



Rezolv Energy

Livelihood Restoration Plan

Dunarea East Wind Farm project

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RSK



General notes

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Acronyms and abbreviations

Term	Definition
ANCPI	National Agency for Cadastre and Land Registration
ANEVAR	National Association of Authorized Valuers in Romania
ANIF	National Agency for Land Reclamation
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESR	Environmental and Social Requirement
EU	European Union
FGD	Focus group discussion
GBVH	Gender-based violence and harassment
GIS	Geographic information systems
GN	Guidance Note
GRM	Grievance redress mechanism
HCL	Local Council Decision
I.I.	Sole trader (Întreprindere Individuală)
IFC	International Finance Corporation
IVS	International Valuation Standards
KII	Key informant interview
LRF	Livelihood Restoration Framework
LRP	Livelihood Restoration Plan
MC	Midmar Callatis
NGO	Non-governmental organisation
PAC	Project affected community
PAP	Project affected person
PAH	Project affected household
PR	Performance Requirement
PS	Performance Standard
PUZ	Zonal Urban Plan
RON	Romanian Leu
SEP	Stakeholder Engagement Plan
SEV	Romanian Valuation Standards
SRL	Limited liability company (Societate cu Răspundere Limitată)



Term	Definition
TLS	Transition livelihood support
WF	Wind farm

1 Introduction

Rezolv Energy is an independent renewable energy producer providing clean power at a long-term, stable price for industrial and commercial users across Central and Southeastern Europe. Through its project company, Midmar Callatis (MC, the Company), it plans to develop the Dunarea East Wind Farm (WF) in Romania (the project).

The project comprises the construction of 45 wind turbines with a total capacity of 288 MW, associated underground and overhead electrical infrastructure, a 33/400 kV transformer substation, and both new and upgraded access roads.

Dunarea East WF will be located in immediate proximity of the Dunarea West WF. These two wind farms will share the same grid connection point and have a combined capacity of up to 600 MW, which will constitute one of the largest onshore wind projects in Europe.

This document focuses on the Dunarea East WF project only.

Rezolv Energy is considering possible financing of the project by international financial institutions and other lenders and is committed to develop and implement the project in line with national requirements and international standards. In particular, Rezolv Energy is committed to ensure that land acquisition and economic displacement activities for the project are conducted in line with:

- Performance Standard (PS) 5 of the International Finance Corporation (IFC)
- Environmental and Social Requirement (ESR) 5 of the European Bank for Reconstruction and Development (EBRD)
- Romanian legal requirements.

This document is the Livelihood Restoration Plan (LRP) developed by RSK Environment (RSK) and its Romanian partner, AUDITECO GES (AUDITECO), in line with the regulatory framework outlined above. The LRP is the document that sets out the principles and processes for land acquisition, compensation, and livelihood restoration. It is based on the initial Livelihood Restoration Framework and the results of the primary data collection, conducted by RSK in February 2026. The LRP will be disclosed to and discussed with the project affected households (PAHs) and organisations. It will serve as the basis for implementing land acquisition, compensation and livelihood restoration activities.

The goals of the LRP are to:

- establish MC's approach to land acquisition, compensation and livelihood restoration
- ensure that land acquisition, compensation and livelihood restoration activities comply with national requirements and international standards
- analyse land acquisition activities already completed, identify any non-compliances and determine corrective or additional measures as necessary
- ensure that compensation is provided at full replacement cost and other forms of assistance are delivered in line with national law and international standards
- engage affected households and businesses in the development and implementation of the LRP
- engage and provide appropriate assistance to vulnerable persons
- ensure that affected livelihoods are restored to pre-project levels and, if possible, improved
- enable effective monitoring and evaluation of the land acquisition, compensation and livelihood restoration processes
- ensure the consistency and transparency of land acquisition, compensation and livelihood restoration processes.

The LRP has the following structure:

- Section 1 introduces the project and the LRP
- Section 2 includes the project description
- Section 3 discusses national requirements and international standards and analyses the gaps between the two



- Section 4 describes the project land requirements and relevant impacts
- Section 5 outlines data collection methodology
- Section 6 provides socio-economic characteristics of the affected people
- Section 7 determines stakeholder engagement related to land acquisition and livelihood restoration
- Section 8 describes the grievance redress mechanism
- Section 9 establishes the compensation framework
- Section 10 determines eligibility and entitlements
- Section 11 outlines livelihood restoration measures
- Section 12 makes provisions on vulnerable groups
- Section 13 describes monitoring and evaluation
- Section 14 determines the budget
- Section 15 includes the implementation schedule
- Section 16 defines roles and responsibilities.

2 Project description

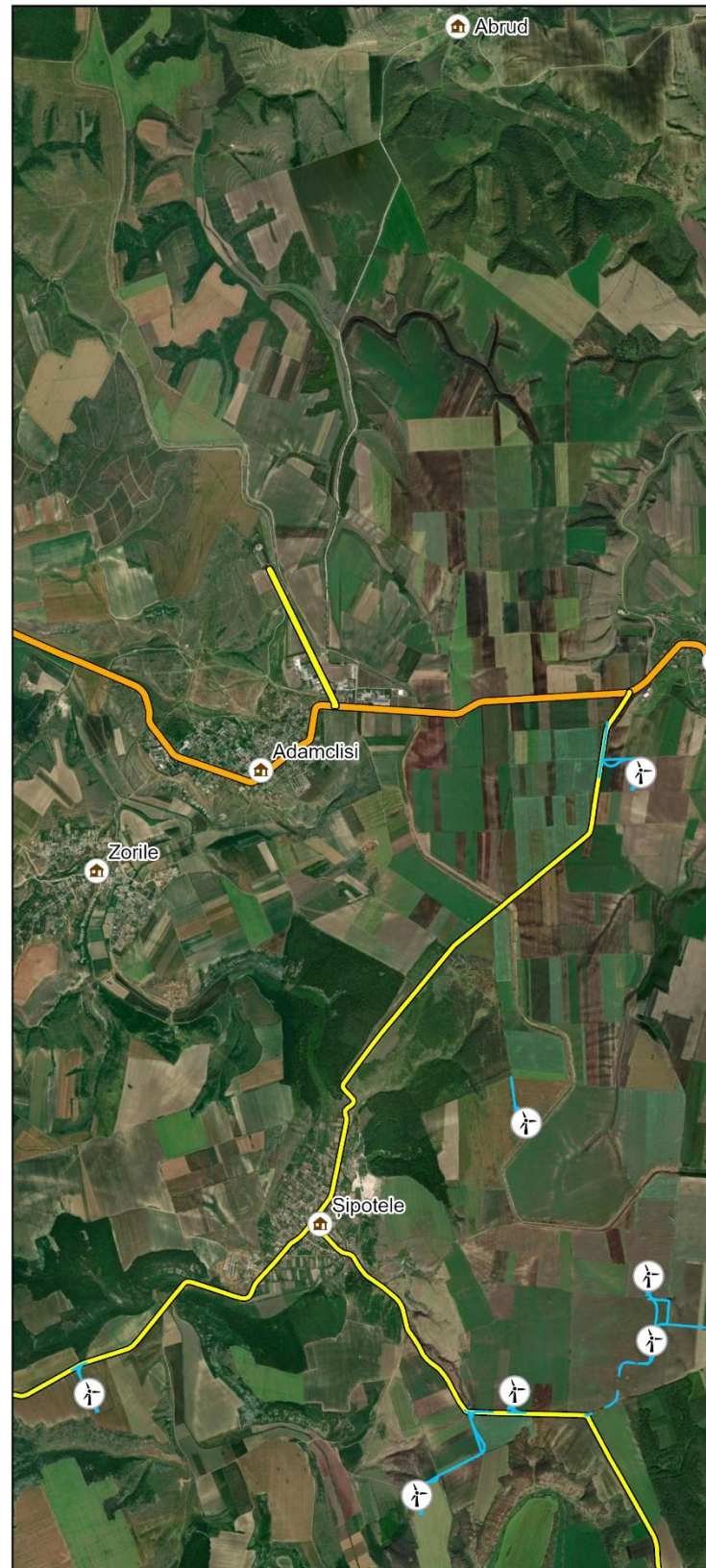
The Dunarea East WF will be located within the administrative territory of Deleni commune in Constanta County, South-East Romania, approximately 11.5 km from the border with Bulgaria. The substation area of the wind farm is located approximately 51.5 km west of Constanta city.

The project consists of:

- 45 wind turbines (electricity-generating units), each with a capacity of 6.4 MW, bringing the total capacity to 288 MW. The turbines are currently envisaged to have a 125 m hub height and 162 m rotor diameter
- electrical connection between the electricity-generating units through the construction of an underground medium-voltage distribution network (33 kV)
- electrical connections to the National Energy System via 400 kV overhead lines approximately 3.6 km long
- a new 33/400 kV transformer substation linking the wind farm to the national grid
- road infrastructure, including:
 - ✓ modernisation and reinforcement of existing exploitation roads to facilitate the transport of large equipment and machinery
 - ✓ construction of new access roads from existing exploitation roads to the wind turbines
- site setup within the project location.



- Location of the social receptors, wind turbines and other key project facilities is shown in



National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp., Map data © OpenStreetMap contributors

Figure 2-1.



At the time of writing, permitting status of the project is as follows:

- aviation permit received
- environmental permit received
- building permits have been issued for all 45 wind turbines, the 400 kV substation, and the overhead line. The permit for the common infrastructure (e.g., roads) remains pending at the time of writing, with issuance expected by March 2026.

Rezolv Energy has also commissioned an independent consultant to conduct an Environmental and Social Impact Assessment (ESIA) in accordance with international standards.

The project construction activities are anticipated to begin in summer 2026.

