

127MW/254MWh BESS, located in Scornicești, Olt County, South Romania

Stakeholder Engagement Plan (SEP)

DATE
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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AoI	Area of Influence
ATU	Administrative Territorial Unit
BESS	Battery Energy Storage System
CLO	Community Liaison Officer
CU	Urban Certificate (<i>Certificat de Urbanism</i> , in Romanian)
DG	Directorate-General
E&S	Environmental and Social
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
EPRP	Emergency Response and Preparedness Plan
ESAP	Environmental Social Action Plan
EBRD	European Bank for Reconstruction and Development
ESMP	Environmental and Social Management Plan
EU	European Union
GM	Grievance Mechanism
H&S	Health and Safety
KII	Key Informant Interviews
NGO	Non-Governmental Organization
NTS	Non-Technical Summary
PIL	Project Information Leaflet
PV	Photovoltaic

Acronyms	Description
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
UNECE	United Nations Economic Commission for Europe

1 INTRODUCTION

1.1 BACKGROUND

This document is the Stakeholder Engagement Plan (SEP) for the a large-scale 127MW/254MWh Battery Energy Storage System (BESS) in Scornicești, Olt County, South Romania.

The Project will be developed by RPOWER BESS – TWO S.R.L, a local SPV established for the Project over a total surface of 75,000 m² on an agricultural plot located within the administrative territory of Scornicești (ATU). The main components of the Project include a Battery Energy Storage System (BESS) area, which will be connected to a 33/400kV transformer station. This station will serve as the link between the BESS and the high-voltage transmission grid, enabling the stored energy to be stepped up to 400kV and injected into the grid, or allowing energy from the grid to be stepped down and stored in the BESS. The spatial footprint of each Project component is distributed as follows:

- Handling area and roads: 3,000 m²
- Battery module area: 2,232 m²
- Invertor area: 460 m²
- Auxiliary transformers area: 61 m²
- Transformer posts: 282 m²
- Transformer station: 1,800 m²
- Green area: 51,529 m²

Although the Project will be located within the administrative territory of Scornicești (ATU), the closest settlements are:

- Radesti, situated approximately 1.7 km to the southwest, and Poboru, located about 2.5 km to the northeast of the Project site.
- Radesti village (from Oporelu commune) – ca. 1.7 km southwest of the Project site;
- Poboru commune – ca. 2.5 km to the northeast of the Project site;
- Albesti village (from Poboru commune) northwest – ca. 4 km of the Project site.

These nearby communities are the most directly affected in terms of proximity, even though they fall outside the Project's administrative boundaries.

This SEP establishes the framework by which stakeholders, and primarily local stakeholders, are informed about the Project and provided with opportunity to provide comments and input to the development of Project.

The SEP provides guidelines for effective and meaningful engagement with the Project stakeholders. It is focused on guiding interaction and communication with stakeholders concerned by the development of the Project and related studies, while setting the stage for future engagement during the construction, operation and decommissioning phases.

The SEP also includes a Grievance Mechanism (GM) established for the Project.

The engagement approach taken by the Project is aligned with Romanian environmental permitting regulations, European Union (EU) Directive on public participation, the Aarhus Convention, as well as relevant international lender and best practice standards.

Stakeholder engagement is an ongoing process, and as such, this SEP is a living document and will be reviewed and updated as the Project progresses.

Building permits have been obtained for the Project and the main construction phase is scheduled to begin in Spring 2026

In line with international good practices, the Project recognizes that stakeholder engagement constitutes the basis for building up constructive and strong relationships with all interested parties, which are essential for successful construction and operation of the BESS Project and shared value creation.

According to EBRD¹, Stakeholders are people, groups or organizations who are directly or indirectly affected by a Project, as well as those who may have interests in a Project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally Affected Communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.

The Company's commitment to effective engagement translates through this SEP 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 phase of the Project. 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 Chapter 3);
- Brief summary of past engagement activities conducted by the Project since its inception (see Chapter 4);
- Initial identification and characterization of stakeholders in order to determine appropriate ways of engagement (see Chapter 5);
- Strategy and timetable for sharing information and consulting with stakeholders (see Chapter 6);
- Tools for engagement (see Chapter 7);
- Resources and responsibilities for implementing stakeholder engagement activities (see Chapter 8);
- Project Grievance Mechanism (see Chapter 9) and
- Description of how stakeholder engagement activities will be incorporated into the Company's overall management system (see Chapter 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.

This document represents the Stakeholder Engagement Plan (SEP) for development and implementation of the proposed 127MW/254MWh Battery Energy Storage System (BESS)

¹ EBRD (2023b) Guidance note – EBRD Performance Requirement 10: Information disclosure and stakeholder engagement.

Project located in Scornicești Administrative Territorial Unit (ATU), Ilt County, Romania, developed by ERM.

The approach of this SEP builds on public engagement provisions of Romanian legislation and is guided by the EBRD's Environmental and Social Policy (2024) 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.

SEP provides the framework through which stakeholders, primarily at the county and local levels, are informed about the Project and offered opportunities to provide comments and input into its development.

This SEP is focused on the Project's socioeconomic Area of Influence (see Section 2) and does not cover national-level stakeholders, regulatory bodies, or entities with which the Client engages at a corporate or country level as part of routine business operations and/or regulatory permitting processes.

1.3 APPLICABLE STANDARDS

The following E&S standards were considered for this assessment:

- Relevant European Union (EU) requirements (including, but not limited to, the EU EIA Directive and IE Directive).
- Applicable local, national and regional requirements, including those related with environmental and social impact assessments.
- The European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2024).

The following EBRD Environmental and Social Requirement (ESR) have been scoped out of the assessment:

- ESR7 – Indigenous People - not applicable to the Project as there are no indigenous populations in Romania.

This report was prepared using the EBRD's Environmental and Social Policy (2024) as the primary benchmark, in alignment with the scope of the assessment.

1.4 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 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 engage with stakeholders in a way that ensures they feel treated fairly and that their concerns are given genuine and balanced 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.

1.5 STAKEHOLDER ENGAGEMENT OBJECTIVES

The general 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 influence how the operations are running or how the Project is being 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 plans. 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.
Create partnerships to promote constructive interaction between all parties and create opportunities	Develop relationships of trust between the Project and the 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 Manage stakeholders' expectations	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. 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 social license to operate and building effective and trustful relations with stakeholders.

Source: ERM, 2025

2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

R.Power S.A. (the "Borrower"), a company incorporated in Warsaw, Poland, is seeking financing from the European Bank for Reconstruction and Development (EBRD), along with potential co-lenders, to support the implementation of a large-scale Battery Energy Storage System (BESS) project in southern Romania. The proposed facility, with a capacity of 127 MW / 254 MWh, will be located in Scornicești, Olt County (the "Project").

The Project will be developed by RPOWER BESS – TWO S.R.L., a special purpose vehicle (SPV) established locally for this purpose. The installation will occupy approximately 75,000 m² of agricultural land within the administrative boundaries of Scornicești (ATU). Key infrastructure will include the BESS installation area and a 33/400 kV transformer station. This station will facilitate the connection between the BESS and the national high-voltage transmission grid, enabling bidirectional energy flow – either injecting stored energy into the grid at 400 kV or drawing energy from the grid for storage.

The spatial layout of the Project components is distributed as follows:

- Handling area and roads: 3,000 m²
- Battery module area: 2,232 m²
- Invertor area: 460 m²
- Auxiliary transformers area: 61 m²
- Transformer posts: 282 m²
- Transformer station: 1,800 m²
- Green area: 51,529 m²

The Project is situated within the Administrative Territorial Unit (ATU) of Scornicești, in Olt County, Romania. The selected site lies in a predominantly agricultural area, officially designated for such land use. The terrain is largely flat, with minor elevation changes characterized by gentle slopes and small hills.

