active construction sites, including:

- Contractor Social Officer (name and phone number publicly displayed)
- Site office walk-in submission
- Verbal complaints to site manager (must be documented)
- Dedicated contractor phone number
- Grievance/suggestion box at site office or camp
- Information boards displaying GRM contact details

Contractors are responsible for:

- Registering grievances within 24 hours of receipt;
- Providing acknowledgment within 2 working days;
- Attempting resolution of site-level grievances within their authority;
- Forwarding all grievances to the IPIU within 1 working day for centralized registration and oversight.

Failure to register or forward grievances constitutes non-compliance with Project requirements.

(b) Local Administrative Channels

Stakeholders may also submit grievances through:

- Soum Governor's Office
- Bag Governor
- Local environmental inspector or other local administrative authority

Local authorities receiving Project-related grievances shall:

- Complete the standardized GRM intake form;
- Forward the grievance to the IPIU within 2 working days;

- Retain a local record for coordination purposes.

Local authorities support vulnerable or hard-to-reach groups and may assist with documentation where literacy, mobility, or digital access is limited.

4.3.2 Tier 2 – Project-Level Channels (IPIU)

The Integrated Project Implementation Unit (IPIU) maintains centralized grievance channels to ensure oversight, tracking, and escalation where necessary.

Project-level channels include:

- Project Email: pmo@mtclip.mn
- IPIU Telephone: +976 7709-7676
- Project Facebook Page (MTCLIP)
- Written submission to IPIU office
- Direct contact with IPIU Social Specialist

All grievances received at project level shall be:

- Registered in the centralized database within 24 hours;
- Screened and categorized by type and risk level;
- Assigned to the responsible entity (Contractor, CSC, IPIU, MRT);
- Tracked until resolution and closure.

4.3.3 Tier 3 – National Government Platforms

Stakeholders may submit grievances through national systems, including:

- Government Citizens' Reception and Public Relations Center (11-11 Hotline and website)
- <https://mrt.gov.mn>
- Office of the President website
- Other official public complaint systems

Where grievances are submitted through national systems:

- They shall be forwarded through the MRT administrative system;
- The IPIU shall register them in the centralized GRM database within 24 hours of receipt;
- The Project GRM process shall still apply.

The 11-11 platform complements but does not replace the Project-level GRM.

4.3.4 SEA/SH and Sensitive Complaints

Grievances related to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), or Gender-Based Violence (GBV) require specialized and confidential handling.

These complaints:

- May be submitted through any channel;
- Shall immediately be referred to the designated SEA/SH Focal Point within the IPIU;
- Shall not be investigated, mediated, or verified by Project staff;
- Shall be referred, with informed consent, to qualified service providers.

Confidential referral services include:

- Domestic Violence Hotline (107)
- Police (102)
- Child Helpline (108)
- National Center Against Violence (9649-0505)
- National Center for Mental Health 70150520-1
- Legal Aid Center (77001982)
- Only anonymized, non-identifying data shall be recorded in the GRM database.

4.3.5 Anonymous Complaints

Anonymous grievances will be accepted through:

- Site-level grievance boxes;
- Phone or digital submission;
- Third-party submission via community leaders.

Anonymous complaints shall be assessed and addressed to the extent possible. Lack of contact information may limit direct feedback but does not invalidate the grievance. Feedback may be given via updates and notices on official websites.

4.3.6 Disclosure of Engagement Channels

Information about GRM channels shall be publicly disclosed through:

- Community meetings;
- Soum and Bag notice boards;
- Construction site information boards;
- Project website and social media;
- Leaflets distributed prior to major construction activities;
- Information boards

Information shall be provided in Mongolian and in accessible formats where needed.

4.3.7 Non-Retaliation and Good Faith

The Project does not tolerate retaliation against individuals who submit grievances in good faith. All grievances shall be treated respectfully, confidentially (where applicable), and without discrimination.

5. GRIEVANCE HANDLING PROCESS

The Project applies a structured six-stage grievance resolution process to ensure grievances are handled in a timely, transparent, fair, and accountable manner. The process applies to all Project-/4.2/ related -grievances, except SEA/SH cases, which follow a separate confidential referral pathway as described in Section 8. All grievances, regardless of entry channel, shall be registered in the centralized GRM database maintained by the IPIU.

Six-stage grievance resolution process

Stage 1: Complaint Submission and Intake

Eligible complainants may submit grievances orally, in writing, by telephone, electronically, or in person regarding matters specified in Section 4.2 of this document. Grievances may be submitted through multiple entry points, including the Government Citizens and Public Relations Center (11-11), contractors, local authorities, or directly to the IPIU. Regardless of entry channel, all Project-related grievances shall:

- Be recorded within 24 hours of receipt;
- Be assigned a unique GRM identification number;
- Be entered into the centralized GRM database maintained by IPIU.

(a) Grievances received through the 11-11 System

Upon receipt through the national 11-11 platform:

- The grievance is forwarded through MRT's administrative system;
- The IPIU Social Specialist registers it in the centralized database within 24 hours;
- Initial screening is conducted;
- Coordination with the Contractor and CSC is initiated as needed;
- The complainant is informed of receipt and expected timeframe.

The 11-11 channel complements but does not replace the Project-level GRM process.