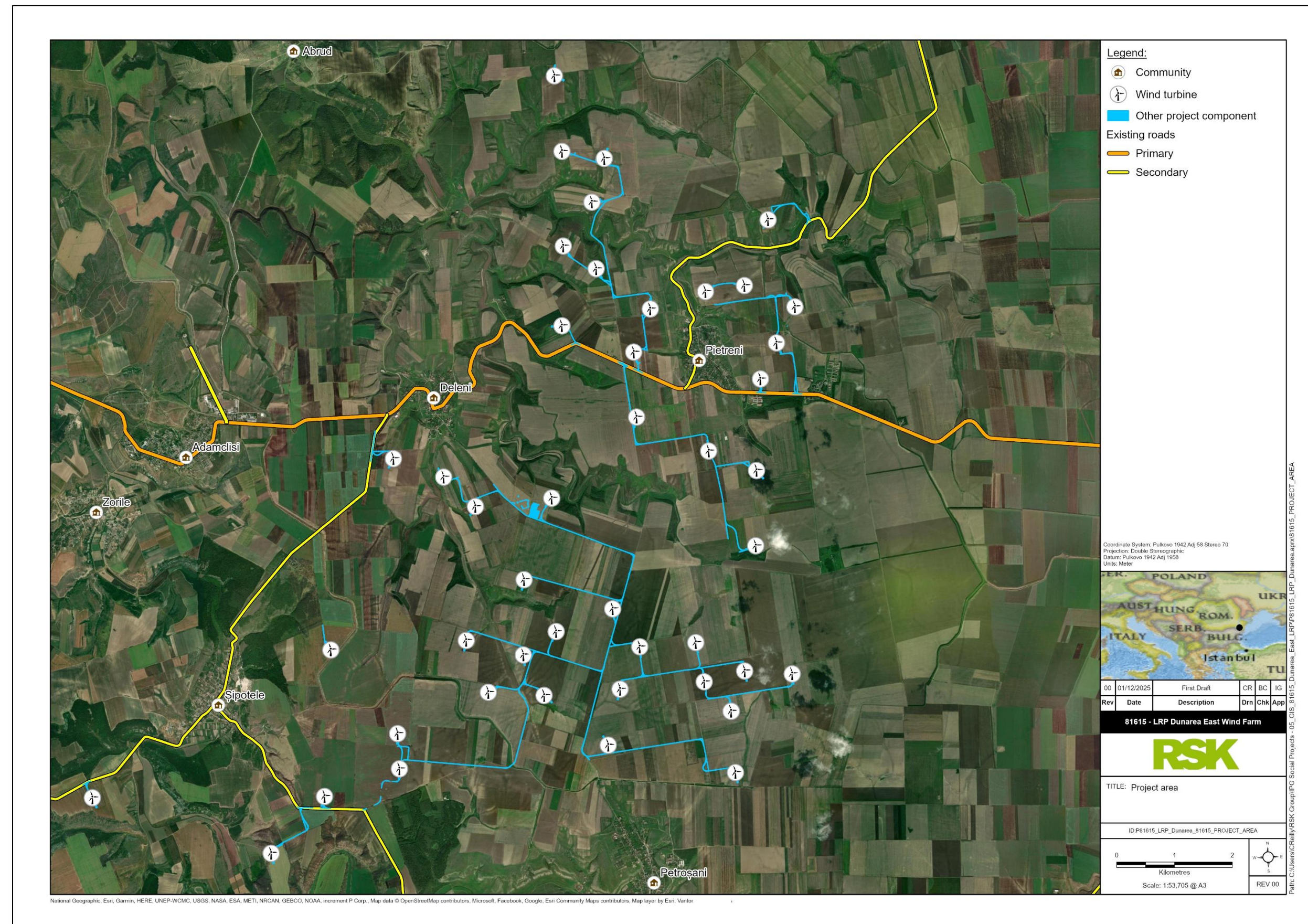


Figure 2-1: Project overview and local communities

3 Requirements and institutional frameworks

3.1 National requirements

Romania has been a member state of the European Union (EU) since 2007, and, consequently, the project must comply with the provisions of national and European legislation. Romanian legislation is fully harmonized with EU legislation in terms of the protection of private property, the prevention and combating of discrimination, as well as the guarantee of the rights of citizens and legal entities.

3.1.1 Requirements

When implementing a renewable energy project, namely wind energy, it is necessary to comply with the following legislative acts, mainly from the point of view of land occupation (list is not exhaustive):

- Law 105/2019 on the amendment and completion of the Law on the Cadastre and Real Estate Advertising No. 7/1996, as well as on the amendment and completion of other normative acts
- Law 185/2018 for the approval of Government Emergency Ordinance no. 31/2018 on the amendment and completion of the Law on the Cadastre and Real Estate Advertising no. 7/1996
- Law 33/1994 on expropriation for public utility purposes (republished)
- Law 255/2010 on expropriation for public utility purposes, necessary to achieve objectives of national, county and local interest
- Law 350/2001 on spatial planning and urban planning
- Law 287/2009 on the Civil Code
- Law 18/1991 on land fund (republished)
- Order 239/2019 for the approval of the Technical Norm regarding the delimitation of protection and safety zones related to energy capacities.

In addition to the legislative requirements in terms of land use, the following legislative aspects (list is not exhaustive) must be respected within a renewable energy project:

- Order 11/2023 on the amendment and completion of the methodology for issuing location permits by network operators, approved by Order of the President of the National Energy Regulatory Authority no. 25/2016
- Law 50/1991 on the authorization of construction works – republished
- Law 123/2012 on electricity and natural gas
- Law 265/2006 for the approval of Government Emergency Ordinance no. 195/2005 on environmental protection
- Law 292/2018 on the assessment of the impact of certain public and private projects on the environment
- Ordinance 7/2016 supplementing Government Emergency Ordinance No. 57/2007 on the regime of protected natural areas, the conservation of natural habitats, wild flora and fauna
- Law 107/1996 Water Law
- Law No. 422/2001 on the protection of historical monuments
- Law 138/2004 on land improvements – republished.

Depending on the requirements of the urban planning certificate, it may also be necessary to obtain approvals/agreements/points of view, as appropriate.

3.1.2 Land titling and tenure system in Romania

In Romania, land ownership and tenure are governed by a combination of civil law principles and specific national legislation. The system is based on private ownership, state ownership, and public domain, all regulated under the Romanian Constitution and the Civil Code.

The Land Fund in Romania is regulated by Law no. 18/1991¹. According to Article 1, all land, regardless of its use or ownership title, and whether it forms part of the public or private domain², constitutes the Land Fund of Romania.

According to art. 3, for the purposes of this law, land holders are understood to be the holders of the right of ownership, of other property rights over them or those who, according to civil law, have the quality of possessors or precarious holders.

Following the transition from collective to private ownership after 1990, restitution and privatization laws – notably Law No. 18/1991, Law No. 1/2000, and Law No. 165/2013 – enabled the restitution of agricultural and forest land to former owners or their heirs. While most restitution cases have been finalized, some cadastral and ownership inconsistencies persist, particularly in rural and forested areas.

Land registration and property rights are managed by the National Agency for Cadastre and Land Registration (ANCPI), through local offices of cadastre and land registry. Property rights are recorded in the Land Book (Cartea Funciară), which provides legal certainty regarding ownership, boundaries, and encumbrances.

After the transition from collective to private property in the early 1990s, land restitution and privatisation laws (notably Law No. 18/1991 on the Land Fund and its subsequent amendments) facilitated the return of agricultural and forest lands to former owners or their heirs. This process has largely been completed, though some disputes and cadastral inconsistencies still exist in certain rural areas.

For the implementation of energy projects, land may be:

- privately owned, acquired through sale-purchase or lease agreements
- public or state-owned, where usage rights are granted through concession or lease contracts.

Agricultural or forest land (public or private) may be also acquired, requiring conversion or change of land use category according to relevant laws (e.g., Law No. 50/1991, Law No. 46/2008, Law No. 350/2001).

3.1.3 Land acquisition process in Romania

The Romanian tenure system ensures protection of private property rights, legal transparency through registration in the Land Book, and compliance with EU principles of non-discrimination and equal access to land for investment purposes.

The land acquisition process key stages for private projects (not of national interest) are summarised in Figure 3-1 below.

¹ The Law no. 18/1991 on Land Fund, republished and subsequently amended in 1998.

² In Romania, state property includes all assets owned by the state, while the public domain refers only to those assets of public interest that cannot be sold or transferred, such as roads, waters, and public infrastructure.

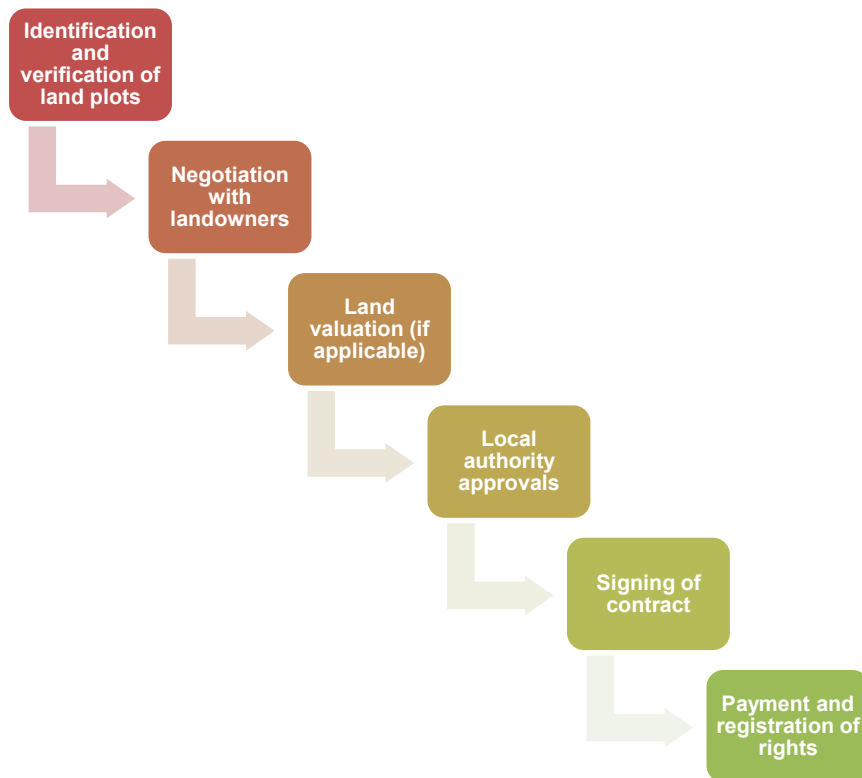


Figure 3-1 Land acquisition process in Romania

The key stages of the land acquisition process can be described as follows:

- **Step 1 Identification and verification of land plots**

The developer identifies the land required for project implementation. Land titles and cadastral plans (Land Book extracts) are obtained for each plot to verify:

- ✓ who the legal owner is (individual, company, or municipality)
- ✓ whether the land has any encumbrances, easements, or disputes
- ✓ the legal status (agricultural, non-agricultural, public or private domain of a municipality).

- **Step 2 Negotiation with landowners**

For privately owned land, the developer negotiates one or more of the following: a sale (transfer of ownership), a lease or rent agreement (temporary use rights), a right of superficies (construction rights over another party's land), or an easement (for access roads, cables, or other infrastructure). The conditions – including duration, payment, and obligations – are established by mutual agreement between the parties.

- **Step 3 Land valuation (if applicable)**

When the land belongs to a local administrative unit (for example, to commune, municipality or county), an independent valuation is mandatory to determine the market value or concession fee. For private land, valuation is optional, the price can be negotiated, or an appraisal report can be used as a reference value.

- **Step 4 Local authority approvals (if land is public or land use must be changed)**

If the land belongs to the local public authority, a Local Council Decision (HCL) is required for:

- ✓ concession, lease, or granting of usage rights
- ✓ changing the land use category (e.g., from agricultural to energy infrastructure)

- ✓ approval of the Zonal Urban Plan (PUZ)

■ **Step 5 Signing of contracts**

Once all evaluations and approvals are obtained, the following agreements are signed:

- ✓ sale-purchase contracts (for ownership transfer)
- ✓ lease or concession contracts (for temporary use)
- ✓ superficies contracts³ (for construction and operation rights)
- ✓ easement agreements (for access or utility corridors).

All contracts must be notarised and registered in the Land Book to become enforceable against third parties, and they are typically concluded for 25–49 years in renewable energy projects.

■ **Step 6 Payment and registration of rights**

After signing the contracts, the developer pays the agreed amounts (price, rent, or concession fee), covers the related notary fees and registration costs (if this was decided according to the contract), registers the ownership or usage rights in the Land Book.

3.1.4 *Government agencies and institutions involved*

In Romania, the implementation of renewable energy projects, such as wind farms, requires coordination with several national and local government authorities. The main agencies and institutions involved include:

- Ministry of Environment, Water and Forests (Ministerul Mediului, Apelor și Pădurilor) – responsible for environmental policy, issuing environmental permits and approvals, and overseeing compliance with environmental legislation
- National Agency for Environment and Protected Areas (Agenția Națională pentru Mediu și Arie Protejate) and its County Environmental Directorates – evaluate Environmental Impact Assessment (EIA) documentation, issue environmental agreements, and monitor environmental performance
- Ministry of Energy (Ministerul Energiei) – responsible for national energy policy, promoting renewable energy development, and coordinating with the European Commission on energy matters
- National Energy Regulatory Authority (Autoritatea Națională de Reglementare în domeniul Energiei) – regulates electricity generation, transmission, and distribution; issues licenses and sets market rules for energy producers
- National Agency for Cadastre and Land Registration (Agenția Națională de Cadastru și Publicitate Imobiliară – ANCPI) – manages property registration, cadastral documentation, and land ownership verification
- Ministry of Development, Public Works and Administration (Ministerul Dezvoltării, Lucrărilor Publice și Administrației) – oversees spatial planning, urbanism, and construction permitting processes
- County and Local Councils (Consiliile Județene și Locale) – responsible for local land-use planning (PUZ, etc.), issuance of building permits, and coordination of public consultation processes
- National Environmental Guard (Garda Națională de Mediu) – responsible for environmental inspections and enforcement of environmental compliance
- Ministry of Culture (Ministerul Culturii) – involved if the project area includes or is near cultural heritage sites or archaeological zones

³ A superficies contract is an agreement by which the owner of a piece of land (the bare owner) grants another person (the superfiary) the right to build, own, or use a building, plantation, or other durable works on that land, either in exchange for payment or free of charge.

