



Stakeholder Engagement Plan



Banie Phase 3 and Zelechowo Wind Farms
developed by Energix – Renewables
Energies Ltd

20 December 2021

Document details	
Document title	Stakeholder Engagement Plan
Document subtitle	Banie Phase 3 and Zelechowo Wind Farms developed by Energix – Renewables Energies Ltd
Date	20 December 2021
Client Name	Energix Renewable Energies Ltd.
Version	1.0

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Acronyms and Abbreviations

Name	Description
Aol	Area of influence
BoP	Balance of Plants
EBRD	European Bank for Reconstruction and Development
ECD	Environmental Consent Decision
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
RDOS	Regionalna Dyrekcja Ochrony Srodowiska (Regional Direction of Environmental Protection)
SEAP	Stakeholder Engagement Action Plan
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
WEP	Wind Electric Plant
WF	Wind Farm
WTG	Wind turbine generators

1. INTRODUCTION

1.1 Background

This document represents the Stakeholder Engagement Plan (SEP) for the Banie Phase 3 and Zelechowo Wind Farm (“the Projects”), located in Poland. The Projects, to be developed by Energix - Renewable Energies Ltd (“the Company”).

Banie 3 Project 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”), and the Zelechowo Project from The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) and mBank (“mBank”) (together with EBRD, the “Lenders”).

Energix Group intends to further develop:

- Banie 3 Project, a 81.4 MW Wind Electric Plant (WEP), comprising 37 onshore turbines and associated project components, located in the area of Banie commune (Banie, Baniewice, Kunowo, Lubanowo, Piaseczno, Sosnowo, Swobnica and Tywica villages) and Widuchowa commune (Żelechowo village), in Gryfino County, West Pomeranian Voivodship in north-western Poland, and
- Zelechowo Project, a 56 MW Wind Electric Plant (WEP), comprising 16 onshore turbines and associated project components, located in the area of Widuchowa commune (Zelechowo, Zarczyn, and Wilcze villages) in Gryfino County, West Pomeranian Voivodship in north-western Poland.

As these are greenfield projects that could result in potentially significant cumulative adverse future environmental and/or social impacts, the international financial institutions have categorised the Project as “A” in terms of their Environmental and Social (E&S) Policy.

To finance both Projects, Lenders require 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, IFC, EP IV, or other relevant International Financing Institutions. These international standards call for the preparation of the following documents:

- The present Stakeholder Engagement Plan (SEP) – together for both Projects;
- Non-Technical Summary (NTS) – together for both Projects;
- Supplemental Study Report to Local EIA (ESIA) – for Banie 3 Project;
- Environmental and Social Action Plan (ESAP) – separately for both Project;
- Environmental and Social Due Diligence (ESDD) – for Zelechowo Project.

This SEP presents the Company’s commitment and approach in terms of communication of Project information and engagement of Project stakeholders.

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 into 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 Projects pre-construction, construction and operation. The SEP is considered a *living* document and it is to be updated and amended as the Project progresses and outputs of engagement conducted are integrated into the decision-making process.

Key elements of this SEP include the following:

- Company's commitment to effectively engage external Projects stakeholders;
- description of national and international requirements for consultation and disclosure (see Section 3);
- initial identification and characterization of stakeholders 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);
- 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 these Projects 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 Projects 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, receive and understand information, and be heard.

1.4 Stakeholder Engagement objectives

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

Table 1-1 Stakeholder Engagement Objectives

Objective	Rationale
Identify relevant stakeholders for the Projects and Associated Facilities	Identify and categorise individuals or organisations that may be affected by the Projects 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 that may change throughout the life cycle of the Projects.
Distribute accurate information in an open and transparent manner	Ensure that stakeholders, particularly those directly affected by the Projects, 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 Projects 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 Projects decisions to be tracked and understood. Records also assist during reviews and audits of the Projects, 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 Projects. 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.
Fulfill national and international requirements for consultation	Ensuring compliance can avoid potential business interruption risks and Projects 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 a market value of over 500\$ million¹. The Group runs the 106 MW Banie 1+2 Windfarms, already operational, one of the largest in Poland, through 100% holding of a Polish subsidiary (Energix Polska or Loxleed Investments Sp. z o.o) and several special purpose vehicles or SPVs.

The Banie wind portfolio, consisting of three separate ready-to-build wind farms, was purchased by Energix in 2015, including Banie 1 and 2 which were constructed as part of the Green Certificate Mechanism in 2016. Banie 3 was managed via a shared ownership structure together with the previous developer until June 2018, when Energix paid the full rights for the wind farm and became the sole owner of the Project.

Zelechowo is a separate Project, with a majority stake acquired by Energix in brownfield development stage in 2019, followed by joint development with the previous developer towards achieving the issuance of the building permits and successful participation in the auction in December 2020, which culminated with the acquisition of full rights for the wind farm and becoming sole owner of the project in May 2021.

2.2 Project description

2.2.1 Banie 3

The Project is planned outside settlement boundaries, on arable land, within the territory of Banie and Widuchowa communes. The main Project components will include the 37 WTG, a project substation, the underground MV line, and the internal access roads:

- 37 Vestas110 WTG with a 110-m rotor diameter and a hub height of 120 m; each WTG with a capacity of 2.2 MW (34 WTGs located in Banie commune and 3 WTGs in Widuchowa commune) which results in a total Project capacity of 81.7 MW;
- one 30/110 kV Project electrical substation covering an area of approximately 4700 m² located on the land plot no. 281/3, precinct Lubanowo, Banie commune;
- the 3 WTGs located in the Widuchowa commune will be connected via an underground MV line to BEW 36 WTG located in Baniewice.