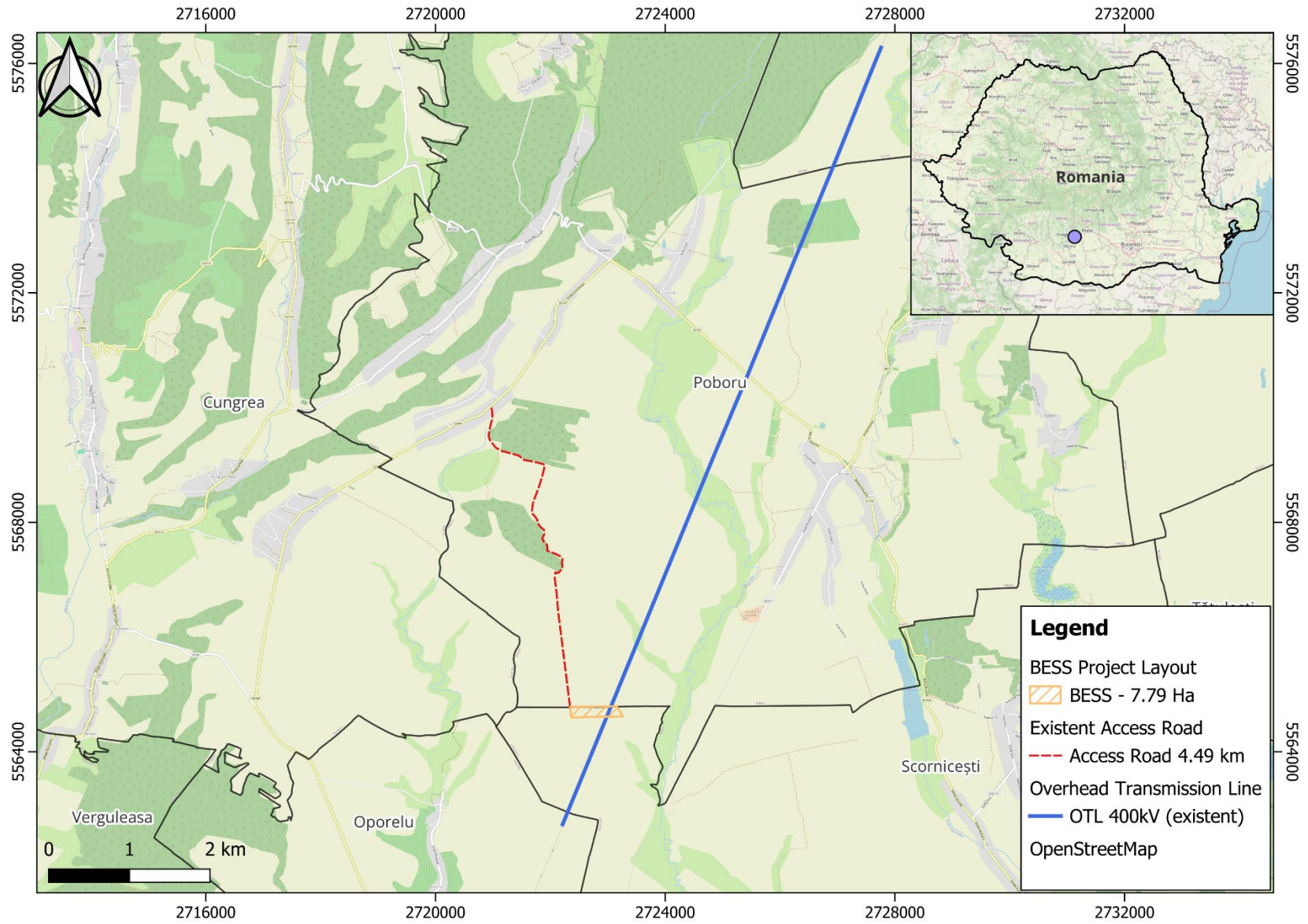
Strategically positioned near the 400 kV Tântăreni–Sibiu Overhead Transmission Line (OHTL), the Project benefits from direct access to existing high-voltage infrastructure, which will serve as the grid connection point.

Although the Project is situated within the administrative boundaries of Scornicești (ATU), the nearest settlements include:

- Radesti, located roughly 1.7 km southwest of the Project site, and Poboru, approximately 2.5 km northeast;
- Radesti village (part of Oporelu commune) – around 1.7 km southwest of the Project site;
- Poboru commune – approximately 2.5 km northeast of the Project site;
- Albesti village (belonging to Poboru commune) – located about 4 km northwest of the Project site.

The site is also located about 1.3 km west of County Road 657, a secondary route within the Scornicești ATU. Based on map assessments, this road is narrow and only partially paved, with improved sections primarily near Poboru village and south of the Project area.

FIGURE 2-1 PROJECT LOCATION



Source: ERM, 2025

2.2 PROJECT PERMITTING STAGE

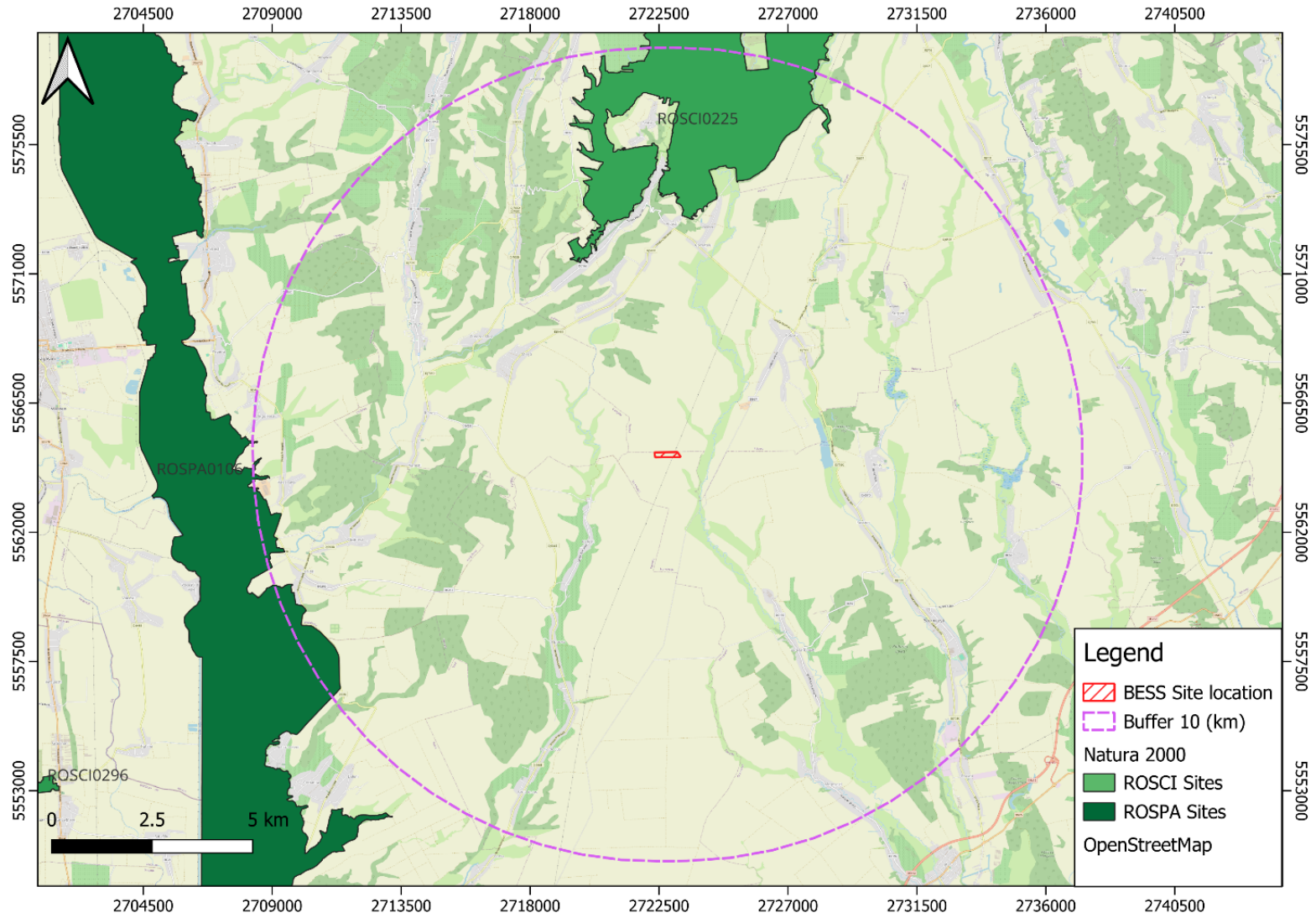
The Project has successfully completed the local construction permitting process and is planned to be implemented over a 24-month construction period. As part of the permitting requirements, the developer sought input from the Olt County Environmental Protection Agency (EPA) regarding the Project's environmental implications.

The environmental permitting process included the following steps:

- Submission of a formal Notification to the Olt EPA by the Special Purpose Vehicle (SPV);
- Issuance of an Initial Decision by the EPA, which determined that the Project would be subject to the local Environmental Impact Assessment (EIA) screening procedure and requested additional information in the form of a presentation memorandum;
- Following its review of the submitted documentation, the EPA issued a Framing Decision concluding that the Project did not require a full EIA process.

In parallel, the SPV requested the EPA's opinion on potential overlaps with Natura 2000 protected areas. Based on the analysis of Stereo 70 maps provided by the developer, the EPA confirmed that no such overlaps were identified (Figure 2-2).

FIGURE 2-2 PROJECT LOCATION IN RELATION WITH LEGALLY PROTECTED AREAS (NATURA 2000)



Source: ERM, 2025

2.3 PROJECT ORGANIZATION

The parties involved in the Project are listed in Table 2-1 below.

TABLE 2-1 PROJECT PARTIES

Responsible Party	Role	Responsibilities
R.Power S.A.	Investor	Holding company of the R.Power Group, registered and headquartered in Warsaw, Poland Owner of the RPower BESS – TWO S.R.L. SPV
RPOWER BESS – TWO S.R.L.	SPV responsible for the project development	Corporate oversight and support for the project development SPV overseeing the development process and construction, including stakeholder engagement
ELECTROGROUP SA	EPC for Substation works	Part of R.Power Group, registered in Bucharest, Romania Contractor registered in Cluj-Napoca, Romania
TBC	EPC for BESS BoP works	TBC
ERM	Environmental and Social consulting firm	Development of the Project E&S assessment for documentation commissioned by EBRD
CONSTMAT SRL	Documentation development for local Environmental Permit	Development of documentation necessary for permitting - technical memorandum

Source: ERM, 2025

2.4 OTHER DEVELOPMENTS IN THE PROJECT AREA OF INFLUENCE

According to the available documentation, no other major projects have been identified within the Project Area of Influence. However, based on discussions held on 16 September 2025 by two ERM consultants with the majority of Scornicești, several small-scale photovoltaic initiatives are planned or have already been developed.

3 NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

3.1 ROMANIAN NATIONAL REGULATIONS

3.1.1 ROMANIAN CONSTITUTION

Article 35 of Romanian Constitution guarantees the right to a healthy environment:

- The State shall acknowledge the right of every person to a healthy, well preserved and balanced environment;
- The State shall provide the legislative framework for the exercise of such right;
- Natural and legal entities shall be bound to protect and improve the environment.