(b) Grievances submitted directly to the Contractor

At construction sites:

- The Contractor’s Social Officer receives the grievance;
- The standardized intake form is completed¹;
- The grievance is forwarded to IPIU within 1 working day;
- The Contractor may resolve minor issues immediately where within its authority²;
- IPIU registers and oversees the case.

Site-level resolution does not eliminate the requirement for centralized registration.

(c) Grievances submitted through Local Authorities

Where grievances are submitted to Soum or Bag authorities:

- The standardized intake form shall be completed;
- The grievance shall be forwarded to IPIU within 2 working days;
- IPIU registers and reviews the grievance;
- A formal response is shared with the complainant and copied to the referring authority.

(d) Complex or Multi-Agency Grievances

Where grievances involve:

- Borrow pit or pasture access disputes,
- Temporary land occupation,
- Multi-agency coordination,
- Significant environmental or social risk,

the complainant shall be informed of the review process, responsible entity, and anticipated timeframe.

Stage 2: Acknowledgment

The complainant shall receive acknowledgment of receipt within two (2) working days from the IPIU or the Contractor GRM focal point when authorized by the IPIU, including:

- GRM registration number;
- Summary of grievance;
- Responsible entity;
- Expected resolution timeframe;
- Contact information for follow-up.

¹ Intake form is provided in Annex 2

² Contractors may resolve grievances directly related to construction impacts that do not involve land acquisition, compensation disputes, or systemic non-compliance

For anonymous grievances, acknowledgment shall be recorded internally.

Stage 3: Screening and Categorization

Within three (3) working days of registration, the IPIU Social Specialist shall:

1. Confirm relevance to Project activities;
2. Categorize the grievance (environmental, social, traffic, land access, labor, OHS, SEP, SEA/SH, etc.);
3. Assign priority level (Low, Medium, High, Critical);
4. Assign responsible entity (Contractor, CSC, IPIU, MRT, or external authority).

Special Screening Rules

- Borrow pit or pasture-related complaints require site verification.
- Land access restrictions require consultation with Soum authorities.
- Serious injuries or fatalities require immediate escalation to IPIU management.
- SEA/SH complaints are immediately referred to confidential pathway (see Section 8).

Priority is given to resolution at the lowest appropriate level.

Stage 4: Investigation and Resolution Development

The responsible entity shall:

- Conduct site visits where required;
- Consult affected persons and relevant authorities;
- Review evidence and technical documentation;
- Develop a corrective action plan.

Standard Timeframes

- Standard grievances: resolution proposal within 20 working days.
- High-risk grievances: action plan initiated within 10 working days.
- Immediate safety risks: interim mitigation measures without delay.

The complainant shall be informed of:

- Proposed corrective measures;
- Implementation timeline;
- Responsible party.

Stage 5: Implementation and Closure

Once corrective actions are agreed:

- The responsible entity implements the measures;
- IPIU verifies implementation;
- The complainant is informed of the outcome;
- Confirmation of satisfaction is sought where possible.

A grievance shall be formally closed when:

- Agreed corrective measures are completed;
- Closure notice is issued;
- All documentation is filed in the GRM database.

If the complainant does not agree with the outcome, escalation procedures apply.

Stage 6: Escalation and Appeal

If a grievance is not resolved satisfactorily at initial levels, it may be escalated as follows:

1. Contractor (site-level)
2. IPIU review
3. MRT senior management review

Each escalation level shall:

- Review documentation and findings;
- Issue decision within ten (10) working days;
- Communicate outcome to complainant.

Complainants retain the right to seek external remedies, including:

- Courts of Mongolia;
- National Human Rights Commission;
- World Bank Grievance Redress Service (GRS).

Use of the Project GRM does not limit legal rights.

Remote Area Acknowledgment and Forwarding Procedure

In locations where mobile network, internet connectivity, or physical access is limited due to remoteness, weather conditions, or other logistical constraints, the IPIU may formally authorize the Contractor, in writing, to issue acknowledgment of grievance receipt on behalf of the IPIU at the site level.

Under such circumstances:

- The Contractor shall provide written or verbal acknowledgment to the complainant within two (2) working days of receipt;

- The acknowledgment shall clearly inform the complainant that the grievance will be registered in the centralized GRM system once transmitted to the IPIU;
- The Contractor shall document the grievance using the standardized intake form and maintain a site-level log.

The grievance documentation shall be forwarded to the IPIU as soon as connectivity or access is restored. As a general rule, forwarding shall occur within five (5) working days. However, in cases of:

- prolonged lack of connectivity,
- severe weather events,
- road inaccessibility, or
- other justified logistical constraints,

forwarding may occur within the earliest practicable timeframe, provided that:

- the delay does not exceed ten (10) working days; and
- the reason for delay is documented in the site-level log and communicated to the IPIU.

Upon receipt, the IPIU shall:

- Register the grievance in the centralized database;
- Assign the official GRM identification number;
- Continue processing in accordance with the established timeframes.

The IPIU retains full responsibility for centralized registration, tracking, oversight, and reporting of all grievances, including those acknowledged at site level under this procedure.

5.2. Mediation, Confidentiality, and Good-Faith Resolution

The Project encourages resolution of grievances through dialogue and good-faith mediation where appropriate and with consent of all parties. Mediation shall:

- Be voluntary and non-adversarial;
- Not limit the complainant's right to legal recourse;
- Be documented.