2.2.2 Zelechowo

The Project is planned outside settlement boundaries, on arable land, within the territory of the Widuchowa commune. The main Project components will include the 16 WTG, the underground MV line, and the internal access roads:

16 Vestas126 WTG located in Widuchowa commune, with 126-m rotor diameter and a hub height of 137 m; each WTG will have a capacity of 3.5 MW, which results in a total Project capacity of 56 MW;

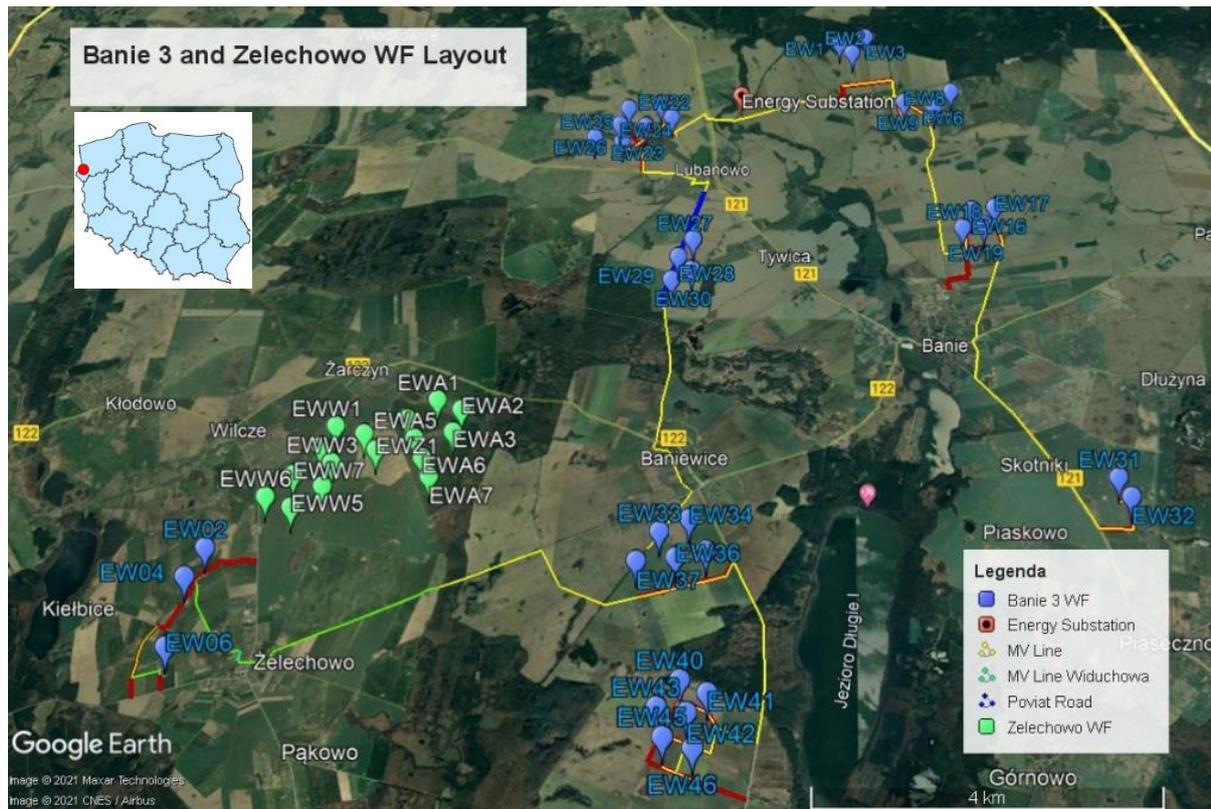
All infrastructure including wind turbines, service pads, internal roads, underground cables is located in Zarczyn precinct on plots 294/1, 310, and 289/2.

The Zelechowo wind farm will be connected with the same energy substation as Banie 3, located on land plot no. 281/3, precinct Lubanowo, Banie commune.

Figure 2-1 below shows the Banie 3 and Zelechowo WF layout.

¹ Souce. <https://www.energix-group.com/Business-Overview/>

Figure 2-1 Banie 3 and Zelechowo WF layout



In both communes, local spatial development plans for wind farms are adopted and all wind turbines are located within these plans on the spatial location of wind turbines.

2.3 Project timeline

The construction activities in Banie 3 Project started in Q1-2021 and would be completed as expected in Q2 2022 as of the date of this report.

The construction activities in Zelechowo Project started at the beginning of Q4 2021 and would be completed as expected in Q3 2022.

3. NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

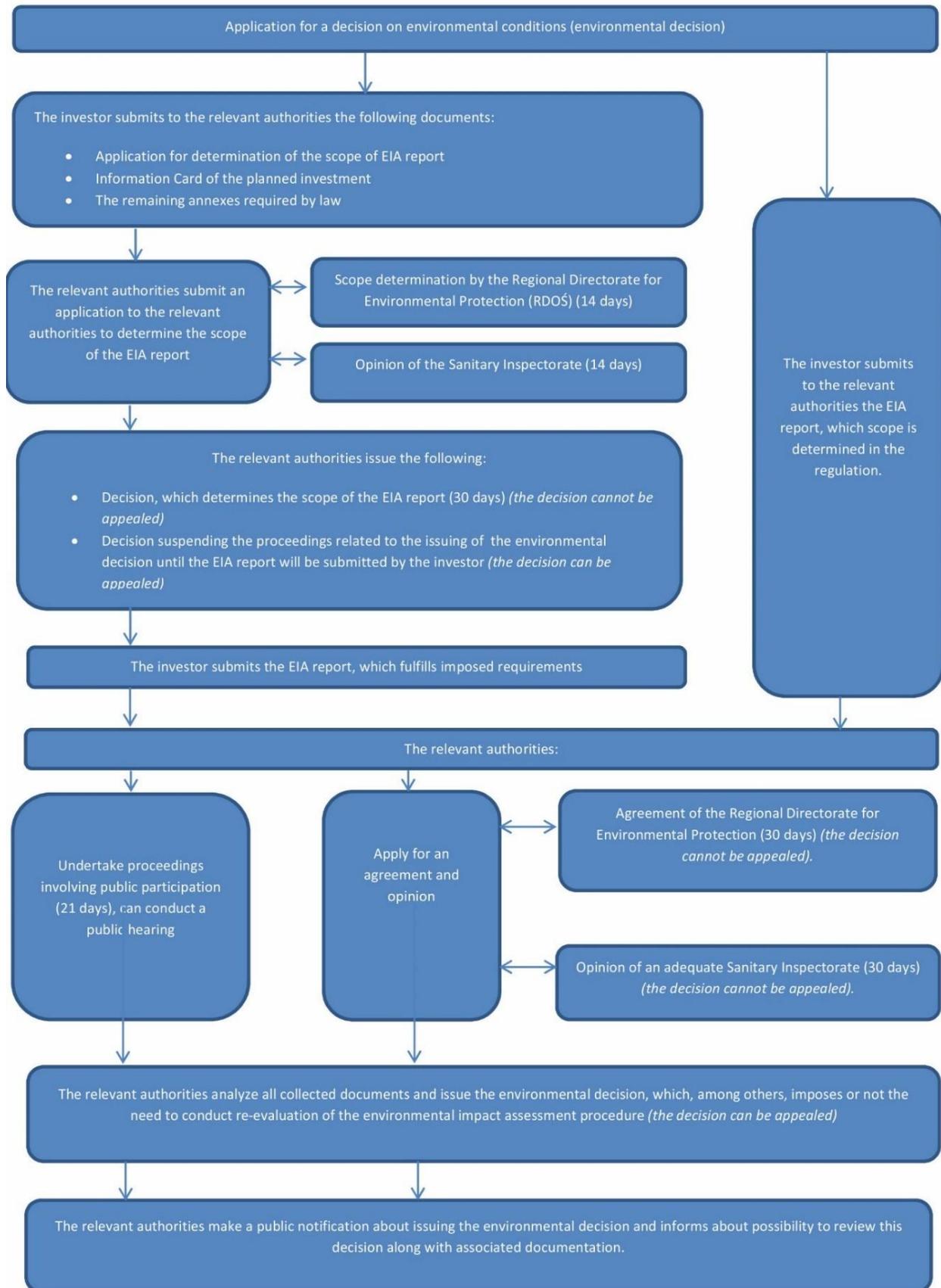
3.1 Polish national regulations

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 *Figure 3-1* below.

Figure 3-1 EIA procedure for projects having a significant environmental impact



For projects that may potentially have a significant impact, the EIA Report is not mandatory for obtaining an 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, a public hearing needs to take place before the authority decides on whether to issue the ECD for the respective Project. Particularly for Banie 3 and Zelechowo, the ECDs were based on an EIA Study. Furthermore, the Project received all necessary construction permits.

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 and 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.

These international standards include specific guidance on conducting stakeholder engagement throughout the project lifecycle.

Stakeholder engagement requirements are outlined in *PR10/ PS1: Information Disclosure and Stakeholder Engagement*. The key requirements for consultation and disclosure through the life of the project as well as requirements around Grievance Mechanism are summarized below.

Stakeholder Identification, Analysis, and Engagement Planning

Stakeholder engagement is an ongoing 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 ongoing 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

The 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 the 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 following 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 ongoing risk to, or impacts on affected stakeholders and on issues that the consultation process or grievance mechanism has 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*² (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.

² 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 PROJECTS

4.1 Banie 3 Project

The environmental impact assessment (EIA) process started in 2008 for 46 WTGs located in Banie commune, area of Baniewice, Kunowo, Lubanowo, Piaseczno, Sosnowo, Swobnica, and Tywica villages, a process which resulted in an Environmental Decision issued in August 2009. In 2019 the EIA Report was updated for 34 WTGs and the amended Environmental Decision was issued in August 2019. A separate EIA was conducted for eight WTGs located in Widuchowa commune, area of Żelechowo village in 2013. The Environmental Decision was issued in September 2014 for six WTGs, while the Construction Permit from December 2016 approves three WTGs and auxiliary squares and roads located in Żelechowo district.

Stakeholder identification, including of vulnerable people, and analysis was not conducted in any of the impact assessments reports conducted for the project components by previous developers, nor following full transfer to Energix Polska in 2018.

Before acquisition by Energix in 2018, the information and consultation activities conducted for the Project were largely limited to complying with the permitting requirements of Polish legislation, according to existing documentation. The public could participate in the EIA proceedings from April 10 to May 9, 2019, and from May 29 2019 to June 27 2019, with the case files is available for review at the seat of Banie commune. No comments from the public were received during the proceedings, as reported in the Environmental Decisions. No details were provided with regards to additional public meetings that may have been conducted by the previous developers.

During the process of changing the building permit in 2019, the company has been in contact with the local stakeholders, focusing on commune and county authorities and landowners, regarding many aspects: introduction, project updates, EIA (2019) process, update of the building permit. This was achieved via daily contact with the authorities and monthly meetings – please see Table 4-1 below – with both authorities and landowners, attended by Energix Construction Manager, Country Manager, Operation Manager, Israel HQ relevant functions, WKB consultants, as per the case. The meetings did not benefit from detailed meeting minutes.

Local communities were provided with the contact details of Energix representatives; more specifically, the lease agreements with landowners provide the contact information for the person responsible for the development. Every time any of the Energix representatives goes to the site, they provide their business cards containing the contact details, address of the company, making it very easy for anyone wanting to get in touch with the company to do so. No complaints regarding the Project have been recorded to date.