According to Article 5 of the Government Emergency Ordinance 195/2005 (Romanian Framework Environmental Protection Law), 'the State recognizes to any person the right to a healthy and ecologically balanced environment and guarantees:

- Access to environmental information;
- The right to be consulted in the process of making decisions on developing the environmental policy and regulations, issuing regulatory acts, development of plans and programs;
- The right to appeal directly or through the environmental organizations to the administrative and judicial authorities regarding environmental issues, regardless of whether an injury or damage occurred;
- The right to compensation for the damages incurred.

In Romania, public participation is mainly regulated in relation to plans, programs (Governmental Decision 564/2006 and Governmental Decision 1076/2004) and projects (Law 292/2018²).

3.1.2 ROMANIAN PERMITTING REGULATIONS

In Romania, disclosure of project information and public consultation in decision-making for investment projects is regulated by the pieces of legislation outlined in below:

Environmental Protection Law - Law No. 90/2021 amending GEO No. 195/2005

- Sets up the permitting framework (including EIA).

Application methodology for the Environmental Impact Assessment (EIA) Procedure for public and private projects - Minister of Environment Order No. 135/2010

- Defines the projects for which an Environmental Impact Assessment is needed. Transposes the EU Directive 2011/92/UE and respectively 2014/52/EU for EIA, as well as Directive 2003/35/EC related to public participation.

Guidelines for EIA - Minister of Environment Order No. 269/2020

- Guidelines for the EIA screening and scoping and review, based on EU Directives edited by the DG Environment.

² The transposition of the revised EIA 2014/52/EU has been fulfilled in December 2018. Law No. 292/2018 on the assessment of the impact of certain public and private projects on the environment was adopted and published on 10/12/2018 in the Romanian Official Journal (Official Gazette No. 1043, Part I). This Law provides the public with the possibility to participate in the EIA procedure before the final development consent is granted.

3.2 INTERNATIONAL REQUIREMENTS

3.2.1 AARHUS CONVENTION

The United Nations Economic Commission for Europe (UNECE) 'Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters' was adopted on 25 June 1998 in the Danish city of Aarhus (Århus) at the Fourth Environment for Europe Ministerial Conference. It entered into force on 30 October 2001. The Aarhus Convention was created to empower the role of citizens and civil society organisations in environmental matters and is founded on the principles of participative democracy³.

The Convention establishes a number of rights to the individuals and civil society organizations with regard to the environment:

Access to information: public's right to receive environmental information held by public authorities. This includes information on:

- The state of the environment;
- Policies or measures affecting the environment;
- Public health and safety where these are affected by the state of the environment.

Public participation: public's right to participate in environmental decision-making. Public authorities are required to allow the general public and environmental Non Governmental Organizations (NGOs) to meaningfully participate in decision-making regarding projects affecting the environment and plans and programmes relating to the environment.

Access to justice: public's right to review by a court or another independent body to ensure that public authorities respect the rights to access to information and public participation, and environmental law in general.

The Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, ratified by Law No. 86/2000, stipulates that the right of public participation is guaranteed by law.

The European Parliament and Council Directive No. 2003/35/EC⁴ provides for public participation regarding drawing up certain plans and programs relating to the environment. According to this Directive, Member States shall ensure that:

- "The public is informed, whether by public notices or other appropriate means such as electronic media where available, about any proposals for such plans or programs or for their modification or review and that relevant information about such proposals is made available to the public including inter alia information about the right to participate in decision-making and about the competent authority to which comments or questions may be submitted;
- The public is entitled to express comments and opinions when all options are open, before decisions on the plans and programs are made;
- In making those decisions, due account shall be taken of the results of the public participation;
- Having examined the comments and opinions expressed by the public, the competent authority makes reasonable efforts to inform the public about the decisions taken and the reasons and considerations upon which those decisions are based, including information about the public participation process".

³ [The Aarhus Convention | OSCE Aarhus](#)

⁴ [Directive - 2003/35 - EN - EUR-Lex](#)

3.2.2 INTERNATIONAL LENDER REQUIREMENTS

3.2.2.1 THE EBRD ENVIRONMENTAL AND SOCIAL PERFORMANCE REQUIREMENTS

The EBRD Environmental and Social Performance Requirements (ESRs) are relevant in the context of a potential finance of the Project by the EBRD.

The EBRD ESRs are considered a benchmark for good practice for environmental and social risk management in private sector developments. The ESRs 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 ESRs include specific guidance on conducting stakeholder engagement throughout the project lifecycle. Stakeholder engagement requirements are outlined in ESR10, Information Disclosure and Stakeholder Engagement.

The key requirements for consultation and disclosure through the life of the project are summarized below.

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.

Disclosure of Relevant Project Information

Project information must be disclosed in a timely, accessible, and culturally appropriate manner to enable stakeholders to understand potential project risks, impacts, and benefits. Key information includes: (i) the purpose, nature, scale and duration of the project activities; (ii) Potential environmental and social risks and impacts, and proposed mitigation and management measures; (iii) The stakeholder engagement process, and opportunities for participation; (iv) The schedule and format of planned public consultation activities, and how feedback will be recorded and considered; and (v) the process by which any grievances will be managed.

Meaningful Consultation

Consultation should be: (i) proportional to the project's risks and potential impacts (ii) inclusive and accessible; (iii) free of manipulation, coercion or intimidation; (iv) initiated early and maintained throughout the project lifecycle, and (v) documented with feedback integrated into project decision-making where relevant.

Informed Consultation and Participation

For projects with potentially significant adverse impacts on Affected Communities, enhanced engagement in the form of Informed Consultation and Participation (ICP) may be required. This includes: (i) sharing project design, mitigation, and benefit-sharing details, (ii) integrating stakeholder perspectives into project decisions, (iii) documenting consultation outcomes and demonstrating how views have been considered, and (iv) meeting applicable national legal requirements for disclosure and consultation.

Engagement During Project Implementation and External Reporting

Stakeholder engagement does not end with project approval. Project developers/owners shall: (i) continue ongoing engagement and information sharing with identified stakeholders, tailored to project changes, stakeholder concerns, and emerging risks, (ii) report regularly on implementation of mitigation measures and progress against action plans, and (iii) where appropriate, publish external E&S performance reports and make non-sensitive biodiversity data available to third-party repositories.

Grievance Mechanism

Projects shall establish a grievance mechanism that is: (i) accessible, transparent, and free to use, (ii) confidential, with protections for those fearing retaliation, (iii) scaled to project risks and tailored to local context, (iv) open to anonymous submissions, and (v) responsive and capable of tracking, resolving, and reporting on concerns related to project E&S performance.

On-going Reporting to Affected Stakeholders

Project developers/owners shall provide periodic updates to affected stakeholders on: (i) progress with mitigation measures and Action Plans, (ii) key topics raised through engagement or the grievance mechanism, (iii) any changes to project risks, timelines, or operations, and (iv) follow-up actions taken to address stakeholder concerns.

Reporting should be in plain language and accessible formats, allowing stakeholders to track the Project's environmental and social performance over time.

4 SUMMARY OF PREVIOUS ENGAGEMENT FOR THE PROJECT

For the environmental permitting process, the Project followed a simplified approach. Instead of undergoing a full Environmental Impact Assessment (EIA), which would typically include public consultations, the Environmental Protection Agency (EPA) reviewed a technical memorandum outlining the key aspects of the Project and indicated that no further studies are necessary.

As part of its commitment to responsible development, the Project undertook an Environmental and Social due Diligence process to identify any potential gaps and ensure alignment with applicable international standards. This process led to the development of an Environmental and Social Action Plan (ESAP), which outlines the steps needed to meet those standards. During the assessment, limited stakeholder engagement was carried out during the site visit, including a meeting with the Mayor of Scornicești. The purpose of this meeting was to gain a deeper understanding of the local context, and to identify any sensitivities or risks that may be relevant to the Project and its surroundings. During this meeting, the mayor did not indicate any major risks or reluctance from the local community.

5 STAKEHOLDERS

5.1 STAKEHOLDER IDENTIFICATION

The objective of stakeholder identification is to determine which organizations and individuals may be directly or indirectly affected—whether positively or negatively—by the Project, or who may otherwise have an interest in its development and implementation.

Project stakeholder groups identified to date, along with the corresponding communication methods proposed for engaging with each group, are presented in Table 5-1 below. Communication approaches will be tailored to the characteristics and needs of each stakeholder group to ensure meaningful information disclosure and to enable their participation in the decision-making process.

Stakeholder identification and analysis is a dynamic and iterative process that requires regular review and refinement. As such, the list and categorization of Project stakeholders will be updated throughout the Project lifecycle, with particular consideration given to:

- The relevance of each stakeholder group for the Project, including their potential influence on, interest in, or impacts from the Project;
- Stakeholder groups that may be disproportionately or differentially affected due to their vulnerability, and who may therefore have distinct concerns, priorities, or expectations related to Project impacts, mitigation measures, or potential benefits.

