



Energix - Renewable Energies Ltd

## Stakeholder Engagement Plan

40 MW Sepopol Wind Farm in Poland

22 February 2021

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## Acronyms and Abbreviations

<b>Name</b>	<b>Description</b>
Aol	Area of influence
BoP	Balance of Plants
EBRD	European Bank for Reconstruction and Development
EHSS	Environmental, Health & Safety and Social
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
EU	European Union
IFC	International Finance Corporation
KPI	Key performance indicator
kV	Kilovolt
MW	Megawatt
NGO	Non-governmental organisation
NTS	Non-Technical Summary
PR	Performance requirement
SEAP	Stakeholder Engagement Action Plan
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
WTG	Wind turbine generators

## 1. INTRODUCTION

### 1.1 Background

This document represents the Stakeholder Engagement Plan (SEP) for the planned 40 MW Sepopol Wind Farm (“the Project”), located in Poland. The Energix Group - Renewable Energies Ltd (“the Company”) is seeking finance from The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”), Santander Bank Polska (“Santander”) and EKF – Danmarks Eksportkredit (“EKF”) (together with EBRD, the “Lenders”) for the development of the Project.

The Project comprises 20 onshore wind turbine generators (WTGs) and associated project components, located in the area of Różyna and Sepopol, Sepopol Commune, Bartoszyce County, Warmińsko-Mazurskie Voivodeship, in northeastern Poland. The Project is considered by the Lenders to be Category B<sup>1</sup>.

In order to finance the Project, the EBRD requires the Company to comply with all applicable Polish laws and regulations, as well as international environmental and social standards and guidelines, such as those of the EBRD or other relevant International Financing Institutions. These international standards call for the preparation of a formal Stakeholder Engagement Plan (SEP – this document in hand) along with the following documents: an Environmental and Social Due Diligence assessment (ESDD); a Project specific Non-Technical Summary (NTS) and an Environmental and Social Action Plan (ESAP) agreed with the Company.

This SEP presents the Company’s commitment and approach in terms of communication of Project information and engagement of Project stakeholders, as laid out in EBRD Performance Requirement 10.

### 1.2 Scope of this SEP

In line with international good practice, the Company recognizes that stakeholder engagement constitutes the basis for building up constructive and strong relationships with all interested parties, which are essential for successful business risk management and shared value creation.

The Company’s commitment to effective engagement translates in an ongoing process that involves different elements such as stakeholder analysis, planning, consultation and participation, grievance management and ongoing reporting to affected communities, scaled to each development phase of the Project.

The approach presented in this SEP builds on public engagement provisions of Polish legislation and international good practice/guidance. It outlines the Company’s commitments and strategy in terms of engaging external stakeholders during Project pre-construction, construction and operation. The SEP is considered a *living* document and is to be updated and amended as the Project progresses and outputs of engagement conducted are integrated in the decision making process.

Key elements of this SEP include the following:

- Company’s commitment to effectively engage external Project stakeholders;
- description of national and international requirements for consultation and disclosure (see Section 3);
- initial identification and characterization of stakeholders in order to determine appropriate ways of engagement (see Section 5);
- strategy and timetable for sharing information and consulting with stakeholders (see Section 6);
- tools for engagement (see Section 7);

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<sup>1</sup> The Project is deemed by EBRD as Category B, as its *potential adverse future environmental and social impacts are typically site specific and/or readily identified and addressed through mitigation measures* (Environmental and Social Policy, 2014)

- resources and responsibilities for implementing stakeholder engagement activities (see Section 8);
- external grievance mechanism for the Project (see Section 9) and
- description of how stakeholder engagement activities will be incorporated into the company's overall management system (see Section 10).

### 1.3 Stakeholder Engagement Principles

The key principles guiding the Company's approach to stakeholder engagement on this Project are:

- to be open and transparent with stakeholders, engaging in an open process and providing meaningful information on relevant aspects;
- to be accountable and willing to accept responsibility as a corporate citizen and to account for impacts associated with the Project activities;
- to have a relationship with stakeholders that is based on trust and a mutual commitment to acting in good faith;
- to respect stakeholders' interests, opinions and aspirations;
- to work collaboratively and cooperatively with stakeholders to find solutions that meet common interests;
- to be responsive and to coherently respond in good time to stakeholders;
- to be pro-active and to act in anticipation of the need for information or potential issues, trying to manage risks before they occur by offering opportunities for dialogue;
- to engage with stakeholders such that they feel they are treated fairly and their issues and concerns are afforded fair consideration;
- to be inclusive and accessible to stakeholders, including vulnerable and minority groups, so that they feel able to participate, to receive and understand information, and to be heard.

### 1.4 Stakeholder Engagement objectives

The generic stakeholder engagement objectives of the Company, with respect to this Project, are summarized in *Table 1-1* below.

**Table 1-1 Stakeholder Engagement Objectives**

Objective	Rationale
Identify relevant stakeholders for the Project and Associated Facilities	Identify and categorise individuals or organisations that may be affected by the Project and its Associated Facilities or have an effect on how the operations are run or the Project is implemented, noting that this is an ongoing process which may change throughout the life cycle of the Project.
Distribute accurate information in an open and transparent manner	Ensure that stakeholders, particularly those directly affected by the Project, have all relevant information available to them, to enable them to make informed comments and plan for the future. This helps reduce levels of uncertainty and anxiety. Information should allow affected parties to develop an understanding of potential impacts, risks and benefits and an open and transparent approach is central to achieving this aim.
Form partnerships to promote constructive interaction between all parties and create benefit-sharing opportunities	Develop relationships of trust between the Project and stakeholders to contribute to proactive interactions and avoid, where possible, unnecessary conflicts based on rumour and misinformation. Identifying structures and processes to deal with conflicts and grievances from early stages allows the Company a better understanding of stakeholder concerns and expectations, thereby providing opportunities to increase the Company's value to local stakeholders.
Record meetings outcomes and address public concerns, issues and suggestions	Document stakeholder issues, concerns and comments to allow the rationale for Project decisions to be tracked and understood. Records also assist during reviews and audits of the Project, in identifying thematic issues, which may need a more holistic response, and during follow up engagement with the affected people.
Manage stakeholders' expectations	Expectations, both positive and negative, may not be aligned with the realities of the Project. Ensuring that expectations are kept at realistic levels (e.g. around job opportunities; provision of local infrastructure; community investments; and disruption) limits disappointments and frustrations of directly affected parties at later stages of project implementation, and therefore mitigates the potential for conflict with stakeholders.
Fulfil national and international requirements for consultation	Ensuring compliance can avoid potential business interruption risks and project delays based on procedural issues rather than substantive ones, and contribute to obtaining the <i>social license to operate</i> and building effective and trustful relations with stakeholders.