All grievance-related information shall be treated as confidential.

The GRM shall be fully operational prior to contractor mobilization. IPIU staff, Contractors, and CSC shall receive periodic training on GRM procedures and confidentiality requirements.

5.3. Timeframes and Performance Standards

The following time standards apply:

1. Registration: within 24 hours of receipt.
2. Acknowledgment: within 2 working days.
3. Screening: within 3 working days.
4. Standard resolution: within 20 working days.
5. Escalated cases:
 - Review initiated within 10 working days of escalation;
 - Implementation of decision within 10 additional working days.

Where additional time is required, the complainant shall be informed in writing with justification and revised timeline.

Performance Benchmarks

- At least 80% of grievances resolved within 20 working days;
- Average resolution time not exceeding 20 working days;
- At least 70% satisfaction rate;
- Corrective action plan required if performance thresholds are not met for two consecutive quarters.

6. INSTITUTIONAL RESPONSIBILITIES AND ROLES IN GRIEVANCE HANDLING

Effective operation of the GRM requires clearly defined institutional roles and accountability across all levels of Project implementation. Responsibilities are structured to align with the six-stage grievance handling process described in Section 5.

The GRM operates through a tiered system involving:

- Contractors (site-level resolution);
- Construction Supervision Consultant (CSC);
- Integrated Project Implementation Unit (IPIU);
- Ministry of Road and Transport Development (MRT);
- Local authorities (Soum and Bag level);
- External referral entities (for SEA/SH and legal mechanisms).

The IPIU retains overall responsibility for GRM oversight and performance monitoring, as well as regular trend analyses and implementation of adaptive management approach.

6.1 Responsibilities by GRM Stage

Contractor	Soum / Bag Authorities	IPIU	CSC
Stage 1: Receipt and Registration			
<ul style="list-style-type: none"> • Serve as first point of contact at site level; • Ensure grievance intake through site-level channels; • Complete standardized intake form; • Register grievance in site logbook; • Forward grievance to IPIU within 1 working day¹; • Provide immediate response for minor site-level issues where possible. 	<ul style="list-style-type: none"> • Assist community members in documenting grievances; • Complete intake form where grievances are submitted locally; • Forward grievance to IPIU within 2 working days; • Support vulnerable complainants. 	<ul style="list-style-type: none"> • Register all grievances in centralized database within 24 hours; • Assign GRM ID number; • Ensure consistency of documentation across all entry channels. 	<ul style="list-style-type: none"> • Verify that Contractor maintains site-level intake system. • Monitor proper documentation during site inspections.
Stage 2: Acknowledgment			
<ul style="list-style-type: none"> • May provide immediate verbal acknowledgment at site level. 	<ul style="list-style-type: none"> • Inform complainant that grievance has been forwarded. 	<ul style="list-style-type: none"> • Issue formal acknowledgment within 2 working days; • Confirm registration and expected timeline; • Ensure complainant understands next steps. Contractors may provide acknowledgment at site level but centralized acknowledgment remains IPIU responsibility. 	<ul style="list-style-type: none"> • Confirm that acknowledgment process is functioning during supervision missions.
Stage 3: Screening and Categorization			
<ul style="list-style-type: none"> • Provide relevant site information and documentation. 	<ul style="list-style-type: none"> • Provide contextual local information if relevant. 	<p>IPIU Social Specialist (Lead Responsibility)</p> <ul style="list-style-type: none"> • Confirm Project relevance; • Categorize grievance by type and severity; 	<ul style="list-style-type: none"> • Provide technical input where grievance involves

¹ IPIU may agree on different timeframe in certain cases described in Section 5

<ul style="list-style-type: none"> Cooperate in initial assessment. 		<ul style="list-style-type: none"> Assign responsible entity; Identify high-risk cases requiring management review; Flag SEA/SH cases for confidential referral. Project Coordinator (IPIU) Endorse categorization for high-risk or complex grievances; Determine need for escalation to MRT. 	<p>environmental compliance, traffic safety, OHS, borrow pits, or ESMP obligations.</p> <ul style="list-style-type: none"> Advise on compliance gaps.
Stage 4: Investigation and Resolution Development			
<ul style="list-style-type: none"> Conduct site inspections as required. Develop corrective action plan for site-level issues. Consult affected persons locally. Propose feasible mitigation measures. 	<ul style="list-style-type: none"> Participate in consultations where grievance affects community-level access or pasture. Support coordination with local stakeholders. 	<ul style="list-style-type: none"> Coordinate investigation process. Approve corrective action plan. Ensure resolution aligns with ESCP, SEP, and ESMP requirements. Inform complainant of proposed resolution and timeline. Escalate high-risk cases to MRT if necessary. 	<ul style="list-style-type: none"> Verify technical adequacy of proposed corrective actions. Confirm compliance with environmental and safety standards. Recommend adjustments where required.
Stage 5: Implementation and Closure			
<ul style="list-style-type: none"> Implement corrective actions within agreed timeframe. Provide evidence of completion. Maintain site-level documentation. 	<ul style="list-style-type: none"> Support confirmation of resolution where relevant 	<ul style="list-style-type: none"> Verify implementation of corrective measures. Confirm closure conditions are met. Seek complainant satisfaction confirmation. Issue formal closure notice. Close case in centralized database. 	<ul style="list-style-type: none"> Verify implementation during supervision visits. Confirm corrective actions meet technical standards.
Stage 6: Escalation and Appeal			
<ul style="list-style-type: none"> Provide documentation and cooperate with escalation review. 	<ul style="list-style-type: none"> Support communication between complainant and Project entities if required. 	<p>If resolution is not satisfactory:</p> <p>Level 1 Escalation – IPIU Management</p> <ul style="list-style-type: none"> Review case documentation; Reassess findings; Issue decision within 10 working days. <p>Level 2 Escalation – MRT Senior Management</p> <ul style="list-style-type: none"> Review high-risk or systemic cases; Determine final Project-level decision; 	<ul style="list-style-type: none"> Provide technical briefing to IPIU or MRT if escalation involves compliance failure or serious risk.