Table 4-1 Meetings with landowners held by Energix

Date	Authority	Agenda
August 2018	Landowners	Introduction
October 2018	Banie Commune; Landowners	Introduction (New chief)
October 2018	Widuchowa Commune	Introduction
December 2018	Banie Commune	Updates on the project
December 2018	Widuchowa Commune	Updates on the project

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January 2019	RDOS Szczecin	Discussion on the new EIA
January 2019	Banie Commune	Updates on the project Discussion on the new EIA
March 2019	RDOS Szczecin	Discussion on the new EIA
March 2019	Banie Commune	Updates on the project
March 2019	Gryfino County Office	Updates on the project
April 2019	Banie Commune, Gryfino County Office	Updates on the project, Discussion on the new EIA, Change of building permit
May 2019	RDOS Szczecin	Discussion on the new EIA
May 2019	Banie and Widuchowa Commune	Updates on the project
June 2019	Banie Commune	Updates on the project,
August 2019	Banie Commune	Updates on the project, new EIA
August 2019	Banie Commune, Gryfino County Office	Updates on the project, new EIA, Change of building permit
August 2019	Widuchowa Commune	Updates on the project,
September 2019	Banie Commune, Gryfino County Office	Updates on the projects, Change of building permit
October 2019	Landowners	Updates on the project
October 2019	Landowners	Updates on the project
November 2019	Banie Commune, Gryfino County Office	Updates on the project, Change of building permit
November 2019	Banie Commune, Gryfino County Office	Updates on the project, Change of building permit
December 2019	Banie Commune, Widuchowa Commune, Gryfino County Office	Updates on the project, Change of building permit
January 2020	Banie Commune, Widuchowa Commune, Gryfino County Office	Updates on the project, Change of building permit
February 2020	Banie Commune	Updates on the project
February 2020	Banie Commune, Widuchowa Commune, Gryfino County Office	Updates on the project, Change of building permit
March 2020	Banie Commune, Widuchowa Commune, Gryfino County Office	Updates on the project, Change of building permit
May 2020	Banie Commune, Widuchowa Commune, Gryfino County Office	Updates on the project
June 2020	Banie Commune, Widuchowa Commune, Gryfino County Office	Updates on the project
June 2020	Landowners	Updates on the project

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June 2020	Landowners	Updates on the project
June 2020	Landowners	Updates on the project
June 2020	Gryfino County Office ,	Updates on the project
July 2020	Banie Commune, Widuchowa Commune, Gryfino County Office , Landowners,	Updates on the project
July 2020	Landowners	Updates on the project
August 2020	Banie Commune, Widuchowa Commune, Landowners	Updates on the project
September 2020	Banie Commune, Widuchowa Commune, Landowners	Updates on the project
October 2020	Banie and Widuchowa Commune	Contractors presentation
November 2020	Banie and Widuchowa Commune	Updates on the project,
December 2020	Banie and Widuchowa Commune	Updates on the project,
January 2021	Landowners	Consents, cooperation coordination
February 2021	Landowners	Consents, cooperation coordination
March 2021	Banie and Widuchowa Commune	Contractors presentation
March 2021	Landowners	Consents, cooperation coordination
April 2021	Gryfino County Office	cooperation coordination
April 2021	Landowners	Consents, cooperation coordination
May 2021	Banie and Widuchowa Commune	Updates on the project,
May 2021	Landowners	Consents, cooperation coordination
June 2021	Landowners	Consents, cooperation coordination
July 2021	Landowners	Consents, cooperation coordination
August 2021	Banie and Widuchowa Commune	Updates on the project
August 2021	Landowners	Consents, cooperation coordination
August 2021	Voivodship road management Koszalin	Updates on the project
September 2021	Banie and Widuchowa Commune	Updates on the project
October 2021	Landowners	Consents, cooperation coordination

Source: Energix Polska, 2020

4.2 Zelechowo Project

For Zelechowo Project the environmental impact assessment process started in 2010 for 16 WTGs located in Widuchowa commune, area of Zarczyn, Zelechowo, and Wilcz villages, a process which resulted in an Environmental Decision issued in November 2012. In 2014 the EIA Report was updated entering some parameters change to turbines and the amended Environmental Decision was issued in February 2015. Moreover, the decision on staging the investment was issued in November 2015.

Stakeholder identification, including vulnerable people, and analysis was not conducted in any of the impact assessments reports conducted for the project components.

The public could participate in both EIA proceedings, however, the date and results of social participation in the first procedure are unknown. Based on the amended ECS issued in 2015 the public disclosure of the report took place between 8 September and 29 September 2013. No comments from the public were received during the proceedings. Upon a request from RDOS in Szczecin, the Investor provided some additional clarifications according to noise modeling, and after that second public disclosure between 25 November and 17 December took place.

No details were provided with regards to any additional public meetings.

During the issuing of the building permit, prior to Energix being a shareholder in the project, the Investor applied to suspend this procedure. Some parties did not agree to this. This was a group of people identified as arable land users in the vicinity of the WF, which wanted to be involved in the administrative procedure. The authority responsible for issuing the building permit allowed their participation and did not agree to the suspension of the procedure. The investor complained about this decision, which concerned incorrect identification of these parties (according to the investor legal analysis, these persons were incorrectly classified as parties with the right to participate in the procedure). The Investor complaint was issued to the administrative body of a higher instance, that agreed presented arguments, which resulted in the rejection of these parties' requests as unfounded, as they have no formal rights to participate in the procedure.

After Energix became an Investor in Zelechowo Project the procedure for issuance of the building permit was unfrozen, and the process did not face any further appeals or complaints.