TABLE 5-1 STAKEHOLDER GROUPS, ANALYSIS AND COMMUNICATION METHODS

Stakeholder Category. Analysis.	Stakeholder Group	Stakeholders	Communication Method	Stakeholders' interests
<p>National Regulatory Authorities</p> <p>National Government is of primary importance to the business and/or projects/activities in terms of establishing policy, granting permits or other approvals, and monitoring and enforcing compliance with Romanian regulations throughout all stages of the Project life cycle.</p>	<ul style="list-style-type: none"> ■ National Government ■ Key Ministries ■ National Regulatory bodies ■ Government Agencies and Institutions 	<ul style="list-style-type: none"> ■ Ministries and Government Agencies with responsibilities in regulating the Project 	<p>Communication with authorities will follow established procedures in line with Romanian regulations. The communication should take place through the following channels:</p> <ul style="list-style-type: none"> ■ online portals and interfaces established for formal communication and reporting of Project-related data ■ official reports, letters, phone or email, ■ meetings with the authority representatives, 	<ul style="list-style-type: none"> ■ Energy Policy Alignment ■ Regulatory Compliance ■ Economic Impact
<p>Local Administration Bodies</p> <p>Local government and administration bodies are of importance to the business and Project as they are responsible for implementation of legislation, and development plans and policies at local level. In addition, the municipalities in the Project area are to be kept informed of Project implementation progress to consider the Project activities in their policy-making, regulatory and other duties and activities.</p>	<ul style="list-style-type: none"> ■ County and Municipal authorities 	<ul style="list-style-type: none"> ■ Mayoralties of Scornicești, Oporelu and Poboru ATUs ■ Spatial and Urban Planning Offices in Scornicești ■ Social assistance offices in each ATU of the AoI 	<p>Communication with local Government and Municipalities will follow established procedures in line with Romanian regulations. The communication will take place through available channels: official letters, meetings with the administration representatives phone and email.</p>	<ul style="list-style-type: none"> ■ Local Economic Development ■ Infrastructure Development ■ Community Welfare

Stakeholder Category. Analysis.	Stakeholder Group	Stakeholders	Communication Method	Stakeholders' interests
<p>Project-affected People and Communities</p> <p>Landowners/users and communities directly or indirectly affected by the project and/or activity. This includes owners/users of land affected by the Project in relation to installation (and later on maintenance) of grid connection cable, residents and land users along the grid connection route and Project site potentially affected by Project construction and Project-related activities</p>	<ul style="list-style-type: none"> ■ Settlements near the Project components ■ Land-affected stakeholders ■ Households / constructions near the Project footprint ■ Residents of settlements where Project construction workforce is accommodated, particularly those nearby facilities used for workforce accommodation. ■ Other local population affected in some form by the Project 	<ul style="list-style-type: none"> ■ Shepherds that might use the land for grazing ■ Community members who use the Project access roads to access nearby natural resources (forest and its expansion plots) and existing infrastructure (hale rocket site, barns etc.) ■ Residents of settlements located near roads used for project activities, such as transporting materials during construction and operation, contractor and supplier vehicles ■ Social / public infrastructure and service companies 	<ul style="list-style-type: none"> ■ Land owners/users directly-affected, inhabitants will be informed individually of the initiation of the construction activities affecting their land plots and households upfront the works initiation. Communication will be through personal meetings, letters, telephone and other direct means of communication. ■ Communication with other residents of municipalities affected will be performed through local municipality and village councils, or other relevant bodies. This will differ depending on location, rural/urban setting, and types of impacts and interest levels. ■ Distribution of flyers, printed announcements posted (e.g., on bus stations, school, mayoralty), briefly explaining the Project, informing on execution schedule and providing contact information for direct contact with the Project. 	<ul style="list-style-type: none"> ■ Land Use and Compensation ■ Project schedule ■ Employment opportunities

Stakeholder Category. Analysis.	Stakeholder Group	Stakeholders	Communication Method	Stakeholders' interests
<p>Vulnerable Persons/Groups</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>Appropriate engagement practices and tools will be adopted to ensure the identification of vulnerable groups and their adequate access to information and participation.</p> <p><i>* Particular attention will be given to ensuring that vulnerable and disadvantaged individuals and groups are effectively identified and engaged throughout the Project lifecycle. Definitions of each vulnerability category are provided in Section 5.2 below.</i></p>	<ul style="list-style-type: none"> ■ Vulnerable groups 	<ul style="list-style-type: none"> ■ Ethnic minority groups (Roma people) ■ Female-headed households, including single mothers, widows, and single women without children. Women, in general, should be considered as a potential vulnerable group ■ Unemployed youth, reliant on other household members, which means that youth are often disenfranchised ■ Elderly and orphans ■ Disabled persons 	<ul style="list-style-type: none"> ■ Local communication will focus on disclosure of routine information, meetings with relevant authorities and councils, and implementation of the grievance mechanism. ■ Once the Company identifies vulnerable groups and/or individuals, these will be engaged to identify any specific information or consultation needs in order to take any concerns or impacts into account. Communication is to be tailored based on their needs and will include face-to-face meetings, phone, email/ mail communication. ■ Dedicated CSR campaigns for vulnerable groups are implemented throughout the year. 	<ul style="list-style-type: none"> ■ Social Impact

Stakeholder Category. Analysis.	Stakeholder Group	Stakeholders	Communication Method	Stakeholders' interests
Local businesses	<ul style="list-style-type: none"> Businesses directly affected by the Project 	<ul style="list-style-type: none"> Other PV developers near the Project Local restaurants and markets Owners of guesthouses 	<ul style="list-style-type: none"> Through direct meetings, distribution of information via leaflets/posters; Target meetings, email/phone communication, information disclosure sessions. 	<ul style="list-style-type: none"> Economic impact
<p>Non-Governmental Organizations (NGOs) and civil society</p> <p>NGOs with direct interest in the Project and/or activity & associated facilities and their social and environmental aspects and that are able to influence the project and/or activity directly or through public opinion.</p> <p>Other interest groups</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"> Local, National NGOs Media 	<ul style="list-style-type: none"> Identification of relevant local NGOs Municipal, county- and national radio stations Municipal and national newspapers TV stations Internet 	<ul style="list-style-type: none"> Project website Formal consultation mechanisms. Meetings Letters Email Phone Communication with the media will be done through the Company website, press releases, and newspaper announcements. 	<ul style="list-style-type: none"> Environmental Sustainability Community Health and Safety Regulatory Compliance Transparency Public Perception
<p>Internal Stakeholders</p> <p>Groups or individuals who work within the Company.</p>	<ul style="list-style-type: none"> Employees and contractor staff Company shareholders 	<ul style="list-style-type: none"> Employees Contractor staff Shareholders 	<p>Engagement with these groups is subject to different plans and procedures, including information disclosure and grievance mechanism. They are not covered in this document.</p> <ul style="list-style-type: none"> General Meeting of Shareholders 	<ul style="list-style-type: none"> Workplace Safety Project Success

Stakeholder Category. Analysis.	Stakeholder Group	Stakeholders	Communication Method	Stakeholders' interests
<p>Business Environment</p> <p>Businesses and individuals with direct interest in the project and/or activity e.g. running businesses or providing services and supplies to the Company.</p>	<ul style="list-style-type: none"> ■ Contractors and subcontractors (construction, maintenance, consulting and engineering services providers, installations and equipment suppliers) ■ Suppliers ■ Project Developers and Investors 	<ul style="list-style-type: none"> ■ Construction contractors ■ Maintenance contractors ■ Equipment and spare parts suppliers ■ Other Businesses 	<ul style="list-style-type: none"> ■ Financial reports ■ Letters ■ Internal meetings with the administration / Human Resource representatives ■ Internal releases ■ Posters ■ Internal competitions ■ Training courses. ■ Email ■ Phone <p>Project website along with its log for registering requests of information from suppliers. The communication with potential partners will take place through the following communication channels:</p> <ul style="list-style-type: none"> ■ meetings ■ tenders for the purchase of services or goods ■ letters, press releases ■ public events ■ email, phone. 	<ul style="list-style-type: none"> ■ Project Success ■ Quality Assurance ■ Financial Return ■ Project Viability ■ Community Engagement

Source: ERM 2025

5.2 DISADVANTAGED AND VULNERABLE GROUPS & INDIVIDUALS

Disadvantaged or vulnerable groups and individuals refers to individuals or groups who by virtue of some of their characteristics, may be more likely to be adversely affected by the Project impacts or more limited than others in their ability to take advantage of a project's benefits. In summary, the levels and causes of vulnerability for different stakeholders are as follows:

Elderly/retired: The elderly have specific vulnerabilities relating to income levels and limited ability to change or increase access to additional finances and access to health care, as well as being more susceptible to disease and disability. Elderly residents in rural settlements may be reliant on subsistence farming and are particularly vulnerable and these settlements are more likely to have limited-service availability. Moreover, many local pensioners benefit from farmers pensions, raising additional financial constraints.

Youth: Youth are reported to be potentially vulnerable in rural areas due to their lack of land ownership or other method of securing a livelihood, particularly where they have a young family. They may also be vulnerable to poor labour practices due to lack of experience. Especially, local unemployed youth from the area who have dependents and financial obligations (i.e., families, rents, etc.) are considered more vulnerable. This characterizes the unemployed youth who may not have benefited from training and skill-building opportunities to be able to benefit from employment opportunities in urban areas or internationally or lost their job and had to come back to their hometown. Qualified youth who do have the qualifications may still face challenges in obtaining employment opportunities due to a lack of job opportunities in the area.

Ethnic minority groups – the Roma community: Roma communities are considered vulnerable across a range of diverse indicators ranging from access to services (including education and health care), level of education and literacy, participation in decision-making, risk of marginalisation and access to financial resources. Within this group, there are specific individuals such as children and young people who may have an increased vulnerability in terms of risk of child labour, poor working practices and limited access to education. Roma population is present throughout the Project area.

Children: Vulnerable children may be present throughout the Project area, where they are not adequately cared for and protected by an adult and are potentially participating in work, that is hazardous or prevents them from continuing education or access proper healthcare. Levels of vulnerability vary greatly and are likely to be linked to additional factors such as overall household income and ethnicity. The Project area is sensitive due to the lack of sidewalks and the use of bikes, e-bikes, scooters and e-scooters. Awareness will have to be raised during the construction period.