## 2. PROJECT GENERAL INFORMATION

### 2.1 Project organisation

Energix Renewable Energies Ltd. (Energix Group) is one of Israel's largest renewable energy companies with a portfolio of more than 1GW of projects under development, 258WMP in commercial operation and market value of over 500\$ million<sup>2</sup>. The Group runs the 106 MW Banie Windfarm, already operational, the second largest in Poland, through its Polish subsidiary Energix Polska or Loxleed Investments Sp. Z.o.o. The Sepopol project was acquired by Energix in 2013, but it has not yet been constructed.

### 2.2 Project description

The 40 MW Sępopol Project is planned outside settlement boundaries, within the territory of of Różyna and Sępopol, Sępopol Commune, Bartoszyce County, Warmińsko-Mazurskie Voivodeship, north eastern Poland. The Project comprises:

- 20 Vestas V110 2,0/2,2 turbine generators (WTG) with a 110-m rotor diameter and a hub height of 120 meters. Each WTG has a capacity of 2 MW, which results in a maximum Project capacity of 40 MW. All WTGs will be located in Sępopol commune in parcels 217/2 (EW1, EW3, EW4, EW6, EW8, EW9, EW11; 8WT), parcel 256/3 (EW12, EW14; 2WT) – 0027 Różyna district; and 27/10 (EW30, EW31, EW32, EW33; 4WT), parcel 30/37 (EW34; EW52; 1 WT), parcel 254 (EW16; EW17; EW23, EW25; EW26; 6 WT) – 0033 Śmiardowo district.
- A substation located on land plot 217/2 in Różyna district;
- medium voltage line, connecting power plant with main power plant; and
- building of assembly square, exit and technological routs.

### 2.3 Project timeline

The preliminary construction schedule assumes starting the works in February 2021; the final completion of the works is currently scheduled for spring 2022.

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<sup>2</sup> Souce. <https://www.energix-group.com/Business-Overview/>



Figure 2-1 Sepopol WEP layout



### 3. NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

#### 3.1 Polish national regulations

Environmental Impact Assessment (EIA) in Poland is regulated by the EIA Act, dated October 2008 with further amendments (Ustawa o udostępnianiu informacji o środowisku i jego ochronie, udziale społeczeństwa w ochronie środowiska oraz o ocenach oddziaływania na środowisko). According to the Polish law, the Executive Order of the Environmental Minister dated November 2010 on projects that can have significant impact on environment (*Rozporządzenie w sprawie przedsięwzięć mogących znacząco oddziaływać na środowisko*), development projects fall into two categories:

- projects that always have a significant impact on the environment;
- projects that may potentially have a significant impact on the environment.

For projects that always have a significant impact on the environment, an EIA Report is mandatory for obtaining the Environmental Consent Decision (ECD). Before issuing the ECD, the public needs to be consulted through public disclosure or public hearing as illustrated in **Error! Reference source not found.** below.

For projects that may potentially have a significant impact, the EIA Report is not mandatory for obtaining Environmental Consent Decision (ECD); however, it can still be requested by the regulatory authority on a case-by-case basis. In situations when an EIA Report is required, as it was the case of the Sepopol windfarm, a public hearing needs to take place before the authority's decision whether to issue the ECD for the respective Project.

#### 3.2 International lender requirements

The EBRD's Performance Requirements (PRs) and IFC Performance Standards (PSs) are considered a benchmark for good practice for environmental and social risk management in private sector developments. The PRs/ PSs require that clients engage affected communities through disclosure of information, consultation and informed participation, in a manner that is meaningful for stakeholders and commensurate with the risks to and impacts of the Project on the affected communities.

The EBRD PRs and IFC PSs include specific guidance on conducting stakeholder engagement throughout the project lifecycle.

Stakeholder engagement requirements are outlined in *PR10: Information Disclosure and Stakeholder Engagement* and *PS1: Assessment and Management of Environmental and Social Risks and Impacts*. The key requirements for consultation and disclosure through the life of the project as well as requirements around Grievance Mechanism are summarized in **Error! Reference source not found.** below (EBRD Environmental and Social Policy, 2019).

#### Box 3-1 Outline of EBRD PR 10 Requirements

##### Stakeholder Identification, Analysis and Engagement Planning

Stakeholder engagement is an on-going process that may involve, in varying degrees, the following elements: stakeholder identification, analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and on-going reporting to affected stakeholders. A Stakeholder Engagement Plan (SEP) will be developed and implemented to guide the engagement process, tailored to the main characteristics and interests of the affected stakeholders and reflecting the nature and scale of the risks associated with the Project.

##### Disclosure of Relevant Project Information

Relevant information is to be provided to stakeholders on key aspects of the project: (i) the purpose, nature, scale and duration of the project activities; (ii) risks to, and potential impacts on, stakeholders and proposed mitigation plans; (iii) the envisaged stakeholder engagement process, if any, and opportunities and ways in which the public can participate; (iv) the time and venue of any envisaged public consultation meetings, and

the process by which meetings are notified, summarised and reported; and (v) the process by which any grievances will be managed.

#### **Meaningful Consultation**

Consultation will be in line with the degree of impact of the Project and will be: (i) inclusive and culturally appropriate; (ii) free of external manipulation, interference, coercion or intimidation; (iii) depending on the nature and scale of the project's potential adverse impacts on affected communities; (iv) begin early and continue throughout the project, and (v) be documented.

#### **Informed Consultation and Participation**

For projects with potentially significant adverse impacts on affected stakeholders, disclosure and consultation requirements will be embedded into each stage of the EIA process, on a case-by-case basis. It should involve deep exchange of views and information, and an organized and iterative consultation, leading to the client's incorporating into its decision-making process the views of the affected parties on matters that affect them directly, such as proposed mitigation measures, the equitable sharing of benefits and opportunities from projects, and implementation issues. The process should be documented, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected stakeholders. The stakeholders should be informed about how their concerns have been considered. In addition, the consultation process must meet any applicable requirements under national environmental impact assessment laws and other relevant legislation.

#### **Engagement During Project Implementation and External Reporting**

The Company will provide information to identified stakeholders, on an ongoing basis, appropriate to the nature of the project and its adverse environmental and social impacts and issues, and the level of public interest throughout the life of the project. If there are material changes to the project that result in additional adverse impacts or issues of concern to the affected communities, the Company will inform them regarding how these impacts and issues are being addressed and disclose an updated ESMP in accordance with the SEP. In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability.

#### **Grievance Mechanism**

Establish a grievance mechanism, process or procedure, to receive and facilitate resolution of affected stakeholders' concerns and grievances about the client's environmental and social performance. The grievance mechanism should be scaled to the risks and potential adverse impacts of the project.

#### **On-going Reporting to Affected Stakeholders**

Provide periodic reports to the affected stakeholders that describe progress with implementation of the project Action Plans on issues that involve on-going risk to, or impacts on affected stakeholders and on issues that the consultation process or grievance mechanism have identified as a concern to those stakeholders.