5. PROJECTS 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 Projects and their 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 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>National Government</p> <p>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 Projects life cycle.</p>	<ul style="list-style-type: none"> ■ Key Ministries ■ National Regulatory bodies ■ Government Agencies and Institutes 	<p><i>National Regulatory Bodies</i></p> <ul style="list-style-type: none"> ■ Government of Poland <p><i>Key Ministries and National Agencies</i></p> <ul style="list-style-type: none"> ■ Ministry of Environment; ■ Ministry of Economy; ■ State Energy Regulatory Office (Urząd Regulacji Energetyki); ■ State Sanitary and Epidemiological Inspectorate (Państwowy Inspektorat Santarno-Epidemiologiczny); ■ State Labour Inspectorate (Panstwowa Inspekcja Pracy); ■ State Fire Brigade (Panstwowa Straz Pozarna) ■ State Construction Inspectorate (Inspektorat Nadzoru Budowlanego); ■ National Water Bodies (Wody Polskie) ■ State Aviation Authority; ■ General Directorate of Roads and Highways 	<p>Communication with authorities will follow established procedures in line with Polish regulations.</p>
<p>Provincial (Voivodeship) Government</p> <p>The provincial government is of regional importance to the Projects as they are responsible for the implementation of legislation, and development plans and policies at the regional level.</p>	<ul style="list-style-type: none"> ■ Provincial authorities 	<p><i>Province administration</i></p> <ul style="list-style-type: none"> ■ West Pomerania Voivodeship Office (Urząd Wojewódzki); ■ West Pomerania Voivodeship Marshalls (Marszałek Województwa); ■ RDOŚ - Regional Directorate of Environmental Protection (Regionalna Dyrekcja Ochrony Środowiska Westpomerania Voivodeship Road Authority ■) 	<p>Communication with Provincial-level Government will follow established procedures in line with Polish regulations.</p>
<p>County (Powiat) Government</p>	<ul style="list-style-type: none"> ■ County authorities 	<p><i>County administration</i></p>	<p>As above</p>

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<p>Powiats have legislative power, however relatively limited, as local and regional matters are dealt with either at commune or voivodeship level. They retain decision-making power concerning education, healthcare, land survey, work permits.</p>		<ul style="list-style-type: none"> ■ County Sanitary and Epidemiological Inspectorate (Państwowy Inspektorat Santarno-Epidemiologiczny); ■ County road administration (Powiatowy Zarzad Drog) 	
<p>Municipal/Commune (Gmina) Government</p> <p>Municipal governments are of local importance to the Projects as they are responsible for the implementation of legislation, and development plans and policies at the Municipality level. This includes issuing environmental authorization for activities of the Projects if the Projects falls within their jurisdiction.</p> <p>In addition, the municipalities and/or communes in the Projects area will be impacted by the Projects and will need to be kept informed of progress and plans in their area, to consider the Projects activities in their policy-making, regulatory, and other duties and activities.</p>	<ul style="list-style-type: none"> ■ Municipal authorities 	<p><i>Municipal Governments:</i></p> <ul style="list-style-type: none"> ■ Banie authority; ■ Widuchowa authority 	<p>As above</p>
<p>Parastatals</p> <p>Parastatals may have land or other assets within the country, which could be affected by the Projects. 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</p>	<ul style="list-style-type: none"> ■ Government-funded private enterprises in charge of managing specific activities (electrical grid, public roads). 	<ul style="list-style-type: none"> ■ Polskie Sieci Elektroenergetyczne Operator S.A. ■ Generalna Dyrekcja Dróg Krajowych i Autostrad 	<ul style="list-style-type: none"> ■ Communication with Parastatals will follow established procedures in line with Polish regulations. ■ Each Project section on Company website ■ Formal notifications

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<p>of the national public roads infrastructure.</p>			
<p>Communities or Settlements</p> <p>Households and communities that may be directly or indirectly affected by the proposed Projects, their components, activities, and Associated Facilities. This includes people living on land affected by the Projects 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 Projects impacts (construction and operations) and receive benefits in the form of employment and Community Investment.</p>	<ul style="list-style-type: none"> ■ Communities in the study area defined for each projects include: <ul style="list-style-type: none"> - Landowners and users; - People living near the Projects sites; - People needing to be resettled; - Community members who use access roads to access nearby natural resources ■ Social / public infrastructure and services; 	<p><i>Settlements included in the study area:</i></p> <ul style="list-style-type: none"> ■ to be listed in the SEP <p><i>Affected Community Members and Infrastructures</i></p> <ul style="list-style-type: none"> ■ Landowners ■ Land users ■ Households with houses at risk of resettlement ■ Neighbors to the turbines, substation, access roads 	<ul style="list-style-type: none"> ■ Local communication will focus on disclosure of information, meetings with relevant authorities and councils, and implementation of the grievance mechanism.
<p>Vulnerable Persons/Groups</p> <p>Vulnerable groups may be affected by the Projects under 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"> ■ Ethnic Minority Groups: if applicable ■ Female-headed households including single mothers and widows - do not have access to the same livelihood activities as 	<ul style="list-style-type: none"> ■ Once the Company identifies vulnerable groups and/or individuals, these will be engaged with to identify any specific information or consultation

