

**Joint Stock Company for performing energy activity natural gas transmission  
NOMAGAS Skopje in state ownership**

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**R U L E B O O K**

**ON THE ESTABLISHMENT OF A GRIEVANCE MECHANISM IN THE JOINT STOCK  
COMPANY FOR PERFORMING ENERGY ACTIVITY NATURAL GAS TRANSMISSION  
NOMAGAS SKOPJE IN STATE OWNERSHIP**

Skopje, 2023

Pursuant to Article 20 paragraph of the Joint Stock Company for performing energy activity natural gas transmission NOMAGAS Skopje in state ownership, the Board of Directors of the Company on the fifth session held on 23.02.2023, according to item 10 of the agenda, adopted a:

## **RULEBOOK**

### **on the establishment of a Grievance Mechanism in the Joint Stock Company for performing energy activity natural gas transmission NOMAGAS Skopje in state ownership**

#### **INTRODUCTION - ASSESSMENT OF THE REASONS AND PURPOSE OF ADOPTING THE REGULATION**

NOMAGAS JSC Skopje with this Rulebook shall determine the established grievance mechanism and shall provide a special procedure through which issues raised by concerned and interested parties will be reviewed and resolved in a timely, transparent, non-discriminatory and cost-effective manner and an appropriate response will be provided thereof. The involvement and continuous interaction with the various groups of stakeholders and interested parties is crucial for increasing the acceptance of the planned measures and activities and for their successful implementation.

The purpose of the information and consultation process is to inform the public about the planned activities of the Company, such as the Projects for the construction of gas pipeline sections and to receive feedback from the concerned and interested parties (their needs, views and opinions related to the Projects and etc.). The public, and especially the interested and affected parties, will be able to use the grievance mechanism and actively participate in the realization of the Projects.

#### **I. GENERAL PROVISIONS**

##### **Article 1**

This Rulebook shall govern the procedure for dealing with submissions and complaints submitted to Joint Stock Company for performing energy activity natural gas transmission NOMAGAS Skopje in state ownership (hereinafter: the Company).

##### **Article 2**

A submission i.e. a complaint, within the meaning of this Rulebook, means any written or oral address of the complainants to the Company, for the purpose of protecting and exercising their rights and interests, which are related to the realization of the projects and the overall operation of the Company.

### Article 3

With this Rulebook, the Company determines the established grievance mechanism and provides a special procedure through which submissions and complaints raised by concerned and interested parties will be reviewed and resolved in a timely, transparent, non-discriminatory and cost-effective manner.

All the important information required for submitting the submissions and complaints as well as the Grievance Form will be published on the website of the Company in Macedonian, Albanian and English language.

The grievance form will also be available in printed form (Attachment No. 1).

### Article 4

The complainant may be any natural or legal person (hereinafter: complainant).

The complainant must not be called to account, nor suffer any harmful consequences due to the submission of the submission i.e. the complaint and the presentation of views and opinions, unless a crime has been committed.

The dealing with the submissions and complaints submitted to the Company shall be carried out by authorized persons from the Company.

### Article 5

The submission i.e. the complaint can be submitted in written form or orally, individually or in groups, by mail or in electronic form, and the Grievance Form can be used.

Complaints received by phone, text messages (SMS) or instant messenger will also be registered and reviewed.

Complaints can also be submitted anonymously or through a third party.

If the complainant prefers to file a complaint anonymously or through a third party, the Company will respond to the extent feasible.

The submissions i.e. the complaints are submitted to the Company or to another representative who may be appointed for a specific gas pipeline section, as well as to a representative of the construction contractor or a representative of the municipality.

### Article 6

The grievance mechanism will be administered by a person in charge of receiving submissions and complaints and will record them in the Grievance Logbook and will process them within the deadline as shown in the Grievance Mechanism Flowchart (Attachment No. 2).

No fee shall be paid for the submission or complaint.

### Article 7

The logbook will include systematic records of the following information: name and contact details, (unless the complainants request anonymity, in this case a code or reference number should be used); date of contact; gender of the inquirer; contact point within the Company; issues raised (comment, suggestion or

complaint); proposed response and actions to be taken; status (recorded, active, closed).

The logbook will be kept up to date to include new stakeholders and issues raised, as well as resolution progress of the noted issues.

The submission will be considered a submission i.e. a complaint if it has another title (urgency, request, appeal, etc.) if it is determined from the content of the submission that it is a submission i.e. a complaint.