- Romanian Waters National Administration (Administrația Națională „Apele Române”) – issues water management permits and approvals for works affecting surface or groundwater
- Forest and Agricultural Land Authorities – such as Romsilva and the County Agricultural Directorates, involved when the project requires land-use change or clearing of vegetation.

Depending on the project's characteristics and location, other institutions may also be consulted, including the Ministry of National Defence, Civil Aviation Authority, or communication and transport authorities, particularly for tall wind turbines or installations near strategic zones.

For private projects, land acquisition in Romania is carried out entirely through civil law agreements with landowners. The main institutions involved are those responsible for verifying, approving, and registering the legality of land use.

The key authorities are:

- City Hall and Local Council – coordination and authorisation at the local level
- National Agency for Cadastre and Land Registration – verification and registration of land rights
- Ministry of Agriculture and Rural Development / National Agency for Land Reclamation – oversight of agricultural land and irrigation infrastructure
- Ministry of Energy / National Energy Regulatory Authority – regulation of energy infrastructure and access rights.

3.2 International standards

3.2.1 IFC Performance Standards

The IFC Performance Standard (PS) 5 provides requirements with respect to land acquisition, compensation and livelihood restoration. The IFC further provides guidance and good practice in the following documents:

- Guidance Note (GN) 5 Land Acquisition and Involuntary Resettlement
- Handbook for Preparing a Resettlement Action Plan (2003)
- Good Practice Handbook. Land Acquisition and Involuntary Resettlement (2023).

IFC PS 5 recognises that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land, whether formally or informally. Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) resulting from project-related land acquisition and/or restrictions on land use. According to the standard, resettlement is involuntary when project affected persons (PAPs) or communities (PACs) do not have the right to refuse land acquisition or restrictions on land use that result in physical or economic displacement.

Involuntary resettlement can occur in the cases of (i) lawful expropriation or temporary or permanent restrictions on land use and/or (ii) negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail. PS 5 applies to both physical and economic displacement resulting from several types of land transactions:

- land rights or land use rights acquired through expropriation or other compulsory procedures in accordance with the legal system of the host country
- land rights or land use rights acquired through negotiated settlements with property owners or those with legal rights to the land if failure to reach settlement would have resulted in expropriation or other compulsory procedures
- project situations where involuntary restrictions on land use and access to natural resources cause a community or groups within a community to lose access to resource usage where they have traditional or recognisable usage rights
- certain project situations requiring evictions of people occupying land without formal, traditional or recognisable usage rights
- restriction on access to land or use of other resources including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest

products, freshwater, medicinal plants, hunting and gathering grounds and grazing and cropping areas.

Economic Displacement

Where affected people are economically displaced (e.g. lose streams of income and access to livelihoods), the developer must develop an LRP in order to compensate PAPs and/or PACs and provide other assistance, including assistance meant to at a minimum restore affected livelihoods. The LRP will establish the entitlements of PAPs and/or PACs and will ensure that these are provided in a transparent, consistent and equitable manner.

According to IFC GN 5, an LRP should, at a minimum, provide the following information: (i) an introduction to the project; (ii) summary of project impacts; (iii) summary of the social baseline; (iv) regulatory framework; (v) results of stakeholder engagement; (vi) eligibility criteria; (vii) entitlement matrix; (viii) timeframe for implementation; (ix) organisational capacity; (x) monitoring, evaluation, and reporting; and (xi) budget and resources.

The adverse impacts of economic displacement will be considered adequately mitigated when PAPs and/or PACs have received compensation and other assistance and are deemed to have been provided with adequate opportunity to reestablish their livelihoods at the same or better standard of living.

Where land acquisition (associated with physical and/or economic displacement) is the responsibility of the government, the developer will collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with the IFC PS 5.

3.2.2 EBRD Performance Requirements

The EBRD's Performance Requirement (PR) 5 outlines the requirements for land acquisition and economic/physical displacement for projects financed by the bank. This policy is expected to be updated on 01 January 2026, with the EBRD's Environmental and Social Requirement (ESR) 5 coming into effect.

The PR 5 / ESR 5 address impacts of project-related land acquisition, including restrictions on land use and access to assets and natural resources, which may cause physical displacement (relocation, loss of land or shelter) and/ or economic displacement (loss of land, assets or restrictions on land use, assets and natural resources leading to loss of income sources). The term "involuntary resettlement" refers to both physical and economic displacement and the processes to mitigate/compensate these impacts. Resettlement is considered involuntary when affected persons or affected communities do not have the right to refuse land acquisition or restrictions on land use, other assets and natural resources, even if compulsory acquisition is used only as a last resort after a negotiated process.

Application of the PR 5 / ESR 5 is consistent with the universal respect for, and observance of, human rights and freedoms, with particular focus on respecting the right to private property, the right to adequate housing and to the continuous improvement of living conditions.

Unless properly managed, involuntary resettlement may result in long-term hardship and impoverishment for PAPs and/or PACs, as well as environmental damage and adverse socio-economic impacts in areas to which they have been displaced. Hence, the developer must consider feasible alternative project designs and sites to avoid or, if not possible, minimise land acquisition or restrictions on land use, other assets and natural resources while balancing environmental, social, and financial costs and benefits, and paying particular attention to disproportionate gender and vulnerable group impacts. Where it cannot be avoided through design, displacement shall be minimised and appropriate measures to mitigate adverse impacts on affected persons and host communities will be carefully planned and implemented.

3.3 Gap analysis – international standards against national requirements

A gap analysis between Romanian legal requirements and the requirements of the IFC and EBRD related to land acquisition, for both economic and physical displacement, is presented in Table 3-1 below.

Table 3-1 Gap analysis between the IFC/EBRD and Romanian requirements

Topic	IFC standards	EBRD requirements	Romanian requirements	Gaps
Avoidance and minimisation	Consider feasible alternative project designs to avoid or minimise physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable.	The objectives of the EBRD PR 5 are to: (i) avoid involuntary resettlement or, when unavoidable, (ii) minimise involuntary resettlement by exploring feasible alternative project designs and sites, (iii) avoid forced eviction.	In urban planning, but also in environmental impact assessment procedures, according to the legislation in force, it is necessary to analyse alternatives, and one of the criteria is to select the option with the lowest environmental and social impact. However, there is no clear obligation to avoid relocation/displacement, especially in projects of national interest. Given the environmental and social criteria is taken into account in the analysis of alternatives, it can be said that the option that requires fewer or no relocations/displacement will be chosen. Measures to reduce the impact of displacement/relocation (if applicable) are proposed within environmental impact assessments.	No gap
Preparation of a Resettlement Action Plan (RAP) / LRP	In the case of economic and / or physical displacement, the client ⁴ needs to develop a RAP or LRP.	In the case of economic and / or physical displacement, the client needs to develop a RAP or LRP.	There is no legal requirement for the preparation of a RAP /LRP. Measures to reduce the impact of economic/physical displacement are proposed in the environmental impact assessments, but without a specific regulatory framework for livelihood restoration.	Gap In addition to the documents prepared in accordance with national legislation, the project initiator must prepare a RAP / LRP.
Avoidance of expropriation	To help avoid expropriation and eliminate the need to use governmental authority to enforce relocation, clients are encouraged to use negotiated settlements meeting the requirements of the PS 5, even if they have the legal means to acquire land without the seller's consent.	Clients are encouraged to acquire land rights through negotiated settlements even if they have the legal means to gain access to the land without the consent of the seller. Negotiated settlements help avoid expropriation and eliminate the need to use governmental authority to remove people forcibly.	According to Romanian law, expropriation is only allowed for public utility projects, which implies notification and related compensation. For projects that are not declared of public interest, expropriation is not possible, and the land may be acquired only on willing seller / willing buyer basis with the relevant purchase/lease of land.	No gap Comment: No expropriation was used for any land acquisition for the Dunarea East Wind Farm Project. All land required for the implementation of the project will be leased.
Eligibility	Displaced persons may be classified as persons (i) who have formal legal rights to the land or assets they occupy or use; (ii) who do not have formal legal rights to land or assets, but have a claim to land that is recognized or recognizable under national law; or (iii) who have no recognisable legal	Displaced persons may be classified as persons: (i) who have formal legal rights to the land (including customary and traditional rights recognised under national laws); (ii) who do not have formal legal rights to land at the time of the census, but who have a claim to land that is recognised or recognisable under	The national framework mainly covers holders with registered or demonstrable property rights. Informal users/occupiers without rights are not eligible for compensation.	Gap Displaced persons classified as (ii) or (iii) under IFC and EBRD standards should be identified and considered eligible for relevant compensation and

⁴ In this table, 'client' refers to the client of IFC/EBRD or to a company applying the IFC standards or EBRD requirements.

Topic	IFC standards	EBRD requirements	Romanian requirements	Gaps
	right or claim to the land or assets they occupy or use. The census will establish the status of the displaced persons.	national laws; or (iii) who have no recognisable legal right or claim to the land they occupy.		livelihood restoration support to be determined as part of the RAP / LRP.
Socioeconomic assessment and census	A census will be carried out to collect appropriate socio-economic baseline data to identify the persons who will be displaced by the project, determine who will be eligible for compensation and assistance, and discourage ineligible persons, such as opportunistic settlers, from claiming benefits.	The client will carry out a socio-economic baseline assessment on people affected by the project, including impacts related to land acquisition and restrictions on land use. The assessment will identify impacts within a project's social context and the needs and rights of the affected people and develop appropriate actions to minimise and mitigate resettlement impacts. The client will carry out a detailed census to: (i) identify persons who will be displaced by the project; (ii) determine who will be eligible for compensation and assistance; and (iii) take inventory of affected land and property. The census should take into account the needs of seasonal resource users who may not be present in the project area during the time of the census.	The Environmental Impact Report analyses the impact on the social and economic environment. However, according to the legislation in force, a census and socio-economic survey are not required. The identification of affected persons is based on cadastral records and legal documents. When the acquired land belongs to a local administrative unit, an independent valuation is mandatory to determine the market value or concession fee. For private land and assets, valuation is optional; the price can be negotiated or an appraisal report can be used as a reference value if agreed by the parties.	Gap Census and socio-economic survey should be conducted during preparation of the RAP / LRP. Additional provisions on the asset inventory should be compiled as part of the RAP / LRP.
Cut-off date	The client will establish a cut-off date for eligibility. Information regarding the cut-off date will be well documented and disseminated throughout the project area.	The client will establish the cut-off date for eligibility as foreseen in the applicable legislation and project timeline as appropriate. Often the most practicable cut-off date is during the baseline assessment or census. Information regarding the cut-off date will be well documented and communicated throughout the project area. Setting a cut-off date will provide clarity as to eligibility for compensation and assistance. Persons moving into the project location after the cut-off date are not entitled to compensation or other assistance.	There is no explicit deadline for eligibility. Further developments in the project area must take into account the current land use. Procedural milestones are used (date of public display of expropriation lists, date of assessment).	Gap A project is to set up a cut-off date and communicate it to all affected people. Provisions on the cut-off date are to be made as part of the RAP / LRP.
Compensation	The client will offer displaced communities and persons compensation for loss of assets at full replacement cost ⁵ and other assistance to help them improve or	The client will offer all displaced persons and communities compensation for loss of assets at full replacement cost ⁷ and other assistance. This is intended to restore, and potentially improve, their standards of living and/or	According to the legislative requirements in the case of land expropriations, compensation is mandatory, and the value is established according to market requirements at the time of the	Gap Compensation should be provided at the full replacement cost, without applying

⁵ Replacement cost is defined as the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow Affected Communities and persons to replace lost assets with assets of similar value.