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<p>Appropriate engagement practices and tools will be adopted to ensure adequate access to information and participation.</p>		<p>men, therefore they are often reliant on assistance from family members or the state to survive.</p> <ul style="list-style-type: none"> ■ Low-income households – have limited access to resources, like savings and access to credit, and are more likely to have lower education levels, which makes it harder to access Projects benefits. ■ Unemployed youth. Reliance on other household members means that youth are often disenfranchised and less able to take advantage of positive Projects impacts. ■ Elderly and orphans. ■ Disabled persons. 	<p>needs to take any concerns or impacts into account.</p> <ul style="list-style-type: none"> ■ Communication will be tailored based on their needs.
<p>Non-Governmental Organizations (NGOs)</p> <p>NGOs with a direct interest in the Projects & Associated Facilities and their social and environmental aspects and can influence the Projects directly or through public opinion.</p>	<ul style="list-style-type: none"> ■ International ■ National ■ Local 	<ul style="list-style-type: none"> ■ Local NGOs and NGOs located in the Study Area: ■ International and National NGOs 	<ul style="list-style-type: none"> ■ Company website ■ Formal consultation mechanisms
<p>Other interest groups</p> <p>Municipal and national level media will typically have a higher level of influence over the Projects and may be leveraged to influence local stakeholders' perceptions of the Projects.</p>	<ul style="list-style-type: none"> ■ Media ■ Law enforcement ■ Healthcare providers 	<ul style="list-style-type: none"> ■ Municipal and national radio stations ■ Municipal and national newspapers ■ Municipal/commune police; ■ Municipal/commune fire brigade; 	<p>Communication with the media will be done through the Company website, press releases, and newspaper announcements.</p>
<p>Potential partners</p> <p>Organizations, businesses, and individuals with a direct interest in the Projects e.g. running businesses or</p>	<ul style="list-style-type: none"> ■ Contractors ■ Suppliers and service providers. 	<ul style="list-style-type: none"> ■ Municipal / provincial / national businesses ■ Employment Agency ■ Lenders such as EBRD, and other financing institutions; 	<p>These groups need to be covered in different plans and procedures, including information disclosure and grievance mechanism.</p>

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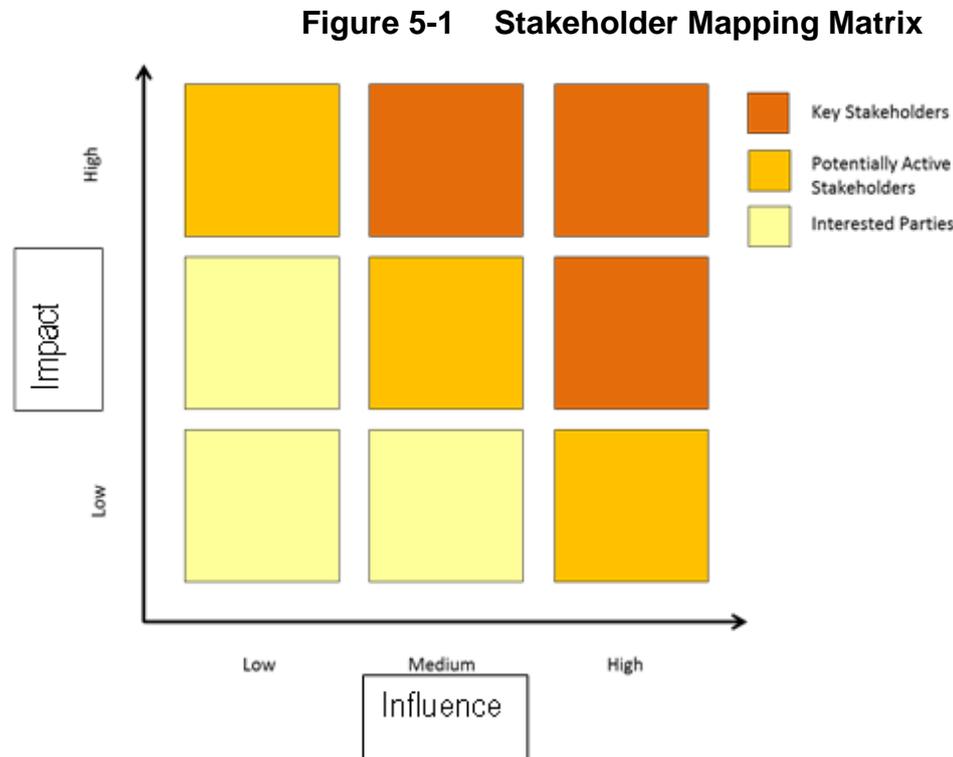
providing services and supplies to the Projects.	<ul style="list-style-type: none">■ Other businesses operating within the municipality/commune■ Local and international banks■ Other		They are not covered in this document.
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5.2 Stakeholder analysis

To develop tailored and effective means of engagement with each category of stakeholders (see *Table 5-1* above), the Company will undertake analysis and mapping of the identified stakeholders such that engagement is tailored to meet their interest in the Projects 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 decision 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 how 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 following *Figure 5-2* below.



Note: Stakeholder mapping is an internal exercise and will not be publicly 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	Monitor Keep informed/ satisfied Manage closely
Medium	2	
High	3	

6. ENGAGEMENT ACTION PLAN

As both Projects are in various stages of implement the stakeholder engagement program included in this SEP is intended to cover specified engagement objectives and activities during each Projects 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
Pre-construction (phase closed)	<ul style="list-style-type: none"> ■ identify relevant stakeholders; ■ familiarise the stakeholders with the Project; ■ manage expectations; ■ obtain a social license to operate; ■ obtain requisite licences and permits; ■ disclosure and dissemination of the Project external grievance mechanism; ■ receive, record, and address stakeholder grievances; 	<ul style="list-style-type: none"> ■ appointment of a Community Liaison Officer (CLO) and dissemination of contact details with the stakeholders; ■ announcements of public meetings; ■ meetings as part of the public hearing process; ■ dissemination of grievance mechanism information sheet, hard copies of grievance forms; ■ meetings to discuss impact mitigation measures, i.e. for noise; ■ meetings for the Community Investment Plan preparation and implementation;
Construction	<ul style="list-style-type: none"> ■ update stakeholders on progress, i.e. main construction milestones; ■ maintain social licence and consolidate trust; ■ manage expectations; ■ obtain requisite licences and permits; ■ receive, record, and address stakeholder grievances; 	<ul style="list-style-type: none"> ■ update SEP for construction phase; ■ regular announcements of key construction milestones, major equipment delivery schedule, planned interruptions of, for example, local traffic; ■ dissemination of grievance mechanism information sheet, hard copies of grievance forms; ■ meetings for the Community Investment Plan preparation and implementation; ■ meetings/newsletter to report on Project progress and E&S performance;
Operation	<ul style="list-style-type: none"> ■ update stakeholders on progress and performance; ■ renew licences and permits; ■ maintain social licence and consolidate trust; ■ obtain requisite licences and permits; ■ manage expectations; ■ receive, record, and address stakeholder grievances; 	<ul style="list-style-type: none"> ■ update SEP for operation phase; ■ meetings/newsletter to report on Project progress and E&S performance; dissemination of grievance mechanism information sheet, hard copies of grievance forms; ■ meetings for the Community Investment Plan preparation and implementation;
De-commissioning	<ul style="list-style-type: none"> ■ inform stakeholders on decommissioning works (activities, schedule, staff retrenchment, disposal of materials); ■ obtain requisite licences and permits; ■ manage expectations; ■ receive, record, and address stakeholder grievances; 	<ul style="list-style-type: none"> ■ update SEP for decommissioning phase; ■ dissemination of grievance mechanism information sheet, hard copies of grievance forms; ■ meetings as part of the local permitting process.