		<ul style="list-style-type: none"> Consult World Bank where required. External mechanisms remain available at all times. 	
Core Institutional Roles			
<ul style="list-style-type: none"> Establishing site-level GRM prior to mobilization; Appointing qualified Social Officer; Displaying GRM contact information publicly; Maintaining grievance logbook; Resolving site-level grievances promptly; Implementing corrective actions; Submitting monthly grievance reports to IPIU. 	<ul style="list-style-type: none"> Facilitate communication with communities; Support vulnerable groups; Assist in resolving community-level disputes; Participate in site visits where required. <p>Local authorities do not independently close grievances but support coordination.</p>	<p>Ministry of Road and Transport (MRT)</p> <ul style="list-style-type: none"> Overall Project accountability; Review escalated or high-risk grievances; Ensure policy-level corrective action where required; Report to World Bank as necessary. <p>Integrated Project Implementation Unit (IPIU)</p> <ul style="list-style-type: none"> Maintaining centralized GRM database; Monitoring compliance with timeframes; Coordinating investigation and resolution; Ensuring confidentiality safeguards; Reviewing contractor performance; Analyzing grievance trends to identify patterns, suggest and implement corrective and preventive actions as per the adaptive management principles Preparing quarterly GRM reports; Monitoring performance thresholds (80% resolution within 20 days, etc.); Ensuring GRM is operational prior to contractor mobilization. 	<ul style="list-style-type: none"> Monitor contractor compliance with GRM procedures; Verify corrective actions during site visits; Provide technical advice on environmental and safety grievances; Report non-compliance to IPIU.
SEA/SH Institutional Responsibilities			
		<ul style="list-style-type: none"> Receive confidential referrals; Ensure survivor consent; Refer case to qualified service provider; Maintain anonymized tracking record; Ensure no retaliation occurs. The IPIU shall maintain and update the SEA/SH referral directory at least annually. 	

6.2 Roles and Responsibilities by Type of Grievance

While the IPIU maintains overall responsibility for GRM coordination, primary responsibility for grievance resolution varies depending on the type of grievance, as summarized below.

Grievance Type	Lead Entity	Supporting Entities
Environmental, traffic, dust, noise	Contractor	CSC, IPIU
Borrow pit, pasture access	Contractor (site) + IPIU oversight	Soum authority
Social impacts, vulnerable groups	IPIU	Contractor, local authorities
Labor issues (Workers' GRM)	Contractor	IPIU oversight
Information disclosure / SEP	IPIU	MRT
Serious safety incidents	Contractor (initial)	IPIU, MRT

7. WORKERS' GRIEVANCE REDRESS MECHANISM

In accordance with Environmental and Social Standard 2 (ESS2) and the Project's Labor Management Procedures (LMP), a dedicated Workers' Grievance Redress Mechanism (Workers' GRM) shall be established and maintained by each Contractor for all Project workers.

The Workers' GRM applies to direct workers, contracted workers, subcontracted workers, and primary supply workers, as applicable. It covers grievances related to employment terms and conditions, wages, working hours, occupational health and safety, camp conditions, discrimination, workplace harassment, and other labor-related matters arising from Project activities.

Each Contractor shall:

- Establish the Workers' GRM prior to worker mobilization;
- Appoint a designated Workers' GRM focal point;
- Provide accessible and confidential grievance submission channels (including anonymous options);
- Acknowledge grievances within two (2) working days;
- Resolve grievances within fifteen (15) working days where feasible;
- Ensure protection against retaliation;
- Maintain a separate Workers' GRM register; and
- Submit periodic anonymized grievance summaries to the IPIU.

Grievances that cannot be resolved at contractor level may be escalated to the Integrated Project Implementation Unit (IPIU) for oversight and follow-up. Workers retain the right to access national labor dispute resolution mechanisms at any time.

Grievances related to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), or Gender-Based Violence (GBV) involving workers shall be handled through confidential referral pathways consistent with Section 8 of this GRM and the LMP.

Detailed procedures, templates, and reporting requirements for the Workers' GRM are provided in the LMP.

8. GBV / SEA / SH GRIEVANCE HANDLING

Grievances related to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) require a survivor-centered, confidential, and ethical response. These cases shall be handled in accordance with the World Bank Environmental and Social Framework (ESF), the Good Practice Note on Addressing SEA/SH in Investment Project Financing, and applicable laws of Mongolia.

SEA/SH cases shall not follow the standard grievance investigation and resolution process described in Section 5. They shall be managed exclusively through a confidential referral pathway as described below.