⁷ The rate of compensation for lost assets should be calculated at full replacement cost including transaction costs. For losses that cannot easily be valued or compensated for in monetary terms, in-kind compensation may be appropriate. However, this compensation should be made in goods or resources that are of equivalent or greater value and that are culturally appropriate.

Topic	IFC standards	EBRD requirements	Romanian requirements	Gaps
	<p>restore their standards of living or livelihoods, as provided in the PS 5. Compensation standards will be transparent and applied consistently to all communities and persons affected by the displacement. Where livelihoods of displaced persons are land-based⁶, or where land is collectively owned, the client will, where feasible, offer the displaced land-based compensation. The client will take possession of acquired land and related assets only after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation. The client will also provide opportunities to displaced communities and persons to derive appropriate development benefits from the project.</p>	<p>livelihoods⁸ of displaced persons to pre-displacement levels. The measures can be based on land, resources, wages and/or business activities. Standards for compensation will be transparent and consistent within the project. Compensation will be provided before displacement or imposition of access restrictions. Where livelihoods of displaced persons are land-based, or where land is collectively owned, the client will offer, where feasible, land-based compensation, taking into account seasonal and agricultural timing requirements. The client will provide opportunities to displaced persons and communities to derive appropriate development benefits from the project.</p>	<p>expropriation. This only applies to projects of national interest. For leased land, as in the project's case, according to the legislation, it is mandatory to offer compensation, otherwise the contract is invalid. The details of the offered price, including the price update, are established in an agreement with the landowners. There are no legislative requirements that impose a certain minimum or maximum amount. Under Romanian law, compensation for leased agricultural land is based on market value or contractual agreement between the parties. There are no legal minimum or maximum rates. Transaction costs are not required by law to be compensated, and depreciation deductions are rarely applicable. There are no legal requirements to pay the full replacement cost. This is usually set at market value, as determined by an independent appraiser or through negotiation. Given that this is a bilateral contract, all conditions are established by mutual agreement between the two contracting parties. For purchased land, the compensation consists of the negotiated purchase price, agreed directly between the seller and buyer. There are no legal minimum or maximum thresholds, and no requirement to pay at replacement cost unless the parties choose to base the price on an independent valuation.</p>	<p>depreciation for wear and tear or age. Transaction costs should be also compensated/covered. Provisions on the compensation are to be made as part of the RAP / LRP.</p>
Livelihood Restoration	<p>PS 5 requires to the improvement, or restoration of the livelihoods and standards of living of displaced persons. Based on consultation with physically displaced persons, the client will provide relocation assistance sufficient for them to</p>	<p>PR 5 requires the restoration or, where possible, improvement of the livelihoods and standards of living of displaced persons to pre-displacement levels. It also requires improving living conditions among physically displaced persons through the provision of adequate</p>	<p>There are no specific legal obligations for livelihood restoration.</p>	<p>Gap Assistance in restoring / improving standards of living and/or livelihoods should be provided.</p>

⁶ The term "land-based" includes livelihood activities such as subsistence cropping and grazing of livestock as well as the harvesting of natural resources.

⁸ Livelihoods may consist of wage-based incomes, and/or incomes derived by individuals, families and/or communities from resource utilisation.

Topic	IFC standards	EBRD requirements	Romanian requirements	Gaps
	<p>restore their standard of living at an adequate alternative site.</p> <p>In addition to compensation for lost assets (if any), economically displaced persons whose livelihoods or income levels are adversely affected will also be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living.</p> <p>Transitional support should be provided as necessary to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living.</p>	<p>housing, including security of tenure at resettlement sites.</p> <p>Based on consultation with physically displaced persons, the client will provide relocation assistance sufficient for them to restore, and where possible improve, their standards of living at an adequate alternative site.</p> <p>The client will provide additional targeted assistance (for example, credit facilities, training or job opportunities) and opportunities to restore, and where possible, improve, their income-earning capacity, production levels and standards of living. In the case of businesses experiencing temporary losses or having to close as a result of project-related displacement, both the owner of the business and employees losing pay or employment are eligible for such assistance.</p> <p>The client will provide transitional support to economically displaced persons, as necessary, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels and standards of living.</p>		<p>Relevant provisions should be made as part of the RAP / LRP.</p>
Engagement	<p>The client will engage with PAPs and PACs, including host communities, through the process of stakeholder engagement described in the PS 1. Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of PACs and PAPs will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of the PS 5.</p>	<p>From the earliest stages and through all resettlement activities the client will involve affected men and women, including host communities. This will facilitate their early and informed participation in decision-making processes related to resettlement. PAPs shall be given the opportunity to participate in the eligibility requirements, negotiation of the compensation packages, resettlement assistance, suitability of proposed resettlement sites and proposed timing. Consultation will continue during the implementation, monitoring and evaluation of compensation payment and resettlement so as to achieve outcomes that are consistent with the objectives of the PR 5.</p>	<p>Under Romanian legislation, stakeholder engagement requirements in relation to land acquisition and potential resettlement are limited and primarily procedural in nature. Engagement is conducted mainly through legally mandated information and consultation mechanisms, rather than through participatory planning or negotiation frameworks.</p> <p>Public participation is ensured primarily through the EIA procedure, which requires the disclosure of project information, public announcements, and the organisation of public debates. In addition, for projects involving land acquisition or expropriation, the competent authorities are required to publish the related decisions in the Official Gazette and in local or national newspapers, and to notify affected landowners or land users in writing.</p> <p>Where land is acquired through voluntary transactions, discussions and negotiations are held directly with affected owners or users at the contract signing stage.</p> <p>Engagement with informal land users or</p>	<p>Gap</p> <p>Engagement activities with PAPs is to be determined in the RAP / LRP and conducted accordingly. These must continue throughout the life of the project and not just before execution (when leasing the land).</p>

Topic	IFC standards	EBRD requirements	Romanian requirements	Gaps
			occupants is not required or recognised under the national legal framework.	
Grievance Mechanism	The client will establish a grievance mechanism consistent with the PS 1 as early as possible in the project development phase. This will allow the client to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host communities in a timely fashion, including a recourse mechanism designed to resolve disputes in an impartial manner.	The client will establish an effective grievance mechanism as early as possible in the process in order to receive and address in a timely fashion specific concerns about compensation and relocation that are raised by displaced persons and/or members of host communities. It will include a recourse mechanism designed to resolve disputes in an impartial manner.	The legal framework provides for administrative/judicial remedies (appeals and court actions). There is no obligation for a dedicated project grievance mechanism for economic/physical displacement.	Gap A grievance mechanism must be created, which is accessible to any category of PAP. The mechanism should be provided at the planning and implementation stages of physical / economic displacement process. Relevant provisions should be made as part of the RAP / LRP.
Vulnerable persons	The client will identify individuals and groups that may be directly and differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. Where individuals or groups are identified as disadvantaged or vulnerable, the client will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities.	The client will take into account any individuals or groups that may be disadvantaged or vulnerable. In particular, the client will take necessary actions to ensure that vulnerable groups are not disadvantaged in the resettlement process, are fully informed and aware of their rights, and are able to benefit equally from the resettlement opportunities and benefits. These groups should be identified through the process of environmental and social assessment.	The anti-discrimination and social assistance framework is in place, but there are no specific requirements in the land acquisition/EIA procedures to identify and support vulnerable people in the context of physical/economic displacement.	Gap Vulnerable groups should be identified. Relevant provisions on vulnerable groups should be made as part of the RAP / LRP.
Gender	The informed consultation and participation process should (i) capture both men's and women's views, if necessary through separate forums or engagements, and (ii) reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate. The consultation process should ensure that women's perspectives are obtained, and their interests factored into all aspects of resettlement planning and implementation. Women's and men's preferences in terms of compensation mechanisms, such as compensation in kind rather than in cash, should be explored.	The EBRD views gender equality as a fundamental aspect of a modern, well-functioning market economy and democratic society. The EBRD expects its clients to identify any potential gender-specific and disproportionate, adverse impacts, and undertake to develop mitigation measures to reduce these. From the earliest stages and through all resettlement activities the client will involve affected men and women, including host communities. This will facilitate their early and informed participation in decision-making processes related to resettlement.	Gender equality is a fundamental principle established under Romanian law. Discrimination on the basis of gender is prohibited in all areas of public and private life. During public consultation or stakeholder engagement activities - including those carried out under the EIA procedure or during land acquisition negotiations - both men and women are expected to be involved on an equal basis. Their opinions, preferences, and comments should be considered without distinction. However, national legislation does not include gender-specific provisions related to physical or economic displacement, nor does it require the implementation of gender-sensitive measures within physical/economic displacement or livelihood restoration processes.	Gap Gender-specific provisions should be made within the RAP / LRP.
Monitoring and Evaluation	The client will establish procedures to monitor and evaluate the implementation of a RAP or LRP and take corrective	Monitoring of the resettlement and livelihood restoration process will be carried out in accordance with PR 1 and should involve the	There are no specific requirements for monitoring physical/economic displacement or livelihood restoration; environmental	Gap



Topic	IFC standards	EBRD requirements	Romanian requirements	Gaps
	<p>action as necessary. The extent of monitoring activities will be commensurate with the project's risks and impacts. PAPs will be consulted during the monitoring process.</p> <p>It may be necessary for the client to commission an external completion audit of the RAP or LRP to assess whether the provisions have been met, depending on the scale and/or complexity of physical and economic displacement associated with a project.</p>	<p>participation of key stakeholders such as affected communities.</p> <p>Depending on the scale of a project's resettlement, it may be appropriate for the client to commission an external completion report of the RAP/LRP to determine that the provisions have been met.</p>	<p>monitoring may be required through the EIA but does not cover the objectives of the RAP / LRP.</p>	<p>Project developer is to conduct monitoring to ensure that livelihoods of affected landowners/users (including informal land users) are restored or improved. Monitoring and evaluation provisions shall be included as part of the RAP / LRP or as part of a standalone monitoring and evaluation plan.</p>

4 Project land requirements and identification of impacts

4.1 Land requirements

The project will acquire 53.47 ha, including:

- 20.53 ha on temporary basis (i.e. acquisition for project construction)
- 32.94 ha on permanent basis (i.e. acquisition for project operation).

This 53.47 ha is within 158 cadastral plots, which have a total area of 744.69 ha (7,446,900m²).

The number of land plots affected by each of the core project components⁹ is:

- wind turbines and platforms – 80 land plots
- construction organisation area – 1 land plot
- substation – 1 land plot
- road extension – 40 land plots
- roads and cables – 35 land plots.

In addition to the above, according to information provided by the Company, one land plot will be acquired for the project (110249), for which no specific facility information is currently available.

All affected land plots are located within the administrative territory of Deleni Commune. Detailed information on affected land, type of ownership, and use is summarised below.