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

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- regular update of the Projects stakeholders as the Projects 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 Projects 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 that took place 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 Projects progresses and reflecting the results of engagement already conducted.

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Table 6-2 Engagement Plan

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
Pre-construction phase (phased closed)				
Project information disclosure package is published online on the Company website	All stakeholders	<p>The Project Information Disclosure Package includes the following documents in an accessible format (PDF):</p> <ul style="list-style-type: none"> ■ Stakeholder Engagement Plan (SEP), including the Grievance Mechanism for the Project – in both English and Polish; ■ Non-technical Summary (NTS) – in both English and Polish; ■ Project presentation leaflet; ■ Grievance Form – in both English and Polish. <p>These documents will be made available on the dedicated each Project page on the Energix website: www.energixpolska.com</p>	All materials will be available online for stakeholder information during the Projects 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 Banie and Widuchowa Town Halls and other public locations in the affected communities</p> <p>The leaflet will include expected locations of the turbines, expected routes for the transport of the construction equipment and turbines, the timeline for construction, details about the contractors, and contact details for contractor and investor, alongside emergency contact details.</p>	<p>Leaflets will be available in hard copy format before the Kick-off public meeting and distributed at the kick-off meeting.</p> <p>Grievance Forms to be available for use throughout the Projects lifetime.</p>	Company
Information notices publication	All stakeholders	<p>The kick-off meeting will be announced in local newspapers at least 10 days before the date and will include the 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

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		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 Email: tomasg@energix-group.com 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	Vulnerable groups Affected land owners and users	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
Construction phase				
Posting notice boards in the Banie and Widuchowa Town Halls and in public places of the affected settlements, in local language (Polish)	Local community	The CLO will be responsible for the dissemination of key announcements on Projects activities (e.g. incoming transport of big Projects equipment to the local communities).	Upon major construction activities	CLO

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Regular meetings with the affected communities	Local community	The CLO will actively listen, collect and process grievances and share relevant Projects information.	<ul style="list-style-type: none"> ■ Bi-monthly during construction, and ad-hoc if needed. ■ Additional immediate meetings if necessary (for instance for vulnerable groups, or if specific concerns arise) 	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
Grievance log overview	All stakeholders	The CLO will regularly review the grievance log	Monthly	CLO
Operations phase				
Inform on the start of operation	Mayors of affected community and residents	Inform stakeholders of the start of the operation, any health and safety risks for the communities, and mitigation measures	2 weeks before the start of operation	Company
Information leaflets in Polish language	Local community	Inform community members on the operation stage and distribute it in key locations in the area impacted by the Projects (hard copy) and on the Company's website.	Throughout the operation phase	Company
Ongoing information on the annual environmental and social performance of the projects (including environmental monitoring) and planned maintenance works	Mayors of affected community and residents	<p>Inform stakeholders of the projects annual environmental and social performance (including bird and bat monitoring) by publishing a summary report on the Company website.</p> <p>Inform stakeholders of the projects annual maintenance works (duration, amount of people).</p>	Annual	Ongoing information on the annual environmental and social performance of the Projects
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

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Grievance log overview	All stakeholders	The CLO will regularly review the grievance log	Monthly	CLO
Decommissioning				
Inform on schedule and approach for decommissioning	■ Mayors of affected community and residents	inform stakeholders on the upcoming decommissioning phase, any health and safety risks for the communities, and mitigation measures	Start discussions from the previous quarter to the one when decommissioning activities will start	Company

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 both Projects, benefitting from updates of the contents and messages as the Projects progresses; these will be formulated as updates to this current SEP and be subject to management approval before dissemination.

Figure 7-1 Stakeholder Engagement Tools

Tool	Description
Project NTS, ESAP, and SEP (incl. Grievance Forms)	<p>The Projects 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 Projects worksites and other agreed locations in the area impacted by the Projects, accessible to the communities, and updated regularly. Projects information should be available in Polish.</p> <p>The notice board will serve as an information dissemination tool. For example, the Projects 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 the accessibility of the notices.</p>
Leaflets	<p>Projects information leaflets will be created and distributed at the kick-off meeting to inform on the expected locations of the turbines, expected routes for the transport of the construction equipment and turbines, the timeline for construction, details about the contractors, and contact details for contractor and investor, alongside emergency contact details. For the 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-compliance 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 Projects 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 Projects components and activities – see section 10.2 for more details.</p>

8. RESOURCES AND RESPONSIBILITIES

The overall responsibility for the effective engagement of the Projects stakeholders, as outlined in this SEP, lies with the Company's management team. The Community Liaison Officer (CLO) has the overall responsibility for the implementation and updates of the current SEP and for dealing with community relations, including the external grievance mechanism. The CLO works closely with the Projects teams to achieve the engagement objectives outlined in this SEP.