In addition, the International Financing Corporation (IFC) discussion paper *Local Benefit Sharing in Large-Scale Wind and Solar Projects*<sup>3</sup> (2019) provides an industry specific framework and outlines a series of benefit-sharing opportunities that wind and solar Project Developers could consider pursuing and maps the universe of wind Projects' stakeholders: investors, shareholders, government actors, industry and civil society, landowners, Project host communities, EPC and O&M contractors and employees.

<sup>3</sup> Source: IFC Discussion Paper *Local Benefit Sharing in Large-Scale Wind and Solar Projects*, June 2019, available at <https://www.commddev.org/local-benefit-sharing-in-large-scale-wind-and-solar-projects/>

## 4. SUMMARY OF PREVIOUS ENGAGEMENT FOR THE PROJECT

With regard to the legal requirements, the assessment of the current status of the Project has been limited to a focused review of applicable legal provisions, environmental permit (Conclusion on EIA) requirements and the systems in place for managing environmental and social regulatory compliance. The EIA Study conducted in 2009 has resulted in a favourable environmental decision SKO-60-44-11 from 6 June 2011.

A summary of the relevant environmental and construction permits processes is presented below:

### Environmental decision:

- 2009: EIA report for 30WT was issued to local authorities;
- May 2010: Refusal of issuing the Environmental permit by Starosta Bartoszycki
- 2010: appealing / case in a court
- June 2010: revoking/cancelling refusal decision of Starosta Bartoszycki
- June 2011 Final environmental decision for 30WT was issued, cancelling the initial refusal decision.

### Construction permit:

- 2010: initial construction design for 30 WT,
- September 2010: final construction permit for 30WT by Starosta Bartoszycki,
- July 2011: owners transfer of the construction permit by Starosta Bartoszycki
- 2019 - review/ confirmation of permit due to performing a study describing technical / construction changes (e.g. 29WTG), however, the construction and transfer permits dated 2010 and 2011 are final.

As part of the permitting procedure, Project information disclosure was undertaken in line with the Polish regulations; however, these regulations do not require a public participation to be conducted for renewables projects, even when an EIA process is deemed necessary.

The access to the process is, however, ensured by the competent administration authority, which: i) shall notify the public that an application procedure has been initiated and allow 21 days for comments from the public to be submitted; ii) conduct an administrative hearing open to the public; iii) shall consider the comments and recommendations submitted.

Following the review of Environmental Decisions in 2011, no comments were received from the public during any of the environmental procedures conducted. The announcements regarding the initiation of the environmental procedure was done in a customary manner in all villages affected by the Project on the respective rural announcement boards, on the notice boards of the associated commune offices and online on the website of the Public Information Bulletin.

Additional to the regulatory proceedings, the previous developer concluded land lease agreements starting as early as 2011. Furthermore, the former project developer, then Energix Group and the rest of the support team has informed each landowner in writing, by phone or through announcements or information to the mayoralties regarding the Project status so that they can plan for the respective agricultural year accordingly.

Further engagement is to be conducted with the local communities, aimed at identifying the potential economic impacts that could occur during construction and/ or operation of the Project and ensure all concerns and grievances are can be raised and addressed in a timely manner.

## 5. PROJECT STAKEHOLDERS

### 5.1 Stakeholder identification

IFC's Stakeholder Engagement *Good Practice Handbook for Companies Doing Business in Emerging Markets* defines stakeholder(s) as *any individual or group who is potentially affected by a project or activity or who has an interest in the project or activity, and/or the ability to influence its outcome, positively or negatively*. The objective of stakeholder identification is therefore to establish which organizations and individuals may be directly or indirectly affected (positively and negatively), or have an interest in the Project and its activities.

Stakeholder groups and communication methods identified to date are included in *Table 5-1* below. The communication methods will be tailored depending on each stakeholder group in order to allow adequate information disclosure and enable participation in the decision-making process.

**Table 5-1 Stakeholder groups and communication methods**

Stakeholder Category	Stakeholder Group	Stakeholders	Communication Method
<p><b>National Government</b> National Government is of primary national political importance to the business and/or projects/activities in terms of establishing policy, granting permits or other approvals, and monitoring and enforcing compliance with Polish regulations throughout all stages of the Project life cycle.</p>	<ul style="list-style-type: none"> <li>■ Key Ministries</li> <li>■ National Regulatory bodies</li> <li>■ Government Agencies and Institutes</li> </ul>	<p><i>National Regulatory Bodies</i></p> <ul style="list-style-type: none"> <li>■ Government of Poland</li> </ul> <p><i>Key Ministries and National Agencies</i></p> <ul style="list-style-type: none"> <li>■ Ministry of Environment;</li> <li>■ Ministry of Economy;</li> <li>■ State Energy Regulatory Office (Urząd Regulacji Energetyki);</li> <li>■ State Sanitary and Epidemiological Inspectorate (Państwowy Inspektorat Santarno-Epidemiologiczny);</li> <li>■ State Labour Inspectorate (Panstwowa Inspekcja Pracy);</li> <li>■ State Construction Inspectorate (Inspektorat Nadzoru Budowlanego);</li> <li>■ State Aviation Authority;</li> </ul>	<p>Communication with authorities will follow established procedures in line with Polish regulations.</p>
<p><b>Provincial (Voivodeship) Government</b>  Provincial government is of regional importance to the Project as they are responsible for implementation of legislation, and development plans and policies at the regional level.</p>	<ul style="list-style-type: none"> <li>■ Provincial authorities</li> </ul>	<p><i>Province administration</i></p> <ul style="list-style-type: none"> <li>■ Voivodeship Office (Urząd Wojewódzki);</li> <li>■ Voivodeship Marshalls (Marszałek Województwa);</li> <li>■ RDOŚ - Regional Directorate of Environmental Protection (Regionalna Dyrekcja Ochrony Środowiska);</li> </ul>	<p>Communication with Provincial-level Government will follow established procedures in line with Polish regulations.</p>
<p><b>County (Powiat) Government</b>  Powiats have legislative power, however relatively limited, as local and regional matters are dealt with either at <i>gmina</i> or <i>voivodeship</i> level. They retain decision making power</p>	<ul style="list-style-type: none"> <li>■ County authorities</li> </ul>	<p><i>County administration</i></p> <ul style="list-style-type: none"> <li>■ County Sanitary and Epidemiological Inspectorate (Państwowy Inspektorat Santarno-Epidemiologiczny);</li> </ul>	<p>As above</p>