Women, including female-headed households: Specific areas of vulnerability related to poverty and lack of access to basic services. Women have less options on the labour market than men, and are more involved in human trafficking, which make them more vulnerable to poverty. Female precariousness is most prevalent among elderly women, particularly in the instances when they live alone.

Individuals with pre-existing health conditions: A pre-existing condition generally refers to any health condition, such as hypertension, diabetes, cancer, or chronic respiratory disease that already affects the health of an individual. Individuals with pre-existing conditions are at more at risk for health complications and are more susceptible to becoming ill due to other diseases, including communicable diseases.

5.3 STAKEHOLDER ANALYSIS

To develop tailored and effective means of engagement with each category of stakeholders (see Table 5-1), the Company must undertake an analysis and map the identified stakeholders such that engagement is tailored to meet their interest in the Project and their main areas of concern or interest.

Stakeholders will be mapped according to the following:

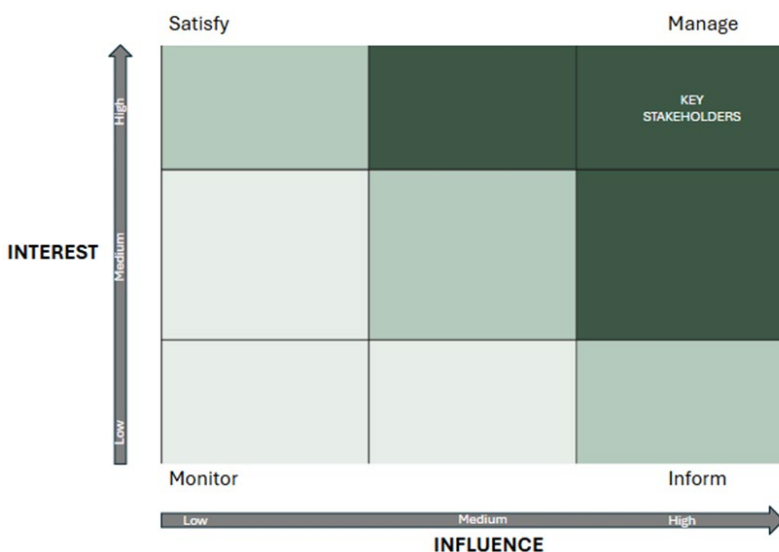
- *Influence on the Project:* Influence refers to the power that the stakeholders have in relation to either decisions taken by or affecting the Project.
- *Interest:* Interest refers to the connection between the stakeholders and the Project – for example, stakeholders may have something to either gain or lose because of Project implementation.

Stakeholder analysis should be adapted to the specific project phase and the subject of engagement. For example, a local NGO may have limited influence during the permitting process, but play a significant role in relation to community. The frequency of updates to the stakeholder analysis will depend on the progress of the Project and the evolution of stakeholder relationships.

Figure 5-1 depicts the level of interest and influence for stakeholders as it relates to the Project and how the Project can engage with each group, as described below:

- Monitor – Those who are low on both influence and interest need Project updates, but not as frequently as other groups. Examples include Project Website.
- Inform – Those with lower level of influence but higher interest may want more Project updates and information and may seek opportunities to engage more frequently. Examples include Social Media, Project Boards.
- Satisfy – Stakeholders who have higher influence but smaller amounts of interest may require more regular updates and two-way dialogue. Examples include Key Informant Interviews and One-on-One Meetings.
- Manage – Key stakeholders with both high influence and high interest require frequent two-way dialogue and taking into consideration their viewpoints in some Project decisions. Examples include Focus Group Discussions.

FIGURE 5-1 STAKEHOLDER MAPPING



Source: ERM, 2025

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 internal stakeholder map must be reviewed and updated as appropriate. In addition, any new stakeholders identified must be added to the map.

6 STAKEHOLDER ENGAGEMENT ACTION PLAN

This SEP addresses the engagement activities, the Project information disclosure and provides a high-level outline of the engagement to be implemented throughout all the phases of the Project.

For each phase, specific Engagement Action Plans will be developed as needed (and added as appendices to this SEP), to guide the Project stakeholder engagement during the respective activities, prior to their initiation.

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 Chapter 10).

The Engagement Action Plan is presented in full as part of Annex C of this document.

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.

Table 7-1 summarises best practice engagement tools that can 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.

TABLE 7-1 BEST PRACTICE STAKEHOLDER ENGAGEMENT TOOLS

Tool	Description
Project NTS and SEP (incl. Grievance Forms)	A Project Non-Technical Summary (NTS) together with the SEP should be translated into local language and be made accessible, online and offline, to all interested stakeholders. Alongside these documents, the External Grievance Form in local language should be made available to the public. The Company shall ensure these documents are available and accessible to all interested stakeholders, both online and offline.
Company website Notice Boards	The Company website should provide relevant and up to date information regarding construction works and operational aspects. Notice board will be placed at the entrance to the construction site. Project information should be available in local language. The notice board will serve as an information dissemination tool, presenting contact information, proposed schedule, grievance submission information etc. Wherever possible, maps or visual aids will be employed to increase accessibility of the notices.
Grievance Boxes	Secure physical grievance boxes should be installed in accessible and trusted public locations (e.g., local town hall, community centres etc) to enable stakeholders with limited digital skills to provide feedback and submit grievances.
Regular Internal Reporting	The Community Liaison Officer (CLO) shall prepare regular reports to the Company. These reports shall include a summary of stakeholder engagement activities, and all grievances received in the reporting period and their status, 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 Chapter 10 for more details.
Reporting to Stakeholders	The CLO shall provide proportionate Project updates to different stakeholder groups at agreed timelines and following engagements conducted. Community members can use it to submit written concerns or complaints anonymously. Physical grievance box will be checked regularly by the CLO, and all grievances will be registered and addressed in line with the Project’s grievance procedure.
Stakeholder Dialogue Log	The CLO needs to maintain a records of engagements related to the different Project components and activities.

8 RESOURCES AND RESPONSIBILITIES

The overall responsibility for the effective engagement of the Project stakeholders, as outlined in this SEP, lies with the Project Company. The Project has a team dedicated to implement the engagement and communication during the different Project phases.

The Community Liaison Officer (CLO) will perform duties on site level and local E&S Expert at corporate level.

8.1 LOCAL E&S EXPERT

As an appropriately qualified professional familiar with social aspects associated with internationally financed projects implementation, the local E&S Expert will have the following responsibilities in coordination with CLO:

- Identify key stakeholders, requiring engagement in the frame of Project stakeholder engagement processes/activities and update regularly the stakeholder mapping in response to stakeholders activities and their relationship with the Project;
- Provide functional support to the field staff to implement the social requirements of this SEP and of the Project ESMS;
- Coordinate the implementation of the SEP;
- Provide timely information to communities on all Project works through regular meetings with stakeholders and ensure that long term relationships are not negatively impacted;
- Provide information on potential issues with local communities and stakeholders and contribute to implementing specific measures to prevent and mitigate risks;
- Communicate Workers, Contractors, and Sub-Contractors about Community conduct codes, and making sure the Project adheres to these behaviours;
- identifying and/or anticipating Community needs, potential conflicts, and opportunities;
- Monitor local developments with potential to impact Project activities, and report to the Project Construction Team;
- Ensure that stakeholder engagement activities are documented and evidence (e.g. Minutes of Meetings) are kept on file;
- Perform regular review, update and monitoring of SEP implementation;
- Coordinate and manage implementation of the Project Grievance Mechanism;
- Train workers, Contractors, and Sub-Contractors on how to manage affected communities grievances;
- Ensure Project grievance committee meetings are formally documented and recorded;
- Coordinate preparation of responses to complainants and agree content with other members of the Project grievance committee;
- Responsible for ensuring responses to complainants are provided in line with the Grievance Mechanism provisions;
- Report to Project Company management on grievance management;
- Take active role in the in the identification of community needs and assist in the decision process regarding Project Owner's community investment program;
- Responsible for the successful implementation of Project Company's community investment program.

- Oversee Project external communications;
- Responsible for the Project information disclosure, mass media coverage/press releases.

8.2 COMMUNITY LIAISON OFFICER RESPONSIBILITIES

The specific responsibilities of the Community Liaison Officer 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; Ensure the grievances tracking with recordings in the Grievance log
- Plan stakeholder engagement activities and ensures they are appropriately implemented by Company and contracted workers;
- Organize stakeholder meetings and public hearings
- Responsible for ensuring Grievance Mechanism dissemination and training, communication, monitoring and reporting;
- Responsible for verifying Engineering, Procurement and Construction (EPC) contractors' compliance to grievance management commitments;
- Produce stakeholder engagement monitoring reports together with the local E&S Expert and updates the SEP accordingly.

The Project CLO, Cosmin Comsa, can be contacted as follows

By telephone: +40 720 017 529

By email: cosmin.comsa@rpower.energy

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

9 GRIEVANCE MECHANISM (GM)

The Company already has a Grievance Mechanism in place⁵, which will be made accessible in the national language (Romanian). Additionally, separate offline forms will be created to ensure that all individuals can access and use the mechanism (Appendix A).

9.1 PURPOSE

The purpose of the external Grievance Mechanism (GM) is to establish a fair, accessible, effective, timely and formalised process (identification, tracking and redress) for stakeholder concerns, complaints/grievances to be raised and managed /resolved in a systematic and transparent manner, without risk of discrimination or retaliation. The GM enables any stakeholder to raise a grievance in relation to project operations. The grievance mechanism is intended to ensure that all comments, questions and complaints regarding the project are addressed and appropriate corrective action is taken. Grievances may take the form of specific complaints for damages/injury, concerns about routine project activities, or perceived incidents or impacts or may only represent requests for information of stakeholders' concern.