The CLO is 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 Projects Teams, the CLO has a clear understanding of the Projects schedules and engagement milestones and engages stakeholders appropriately in line with the Projects progress.

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

CLO specific responsibilities

The specific responsibilities of the CLO are:

- act as the liaison between the community/stakeholders and the Company; maintains a regular presence in the affected communities and engagement with community members to monitor opinions, provide updates on Projects activities and ensure communication with community members and vulnerable groups;
- lead the 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 an active role in the identification of community needs and assist in the successful development and implementation of a Community Investment Plan for each of the Project;
- produce stakeholder engagement monitoring reports and update the SEP accordingly.

The dedicated CLO for the Projects is Mr. Tomasz Golab:

- Telephone: +48 518 988 262
- Email: tomaszg@energix-group.com

The contact details of the CLO are available to the contractors, local communities, and residents of the area 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 concerning 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*³ 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 projects-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)⁽⁴⁾.

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

For the Projects-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, under the existing legislation in Poland.

The grievance mechanism is tailored to the local context of the Projects 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 promptly, 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 Projects is structured as follows (please also see Figure 9-1 below):

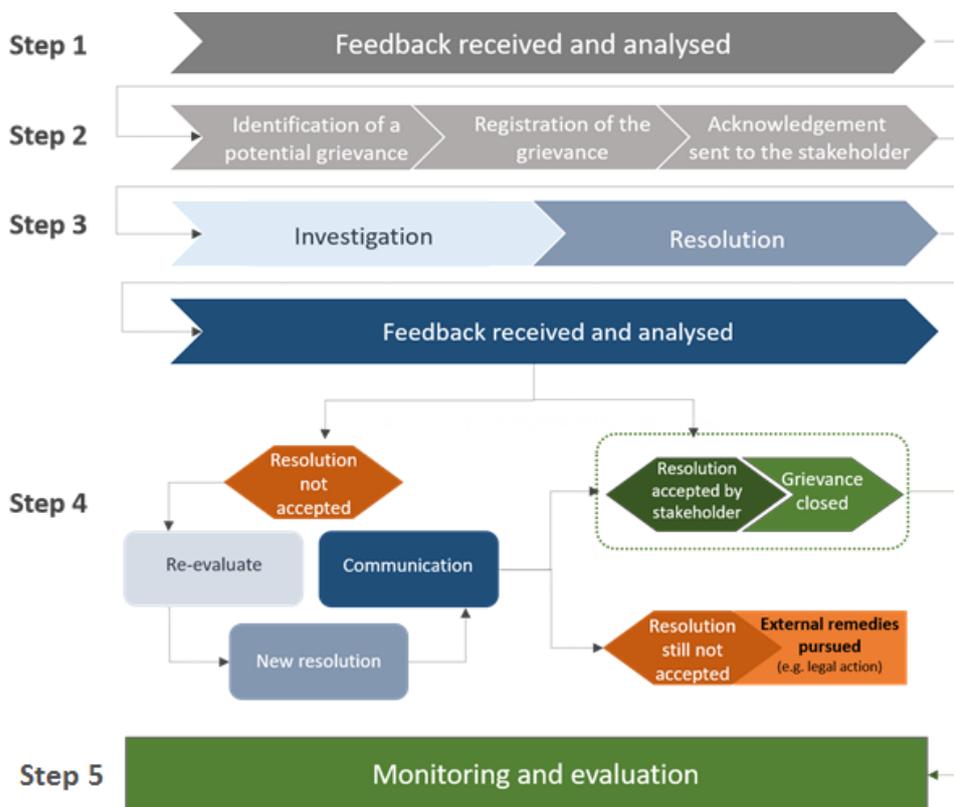
- **STEP 1:** a grievance is recorded regardless of whether it was received verbally or in writing, using the *Grievance Form*; it will be then registered in the *Grievance Log/Database* by the Community Liaison Officer. A sample grievance form and database are provided in Appendices A and B to this 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;

³ 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, accessed in April 2020

(4) 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

- **STEP 4:** CLO will follow up with the complainant and close out the grievance; the overall process of closing a grievance will not exceed 30 calendar days as per the EBRD *Guidance Note*. Should the issue raised be complex and need 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

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 to ensure accountable delivery of commitments made to stakeholders.

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

- *Stakeholder dialogue log*: Used to store, analyse and report on stakeholder dialogue activities. It will be populated with details on the information presented, audience questions, Company responses and actions, and meeting evaluation results, when appropriate. The database will also be used to track the frequency of meetings over the life of each 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.
- *The 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 each Project.

Records will be reviewed quarterly 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 the 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 Projects;
 - limitations (e.g. resources, internal alignment);
 - priorities for the next quarter.

These reports will be discussed at quarterly Company internal meetings between the CLO and the Projects teams. 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 each Project and share it with the relevant stakeholders. This will also include reporting regularly 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 regularly (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*

First name _____

Last name _____

I wish to raise my grievance anonymously

I request not to disclose my identity without my consent

Contact Information

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

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 Gołąb, Community Liaison Officer Banie 3 and Żelechowo Wind Farms

Address: Pl. Małachowskiego 2, 00-066 Warszawa

Tel.: 518 988 262 or e-mail: tomaszg@energix-group.com

Source: EBRD *Guidance Note on Grievance Management*, 2012, Appendix 1

APPENDIX B SAMPLE GRIEVANCE DATABASE

1	Description of the problem															
2	Initiator					Person delegated to address in SSW/DPH				Problem						
3	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
4																
5																
6																
7																
8																
9																
10																
11																
12																
13																
14																
15																
16																
17																

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