4.1.1 Wind turbines and platforms

In total, 80 land plots with a total area of 372.39 ha will be affected by the wind turbines, of which 73 are private and 7 public (municipal) land plots (Table 4-1).

The area affected by the permanent and temporary land acquisition for the wind turbines is 32.98 ha or about 9% of the total area of the affected land plots. Out of this area of 32.98 ha, 14.41 ha will be acquired on temporary basis, and 18.58 ha permanently. Temporary land take occurs mainly within the turbine installation areas and assembly platforms.

Table 4-1 Land requirements for the wind turbines

Total number of affected land plots	Total area of affected land plots, ha	Total area affected by land acquisition, ha	Temporary land take, ha	Permanent land take, ha	Private land plots		Public land plots	
					Number	Area, ha	Number	Area, ha
80	372.39	32.98	14.41	18.58	73	2.1	7	30.88

All land for the wind turbines and platforms is acquired by the project through lease agreements. The turbine locations occupy both private and public land, with both used for agricultural purposes. Approximately 94% of the total acquired area corresponds to private parcels. Public land parcels represent the remaining 5% of the total acquired.

⁹ The categories “Road extension” and “Roads and cables” were used by MC in providing data on land plots. In this LRP, RSK used the categorisation of project facilities as provided by MC to ensure consistency in the land acquisition data. The data is considered appropriate for the LRP purposes.

4.1.2 Construction organisation area

A dedicated construction organisation area will be temporarily used for storage of equipment, materials, and assembly operations. The area affects one private land plot with a total area of 2.8 ha. Part of this land plot, i.e. 1.58 ha, has been leased for the project on permanent basis (Table 4-2).

Table 4-2 Land requirements for the construction organisation area

Total number of affected land plots	Total area of affected land plots (ha)	Total area affected by land acquisition (ha)	Temporary land take (ha)	Permanent land take (ha)	Private land plots		Public land plots	
					Number	Area (ha)	Number	Area (ha)
1	2.8	1.58	0	1.58	1	1.58	0	0

4.1.3 Substation

The substation is a permanent facility. As shown in Table 4-3, it affects one private land plot with total area of 4.3 ha. The whole land plot has been acquired for the project through a land exchange. Apart from another land plot that was reportedly purchased by MC¹⁰; all other land plots acquired for the project have been obtained through lease (see more detail on the land acquisition process in Section 4.2).

Table 4-3 Land requirements for the substation site

Total number of affected land plots	Total area of affected land plots (ha)	Total area affected by land acquisition (ha)	Temporary land take (ha)	Permanent land take (ha)	Private land plots		Public land plots	
					Number	Area (ha)	Number	Area (ha)
1	4.3	4.3	0	4.3	1	4.3	0	0

4.1.4 Road extension

The construction of new access roads and the upgrading of existing ones require both temporary and permanent land acquisition. Permanent acquisition occurs within road footprints, while temporary areas are used for construction works and manoeuvring of the project facilities and equipment.

In total, 40 land plots of 277.78 ha will be affected by land acquisition; however, only 5.99 ha or 2.63% of the total area will be acquired for the project on temporary (5.47 ha) and permanent (0.52 ha) basis (Table 4-4).

Table 4-4 Land requirements for the roads

Total number of affected land plots	Total area of affected land plots (ha)	Total area affected by land acquisition (ha)	Temporary land take (ha)	Permanent land take (ha)	Private land plots		Public land plots	
					Number	Area (ha)	Number	Area (ha)
40	227.78	5.99	5.47	0.52	26	3.73	14	2.26

The affected parcels include both private agricultural and public (municipal) land plots. Public land acquired for the project (mainly used for public roads) accounts for approximately 38% of the total affected area. All temporarily occupied zones will be rehabilitated upon completion of the project construction.

¹⁰ Land plot 104928 (110260) acquired for road extension.

4.1.5 Roads and cables

Underground electrical cables will connect turbines to the substation. Land acquisition for these components is mainly temporary, except for small permanent easement corridors. In total, 35 land plots of 133.03 ha are affected by the project land acquisition (Table 4-5). However, only 8.52 ha or 6.4 % of these 133 ha will be acquired for the project on temporary (0.56 ha) or permanent (7.96 ha) basis. Most affected land plots belong to private owners, while some are owned by the municipality or form part of the irrigation system infrastructure.

Table 4-5 Land requirements for the cables

Total number of affected land plots	Total area of affected land plots (ha)	Total area affected by land acquisition (ha)	Temporary land take (ha)	Permanent land take (ha)	Private land plots		Public land plots	
					Number	Area (ha)	Number	Area (ha)
35	133.03	8.52	0.56	7.96	19	6.1	16	2.42

Public plots include municipal and ANIF¹¹-owned land used for roads and irrigation channels. All land plots have been secured through lease, superficies or easement agreements.

4.1.6 Summary of the project land requirements

Most of the affected land plots are categorised as agricultural land and are used for agricultural purposes. However, some of the acquired land plots are categorised as roads, irrigation systems, or unproductive land.

As discussed above, temporary land acquisition affects approximately 20.53 ha. According to Environmental Agreement No. 28/26.07.2011 (revised on 04.02.2025), all temporarily occupied areas will be fully reinstated after construction, with soil fertility restored.

Permanent land acquisition affects approximately 32.94 ha. The land category for the permanently acquired parcels will be changed to “land for construction” once construction is completed and the relevant registration is made in the Land Book.

Public land affected (approximately 35.56 ha, or 67% of the total affected area – permanent and temporary) consists mainly of communal roads and pasture areas, used under lease or joint venture agreements.

Private land affected (approximately 17.81 ha, or 33%) remains under private ownership, with superficies rights registered in favour of the project company to ensure long-term operational control. In addition, 4.3 ha are owned by MC through a land exchange contract with a private landowner and 0.49 ha are reportedly purchased by MC.

4.2 Overview of land acquisition completed to date

As indicated in Section 2, the project is located in the rural area of Deleni commune, Constanta county. According to the Urban Planning Certificate no. 50/02.03.2022 extended until 03.03.2025¹², the land has the current use category: agricultural, pastures, exploitation roads¹³. According to Environmental Approval no. 5/15.02.2011, of the total agricultural areas, only the land occupied by turbine foundations,

¹¹ National Agency for Land Reclamation.

¹² RSK presumes that the Urban Planning Certificate would be further extended as appropriate.

¹³ According to information provided by MC under request, the land category prior to land acquisition is agriculture, irrigation system and road. In the LRF, the category of land is provided as per the Urban Planning Certificate.

access roads, and technological platforms will be converted into construction yards (classified as “land for construction”).

According to the Environmental Agreement no. 28/26.07.2021 - revision no. 1 of 28.02.2025, the project is included in the General Urban Plan of Deleni, approved by HCL no. 36/17.06.2005. The project is included in the PUZ "Development of the Deleni commune wind farm, access roads, connections to the national energy system (total power 510 MW), which was subject to EIA procedure according to Government Decision 1076/2004¹⁴.

For the implementation of the project, 158 land plots are required on permanent or temporary basis. The land plots belong to both the state and to individuals or legal entities. According to information provided by the Company, for most of the land plots required for the implementation of the project, lease contracts have already been concluded, but for 21 land plots, the lease contracts are still being negotiated and signed.

The land acquisition process for the project was carried out over an extended period, with land lease agreements, ownership agreements or superficies agreements and associated addenda (see below) signed between 2009 and 2025. According to information provided by MC, land acquisition was initiated in 2009 by another organisation, Adamdel, which intended to develop a renewable energy project in the area. In January 2023, MC became the developer of the Dunarea East WF project and therefore inherited the land acquisition process, including the land lease agreements that had already been concluded. MC also signed additional acts (contract addenda) as necessary. The additional acts (contract addenda) were signed mainly due to:

- changes in the project design
- changes in market conditions, and
- changes in land ownership.

Engagement with affected landowners was led directly by the Rezolv Energy team on behalf of MC, which managed all negotiations and contractual procedures. The engagement was conducted entirely through face-to-face negotiations. No prior public announcements, written notices, or mailed information were used; instead, discussions were held directly with each landowner during on-site or in-person meetings (see more detail on engagement as part of the land acquisition process in Section 7.2.3).

The amount of compensation for land has been determined at full replacement cost, i.e. compensation has been provided at market value, the depreciation costs did not apply, and transaction costs have been compensated (Section 9). No inventory of assets such as annual and perennial crops, trees and structures has been conducted. The compensation amount has been determined during face-to-face negotiations with PAPs based on land value only and/or type of the project infrastructure to be installed, on a willing seller / willing buyer basis.

No expropriation procedures have been initiated for the project.

Payments under the signed lease agreements are reportedly being paid, in accordance with the contractual conditions. All notary fees associated with the land acquisition process were paid by Rezolv Energy on behalf of MC.

For land plots covered by Local Council Decisions (HCL), the process also included the signing of formal contracts. The land exchange for the substation has been finalised in April 2023.

At the time of preparing this LRP, affected households and organisations were continuing their land-use practices (where applicable) on the acquired land plots.

¹⁴ Which transposes Directive 2001/42/EC, finalised with environmental approval no. 5 of 15.02.2011.

4.2.1 Wind turbines and platforms

For the construction of the turbines and related elements (e.g. platforms), 57 lease contracts have been concluded for 80 plots of land. These were concluded mainly with individuals, but also with legal entities. The process of concluding the lease contracts has been completed. Some of the contracts were signed between 2009 and 2014. For these, additional acts (addendums to contracts)¹⁵ were concluded between 2020 and 2024. For the other land plots, contracts were signed in 2021 and 2024 (no additional acts were signed for these contracts, based on information provided by the Company)

4.2.2 Construction organisation area

One land plot is required for the site establishment¹⁶. For this land plot, a lease agreement with an agricultural organisation was concluded in 2022.

4.2.3 Substation

One land plot is required for the substation. An exchange agreement with the owner of this plot (an individual) was concluded in 2023. This is the only land plot acquired for the project for which the owner received another plot in exchange.

4.2.4 Roads extension

The implementation of the project also requires the extension of existing roads, in order to be able to transport wind turbine elements. This affects 40 land plots.

Part of the land plots were public land belonging to the Deleni City Hall, for which Local Council Decisions were issued between 2022 and 2023. For the land belonging to private owners, lease contracts and additional acts were concluded between 2009 and 2025. As of 2 December 2025, lease contracts for 5 land plots are still in the process of negotiation and signing.

4.2.5 Roads and cables

For the construction of access roads and the laying of cables, access to 35 land plots is required. To lease them, 26 contracts are to be signed. As of 2 December 2025, 24 contracts have been concluded with both individuals and legal entities. The remaining 2 contracts were under negotiation and in the process of being signed.

The contracts were signed in 2009, 2014 and between 2021 and 2025. For the contracts signed in 2009 and 2014, additional acts were signed between 2020 and 2021. Some of the land acquired is owned by the Deleni City Hall, for which Local Council Decisions were issued between 2021 and 2025, and contracts were obtained where necessary¹⁷.

¹⁵ Additional acts have been concluded to make changes to the original contracts. These are changes in project design, changes in the market conditions and change of landowners.

¹⁶ Site establishment for the construction of a wind farm consists of the temporary arrangement of spaces and facilities necessary for the work, material warehouses, site offices, temporary water and energy networks, as well as parking and safety areas. The goal is to ensure the logistical, technical and security conditions for the efficient and safe implementation of the project.

¹⁷ The local council's decision is requested when a project is to be carried out on land belonging to the public or private domain of the administrative-territorial unit, in order to approve the use, concession or change of their destination. After issuing the local council decision, a contract is concluded that implements the decision regarding the use, concession or lease of the land.



4.3 Economic displacement impacts

There is no physical displacement of households or loss of housing.