8.1 Guiding Principles

All SEA/SH-related grievances shall be handled in accordance with the following principles:

- Survivor safety and dignity first – The immediate physical and psychological safety of the survivor takes priority over all other considerations.
- Confidentiality and privacy protection – Information shall be shared strictly on a need-to-know basis and stored in restricted-access records.
- Informed consent – No referral, reporting, or information sharing shall occur without the survivor's informed and voluntary consent, except where mandatory reporting obligations apply under Mongolian law (e.g., cases involving minors).
- Non-retaliation and non-discrimination – Survivors and reporters shall be protected from retaliation, discrimination, or adverse consequences.
- Do no harm – Project staff shall avoid actions that could expose survivors to further risk.

- No internal investigation or mediation – Project personnel shall not attempt to verify, investigate, mediate, or adjudicate SEA/SH allegations.

Investigation and prosecution fall within the mandate of competent national authorities.

8.2 Reporting Channels

SEA/SH grievances may be submitted through any of the following channels:

- Contractor Social Officer or designated SEA/SH focal point;
- IPIU Social Specialist or SEA/SH Focal Point;
- Dedicated confidential phone number or email (where established);
- Soum or Bag authorities (who shall immediately refer to IPIU);
- National hotlines and service providers (e.g., 107, 102, 108).

If a SEA/SH allegation is received through the general GRM, it shall:

1. Be immediately removed from the standard grievance handling process;
2. Be redirected to the confidential SEA/SH pathway;
3. Not be circulated among contractors or general GRM staff;
4. Be recorded only in anonymized form for monitoring purposes.

Only non-identifying, aggregated tracking information shall be entered into the centralized GRM database.

8.3 Institutional Responsibilities

Each Contractor shall:

- Ensure all workers sign and comply with a Code of Conduct that explicitly prohibits SEA/SH;
- Conduct mandatory induction and periodic refresher training on worker behavior, SEA/SH prevention, and reporting obligations;
- Designate a trained focal point for SEA/SH-related complaints;
- Immediately and confidentially refer SEA/SH allegations to the IPIU SEA/SH Focal Point;
- Refrain from conducting internal investigations or mediation of SEA/SH cases;
- Cooperate with IPIU in implementing preventive and corrective measures;
- Ensure no retaliation occurs against complainants or witnesses.

Failure to comply may result in contractual sanctions in accordance with the Project's ESCP and contractual provisions.

The IPIU shall designate a trained SEA/SH Focal Point responsible for:

- Receiving confidential referrals from contractors, local authorities, or other entry points;
- Ensuring informed consent is obtained prior to referral;
- Informing the survivor of available support services and legal options;
- Referring cases to qualified local service providers in accordance with Mongolian law;
- Maintaining anonymized, access-restricted records;
- Monitoring implementation of non-retaliation measures;
- Identifying systemic risks or repeated patterns requiring preventive action;
- Reporting aggregated, non-identifying data in periodic environmental and social monitoring reports.

The IPIU shall maintain and update the SEA/SH referral directory at least annually, including verification of local service providers in each project aimag.

8.4 Referral to Service Providers

In accordance with the Law on Combating Domestic Violence (2016), the Criminal Code of Mongolia, the Law on Child Protection (2016), the Law on Gender Equality (2011), and other applicable national legislation, grievances related to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), or Sexual Harassment (SH) shall be referred to competent service providers and authorities, with the informed consent of the survivor.

The Project shall not replace or interfere with legally mandated protection, reporting, or judicial mechanisms under Mongolian law.

8.4.1. Referral Process

Upon receipt of a SEA/SH-related complaint:

- The IPIU SEA/SH Focal Point shall inform the survivor of available support services and reporting options;
- Referral shall be made only with the survivor's informed consent, except in cases where mandatory reporting obligations apply under national law (e.g., child protection cases);
- The Project shall not conduct internal investigation or mediation of SEA/SH allegations;
- Immediate safety risks shall be addressed by contacting appropriate emergency authorities.

With survivor consent, referrals may be made to relevant institutions, including:

- National Center Against Violence (NCAV) – Specialized survivor support and shelter services;
- Domestic Violence Hotline (107) – National crisis hotline;
- Police (102) – Emergency response and criminal investigation authority;
- Child Helpline (108) – Child protection services (mandatory reporting for cases involving minors);
- National Center for Mental Health – Psychological and psychiatric support;
- Legal Aid Center of Mongolia – Free legal assistance for eligible individuals.

Where appropriate, referrals may also include:

- Local One-Stop Service Centers (where available);
- Provincial social welfare and family development departments;
- Accredited civil society service providers operating in the relevant aimag.

8.4.2. Maintenance of Referral Directory

The IPIU shall maintain and periodically update a centralized SEA/SH referral directory covering national and aimag-level service providers.

To ensure local accuracy:

- Each Contractor shall identify and verify locally available referral services within their project area prior to mobilization;
- The Contractor’s SEA/SH Focal Point shall review and confirm the availability and contact details of local service providers at least quarterly;
- Updated local referral information shall be submitted to the IPIU for consolidation and logging;

The IPIU shall maintain a master referral list and ensure its accessibility to designated focal points.