## **II. MANNER OF ACTING ON SUBMISSIONS AND COMPLAINTS**

### Article 8

After submission of the submission or complaint by an authorized person, it will be determined whether they are completely filled out and clear enough to act upon them.

In cases where the submission or complaint is not completely filled out or is not clear enough, the authorized persons to resolve the submission or complaint in the Company will return it to the complainant with a direction to complete it so that a decision can be made that will be in the best interest of the complainants.

In a situation where the persons authorized to resolve the submission or complaint are not able to resolve the specific problem through the grievance mechanism or if there is no need for any action, then they will provide a detailed explanation/reasoning as to why the issue was not resolved.

The reasoning from paragraph 3 of this Article will contain legal instructions for other legal remedies in accordance with the legal legislation of the Republic of North Macedonia.

Complainants can be informed about the progress of the submissions and complaints at any time.

The deadline for action starts from the day of receipt of the submission i.e. the complaint in the Company.

### Article 9

The dealing with submissions and complaints includes the collection of data, reports and opinions about the facts and circumstances of importance for their evaluation, immediate examination, analysis and recording of the circumstances and the reasons for their submission and taking the necessary actions and measures to exercise the rights of the complainant or the violation of the public interest determined by law.

### Article 10

The persons authorized to resolve the submission or complaint in the Company are obliged to respond to the complainant about the grounding and the results of the action within 15 working days, and for complex issues within 30 working days from the date of receipt of the submission, i.e. the complaint.

### Article 11

When the persons authorized to resolve the submission or complaint determine that the submission i.e. the complaint refers to a legal matter for which a procedure has not been initiated, the complainant can be instructed that he can initiate an appropriate procedure before the competent authorities.

If the persons authorized to resolve the submission or complaint determine that a court or other procedure is being conducted on the issue stated in the submission i.e. the complaint, they will stop the

proceedings i.e. it will be considered completed and will notify the complainant thereof.

#### Article 12

When the submission, i.e. the complaint refers to an issue that has already been dealt with or another procedure has been conducted, the proceedings on the newly submitted submission, i.e. complaint will be repeated only if new facts and circumstances that were not known in the previous proceedings i.e. in the conducting of the procedure were presented in the submission, i.e. the complaint.

The procedure for the newly submitted submission i.e. complaint about an issue that has already been acted upon or another procedure has been conducted, can be repeated only once.

#### Article 13

The management structure of the Company shall review the database of received submissions and complaints every month to identify and analyze all recurring problems during the implementation of the Projects.

These periodic reviews will be used to check functionality, monitor trends in submissions and complaints, and evaluate overall performance in order to determine opportunities to adjust the Company's policies and behavior.

### **III. TRANSITIONAL AND FINAL PROVISIONS**

#### Article 14

This Rulebook may be changed and supplemented in the manner and procedure as for its adoption.

#### Article 15

This Rulebook shall enter into force on the day of its adoption.

NOMAGAS JSC Skopje  
Board of Directors,  
President  
Risto Talevski

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Attachment no.1: Sample grievance form

<b>First name</b>	
<b>Last name</b>	
<b>Contact information</b>  Please indicate the preferable means of communication (Mail, Telephone, E-mail)	<input type="checkbox"/> <b>Address: Please indicate the postal address:</b> _____ _____ _____ <input type="checkbox"/> <b>Telephone:</b> _____ <input type="checkbox"/> <b>E-mail:</b> _____
<b>Confidentiality:</b>	
<input type="checkbox"/> I request not to disclose my identity without my consent  <input type="checkbox"/> I wish to file my grievance anonymously *	
* In case of anonymous grievances, we cannot communicate the response to you, but will publish the case and the response in the annual grievance report and on our website.	
<b>The language desirable for the communication</b>	<input type="checkbox"/> Macedonian <input type="checkbox"/> Albanian <input type="checkbox"/> English
<b>Describe the grievance/claim: What is the complaint about? What is the claim?</b>	
<b>Date of Incident/Grievance</b>	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
<b>Additional supporting documentation::</b>	<b>Space to upload materials</b>
<b>What measures would you like to propose to solve your problem?</b>	
<b>Signature of the complainant</b>	<b>Date of submission</b>

ATTACHMENT 2. GRIEVANCE MECHANISM FLOWCHART