For the Project-affected stakeholders, the grievance mechanism provides an accessible, yet formalized (identification, tracking and resolving 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 Romania.

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. The Company commits to processing 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 GM should address grievances expressed both verbally and/or in writing, and grievances that are communicated indirectly (i.e. Through intermediaries), including those raised anonymously.

Company commits to process any grievance received in timely manner, via a procedure that is transparent, culturally appropriate, and without any retaliation towards the party submitting a grievance.

9.2 DETAILED GRIEVANCE PROCEDURE

The Company commits to processing 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.

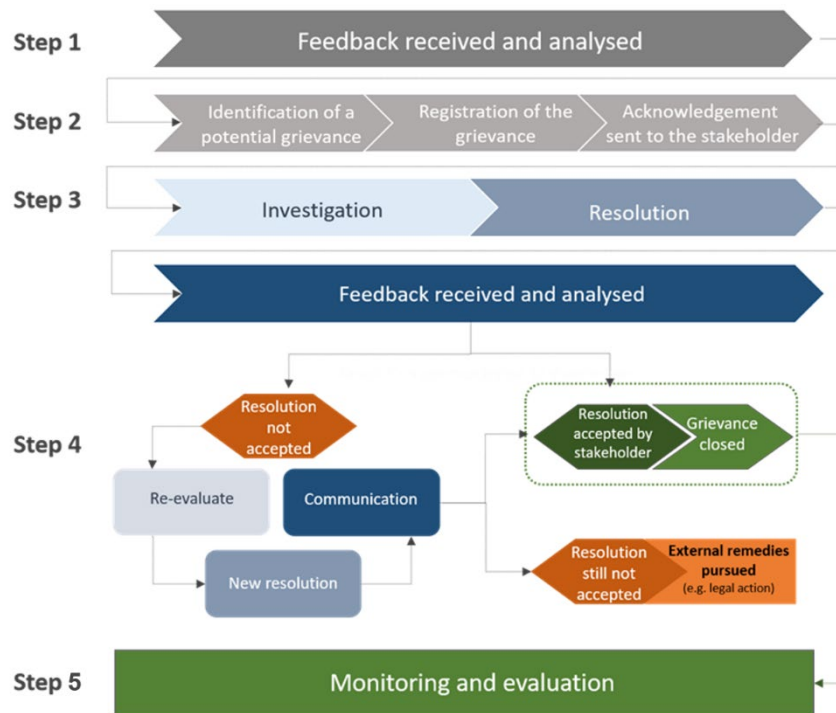
The Grievance mechanism for the Project is structured as follows (please also see Figure 9-1 below):

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

⁵ <https://rpower.energy/en/contact-form/>

- **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 shall not exceed 30 calendar days as per the EBRD Guidance Note. Should 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 Chapter 10.

FIGURE 9-1 GRIEVANCE PROCEDURE DIAGRAM



Source: ERM 2023

FIGURE 9-2 TIMEFRAME PER GRIEVANCE RISK CATEGORIZATION

Timeframe per Grievance Risk Categorization			
Steps	High Risk (days)	Medium Risk (days)	Low risk (days)
Step 1	1 day	1 day	1 day
Step 2	1 day	2 days	3-5 days
Step 3	1-2 days	5-8 days	10-15 days
Step 4	1-2 days	1-3 days	5-10 days
Total (max.)	5 days	15 days	30 days

Source: ERM

Step 1: Receipt, Admissibility and Filing

Grievances may be reported through a series of channels for the Company’s consideration, including Project’s subcontractors in the course of their duties as well as through the appointed Community Liaison Officer (CLO). Grievances may be identified through the following reporting channels:

- verbally to the CLO or other relevant Contractor Team members;
- verbally through the Community Grievance Mechanism (CGM) telephone hotline;
- in writing via a form on the Project website or in the dedicated boxes available throughout the AoI, Scornicesti and Poboru Town halls.

In either case, the grievances received as well as the details of the complainant will be noted down and passed on to the CLO for registration within the day of receipt. These grievances may be in written form or verbal complaints and shall be treated with equal respect. Anonymous grievances will be given the same due process. The grievance form developed for the Project is presented in Appendix B – Sample Grievance Form.

Once received, the grievance will be reviewed and registered. This activity shall entail capture of complete details of the complaint and may involve phone calls or meeting with the complainant, review of records of previous similar incidents or occurrences, any available evidence, supporting documents or statements.

The details of the complaint shall be recorded in the grievance database for follow-up and future reference, as presented in Appendix C – Sample Grievance Database. The database includes the following information: date received, description of concern/ complaint, settlement, risk level, classification, grievance management process dates, responsibilities, complaint resolution, additional information, complainant date (confidential and if available) and information about grievance reception.

The admissibility of the grievance is determined at this stage. Claims need to be related to the Project activities (in all its phases), whether they are caused by direct Company workers, contractors and/ or subcontractors.

If the claim is not admissible, the CLO will clearly communicate the reasons why the claim cannot be considered, and where possible, the Company will provide information to help them redirect their grievance to the relevant institution or person. The grievance will be registered in the grievance database as non-admissible.

During this process, the Company shall also acknowledge receipt of the complaint within a standardized time period (ideally at reception or within 12 hours, for example from the collection of the grievances from the dedicated boxes) and explain the process to the complainant, including timelines of the remaining steps in the procedure, e.g. if further 5, 15 or 30 days are required as indicated in the Figure 5 and Figure 6.

All claims and grievances will be registered by the Grievance and Data Manager. The Grievance and Data Manager is responsible for identifying the people and the corresponding departments that will provide a timely response to the interested stakeholder, along with monitoring their follow-up within the deadlines stipulated by the procedure.

At this stage the Grievance and Data Manager could request the applicant to submit more information if after the preliminary analysis it has been concluded that the information provided by the interested party is not sufficient.

Step 2: Screening, Risk Evaluation and Coordination

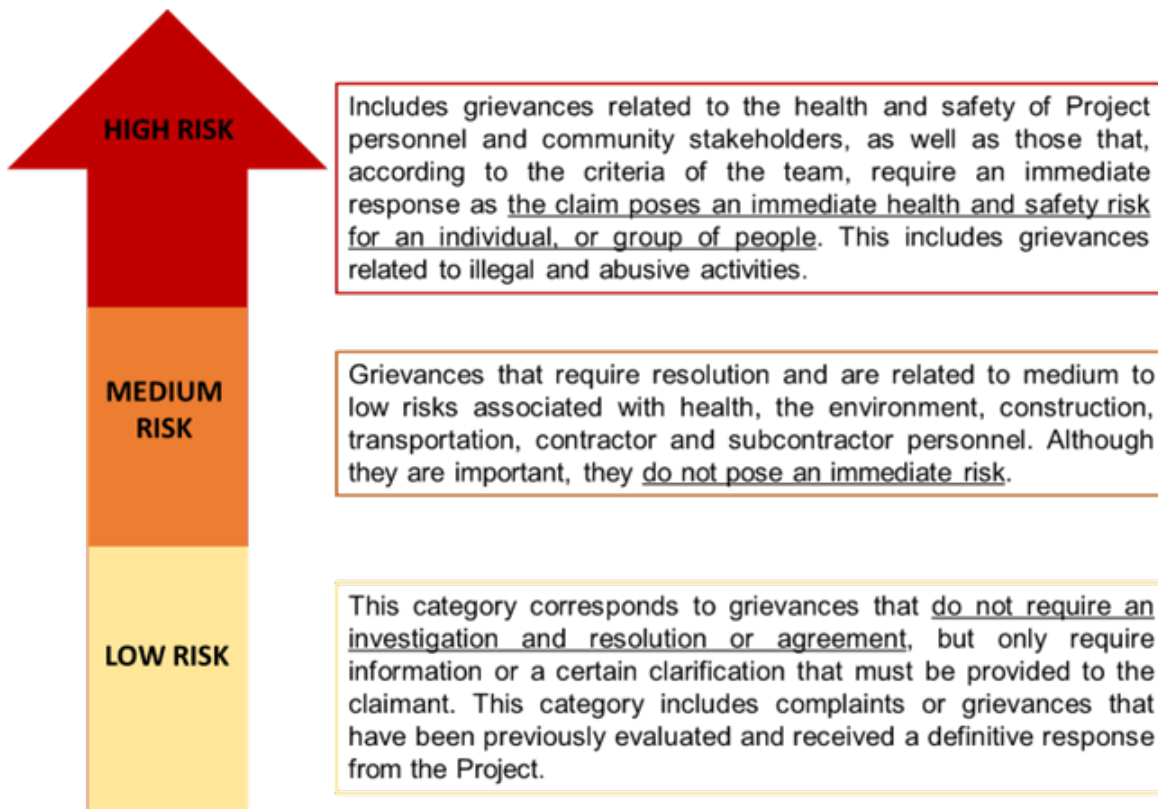
All grievances will need to undergo some degree of screening, risk evaluation and prioritisation. The Company will be responsible for managing the grievance resolution process. Management of the grievance will entail determining the nature of the investigation based on the type of grievance and the potential risk attached to it.

Prior to beginning the investigation process, the Company shall establish the nature of the grievance and risk level to determine the resolution timeframe, measures needed for review and investigation.

Depending on the circumstances of the grievance, various units or departments may need to get involved, including subcontractors and senior management if their input is required. The screening and risk evaluation phase is expected to be carried out in a target timeframe of 24 hours. Following this preliminary assessment, the Company will organise the review and investigation process of each grievance received.