8.5 Confidentiality and Data Protection

All SEA/SH-related grievances shall be handled with strict confidentiality, survivor-centered principles, and in compliance with applicable Mongolian laws and regulations. The following safeguards shall apply:

- No identifying personal information (name, address, phone number, employer, or other identifiable data) shall be entered into the general GRM database.
- SEA/SH cases shall be recorded in a restricted-access log maintained by the designated IPIU SEA/SH Focal Point.
- Access to SEA/SH case information shall be strictly limited to authorized personnel with a legitimate need to know.

- All records shall be anonymized and securely stored, whether in electronic or hard-copy format.
- Data shall not be shared with Contractors, Supervision Consultants, or third parties unless required for referral and only with survivor consent.
- Disclosure of information without survivor consent is prohibited, except where mandatory reporting obligations apply under Mongolian law (e.g., cases involving minors or immediate risk of harm).

The Project shall not conduct internal investigations into SEA/SH allegations. Investigation and prosecution fall under the jurisdiction of competent national authorities.

8.6 Monitoring and Reporting

SEA/SH-related grievances shall be monitored separately from general grievances and reported only in aggregated and anonymized form. Quarterly environmental and social monitoring reports submitted to MRT and the World Bank shall include:

- Total number of SEA/SH grievances received during the reporting period;
- Number of cases referred to qualified service providers;
- Confirmation that referral protocols and survivor-centered procedures were followed;
- Confirmation that confidentiality safeguards were maintained.

No personal identifiers, case narratives, or location-specific details that could lead to survivor identification shall be disclosed in public or external reports.

Internal reporting shall ensure that systemic risks or repeated patterns are identified and addressed through preventive measures, including contractor compliance reviews and Code of Conduct enforcement.

8.7 Non-retaliation

Retaliation against any individual who reports SEA/SH concerns in good faith, participates in grievance procedures, or supports a survivor is strictly prohibited.

This prohibition applies to:

- Project staff;
- Contractors and subcontractors;
- Supervising consultants;
- Local authorities engaged in Project implementation.

Retaliation may include, but is not limited to:

- Termination of employment or contract;

- Demotion or reduction of wages;
- Threats, intimidation, or harassment;
- Social or professional exclusion;
- Denial of services or access.

Allegations of retaliation shall be treated as serious non-compliance and subject to immediate review by the IPIU. Where substantiated, corrective measures may include:

- Disciplinary action in accordance with the Labor Law of Mongolia (2021);
- Contractual remedies under contractor agreements;
- Referral to competent national authorities where criminal conduct is suspected.

The Project affirms that reporting of SEA/SH concerns shall not prejudice access to employment, services, compensation, or legal remedies.

9. MONITORING, EVALUATION, REPORTING, AND DISCLOSURE

9.1 GRM Database Management

The Integrated Project Implementation Unit (IPIU) shall maintain a centralized, secure grievance database covering all Project-related grievances received through authorized channels, including Contractor, Soum/Bag authorities, IPIU, and national platforms such as 11-11. The database shall:

- Assign (preferably automatically) a unique identification number to each grievance;
- Record category, source, location, responsible entity, and status;
- Track compliance with established timeframes;
- Document investigation findings, corrective actions taken, and closure confirmation;
- Record root causes and preventive measures implemented;
- Maintain anonymized and restricted records for sensitive cases, including SEA/SH grievances;
- Allow aggregation and analysis of grievances by location, contractor package, issue type, and stakeholder group.

Access to the database shall be limited to authorized IPIU personnel. SEA/SH-related information shall be stored separately in anonymized form with restricted access. Records shall be retained for the duration of Project implementation and for a defined post-completion period consistent with national and World Bank requirements.

9.2 Performance Monitoring

IPIU shall regularly monitor and analyze GRM performance, including:

- Number, type, and source of grievances received;

- Geographic distribution of grievances by package or corridor;
- Status of grievances (open, under review, resolved, escalated);
- Average time to resolution;
- Percentage of grievances resolved within prescribed timeframe;
- Satisfaction rate of complainants (where confirmation is available);
- Recurring issues and systemic patterns;
- Contractor responsiveness and compliance.
- Trends in grievances related to labor conditions through the Workers' GRM (reported in anonymized form).
- Workers' GRM summaries (anonymized) shall also be reviewed periodically to identify labor-related trends and risks.

The following performance standards shall be monitored:

- Registration within 24 hours of receipt;
- Acknowledgment within 2 working days;
- At least 80% of grievances resolved within 20 working days;
- Average resolution time not exceeding 20 working days;
- At least 70% satisfaction rate where feedback is obtained.

If performance thresholds are not met for two consecutive quarters, IPIU shall require a corrective action plan and may escalate to MRT management.

9.3. Grievance Analysis, Adaptive Management, and Learning

Beyond resolving individual grievances, the GRM shall function as an important management tool for identifying systemic risks and improving project implementation. The IPIU shall periodically analyze grievance data to identify:

- Recurring issues linked to construction activities;
- Environmental or social impacts requiring stronger mitigation measures;
- Weaknesses in contractor compliance or site management practices;
- Communication gaps between the project and local communities;
- Geographic "hotspots" where grievances occur more frequently.

This analysis shall be conducted on a monthly and quarterly basis and discussed during project management and supervision meetings. Where recurring or systemic issues are identified, the IPIU may initiate corrective and preventive measures, including:

- Strengthening environmental or social mitigation measures under the ESMP or Contractor ESMP;
- Revising construction practices (e.g., dust suppression, traffic management, working hours);
- Enhancing communication with affected communities;

- Strengthening contractor supervision and compliance monitoring;
- Updating stakeholder engagement approaches.