Project-related economic displacement impacts comprise temporary and permanent exclusion of agricultural and grazing land from productive use during excavation, cable laying, and turbine foundation construction works. Additionally, permanent acquisition of land occurs where turbine foundations, access roads, and the substation are constructed.

Temporary ineligibility for agricultural subsidies is expected for plots affected during construction on temporary basis, as these areas will be temporarily removed from the agricultural circuit. No return to agricultural activities will be possible at the areas acquired for the project on permanent basis.

Table 4-6 table reflects impacts only on private landowners and landusers, as well on land users using municipal land.

Table 4-6 Summary of project's economic displacement impacts

Facility	Land category	Land acquisition timeline	Total number of affected land plots	Number of private land plots	Number of public land plots	Affected households and organisations
Wind turbines and platforms	Agriculture	2009-2024	80	73	7	<p>Affected households – 30</p> <ul style="list-style-type: none"> landowners and land users (both own and use land): 6 landowners only (own but don't use land): 18 landowners (unknown land users): 3 land users only (use but don't own land): 3. <p>Affected businesses – 8</p> <ul style="list-style-type: none"> landowners and land users (both own and use land): 1 <ul style="list-style-type: none"> ✓ Zoo Agro Traiani SRL – a private agri-business, managing agricultural land in Deleni Commune landowners only (own but don't use land): 1 <ul style="list-style-type: none"> ✓ Newco Agro Land SRL land users only (use but don't own land): 6 <ul style="list-style-type: none"> ✓ Amagenic SRL ✓ Banciu Gh. Ion I.I. (sole trader) ✓ Oprea Marian I.I. (sole trader) ✓ Săpunaru Tănase I.I. (sole trader) ✓ Tilicea Mariana I.I. (sole trader) ✓ Velea Viorel I.I. (sole trader). <p>Informal land users – None.</p>
Construction organisation area	Agriculture	2022	1	1	0	<p>Affected households – None</p> <p>Affected businesses – 1</p> <ul style="list-style-type: none"> landowners and land users (both own and use land): 1 (Zoo Agro Traiani SRL) landowners only (own but don't use land): None land users only (use but don't own land): None. <p>Informal land users – None.</p>

Facility	Land category	Land acquisition timeline	Total number of affected land plots	Number of private land plots	Number of public land plots	Affected households and organisations
Substation	Agriculture	2023	1	1	0	<p>Affected households – 1</p> <ul style="list-style-type: none"> landowners and land users (both own and use land): None landowners only (own but don't use land): 1 land users only (use but don't own land): None. <p>A single individual landowner is affected by the permanent acquisition of land for the construction of the substation.</p> <p>Affected businesses – 1</p> <ul style="list-style-type: none"> landowners and land users (both own and use land): None landowners only (own but don't use land): None land users only (use but don't own land): 1 (Zoo Agro Traiani SRL). <p>Informal land users – None.</p>
Roads extension	Agriculture	2009-2025 (ongoing for last 5 plots)	40	26	14	<p>Affected households – 15</p> <ul style="list-style-type: none"> landowners and land users (both own and use land): 2 landowners only (own but don't use land): 10 land users only (use but don't own land): 3. <p>Affected businesses – 8</p> <ul style="list-style-type: none"> landowners and land users (both own and use land): 1 <ul style="list-style-type: none"> ✓ Zoo Agro Traiani SRL landowners only (own but don't use land): 1 <ul style="list-style-type: none"> ✓ SC Agrodania SRL land users only (use but don't own land): 6 <ul style="list-style-type: none"> ✓ AMAGENIC SRL ✓ AGRODIP COM SRL ✓ AGROSAN Pietreni SRL ✓ Oprea Marian I.I. (sole trader) ✓ Velea Viorel I.I. (sole trader) ✓ Zoo Agro Traiani SRL. <p>Informal land users – None.</p>

Facility	Land category	Land acquisition timeline	Total number of affected land plots	Number of private land plots	Number of public land plots	Affected households and organisations
Roads and cables	Agriculture, Road, Irrigation system	2009-2025 (ongoing for 2 last plots)	35	19	16	<p>Affected households – 17</p> <ul style="list-style-type: none"> landowners and land users (both own and use land): 1 landowners only (own but don't use land): 9 land users only (use but don't own land): 5 landowners (unknown land users): 2. <p>Affected businesses – 8</p> <ul style="list-style-type: none"> landowners and land users (both own and use land): 1 <ul style="list-style-type: none"> ✓ SC Nostalgic SRL landowners only (own but don't use land): 1 <ul style="list-style-type: none"> ✓ Newco Agro Land SRL land users only (use but don't own land): 6 <ul style="list-style-type: none"> ✓ AMAGENIC SRL ✓ Dan Vasile I.I. (sole trader) ✓ Tilicea Mariana I.I. (sole trader) ✓ Oprea Marian I.I. (sole trader) ✓ Velea Viorel I.I. (sole trader) ✓ Zoo Agro Traiani SRL. <p>Informal land users – None.</p>

In total, the project land acquisition affected 47 households and 13 businesses (sole traders and organisations). It should be noted that at the time of the preparation of this report, information on actual land users of 15 parcels was not available (there was no opportunity to conduct interviews with the owners of those parcels). Since some of the land plots acquired for different project components affect the same households, the total number of affected households is lower than the sum of the numbers identified for each component separately in Table 4-6.

Most of the land plots affected by the Dunarea East WF project are categorised as agricultural land, with a few plots officially registered as pasture, road, irrigation system, or unproductive land.

Agricultural plots are actively cultivated; one of the affected land parcels is used for grazing. In many cases, the same landowners or land users are affected both by temporary land take (during construction and cable installation) and permanent land take (for turbine foundations, access roads, and the substation). Temporary land acquisition is mainly associated with excavation works, assembly platforms, and trenching for underground cables. These areas will be fully reinstated to their prior use after construction. Organisations and individuals conducting agricultural activities on temporarily affected land will be able to resume operations after construction works are completed.

According to the EIA Report (2011), construction-related restrictions on agricultural use will not exceed one year for any temporarily affected plots. Based on the EIA Report and the Environmental Agreement, the company has committed to restore soil fertility and drainage conditions after works, including removal of gravel layers, levelling, and reinstatement of topsoil.

Permanent land take relates only to the turbines, substation site, and road alignments, where the Company holds long-term use rights under superficies, lease contracts or land exchange agreement.

The majority of PAPs interviewed during the preparation of this LRP (see methodology in Section 5) stated that project-related land acquisition has not affected and is not expected to affect their activities. Only two PAPs indicated a potential impact on their land-based (agricultural) activities.

For the first PAP, approximately 30% of the land plot he owns will be affected by the project (permanently). This PAP also reported that he: a) conducts agricultural activities on other land plots (owned by other parties); b) has alternative land plots to use; c) doesn't need to use the alternative land plots to reestablish the activities affected by the project. In total, the project will affect approximately 1.5% of the land that the PAP reportedly uses. Therefore, no significant impact on this PAP's livelihood is anticipated.

As for another PAP who indicated that his land-based livelihood will be affected, approximately 7.5% of the land plot he owns will be affected by the project (through temporary land acquisition only). This PAP also reported that he: a) conducts agricultural activities on other land plots (owned by third parties); b) has alternative land plots to use. In total, the project temporary land acquisition will affect approximately 4% of the land that the PAP reportedly uses. No significant impact on this PAP's livelihood is anticipated.

In addition to one of the PAPs named above, two more PAPs who indicated that 20% or more of their land will be affected by the project.

The first PAP reported that 30% of the land he owns will be affected (however, in fact, approximately 15% of his land plot will be permanently and temporarily acquired). In total, the project land acquisition will affect approximately 1.5% of land that the PAP reportedly uses. No significant impact on land-based livelihood of this PAP is anticipated.

The second PAP reported that 20% of the land he owns will be affected by permanent and temporary land acquisition (the accurate figure is 17%). This PAP is the landowner who does not use the land but leases it to another person. Therefore, the project does not affect any land-based activities or related livelihood of this PAP.

All the other PAPs interviewed reported that less than 20% of their land is affected by the project.

For one of the land plots acquired, the project affected the entire land plot leased by one of the affected businesses. However, the representative of this business reported that this is not the only land plot cultivated by the business: the project affects less than 1% of the total area reportedly used by the business (the business has already started using alternative land due to the project's land acquisition). No significant impact on the enterprise-based activities of this business is anticipated.



Potential Change of Land Status

According to Romanian legal provisions under Law No. 18/1991 on Land Resources and the Law on the Protection and Use of Agricultural Land (Law No. 246/2020), any permanent change in land use from agricultural to industrial (energy infrastructure) requires formal approval from the competent authorities.

For the Dunarea East WF, only those plots allocated for the wind turbines, substation, and permanent roads will undergo official change of land category to “land for construction” once construction is completed and the relevant registration is made in the Land Book, in accordance with the Environmental Agreement no. 28/26.07.2011 (revised 04.02.2025).

For temporary land take, no change in land use status is required. These areas remain classified as agricultural and will return to their original category following site rehabilitation.

In line with the applicable national legislation (Law no. 18/1991 and related regulations), small-scale technical installations (such as buried cables and micro-foundations of under 100 m²) do not require formal reclassification of agricultural land, provided that the land is reinstated for productive use.

4.4 Impact on public infrastructure

No impact on public infrastructure is anticipated, apart from the impact on roads. The roads’ use might be temporarily disrupted during the project construction, which will take 36 months.

According to the EIA Report developed in line with national requirements, one of the project benefits will relate to the improvement of rural road infrastructure (and a potential increase in land value in the project area)¹⁸. However, the EIA Report does not elaborate on this benefit and does not provide any specific measures.

According to RSK’s understanding, Rezolv Energy has commissioned an independent consultant to conduct an ESIA in accordance with international standards, including assessment on impact on public infrastructure. It is anticipated that the potential impact on road infrastructure is to be considered as part of the ESIA report, with relevant mitigation measures being developed accordingly. The LRP (this document) focuses on impacts associated with land acquisition and economic displacement. Measures determined in the LRP will be implemented in addition to the other measures determined by the ESIA report.

¹⁸ Environmental Impact Assessment report (AON – Society for Biodiversity Research and Environmental Engineering, 2011).

5 Data collection methodology

This section presents the methodology for collection and analysis of secondary and primary data for the LRP development.

5.1 Secondary data

RSK has collected and analysed the following secondary data:

- documentation related to the international impact assessment process, prepared for the Dunarea East and West wind farms, including:
 - ✓ the draft ESIA report (ERM, December 2023)
 - ✓ the draft Social Impact Assessment report (ERM, May 2025)
 - ✓ Stakeholder Engagement Plan (SEP) (ERM, May 2025)
- documentation related to the national permitting process, including:
 - ✓ Appropriate Assessment Study (AON – Society for Biodiversity Research and Environmental Engineering, 2011)
 - ✓ Environmental Impact Assessment report (AON – Society for Biodiversity Research and Environmental Engineering, 2011)
 - ✓ Environmental Permit (Revision no. 1 / 28.02.2025 or the Environmental Agreement no. 28 / 26.07.2011)
- archaeology-related documents developed/obtained as part of the impact assessment process conducted in line with national and/or international requirements:
 - ✓ Archaeological Diagnostic Report (Museum of National History and Archaeology in Constanta, 2024)
 - ✓ Preventive Archaeological Research Report (Museum of National History and Archaeology in Constanta, 2005)
 - ✓ Notice from the Ministry of Culture, County Directorate for Culture in Constanta, 2005
 - ✓ MEMO - Summary of Archaeological Process and Status – Dunarea East Wind Farm
- land-related documents provided by the Company under request, including:
 - ✓ cadastral map and open-source GIS data
 - ✓ summary table providing key information on the affected land parcels and key aspects of the land acquisition process
 - ✓ examples of land acquisition documentation (contracts and acts)
 - ✓ Valuation Report (Dobrogea EVAL SRL, 2025).