Once the admissibility of the claim is verified (Step 1), the risk level and severity of the grievance will be determined as follows:

FIGURE 9-3 GRIEVANCE RISK EVALUATION



Source ERM, 2023

The CLO and other relevant Company staff, workers and community members will be familiar with this risk categorization.

The CLO will provide training on the Community Grievance Mechanism (CGM), especially to those who will be responsible to manage the grievances, as they will be responsible to resolve the grievances as best and as efficiently as possible, notably those grievances that pose an immediate risk.

Once the risk level is determined, the timeframe to carry out the investigation, resolution and grievance close out will be established:

- Low risk grievances shall be solved and closed in a maximum of 30 days.
- Medium risk grievances are registered and evaluated in a maximum of 10 days. Medium risk claims will be solved and closed in a maximum of 15 days.
- High risk grievances will be evaluated immediately when received and should be investigated and solved in a maximum period of 5 days. If a persons' life or health is at risk, the complaint will be addressed and solved immediately.

If an investigation is required, and different teams need to be involved, the CLO will be responsible to coordinate the relevant resources and teams in order to proceed with Step 3: Investigation and Resolution detailed below.

Step 3: Investigation and Resolution

The Company will organize telephone or face to face meetings to investigate the complainant's allegations and verify the validity and gravity of the grievance. If necessary, if the grievance

relates to a given site or location, the Company along with the relevant local authority representative will organize a site inspection.

The Company will investigate the grievance and identify corrective or preventive measures to properly address the grievance.

Step 4: Communication to Stakeholder and Agreement

Once grievance investigations are completed, the CLO shall draft a formal communication to the complainant, advising of findings and the outcome.

The Company shall communicate the response, stipulate mutual commitments, and ask for the complainant's agreement. If the grievance is anonymous, the resolution should be published through the Project's website and on notice boards placed in key locations where community stakeholders can easily have access to (e.g. at the town halls).

If the complainant is not satisfied with the resolution or the outcome of the agreed corrective actions, the response should be reviewed and, if appropriate, amended in light of any discussions or negotiations. If the complainant is still not satisfied, they should be free to take their grievances to a dispute resolution mechanism outside of the company's grievance mechanisms, including legal actions. In such cases, the CLO is responsible to coordinate with the Company's legal department and/or the Project contractor's legal representative as needed, remaining up to date on the case and completing close out activities in the management system when a resolution is ultimately achieved.

Proposed resolution actions may be of the following types:

- Unilateral: the Company addresses the source of the problem directly (e.g. reducing noise or dust);
- Bilateral: the Company convenes a meeting, if possible, with the complainant, and appropriate management levels (according to the grievance category) to reach a resolution through discussion or negotiation. As during the evaluation process, the Company is committed to considering all the evidence and meeting with all the relevant parties in an effort to give complainants every opportunity to present their views;
- Third Party: Informally or through mediation;

While gathering and communicating the response to the complainant, the Company shall:

- Take photos or collect other documentary evidence to form a comprehensive record of the grievance and how it was resolved;
- Create a record of resolution internally, with the date and time it took place, and have responsible staff sign off;
- Have a meeting with the complainants to get a collective agreement to close out the claim;
- If the issue was resolved to the satisfaction of the complainant(s), get a confirmation and file it along with the case documentation.

Step 5: Grievance Close Out, Monitoring and Evaluation

When the stakeholder is satisfied with the responses provided to its grievance, the grievance will be closed out and the register/database will be updated to indicate the resolution and close-out date.

All correspondence will be filed and corrective actions clearly updated against the grievances. This will be done within a maximum of 72 hours after the response and confirmation of the concerned stakeholder.

As stated in the previous section, if the complainant is not satisfied with the resolution or the outcome of the agreed corrective actions, they should be free to take their grievances to a dispute resolution mechanism outside of the company's grievance mechanism, such as involving the Romanian Ombudsman (the People's Advocate Institution), an Arbitrary Court or taking legal action.

The grievance will only be closed out when it is 100% resolved, if there is a process ongoing to resolve the issue (for example, repair works due to property damages), it will remain open until it is completed. Monitoring activities will be carried out by the Grievance and Data Manager to make sure the resolution commitments are being implemented as agreed in terms of quality, schedule and safety.

The CLO shall be in permanent communication with the contractor's CLO and the HSES manager to be informed about the critical grievances' resolution status. The Company will ensure that all grievances raised by all Project stakeholders are treated impartially, respectfully and, if required, confidentially.

General monitoring and evaluation tasks will be carried out by the Management team to make sure that all the grievances are resolved in a timely manner, all the evidence information is documented and properly saved, and to identify whether certain patterns or recurrent grievances are arising. The grievance database will be used to monitor and evaluate the state of the CGM as well as meetings with key team members.

9.3 GENDER-BASED VIOLENCE AND HARASSMENT (GBVH) PROVISIONS

According to the EBRD/CDC Group Toolkit regarding GBVH, GBVH risks can intensify within local communities when there are large influxes of male workers from outside the area. Such workers often come without their families and have large disposable incomes relative to the local community, and can pose a risk in terms of sexual harassment, violence and exploitative transactional relationships. These risks are higher where workers come into close contact with the local community, for example on access routes or when living together in remote areas.

In order to have a CGM able to manage GBVH grievances, the Company shall:

- Establish safe, confidential and accessible grievance mechanisms for local communities;
- Include options to report anonymously if preferred;
- Include the option to report to a focal point person of either gender as preferred;
- Liaise with EPC contractor to make sure that contractor and subcontractor workers are informed of the Company's confidential grievance reporting mechanism;
- Liaise with EPC contractor to make sure contractor and subcontractor workers have regular GBVH trainings as part of H&S trainings programme; and
- Consider engaging expertise to conduct mappings of formal services (healthcare, counselling) and informal resources (including through women's organisations) to support those who have experienced GBVH.

The Company shall vet contractors for prior efforts to address GBVH through prevention and response and ensure contracts include clauses on GBVH (for example all workers and staff sign codes of conduct).

9.4 ADMINISTERING AND PUBLICIZING THE COMMUNITY GRIEVANCE MECHANISM

The functions of the CLO will include the overall responsibility for the handling of grievances through to resolution in collaboration with other key personnel and Project contractors at different stages of the process, as needed.

Ultimately, the Company is responsible for the administration and monitoring of the CGM, both for internal and external grievances. Project contractors will be required to report and coordinate with the Company any grievances involving contractors.

The Community Grievance Mechanism will be publicized among all the Project's stakeholders and affected people. Communication tools such as posters and flyers with contact information as well as the CGM process outline will be distributed. The information presented will be structured in a clear way, aiming to be understood by all the stakeholders.

10 MONITORING, EVALUATION AND REPORTING

10.1 OVERVIEW

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

10.2 MONITORING AND EVALUATION

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 all Project phases:

- **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 and Grievance register:** will record all grievances received, management actions taken and whether it has been closed out satisfactorily.
- **Minutes of Meetings template:** used to collect meeting minutes; to be filed within the stakeholder database and SEP updates.
- **Media monitoring:** of press and radio stories relevant to the Project.

Ideally, records should be reviewed on a quarterly basis by a qualified and impartial third party 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:

High Priority Grievance Reports: this report will be developed as soon as the Community Liaison Officer becomes aware of urgent matters (e.g., critical concerns or grievances) or significant incidents. The Grievance Mechanism will set the level of incidents to be included in the High Priority Grievance Report together with the reporting time requirements.

Quarterly Progress Reports: internal quarterly progress reports will be prepared by the Community Liaison Officer. These reports will review:

- Dialogue activities undertaken thus far: stakeholders met, key topics discussed, main concerns and expectations, positioning towards the Project activities;
- Grievance Mechanism: participation, main grievances 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 internal meetings and will be circulated internally as required, including to the relevant EPC contractors, if applicable.

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, impacts are being monitored.

Consequently, the Project Company will:

- Provide immediate updates to the Affected Communities if new environmental or social risks arise, or a change in the construction activities and operations that might affect their everyday lives (negatively or positively);
- Report progress about certain topics on the implementation of agreements established between the Project and the Affected Communities;
- Communicate the results of E&S monitoring efforts on activities that affect and interest the Affected Communities;
- Report in an accessible manner considering local language and culture;
- Try to maintain the same company communication representative, unless the Affected Communities state otherwise.

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

A Stakeholder Engagement Progress Report will be prepared by the Project, summarizing SEP results, based on which updated information will be delivered back to the community.

APPENDIX A

SAMPLE GRIEVANCE FORM⁶

Submission date:

Full Name

First name _____

Last name _____

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

I wish to raise my grievance anonymously

I request not to disclose my identity without my consent

Stakeholder group:

Employee ONG/association Private business Resident Other:

Contact Information

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

By E-mail _____

By Telephone: _____

By Post: Please provide mailing address:

Preferred Language for communication

Romanian

English

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: RPOWER BESS – TWO S.R.L.