Lessons learned from grievance management shall be documented and integrated into ongoing project supervision and environmental and social management processes.

9.4. Reporting

GRM performance shall be summarized in:

- Monthly internal summaries (for IPIU management);
- Quarterly environmental and social monitoring reports;
- Semi-annual or annual reports submitted to the World Bank.

Reports shall include aggregated data only and shall not disclose personal or confidential information. SEA/SH grievances shall be reported only in anonymized and aggregated form, indicating number of cases and confirmation of referral to appropriate service providers.

9.4 Public Disclosure

Information about the GRM shall be publicly disclosed in an accessible, culturally appropriate, and understandable manner throughout the Project lifecycle.

Disclosure methods may include:

- MRT and IPIU websites;
- Soum and Bag notice boards;
- Construction site information boards;
- Community meetings;
- Printed leaflets;
- Social media platforms.

Public disclosure shall include:

- GRM procedures;
- Submission channels;
- Contact details;
- Timeframes;
- Non-retaliation policy.

Where appropriate, the Project may also provide periodic feedback to communities on common grievances received and actions taken, demonstrating how community input has contributed to improving project implementation.

Personal data and confidential case information shall never be publicly disclosed.

10. APPEALS AND EXTERNAL MECHANISMS

The Project GRM provides a structured internal mechanism for grievance resolution. However, use of the GRM is voluntary and does not limit or replace access to external remedies available under national or international frameworks. Complainants may access external grievance and redress mechanisms at any stage of the GRM process.

10.1 Internal Appeals

If a complainant is not satisfied with the resolution at Contractor level, the grievance may be escalated to:

1. IPIU Management (Project-level review);
2. MRT Senior Management (final Project-level decision).

Each internal appeal shall be reviewed within ten (10) working days of escalation.

10.2 External Mechanisms

Complainants may seek recourse through:

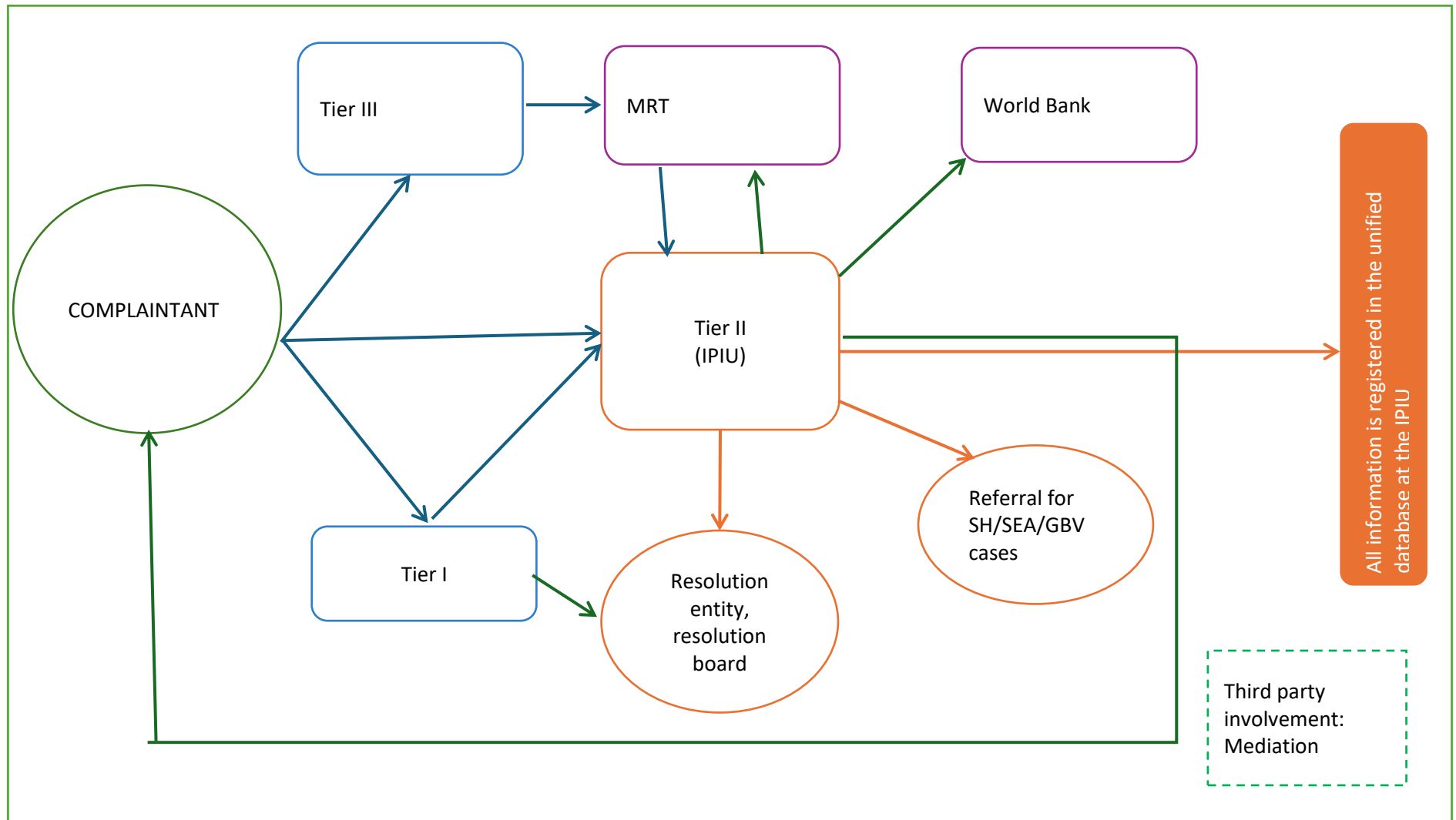
- Relevant national authorities and courts of Mongolia;
- The National Human Rights Commission of Mongolia;
- Labor dispute resolution mechanisms (for workers);
- The World Bank GRS;
- The World Bank Inspection Panel (where applicable).