<p>with regard to education, healthcare, land survey, work permits.</p>			
<p><b>Municipal/Commune (Gmina) Government</b></p> <p>Municipal government is of local importance to the Project as they are responsible for implementation of legislation, and development plans and policies at the Municipality level. This includes issuing environmental authorization for activities of the Project if the Project falls within their jurisdiction.</p> <p>In addition, the municipalities and/or communes in the Project area will be impacted by the Project and will need to be kept informed of progress and plans in their area, to consider the Project activities in their policy-making, regulatory and other duties and activities.</p>	<ul style="list-style-type: none"> <li>■ Municipal authorities</li> </ul>	<ul style="list-style-type: none"> <li>■ Municipal Government</li> </ul>	<p>As above</p>
<p><b>Parastatals</b></p> <p>Parastatals may have land or other assets within the country, which could be affected by the Project. Polskie Sieci Elektroenergetyczne Operator S.A. is the operator of the national electrical grid.</p> <p>Generalna Dyrekcja Dróg Krajowych i Autostrad is the owner and operator of the national public roads infrastructure.</p>	<ul style="list-style-type: none"> <li>■ Government funded private enterprises in charge of managing specific activities (electrical grid, public roads).</li> </ul>	<ul style="list-style-type: none"> <li>■ Polskie Sieci Elektroenergetyczne Operator S.A.</li> <li>■ Generalna Dyrekcja Dróg Krajowych i Autostrad</li> </ul>	<ul style="list-style-type: none"> <li>■ Communication with Parastatals will follow established procedures in line with Polish regulations.</li> <li>■ Project section on Company website</li> <li>■ Formal notifications</li> </ul>

<p><b>Communities or Settlements</b></p> <p>Households and communities that may be directly or indirectly affected by the proposed Project, its components, activities and Associated Facilities. This includes people living on land affected by the Project and its key components and Associated Facilities, through direct land take or by social and environmental impacts, and other people who visit or use land or resources that may be affected.</p> <p>Primary stakeholders include landowners and land users.</p> <p>These communities need to be sensitized to Project impacts (construction and operations) and receive benefits in the form of employment and Community Investment.</p>	<ul style="list-style-type: none"> <li>■ Communities in the study area defined for each project including: <ul style="list-style-type: none"> <li>- Landowners and users;</li> <li>- People living near the Project site;</li> <li>- People needing to be resettled;</li> <li>- Community members who use access roads to access nearby natural resources</li> </ul> </li> <li>■ Social / public infrastructure and services;</li> </ul>	<p><i>Settlements included in the study area:</i></p> <ul style="list-style-type: none"> <li>■ to be listed in the SEP</li> </ul> <p><i>Affected Community Members and Infrastructures</i></p> <ul style="list-style-type: none"> <li>■ Landowners</li> <li>■ Land users</li> <li>■ Households with houses at risk of resettlement</li> <li>■ Neighbors to the turbines, substation, access roads</li> </ul>	<ul style="list-style-type: none"> <li>■ Local communication will focus on disclosure of information, meetings with relevant authorities and councils, and implementation of the grievance mechanism.</li> </ul>
<p><b>Vulnerable Persons/Groups</b></p> <p>Vulnerable groups may be affected by the Project by virtue of their physical disability, social or economic standing, limited education, lack of employment or access to land.</p>	<p>Vulnerable groups within the Study Area</p>	<p>Vulnerable people/groups within the communities of the Study Area (to be defined for each project), specifically:</p> <ul style="list-style-type: none"> <li>■ Ethnic Minority Groups: e.g. Ukrainian minority, if applicable</li> <li>■ Female-headed households including single mothers and widows - do not have access to the same livelihood activities as men, therefore they are often reliant on assistance from family members or the state in order to survive.</li> </ul>	<ul style="list-style-type: none"> <li>■ Once the Company identifies vulnerable groups and/or individuals, these will engaged with to identify any specific information or consultation needs in order to take any concerns or</li> </ul>



<p>Appropriate engagement practices and tools will be adopted to ensure adequate access to information and participation.</p>		<ul style="list-style-type: none"> <li>■ Low-income households – have limited access to resources, like savings and access to credit and more likely to have lower education levels, which makes it harder to access Project benefits.</li> <li>■ Unemployed youth. Reliance on other household members means that youth are often disenfranchised and less able to take advantage of positive Project impacts.</li> <li>■ Elderly and orphans.</li> <li>■ Disabled persons.</li> </ul>	<p>impacts into account.</p> <ul style="list-style-type: none"> <li>■ Communication will be tailored based on their needs.</li> </ul>
<p><b>Non-Governmental Organizations (NGOs)</b></p> <p>NGOs with direct interest in the Project &amp; Associated Facilities and their social and environmental aspects and that are able to influence the Project directly or through public opinion.</p>	<ul style="list-style-type: none"> <li>■ International</li> <li>■ National</li> <li>■ Local</li> </ul>	<ul style="list-style-type: none"> <li>■ Local NGOs and NGOs located in the Study Area:</li> <li>■ International NGOs</li> </ul>	<ul style="list-style-type: none"> <li>■ Company website</li> <li>■ Formal consultation mechanisms</li> </ul>
<p><b>Other interest groups</b></p> <p>Municipal and national level media will typically have a higher level of influence over the Project and may be leveraged to influence local stakeholders' perceptions of the Project.</p>	<ul style="list-style-type: none"> <li>■ Media</li> <li>■ Law enforcement</li> <li>■ Healthcare providers</li> </ul>	<ul style="list-style-type: none"> <li>■ Municipal and national radio stations</li> <li>■ Municipal and national newspapers</li> <li>■ Municipal/commune police;</li> <li>■ Municipal/commune fire brigade;</li> </ul>	<p>Communication with the media will be done through the Company website, press releases, and newspaper announcements.</p>
<p><b>Potential partners</b></p> <p>Organizations, businesses and individuals with direct interest in the Project e.g. running businesses or providing services and supplies to the Project.</p>	<ul style="list-style-type: none"> <li>■ Contractors</li> <li>■ Suppliers and service providers.</li> </ul>	<ul style="list-style-type: none"> <li>■ Municipal / provincial / national businesses</li> <li>■ Employment Agency</li> <li>■ Lenders such as EBRD;</li> </ul>	<p>These groups need to be covered in different plans and procedures, including information disclosure and grievance mechanism. They are not covered in this document.</p>

	<ul style="list-style-type: none"><li>■ Other businesses operating within the municipality/commune</li><li>■ Local and international banks</li><li>■ Other</li></ul>		
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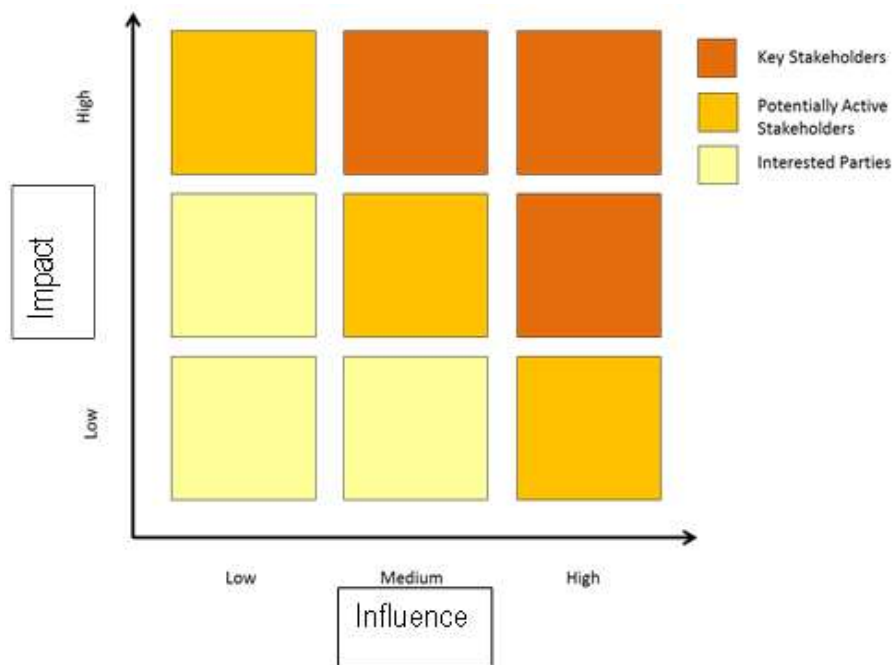
## 5.2 Stakeholder analysis