Address: Strada Turturelelor 62, București 030882

Tel.: +40 720 017 529

E-mail: cosmin.comsa@rpower.energy

⁶ Based on EBRD *Guidance Note on Grievance Management*, 2012

APPENDIX C ENGAGEMENT ACTION PLAN FOR
CONSTRUCTION, OPERATION AND
DECOMMISSIONING

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
Pre-construction phase				
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"> • Stakeholder Engagement Plan (SEP), including the Grievance Mechanism for the Project – in both English and Romanian; • Non-technical Summary (NTS) – in both English and Romanian; • Grievance Form – in both English and Romanian. <p>These documents will be made available on the dedicated Project page on RPower’s website (dedicated Project section).</p> <p>The Project website will include details for written submissions:</p> <ul style="list-style-type: none"> • e-mail address: CLO email address to be confirmed, • local postal address: new postal address to be confirmed <p>The company (RPower) should request support from local communes within the AoI to share project information via their official social media channels to help reach local citizens effectively.</p>	<p>All materials will be available online for stakeholder access and comments for minimum 30 days</p> <p>Estimated timeline : before construction start</p> <p>The grievance mechanism and forms will remain available for use throughout the Project lifetime.</p>	Company
Implementing a stakeholder register / mapping (see Section 5.3)	All stakeholders	Conduct a process that first enables the identification of stakeholders, followed by their mapping according to their level of interest and influence.	Throughout all Project phases	Company

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
Engage with vulnerable groups (if applicable based on the outcomes of the mapping and SIA)	Vulnerable groups	<p>Focus should be put on the stakeholders along the main Project access route and the Project site – landowners, infrastructure owners, informal land users etc.</p> <p>Based on the outcomes of the stakeholder mapping and SIA, if any vulnerable groups are identified—such as individuals with low education or literacy levels, ethnic or religious minorities, female-headed households, or low-income families—particularly in areas directly affected by the Project (e.g., along transport routes or in communities where Project team will reach), further engagement will be undertaken. This approach ensures that any potentially at-risk populations are appropriately informed and consulted, should they be present within the Project’s area of influence.</p>	Prior to construction	Company CLO
Interact with potentially affected land stakeholders	<p>Road users, Informal land users near the Project site, Individuals who own / use structures built along the road (forest expansion plots, barns, hale rocket infrastructure)</p>	The company should disseminate Project specific information regarding the timing, activities, potential restrictions, compensation procedures, and contact details.	Before construction	Company

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
Ensure phone communication channel is available to the stakeholders	All stakeholders	<p>A phone number for the Community Liaison Officer and R.Power Romanian office in Bucharest will be available during normal business hours to all stakeholders.</p> <p>The details will be advertised via the communication channels described in this SEP (Project webpage, publication of notices, public hearings).</p>	The phone number will be operational during the project implementation (pre-construction, construction and operation). The CLO will be responsible to receive, record and report this, following the Grievance mechanism.	Company
Appoint Community Liaison Officer to act as key contact person for external stakeholders	Local community	<p>The Company will allocate Community Liaison Officer (CLO) responsibilities to a Romanian national, with appropriate experience in the renewable development, construction industry or stakeholder engagement in Romania.</p> <p>The CLO will be responsible for overseeing the communication with the local community and managing the grievances (receiving, recording, and resolving external grievances).</p>	Throughout all Project phases	<p>Company</p> <p>CLO contact details:</p> <p>Cosmin Comsa, Head of Project Development</p> <p>telephone: +40 720 017 529</p> <p>email: cosmin.comsa@rpower.energy</p>
Disseminate grievance mechanism	All stakeholders	<p>The Grievance mechanism, along with the grievance form (as included in this SEP) will be made available to the public, via the online and offline communication channels, in a practical way. Grievances can be raised directly with the CLO, in person, via the phone or by email (details specified above).</p> <p>Grievance procedure should be made available also to EPC and subcontractors.</p>	Throughout pre-construction and operation phases	CLO

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
Set up Grievance Boxes	Local Community	<p>Local community, especially elderly and less digitally-oriented residents, shall have the possibility to submit grievances in paper form and in an anonymous way in the Scornicești, Poboru and Oporelu town halls. Additional nearby villages within the jurisdiction of these communes may also be considered, depending on their proximity to the project footprint.</p> <p>Printed grievance forms should be available at each of the box.</p> <p>The Company will liaise with representatives of the municipalities to confirm the best practical solutions – for instance, an already existing municipal channel or grievance box might be used.</p>	Throughout pre-construction, construction and operation phases	CLO
Conduct tailored engagement activities	Vulnerable groups Affected landowners and users	<p>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.</p> <p>Land-related comments and grievances may require additional engagement by the CLO, so to ensure transparency and effective management of these impacts.</p>	Throughout pre-construction and operation phases	CLO
Stakeholder dissemination event	All stakeholders	<p>Disclosure of information on the project and its impacts, mitigation measures considered, as well as about grievance mechanism, should be done through at least one meeting organized in the local community. Investor will consider the best way to organise such meeting,</p>	Prior construction start, exact dates to be established (preferable one- meeting- day, during the weekend, time in public spaces, e.g. schools)	Company

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
		<p>including the selection of municipality, facility and type and nature of the event. It is possible to use the opportunity of other pre-organised meetings in the local community instead of creating a separate one, in order to optimize the process and maximize the turnout.</p> <p>The meeting will serve as a platform to transparently share information, address concerns, and ensure that local residents are meaningfully engaged in the process.</p> <p>The meeting will be announced through local media channels, city hall boards, bus stations, with minimum 10 days before meeting. Evidence of posting will be recorded and included in SEP reports.</p> <p>During the meeting, there will be available for participants hard copies of NTS, SEP, Grievance form, leaflets.</p> <p>Lender’s advisor will supervise the preparation of the meeting, including advertising the events and preparation of materials and will be invited to attend and briefly report to Lenders the results.</p>		
Posting notice board at the main entrances of the site.	Local community	The key noticeboard will be placed at the main entrance of the construction site, Additional physical dissemination ways – such as posters - will be considered to placed in appropriate areas of the nearby communities (bus stations, city halls, local markets, schools and other highly transited areas).	2 weeks prior to construction	EPC contractor and CLO

Construction phase (to be detailed in updated SEP)

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
Posting physical and online notifications in public places of the affected settlements, in local language	Local community	The CLO will be responsible for dissemination of key announcements on Project activities (e.g. incoming transport of big Project equipment within week to be confirmed) to the local communities.	Upon major construction activities	CLO
Focused announcement on the initiation of construction activities	Mayors of affected settlements and community members	Provide a timely notification regarding the beginning of the work. The main stakeholders to be announced include the local administrations and especially the most sensitive stakeholders (land users near the Project footprint, vulnerable groups). These stakeholders should be notified directly in person or via official written communication such as letters or emails. Notifications should clearly specify the start date, expected duration, and any expected disruptions. Furthermore, periodic updates should be provided throughout the construction phase using the stakeholders' preferred communication channels, including phone calls, emails, or in-person meetings, to ensure continuous engagement and information flow.	As mandated by the regulations and agreed with the land owners	CLO
Appoint Community Liaison Officer to act as key contact person for external stakeholders	Local community	The Company will allocate a CLO responsibilities to a Romanian national, from the Project's team, with knowledge of local context. The CLO will be responsible for facilitating transparent two-way engagement – overseeing communication with the local community and managing the grievance mechanism	Throughout all Project phases	Company CLO for the construction stage

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
Disseminate grievance mechanism	All stakeholders	<p>by receiving, documenting, and resolving external grievances.</p> <p>The Grievance mechanism, along with the grievance form (as included in this SEP / the grievance form already) will be made widely available to the public, via the online and offline communication channels.</p> <p>Grievances can be raised directly with the CLO, in person, via the phone or by email (details specified above). The grievance procedure is also communicated to the EPC contractor and all subcontractors to ensure full awareness and compliance.</p> <p>Grievance procedure should be made available also to EPC and subcontractors.</p>	Throughout pre-construction and operation phases	CLO
Set up Grievance Boxes	Local Community	<p>Physical grievance boxes shall be established at key, easily accessible locations such as the town halls of Scornicești, Oporelu and Poboru town halls (consideration will also be given to including villages belonging to the aforementioned communes). Each box will contain printed grievance forms for community members to submit their concerns conveniently. The boxes should be checked regularly, and grievances are addressed in a timely manner.</p> <p>As mentioned above, the Company will liaise with representatives of the municipalities to confirm the best practical solutions – for instance, an already existing municipal channel or</p>	Throughout pre-construction, construction and operation phases	CLO

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
		grievance box might be used to avoid confusion in the community.		
Potential additional community investment	Local community	As part of the Social Impact assessment and stakeholder mapping, identify key socioeconomic challenges faced by the affected communities. Together with the Lender explore option to mitigate the through additional community investments, to be co financed by the Lender	Timing of potential investments and related engagement will depend on the nature of the investments, if applicable.	Company
Operations phase (to be detailed in updated SEP)				
Information on start of operation	Mayors of affected settlements and community members	Inform stakeholders of the start of operation, any health and safety risk for the communities and mitigation measures	2 weeks prior to start of operation	Company
Ongoing information on the annual environmental and social performance of the project (including environmental monitoring) and planned maintenance works	Mayors of affected settlements and community members	<p>Inform stakeholders of the project annual environmental and social performance by publishing summary report on the Company website.</p> <p>The annual updates should be provided directly to the municipalities and uploaded on the Project webpage for the public access.</p> <p>The municipalities should be notified regarding any major maintenance works (information such as duration, amount of people etc.). Depending on the location and scale of maintenance, the local residents should also be notified.</p>	Annual	Ongoing information on the annual environmental and social performance of the Project

Engagement Activity	Target stakeholder group(s)	Description	Timing	Responsibility
Potential additional community investment	Local community	As part of the Social Impact assessment and stakeholder mapping, identify key socioeconomic challenges faced by the affected communities. Together with the Lender explore option to mitigate the through additional community investments, to be co financed by the Lender	Timing of potential investments and related engagement will depend on the nature of the investments, if applicable.	Company
Decommissioning (to be detailed in updated SEP)				
Inform on schedule and approach for decommissioning	Mayors of affected settlements and community members	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 when decommissioning activities will start	Company