Information on how to access the World Bank's GRS shall be publicly disclosed on the Project website and through GRM communication materials.

10.3 No Retaliation

Accessing external grievance mechanisms shall not result in retaliation, discrimination, or restriction of rights. The Project remains committed to resolving grievances at the earliest possible stage while respecting the right of complainants to seek alternative remedies.

ANNEX 1. GRM FLOW CHART



- Intake
- Resolution
- Reporting

ANNEX 2. GRM INTAKE FORM

A. BASIC INFORMATION

Item	Details
Location (Aimags/Soums/Bag, road section, km):	
Date and time received:	
Received By: (Name and Organization)	
Entry Channel:	<input type="checkbox"/> Local authority <input type="checkbox"/> E-mail <input type="checkbox"/> Phone <input type="checkbox"/> Facebook group <input type="checkbox"/> In person <input type="checkbox"/> Local Authority walk in <input type="checkbox"/> Other: _____

B. TYPE OF SUBMISSION

- Grievance / Complaint
- Request for information
- Comment / Suggestion

C. COMPLAINANT INFORMATION (Leave blank if anonymous)

Item	Details
Name:	
Gender (optional):	<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other <input type="checkbox"/> Prefer not to say
Stakeholder group:	<input type="checkbox"/> Local resident <input type="checkbox"/> Local business owner <input type="checkbox"/> Interested party <input type="checkbox"/> Road user <input type="checkbox"/> NGO/CSO <input type="checkbox"/> Worker <input type="checkbox"/> Other _____
Vulnerability (if any)	<input type="checkbox"/> Elderly <input type="checkbox"/> single household head <input type="checkbox"/> Disabled <input type="checkbox"/> low income <input type="checkbox"/> other _____
Preferred Method of Response:	<input type="checkbox"/> Phone <input type="checkbox"/> SMS <input type="checkbox"/> Email <input type="checkbox"/> Letter

	<input type="checkbox"/> In person
Phone #, address	

D. DESCRIPTION OF ISSUE

(What happened? Where? When? Who is affected?)

E. URGENCY (Tick one)

- Minor (no safety risk)
- Urgent (safety / access issue)
- Sensitive (possible SEA/SH or serious harm)

F. SENSITIVITY SCREENING (For GRM Focal Point Use Only)

Does this grievance involve any of the following?

- SEA / SH
- Child protection concern
- Serious injury or fatality
- Labor issue (worker-related)

(Note: If SEA/SH is suspected

- Do NOT investigate;
- Refer immediately to IPIU SEA/SH Focal Point;
- Do NOT record identifying details)

G. FORWARDING INFORMATION (For Official Use Only)

Item	Details
Date forwarded to IPIU	
Forwarded by	
Temporary site action taken (if any)	

SIGNATURES

Focal Point Name & Signature: _____

Date: _____

ANNEX 3. GRM REGISTRATION DATABASE

Column Name	Description / Data Type	Example / Notes
GRM_ID	Auto-generated ID	MTCLIP-YYYY-###
Date Received	Date	From intake form/date received
Package / Corridor	Drop-down list	Enables package-level analysis
Location (Aimag/Soum)	Drop-down list	For geographic reporting
Entry Channel	Drop-down	11-11 Hotline / Email / Facebook / In person / Local Authority / Other
Anonymous	Yes / No	Required field
Complainant Type	Drop-down	Community / Business / Road User / Worker / Government / Other
Complainant gender	Drop-down	Male / Female / no response
Complainant vulnerability	Drop-down	Elderly / single household head / Disabled / low income / other
Grievance Category	Drop-down	Environmental / Social / Labor / OHS / Traffic / Land / Information Disclosure / SEA/SH / Other
Subcategory	Drop-down (standard list)	Dust / Noise / Access / Livestock movement / Payment / Overtime / Safety / etc.
Urgency	Drop-down	Minor (no safety risk)/Urgent (safety / access issue)/Sensitive (possible SEA/SH or serious harm)
Sensitive Case	Yes/No	Yes = restricted handling
Responsible Entity	Drop-down	Contractor / CSC / IPIU / MRT / other
Date Acknowledged	Date	Must be within 2 working days
Target Resolution Date	Date	Automatically calculated (e.g., receipt+20 days)
Date Resolved	Date	Actual closure date
Status	Drop-down	Open / Under Review / Resolved / Closed / Escalated
Escalation level	Drop-down	None / IPIU Review / MRT Review / External
Complainant Satisfaction	Drop-down	Yes / No / Not confirmed
Resolution summary	Short text (max 300 characters)	Concise corrective action summary