In order to develop tailored and effective means of engagement with each category of stakeholders (see *Table 5-1* above), the Company will undertake an analysis and mapping of the identified stakeholders such that engagement are tailored to meet their interest in the Project and their likely key issues of interest. Stakeholders will be mapped according to the following:

- **Influence on the Project:** Influence refers to the power that the stakeholders have in relation to either decisions taken by, or affecting the Project. This power may be in the form of formal control over the decision-making process or it can be informal in the sense of protesting against, blocking or allowing project operations to continue.
- **Interest:** Interest refers to the connection between the stakeholders and the Project – for example, stakeholders may have something to either gain or lose because of Project implementation. Understanding stakeholders’ level of interest can help clarify their motivations and the ways in which they might be able to influence the project.

Stakeholders will be mapped using the matrix presented in *Figure 5-1* below and the level of engagement will be defined in accordance with *Figure 5-2* below.

**Figure 5-1 Stakeholder Mapping Matrix**



*Note: Stakeholder mapping is an internal exercise and will not be publically disclosed. It is to be noted that the positions of stakeholders may change over time as the project progresses and, as part of regular updates of the SEP, the stakeholder map will be reviewed and updated as appropriate. In addition, any new stakeholders identified will be added to the map.*

**Figure 5-2 Engagement tactics for mapped stakeholders**

Low	1	<b>Monitor</b>
Medium	2	<b>Keep informed/ satisfied</b>
High	3	<b>Manage closely</b>

## 6. ENGAGEMENT ACTION PLAN

The stakeholder engagement program included in this SEP is intended to cover specifically the pre-construction phase and to provide a high-level outline for the subsequent phases of the Project – see *Table 6-1* below for a snapshot of engagement objectives and activities during each Project phase. The list below is not exhaustive and can be amended depending on feedback received from relevant stakeholders.

**Table 6-1 Engagement Objectives and Activities during each Project phase**

Project Phase	Engagement Objectives	Engagement activities
<b>Pre-construction</b>	<ul style="list-style-type: none"> <li>■ identify relevant stakeholders;</li> <li>■ familiarise the stakeholders with the Project;</li> <li>■ manage expectations;</li> <li>■ obtain social licence to operate;</li> <li>■ obtain requisite licences and permits;</li> <li>■ disclosure and dissemination of the Project external grievance mechanism;</li> <li>■ receive, record and address stakeholder grievances;</li> </ul>	<ul style="list-style-type: none"> <li>■ appointment of a Community Liaison Officer (CLO) and dissemination of contact details with the stakeholders;</li> <li>■ announcements of public meetings;</li> <li>■ dissemination of grievance mechanism information sheet, hardcopies of grievance forms;</li> <li>■ meetings to discuss impact mitigation measures, eg for noise;</li> <li>■ meetings for the Community Investment Plan preparation and implementation;</li> </ul>
<b>Construction</b>	<ul style="list-style-type: none"> <li>■ update stakeholders on progress, eg main construction milestones;</li> <li>■ maintain social licence and consolidate trust;</li> <li>■ manage expectations;</li> <li>■ obtain requisite licences and permits;</li> <li>■ receive, record and address stakeholder grievances;</li> </ul>	<ul style="list-style-type: none"> <li>■ update SEP for construction phase;</li> <li>■ regular announcements of key construction milestones, major equipment delivery schedule, planned interruptions of, for example, local traffic;</li> <li>■ dissemination of grievance mechanism information sheet, hardcopies of grievance forms;</li> <li>■ meetings for the Community Investment Plan preparation and implementation;</li> <li>■ meetings / newsletter to report on Project progress and E&amp;S performance;</li> </ul>
<b>Operation</b>	<ul style="list-style-type: none"> <li>■ update stakeholders on progress and performance;</li> <li>■ renew licences and permits;</li> <li>■ maintain social licence and consolidate trust;</li> <li>■ obtain requisite licences and permits;</li> <li>■ manage expectations;</li> <li>■ receive, record and address stakeholder grievances;</li> </ul>	<ul style="list-style-type: none"> <li>■ update SEP for operation phase;</li> <li>■ meetings / newsletter to report on Project progress and E&amp;S performance; dissemination of grievance mechanism information sheet, hardcopies of grievance forms;</li> <li>■ meetings for the Community Investment Plan preparation and implementation;</li> </ul>
<b>De-commissioning</b>	<ul style="list-style-type: none"> <li>■ inform stakeholders on decommissioning works (activities, schedule, staff retrenchment, disposal of materials);</li> <li>■ obtain requisite licences and permits;</li> <li>■ manage expectations;</li> <li>■ receive, record and address stakeholder grievances;</li> </ul>	<ul style="list-style-type: none"> <li>■ update SEP for decommissioning phase;</li> <li>■ dissemination of grievance mechanism information sheet, hardcopies of grievance forms;</li> <li>■ meetings as part of the local permitting process.</li> </ul>

Some planning and engagement activities will be ongoing throughout the entire Project cycle and they include the following:

- regular update of the Project stakeholders as the Project moves forward and activities, schedules and milestones evolve;
- regular update and revision of the stakeholder register including stakeholder analysis and re-evaluation as necessary throughout the different Project phases;
- addressing comments, questions and grievances regularly and through appropriate channels, and issuing information to stakeholders. This includes regular refreshers to stakeholders about the Grievance Mechanism and related processes.
- regular reporting to the different stakeholders as appropriate (see Section 9).

The following section describes the planned engagement during the pre-construction phase and, to a higher-level, construction and operation phases. The latter ones will be further planned and detailed into updated versions of this SEP, developed as the Project progresses and reflecting the results of engagement already conducted.