The purpose of the secondary data analysis is to:

- identify landowners and land users affected by the project
- inform the analysis of completed land acquisition and livelihood restoration processes against IFC PS 5
- inform the primary data collection and analysis.

5.2 Primary data collection

The primary baseline data collection includes the socio-economic survey and asset inventory.

5.2.1 Socio-economic survey

No socio-economic survey in line with the PS 5 has been conducted as part of the land acquisition process. The process was conducted in line with the national requirements as the national law does not require it. The socio-economic survey was conducted by RSK between 02 and 07 February 2026 using the following methods:

- household survey
- key informant interviews (KIIs)
- focus group discussions (FGDs)¹⁹.

These are discussed in more detail below.

5.2.1.1 Household survey

RSK conducted the household survey to collect information on:

- characteristics of affected households (e.g., demographic characteristics, household size, sources of income)
- characteristics of businesses (e.g., the number employees, type of activities)
- characteristics of livelihoods
- how the land acquisition process was conducted and whether compensation was paid
- land use practices and anticipated impact
- livelihood restoration support to be potentially provided to affected households and businesses
- vulnerable persons or groups that might require assistance during the land acquisition and livelihood restoration processes, etc.

The questionnaire used as part of the household survey is provided in Appendix 1.

5.2.1.2 Key Informant Interviews and Focus Groups Discussions

Table 5-1 details the KIIs/FGD that RSK conducted to collect and/or verify information on landownership and land use practices, as well as to obtain additional information on affected people and businesses.

Table 5-1: Key informant interviews and focus group discussions

Stakeholder group	Description	Format	Issues discussed
Local government administration	<ul style="list-style-type: none"> ▪ Administration of Deleni commune (local level)²⁰. 	KII	<ul style="list-style-type: none"> ▪ clarification of the practices of informal land use in the project area ▪ key steps of the land acquisition process ▪ grievances and/or court cases related to the project land acquisition (if any) ▪ anticipated land acquisition impacts

¹⁹ FGDs consist of semi-structured discussions with a group of people who have knowledge about a particular topic, such as agricultural practices or land tenure. The objective is to obtain qualitative data that reflects the perceptions, attitudes and knowledge of diverse groups.

²⁰ No meeting with the administration of Constanta county (district level) was planned as it has not been involved in the land acquisition process.

Stakeholder group	Description	Format	Issues discussed
			<ul style="list-style-type: none"> potential livelihood restoration support information on vulnerable groups.
Women	<ul style="list-style-type: none"> Women affected by land acquisition and economic displacement, including female landowners / land users or members of the affected households. 	FGD (three participants)	<ul style="list-style-type: none"> key steps of the land acquisition process grievances and/or court cases related to the project land acquisition (if any) anticipated land acquisition impacts – in general and specifically on women presence of informal land users potential livelihood restoration measures.

The KIIs and FGD guides used as part of the socio-economic survey are included in Appendix 2.

RSK had also intended to conduct KIIs/FGDs with Non-governmental Organisations (NGOs). However, during the primary data collection, it was confirmed that there are no NGOs active in the Deleni commune. No Constanta-based NGOs were identified as operating in Deleni commune or as being of potential relevance for engagement in the development and implementation of the LRP (confirmed by the Company's Community Liaison Officer and the administration of Deleni commune).

Prior to the primary data collection, there was no information on whether any of the PAHs were members of any agricultural cooperatives. Therefore, no meeting with agricultural cooperatives were conducted during the field work. During the field work, it was identified that seven PAHs and three businesses are part of five or six different agricultural cooperatives (one of the interviewed PAPs was not able to remember the exact name of the cooperative). None of these cooperatives were identified as having a significant number of PAHs among its members. In addition, according to the administration of Deleni commune, the practice of joining agricultural cooperatives is not widespread among the local farmers. Reportedly, farmers prefer not to join cooperatives, as they associate them with the former Soviet-era practices. Therefore, dedicated meetings with the cooperatives as part of the LRP development was not deemed to add value to the LRP. However, RSK will aim to inform the agricultural cooperatives on the LRP disclosure and to engage them in the LRP discussion stage (Section 7).

RSK developed a project LRP leaflet (in English and Romanian) to support the primary data collection and provide an overview of the project and the LRP process to affected people and organisations. These leaflets were handed out to affected people and organisations during the primary data collection. It is provided in Appendix 3.

5.2.2 Asset inventory

According to information available at the time of the LRP preparation, lease contracts for most of the land plots affected had already been concluded (MC had acquired property rights via land exchange for only one of the affected land plots).

No inventory of assets, such as annual and perennial crops, trees and structures, had been undertaken as part of the land acquisition process as this had been conducted in line with national requirements. However, in line with international requirements, RSK conducted an asset inventory/verification during the field visit between 02 and 07 February 2026. The asset inventory/verification sheet is provided in Appendix 1.

The date of completion of the asset inventory was established as the cut-off date (Section 10.2). The PAPs were notified that the information collected during the asset inventory would be considered final (no further changes would be made) and would inform the preparation of the LRP, as well as the further compensation and livelihood restoration process.

5.3 Scope of the primary data collection

Table 5-2 provides information on the targeted and achieved sampling for the primary data collection during the February 2026 survey:

Table 5-2: Sampling for the primary data collection

Category of affected people	Number of PAHs / businesses	Sampling strategy	Actual sample size	Comment
PAHs	47	All PAPs (100%)	35 (75%)	<ul style="list-style-type: none"> 35 PAPs were interviewed 1 PAP refused to meet 1 PAP was not available during the survey contact details of 2 PAHs were unavailable 8 PAHs were not interviewed since they were newly identified land users during the field survey conducted in February 2026.
Businesses (including sole traders)	13	All businesses (100%)	5 (39%)	<ul style="list-style-type: none"> information on only 5 businesses was available prior to the field survey in February 2026; representatives of all these businesses were interviewed 8 new businesses (including 2 organisations and 6 sole traders) were identified during the survey.

It should be noted that during the field survey, 11 PAPs preferred to be represented by other PAPs, e.g. by relatives, actual users of their land, etc.

Three PAPs owning the land were not available for interviews, which meant that information on the actual users of the land could not be obtained (this relates to 15 land plots acquired for the project).

No informal land users were affected by the project land acquisition, which was confirmed by the Company's CLO, the administration of Deleni commune and all the PAPs interviewed.

Information collected during the field survey in February 2026 is considered sufficient for LRP development. It provides sufficient grounds to analyse the land acquisition and compensation processes conducted, to identify affected households and businesses, determine relevant compensation and livelihood restoration measures, stakeholder engagement and grievance management, as well as monitoring processes.

MC will continue to identify and conduct relevant socio-economic surveys and asset inventories for the remaining affected households and organisations that have not been covered by the field survey in February 2026 throughout the LRP implementation. MC will also implement the Grievance Redress Mechanism (GRM) to provide an additional opportunity for identifying and engaging with PAHs and businesses.

5.4 Survey team

The survey team consisted of five experts, including four in-country and one international expert:

- Senior Social Expert (fluent in Romanian)
- Senior Social Expert (fluent in Romanian)



- Social Expert (fluent in Romanian)
- Junior Social Expert (fluent in Romanian)
- Senior Social Expert, team lead (international expert).

Four of the social experts were fluent in Romanian, which facilitated effective communication with affected households and businesses, as well as with other stakeholders.

Two of the Romanian-speaking social experts were female, which was an asset in communication with women affected by economic displacement, including during relevant FGD.

Prior to the start of the survey activities, the team received induction training covering key aspects of the fieldwork, including talking points related to the purpose of the LRP and the socio-economic survey / asset inventory, as well as communication protocols to follow when interacting with affected people and other stakeholders.

5.5 Data limitations

The following data limitations have been identified:

- During the preparation of the LRP, RSK used information on the affected land plots (including their overall size and temporarily/permanently acquired area) based on the database provided by MC upon RSK's request. RSK's local partner AUTIDECO conducted a random check to confirm that the information in the database corresponds with the information in the contracts with the PAPs. However, not all the contracts have been checked, and it is assumed that the information provided by MC was correct.
- During the field survey in February 2026, not all affected PAHs and businesses were covered, as not all interviews could be arranged. Some new affected PAHs/businesses were identified during the fieldwork (see Section 5.3). However, given that a significant number of PAHs and businesses were included and that land ownership and land-use patterns in the project area are largely similar, the information collected during the primary data collection is considered sufficient for the LRP development. It provides adequate grounds to analyse the land acquisition and compensation processes, to identify PAHs and businesses, and to determine relevant compensation and livelihood restoration measures, among other aspects. MC will continue to identify and conduct relevant socio-economic surveys and asset inventories for the remaining affected PAHs and businesses that were not covered by the February 2026 field survey throughout the LRP implementation.
- During the field survey in February 2026, some PAPs preferred to be represented by other PAPs during the interviews, such as relatives or actual users of their land. In such cases, certain questions about the represented PAPs were omitted (e.g., questions on household income and expenditures) if the information was considered sensitive or could not be accurately provided by the person representing the PAH.

RSK considers that the limitations described above do not compromise the integrity of the LRP. However, the livelihood restoration process is ongoing and adaptive, allowing for review and adjustment throughout the implementation of the LRP.

6 Socio-economic profile of the affected people

6.1 Communities within the project area

6.1.1 Overview

The project is located in the administrative municipality of Deleni, in the vicinity of the communities of Deleni, Pietreni, Sipotele, and Petrosani.

The Deleni commune is located in the central-southern part of Constanta County in the historical region of Dobrogea. It lies approximately 40 to 50 km from the city of Constanta and approximately 40 km from the Black Sea coast. The commune is predominantly rural and is composed of several villages administered under the same local authority. The area is characterized by flat to gently undulating terrain, typical of the Dobrogea Plateau, with extensive agricultural land use. Figure 6-1 shows the Deleni landscape in winter conditions during the site visit in February.

The local economy is primarily based on agriculture, including cereal crops (wheat, barley, corn), sunflower and rapeseed cultivation, as well as livestock farming at small and medium scale. Land is typically cultivated by individuals, sole traders and agricultural organisations. There are no major industrial facilities within Deleni.



Figure 6-1: Deleni landscape (February, 2026)

6.1.2 Demographics

Deleni reflects broader rural trends observed within the Constanta County, including gradual population decline and ageing. Younger residents often migrate toward Constanta municipality or other urban centres for employment and education opportunities. As a result, the population structure includes a relatively high proportion of elderly residents and pension-dependent households.

Basic public services are available in the Deleni commune, including local administrative services, primary education and primary healthcare (family medicine). More specialised administrative, educational and medical services are provided in nearby urban centres, primarily Constanta. Good road infrastructure connects Deleni to neighbouring communes and to national roads, facilitating access to regional markets and employment hubs.

Neighbouring rural communities share similar socioeconomic characteristics, with agriculture representing the dominant land use and income source. The broader regional context is defined by agricultural production, proximity to transport corridors linking inland Dobrogea to the Black Sea ports and increasing interest in renewable energy developments due to favourable wind and solar conditions.

The National Institute of Statistics (2021) shows that the Deleni commune had a total population of 2,223 inhabitants in 2021, representing a 0.71% decrease compared to 2011. All villages within the commune experienced a population decline over the past decade, reflecting broader rural demographic trends in Romania, including out-migration of working-age residents to urban areas and abroad, as well as negative natural growth.

Table 6-1 provides an overview of demographic characteristics of the communities.