**Table 6-2 Pre-construction Engagement Plan**

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
<b>Pre-construction phase</b>				
Project information disclosure package is published online on the Company website	All stakeholders	<p>The Project Information Disclosure Package will include the following documents in an accessible format (PDF):</p> <ul style="list-style-type: none"> <li>■ Stakeholder Engagement Plan (SEP), including the Grievance Mechanism for the Project – in both English and Polish;</li> <li>■ Non-technical Summary (NTS) – in both English and Polish;</li> <li>■ Project presentation leaflet;</li> <li>■ Grievance Form – in both English and Polish.</li> </ul> <p>These documents will be made available on the dedicated Project page on Energix website: <a href="http://www.energixpolska.com">www.energixpolska.com</a></p>	All materials will be available online for stakeholder information during the Project lifetime.	Company
Project information Leaflet and Grievance Forms are made available in hard copy in key locations in Polish language	All stakeholders	<p>The Leaflets (in Polish) in hardcopy format, along with Grievance Forms, will be made available to the public in the Sepopol Town Hall and in other public locations in the affected communities.</p> <p>The leaflet will include expected locations of the turbines, expected routes for transport of the construction equipment and turbines, timeline for construction, details about the contractors and contact details for contractor and investor, alongside emergency contact details.</p>	Leaflets will be available in hard copy format prior to the Kick-off public meeting and distributed at the kick-off meeting. Grievance Forms to be available for use throughout the Project lifetime.	Company
Information notices publication	All stakeholders	<p>The kick-off meeting will be announced in local newspapers at least 10 days prior to the date and will include announcement of the date and location of the meeting, along with all the details for stakeholders to access Project Information Disclosure Package online and offline. Additionally, notices with information about the kick-off meeting will be posted in key locations in the area impacted by the Project and on the Company's website.</p> <p>All notices will be published in Polish language.</p>	At least 10 days prior to kick-off date.	Company
Conduct Kick-off meeting in affected communities	Authorities and land owners	The Company will organise one public meeting in the affected village(s) to present the Project Information Disclosure Package and address concerns and comments from the public relating to the Project	To be determined.	Company

		implementation. The issues raised by the public will be captured and included in the following SEP update (covering Construction phase of the Project).		
Appoint Community Liaison Officer to act as key contact person for external stakeholders	Local community	The Company will allocate Community Liaison Officer (CLO) responsibilities to a member of the Project team. CLO contact details: Mr. Tomasz Golab Telephone: +48 518 988 262 <a href="mailto:tomaszg@energix-group.com">Email: tomaszg@energix-group.com</a>  The CLO will be responsible for communicating all relevant information to the local community and managing the grievance mechanism (receiving, recording and resolving external grievances).	Throughout all Project phases	Company
Disseminate grievance mechanism	All stakeholders	The Grievance mechanism, along with the grievance form (as included in this SEP) will be made widely available to the public, via the online and offline communication channels. Grievances can be raised directly with the CLO, in person, via the phone or by email (details specified above).	Throughout pre-construction and operation phases	CLO
Install grievance boxes	Local community	Grievance boxes will be installed in key locations in the affected communities and will be managed by the CLO, who will ensure grievance forms are widely available, the boxes are regularly emptied and all grievances recorded and resolved according to the grievance mechanism.	Weekly, throughout pre-construction and construction; for the operation phase, frequency to be reassessed	CLO
Conduct tailored engagement activities	<ul style="list-style-type: none"> <li>■ Vulnerable groups</li> <li>■ Affected land owners and users</li> </ul>	If vulnerable groups are identified in the affected communities, the CLO will verify if special engagement measures are needed to enable their informed participation in the decision making process and take appropriate actions. Land-related comments and grievances may require additional engagement by the CLO, so to ensure transparency and effective management of these impacts.	Throughout pre-construction and operation phases	CLO
<b>Construction phase (to be detailed in updated SEP)</b>				
Posting notice boards in the Sepopol Town Hall and in public places of the affected settlements, in local language (Polish)	Local community	The CLO will be responsible for dissemination of key announcements on Project activities (e.g. incoming transport of big Project equipment to the local communities).	Upon major construction activities	CLO

Regular meetings with the affected communities	Local community	The CLO will actively listen, collect and process grievances and share relevant Project information.	<ul style="list-style-type: none"> <li>■ Bi-monthly during construction</li> <li>■ Additional immediate meetings if necessary (for instance for vulnerable groups, or if a specific concerns arises)</li> </ul>	CLO
Meeting to develop and implement the Community Investment Plan	Local community	Ensure a participatory approach to the development of the annual Community Investment Plan.	Meetings as often as needed to agree on initiatives to be funded from this Community Investment Plan	Company
<b>Operations phase (to be detailed in updated SEP)</b>				
Inform on start of operation	<ul style="list-style-type: none"> <li>■ Mayors of affected settlements and community members</li> </ul>	Inform stakeholders of the start of operation, any health and safety risks for the communities and mitigation measures	2 weeks prior to start of operation	Company
Information leaflets in Polish language	<ul style="list-style-type: none"> <li>■ Local community</li> </ul>	Inform community members on the operation stage and distribute it in key locations in the area impacted by the Project (hard copy) and on the Company's website.	Throughout the operation phase	Company
Ongoing information on the annual environmental and social performance of the project (including environmental monitoring) and planned maintenance works	<ul style="list-style-type: none"> <li>■ Mayors of affected settlements and community members</li> </ul>	<p>Inform stakeholders of the project annual environmental and social performance (including bird and bat monitoring) by publishing summary report on the Company website.</p> <p>Inform stakeholders of the project annual maintenance works (duration, amount of people).</p>	Annual	Ongoing information on the annual environmental and social performance of the Project
<b>Decommissioning (to be detailed in updated SEP)</b>				
Inform on schedule and approach for decommissioning	<ul style="list-style-type: none"> <li>■ Mayors of affected settlements and</li> </ul>	inform stakeholders on the upcoming decommissioning phase, any health and safety risks for the communities and mitigation measures	Start discussions since the previous quarter to the one	Company



	community members		when decommissioning activities will start	
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## 7. ENGAGEMENT TOOLS

The consistent use of best practice tools that have been tailored to local context and stakeholders needs maximize the effectiveness of the engagement action plan.

The tools outlined in Figure 7-1 will be used across the different stages of the Project, benefitting from updates of the contents and messages as the Project progresses; these will be formulated as updates to this current SEP and be subject to management approval prior to dissemination.

**Figure 7-1 Stakeholder Engagement Tools**

<b>Tool</b>	<b>Description</b>
Project NTS, ESAP and SEP (incl. Grievance Forms)	<p>The Project NTS, ESAP and SEP, prepared as part of the environmental and social review package will be translated into Polish and made accessible, online and offline, to all interested stakeholders. Alongside these documents, the External Grievance Form will be made available to the public.</p> <p>The Company will ensure these documents are available and accessible to all interested stakeholders, both online and offline.</p>
Notice Boards	<p>Notice boards will be erected at the entrance to the Project worksite and at other agreed locations in the area impacted by the Project, accessible to the communities, and updated on a regular basis. Project information should be available in Polish.</p> <p>The notice board will serve as an information dissemination tool. For example, the Project team will be able to display contact details and grievance mechanism, construction updates, heavy traffic movement information, and recruitment updates. Wherever possible, maps or visual aids will be employed to increase accessibility of the notices.</p>
Leaflets	<p>Project information leaflets will be created and distributed at the kick-off meeting to inform on the expected locations of the turbines, expected routes for transport of the construction equipment and turbines, timeline for construction, details about the contractors and contact details for contractor and investor, alongside emergency contact details. For operation stage, a similar leaflet will be created and distributed locally.</p>
Regular Internal Reporting	<p>The CLO will prepare regular reports to the HSE Manager/ Project team. These reports will include a summary of stakeholder engagement activities and all grievances received in the reporting period, any material deviations or non-compliances to the requirements of this SEP, planned activities for the next reporting period and any other issues of potential concern – please see section 10 for more details.</p>
Reporting to Stakeholders	<p>The CLO will provide Project updates to different stakeholder groups at agreed timelines and following engagements conducted.</p>
Stakeholder Dialogue Log	<p>The CLO will maintain a Stakeholder Dialogue Log to plan, record and track engagements related to the different Project components and activities – see section 10.2 for more details.</p>

## 8. RESOURCES AND RESPONSIBILITIES

The overall responsibility for the effective engagement of the project stakeholders, as outlined in this SEP, lies with the Company's management team. The Community Liaison Officer (CLO) will have the

overall responsibility for the implementation and updates of the current SEP and for dealing with community relations, including the external grievance mechanism. To achieve this, the CLO will work closely with the Project team to achieve the engagement objectives outlined in this SEP.

The CLO will be acquainted with the local context and stakeholders' specific needs and also with the stakeholder engagement process as outlined in the SEP. Working in close collaboration with the Project team, the CLO will have a clear understanding of the Project schedule and engagement milestones and engage stakeholders appropriately in line with the Project progress.

Energix Polska team maintains engagement with the communes' administrations, land owners and the community at large. The overall responsibility for external engagement lies with the Construction Manager, with the support from the Project Manager who will be present on site on a daily basis. The Contractor Manager is the main point of contact for issues arising locally. The Project Manager will be close to the site, making sure that everything is running smoothly and can escalate matters to Construction Manager as required for timely and effective resolution.

### *CLO specific responsibilities*

The specific responsibilities of the CLO are:

- act as liaison between the community/stakeholders and the Company; maintains regular presence in the affected communities and engagement with community members to monitor opinions, provide updates on Project activities and ensure communication with community members and vulnerable groups;
- lead day-to-day implementation of the SEP and Grievance Mechanism and manages the grievance resolution process; plans the stakeholder engagement activities and ensures they are appropriately implemented by Company and contracted staff;
- is responsible for ensuring grievance mechanism dissemination and training, communication, monitoring and reporting; is responsible for verifying contractors' compliance to grievance management commitments;
- take active role in the identification of community needs and assists in the successful development and implementation of a Community Investment Plan for the Project;
- produce stakeholder engagement monitoring reports and updates the SEP accordingly.

The dedicated CLO for the Project is Tomasz Golab:

- Telephone: +48 518 988 262
- Email: [tomaszq@energix-group.com](mailto:tomaszq@energix-group.com)

The contact details of the CLO will be made available to the contractors, local communities and residents of the area in order to ensure that any grievances including related to environmental, social and H&S aspects of the wind farm can be easily communicated to the Company.

## 9. EXTERNAL GRIEVANCE MECHANISM

### 9.1 Purpose

The EBRD *Guidance Note on Grievance Management* (EBRD, 2012) presents EBRD's requirements with regard to the grievance mechanism, key principles to be implemented in defining the process and provides examples of grievance forms, databases and management flow charts – see Section 8.

The IFC *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*<sup>4</sup> describes a grievance as: 'a concern or complaint raised by an individual or a group within communities affected by company operations. Both concerns and complaints can result from either real or perceived impacts of a company's operations, and may be filed in the same manner and handled with the same procedure'. It describes a project-level grievance mechanism for affected communities as: 'a process for receiving, evaluating, and addressing project-related grievances from affected communities at the level of the company, or project' (IFC, 2009)<sup>(5)</sup>.

The External Grievance Mechanism enables any stakeholder to make a grievance about the way the Project is being designed or implemented. Grievances may take the form of specific complaints for damages/injury, concerns about routine Project activities, or perceived incidents or impacts.

For the Project-affected communities, an effective grievance mechanism provides an accessible, yet formalised (identification, tracking and resolving of grievances) alternative to an external dispute resolution process. However, a stakeholder will always have the right to complain to the relevant authorities or the legal system, in accordance with the existing legislation in Poland.

The grievance mechanism is tailored to the local context of the Project environment and has the aim of finding mutually beneficial solutions to settle issues and developing a trust-based Company-community relationship.

### 9.2 Detailed grievance procedure

The Company commits to process any grievance received in a timely manner, via a procedure that is transparent, culturally appropriate, at no cost, and without retribution for the party presenting the grievance.

The Grievance mechanism for the Project is structured as follows (please also see Figure 9-1 below):

- **STEP 1:** a grievance is recorded regardless whether it was received verbally or in writing, using the *Grievance Form*; it will be then registered in the *Grievance Log/Database* by the Community Liaison Officer. A sample grievance form and database are provided in Appendices A and B to this SEP, as recommended by the EBRD *Guidance Note on Grievance Management*;
- **STEP 2:** the CLO will formally acknowledge the receipt of the grievance to the complainant, in written form (within 7 days of receiving the grievance); if the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step;
- **STEP 3:** CLO will assess priority and assign responsibility for resolution: significant concerns and incidents will be immediately brought to the attention of management team; investigate the issue and identify resolution; CLO will then respond to the complainant with the proposed solution;
- **STEP 4:** CLO will follow up with the complainant and close out grievance; the overall process of closing a grievance will not exceed 30 calendar days as per the EBRD *Guidance Note*. Should

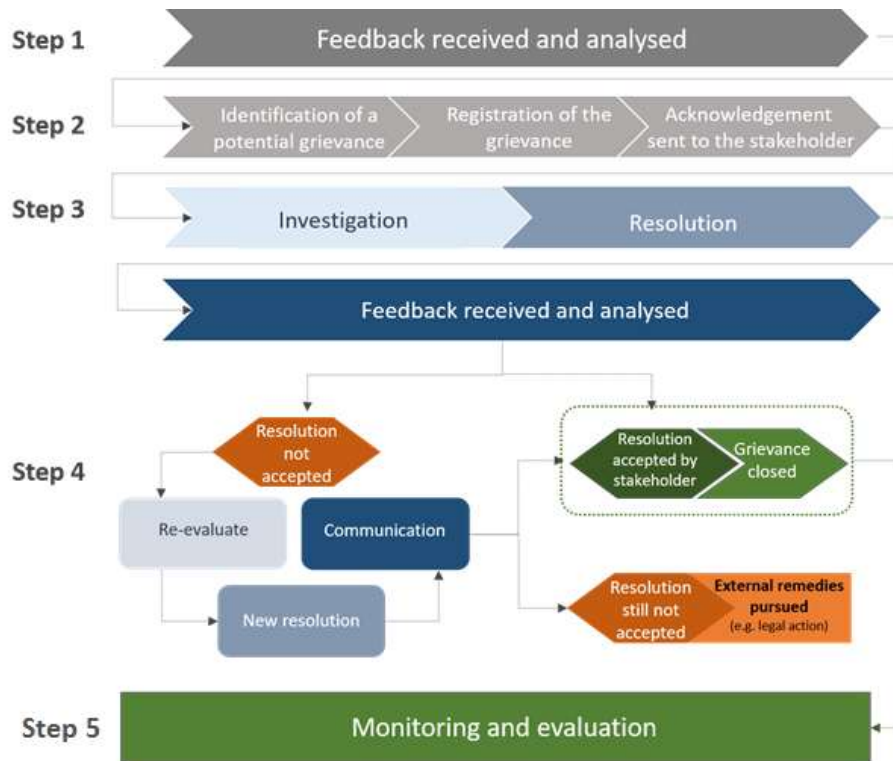
<sup>4</sup> Source: IFC *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*, available at [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/publications/publications\\_handbook\\_stakeholderengagement\\_wci\\_1319577185063](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_handbook_stakeholderengagement_wci_1319577185063), accessed in April 2020

<sup>(5)</sup> Source: IFC Good Practice Note: Addressing Grievances From Project-Affected Communities, available at [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/publications/publications\\_gpn\\_grievances](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_grievances)

the issue raised be complex and needing further investigation, the complainant will be notified of the time necessary to respond. Should the complainant not accept the resolution, legal remedies can be pursued.

- **STEP 5.** The CLO is responsible to monitor and evaluate the grievance procedure in line with the provisions of Section 9.

**Figure 9-1 Grievance mechanism for pre-construction, construction and operation phases**



## 10. MONITORING, EVALUATION AND REPORTING

### 10.1 Overview

In order to assess the effectiveness of this SEP and associated community engagement activities, the Company will implement a data management and monitoring process, as outlined in this section. This process will further support reporting to external stakeholders, as an integral step in building trust locally and generating shared value.

### 10.2 Monitoring and evaluation activities

Stakeholder engagement activities will be documented and filed in order to ensure accountable delivery of commitments made to stakeholders.

The following documentation will be used and maintained by the Company during pre-construction, construction and operation phases:

- *Stakeholder dialogue log*: Used to store, analyse and report on stakeholder dialogue activities. It will be populated with details on information presented, audience questions, Company responses and actions, and meeting evaluation results, when appropriate. The database will also be used to track frequency of meetings over the life of the Project.
- *Commitments register*: used to keep track of the commitments made to various stakeholders.
- *Meeting minute template*: used to collect meeting minutes; to be filed within the stakeholder database and SEP updates.
- *Stakeholder list*: ongoing updates to the list, including key contacts and contact details (telephone number, email address etc.) as additional stakeholders are identified.
- *Grievance log* will record all grievances received, management actions taken and whether it has been closed out satisfactorily.
- *Media monitoring* of press and radio stories relevant to the Project.

Records will be reviewed on a quarterly basis to ensure that records are being used and maintained. Commitments and actions recorded during community interaction activities will also be regularly reviewed to ensure they are taken forward.

## 10.3 Reporting to stakeholders

### 10.3.1 Internal Reporting

The following internal reports will be developed:

- *Red Flag Reports*: weekly or daily reports for urgent items (e.g. critical concerns or grievances) or incidents of significant nature. These red flag reports will be prepared by the CLO and sent to the Project team, who will take action and/or escalate if necessary. The Grievance Mechanism will set the level of incident to be communicated in the red flag reports together with reporting time requirements.
- *Quarterly Progress reports*: internal quarterly progress reports will be prepared by the CLO. These reports will review:
  - dialogue activities undertaken thus far: stakeholders met, key topics discussed, main concerns and expectations, positioning towards Project activities;
  - grievance mechanism: participation, main grieves reported, progress summary (actions to be taken and status);
  - risks to the Project;
  - limitations (e.g. resources, internal alignment);
  - priorities for next quarter.

These reports will be discussed at quarterly Company internal meetings between the CLO and the Project team. The progress reports will be circulated internally as required.

### 10.3.2 External Reporting

Once consultation with stakeholders has taken place, stakeholders generally want to know which of their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, projects impacts are being monitored.

The Company will develop an Annual Environmental and Social Report on the environmental, social and health and safety performance of the Project and share it with the relevant stakeholders. This will also include reporting on a regular basis to the impacted communities about project progress status, and progress in the implementation of the ESAP.

The Company will keep track of commitments made (commitments tracker) and communicate progress made against these commitments on a regular basis (for instance, during regular meetings with the community representatives).

*“All projects financed by EBRD shall be structured to meet the requirements of the EBRD [Environmental and Social Policy](#) which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD’s [Independent Project Accountability Mechanism](#) (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its [Access to Information Policy](#); and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.”*

## APPENDIX A SAMPLE GRIEVANCE FORM

### Reference No:

#### Full Name

Note: *you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent*

#### Contact Information

Please mark how you wish to be contacted (mail, telephone, e-mail).

First name \_\_\_\_\_  
Last name \_\_\_\_\_

- I wish to raise my grievance anonymously  
 I request not to disclose my identity without my consent

By Post: Please provide mailing address:

\_\_\_\_\_  
\_\_\_\_\_

By Telephone:

\_\_\_\_\_

By E-mail:

\_\_\_\_\_

#### Preferred Language for communication

- Polish  
 Other. Please specify: \_\_\_\_\_

#### Description of Incident or Grievance:

What happened? Where did it happen? Who did it happen to?  
What is the result of the problem?

#### Date of Incident/ Grievance

- One time incident/grievance (date: \_\_\_\_\_)  
 Happened more than once (how many times? \_\_\_\_\_)  
 On-going (currently experiencing problem)

#### What would you like to see happen to resolve the problem?

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

#### Please return this form to:

Tomasz Golab, Community Liaison Officer Sepopol Wind Farm

**Address:** Plac Stanisława Małachowskiego 2, 00-066 Warszawa

**Tel.:** +48 518 988 262 **or E-mail:** [tomaszg@energix-group.com](mailto:tomaszg@energix-group.com)



## APPENDIX B      SAMPLE GRIEVANCE DATABASE

Screenshot of Microsoft Excel showing a sample grievance database template. The spreadsheet has the following structure:

Description of the problem															
Initiator					Person delegated to address in SSW/DPH				Problem						
Settlement	Type of the problem	Name	Date	Phone number	Name	Phone number	Others comment	Number	Description of the problem	Responsible department	Responsible person	Actions to be done	Due date	Results of the intervention	Closing date of the issue

Source: EBRD *Guidance Note on Grievance Management*, 2012 – Appendix 2