Table 6-1: Demographic characteristics of villages within Deleni Commune

Village	Population	Population growth/decline	Women	Men
Deleni	379	-0.87%	178	201
Pietreni	799	-0.55%	402	397
Sipotele	499	-1.2%	232	276
Petrosani	546	-0.3%	259	287

Source: Census, 2021 (National Institute of Statistics, accessed on 26 February 2026).

In the 2021 census, the ethnic composition was predominantly Romanian (90.55%), with a small proportion of residents whose ethnicity was undeclared (8.82%). Other recorded ethnic groups (such as Turks or Tatars) are present in very small numbers or aggregated elsewhere in the census reporting for the commune. From a religious perspective, the majority of inhabitants identified as Orthodox (88.62%), with a minor share reporting Muslim affiliation (1.93%). Overall, Deleni remains largely homogeneous in ethnic and religious structure, with limited representation of minority communities within official census statistics.

The main education institution is Școala Gimnazială Deleni, located in the central village of Deleni. The school provides primary and lower secondary education from preparatory class through grade VIII and includes modernised classrooms and facilities. In addition to this, there are schools with grades I to VIII in the villages of Poiana, Maxut and Feredeni, providing accessible education in the outlying villages of the commune. Early childhood education is also available locally, with kindergartens or preschool classes functioning within the school structures. As a result, children from all constituent villages of the commune can attend school within the community without being transported to distant towns.

Cultural and community life in Deleni centres around a single local cultural institution, the Căminul Cultural Alexandru Tănase, which hosts community events, performances, traditional festivities and social activities for residents. There is no information indicating the presence of separate community centres in the other villages of the commune.

6.1.3 Infrastructure, utilities and housing conditions

Within the administrative territory of Comuna Deleni, electricity distribution is provided through the regional grid operated by Rețele Electrice România, which covers the Dobrogea region. Households purchase electricity from licensed retail suppliers active in the Romanian energy market, depending on individual contractual arrangements. Electricity access is available across the commune. Household heating is typically provided through individual systems, including firewood and electrical appliances, while bottled gas is commonly used for cooking purposes.

Water supply and wastewater services are provided by the regional operator RAJA SA, which serves urban and rural localities across Constanta County. Water is generally supplied through centralised public systems in the main villages, although in certain peripheral areas households may rely on individual wells. Sewerage infrastructure coverage is not uniform across all settlements, and some households use individual septic systems. Solid waste collection services are organised at commune level and operate on a regular basis.

According to the Constanta County Waste Management Plan 2020–2025, municipal waste collection and disposal are organised within the framework of the county-level waste management system. The Constanta County Waste Management Plan confirms that the county is included in an integrated waste management system, with objectives focused on waste prevention, separate collection, recycling and recovery and environmentally compliant disposal in line with national and EU environmental legislation. As part of this system, municipal waste services are provided under county arrangements, ensuring collection, transport and treatment of household waste in accordance with applicable regulatory standards.

Residential buildings consist predominantly of single- and two-storey detached houses constructed mainly between the 1960s and 1990s, with some newer constructions developed in recent years. Houses are typically built of brick, concrete or mixed materials. According to information provided by Deleni Municipality Office during the primary data collection in February 2026, there are no unoccupied dwellings. The overall structural condition of housing is generally adequate, with gradual renovations observed over time.

Private vehicle ownership is common among households. Mobile phone coverage is widespread, and residents have access to internet services through mobile or fixed network providers. The national roads connecting the county roads are in good condition, while the local roads vary in condition.

There are no large-scale industrial or processing facilities within the commune. Economic activity is primarily agricultural. Residents typically access higher-level administrative, medical and commercial services in larger towns within Constanta County.

6.2 Affected households and organisations

This section provides information on the socio-economic profile of the PAHs and organisations interviewed during the preparation of this LRP. The methodology of the primary data collection, including its scope and limitations, is provided in Section 5.

It should be noted that some of the PAPs are sole traders, which makes them affected households and business owners at the same time. In this section, these sole traders are covered in both subsections below, i.e. as households and businesses. All the other sections of this report categorise sole traders as businesses.

The majority of interviews (70%) were attended directly by the PAP. In 20% of cases, a relative of the PAP participated in the interview, while 10% were represented by another authorised representative. The data indicates that most responses were provided firsthand by the affected individuals themselves, ensuring direct representation of their views and socioeconomic situation.

Most interviews were conducted directly with the household head²¹, representing the largest proportion of respondents (37). A significant number of interviews were also conducted with wives (19) and sons (11) of the household head. Other family members such as daughters, grandsons, mothers, or extended relatives represent a smaller share. Figure 6-2 shows that responses were primarily provided by key household decision-makers or immediate family members

²¹ Interviewees were asked to define their role in the household.

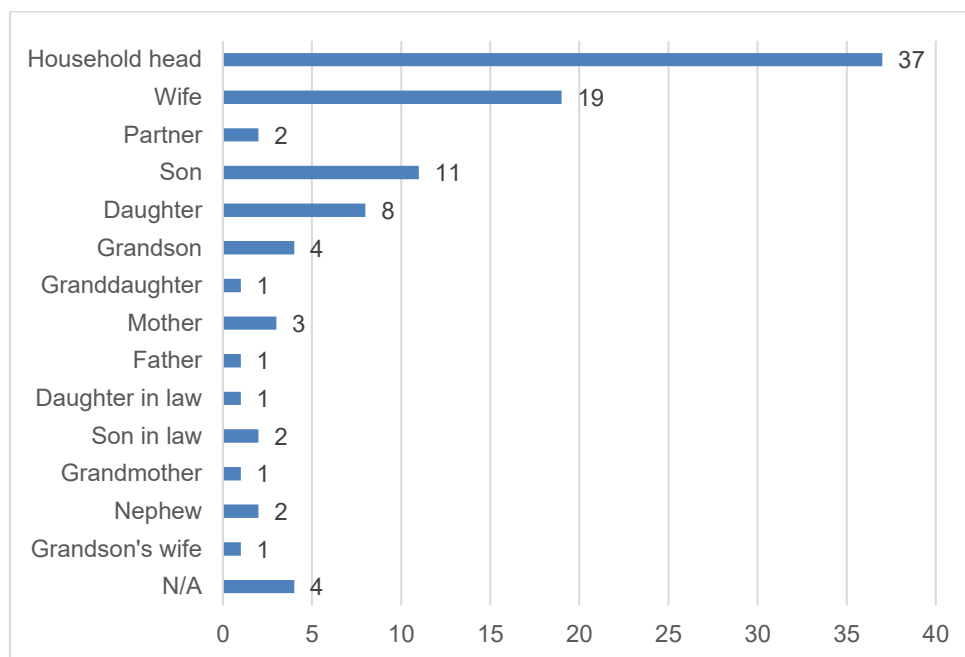


Figure 6-2: Interviewee's relationship with household head

6.2.1 Affected households

6.2.1.1 Demographics and education

The households surveyed are predominantly small to medium-sized (between one and four members). The largest share of respondents (20%) reported three household members, followed by two-member households (18%). Single-person and six-member households each represent 10%, while four-member households account for 8% and five-member households for 5%. In 26% of cases, no data was available as no information could be provided by the interviewee on behalf of other PAPs, and in 3% of cases the landowner did not provide any family information.

Out of the 40 PAPs interviewed, 90% (36 respondents) were male, while 10% (4 respondents) were female. The average age of household heads is approximately 60 years, reflecting a predominantly older household leadership structure. Female household heads present a slightly higher average age (65 years) compared to male household heads (59 years). Although female-headed households are limited in number within the sample, the data suggests that women acting as household heads tend to be marginally older than their male counterparts. Overall, the age profile confirms a mature household demographic, consistent with rural population ageing trends observed in Romania.

The age profile of the households of the interviewed PAPs shows that the majority of household members (63%) are between 18 and 65 years old, representing the economically active population (Figure 6-3). Elderly persons above 65 years account for 25% of household members reported, while children under 18 represent 12%.

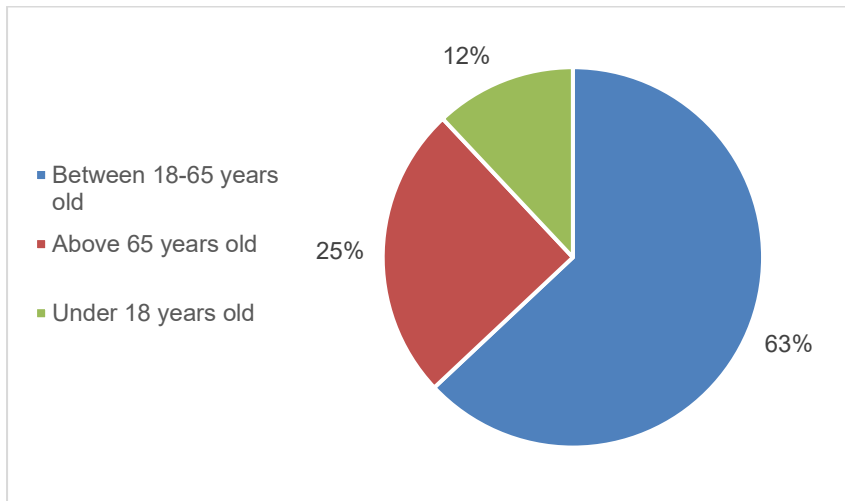


Figure 6-3: Age profile of affected households

Most members of the households whose representatives were interviewed are married (59%), while 21% are single. A smaller proportion are widowed (5%) or widower (2%), and 1% are divorced. In 12% of cases, no information was provided. The data indicates that most affected persons belong to stable family structures, with limited representation of single or separated individuals.

The education profile of the interviewed households shows that the largest share of members (33%) have completed higher education. Secondary school graduates account for 20%, while 17% completed primary school. Technical school graduates represent 9%, and 8% completed high school. Students account for 5%, with an additional 2% secondary school students and 2% primary school students. Only 1% reported no education. Overall, the data indicates a relatively well-educated population, with more than half of respondents having at least secondary education or higher.

6.2.1.2 Livelihoods

Income information provided by the PAPs representing households is presented in Figure 6-4.

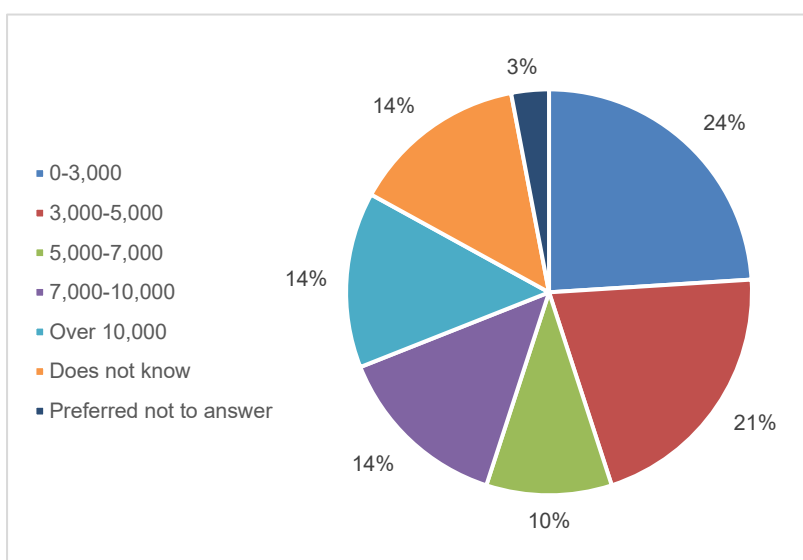


Figure 6-4: Monthly household income (RON)

Approximately 24% of the affected households whose representatives were interviewed have monthly income lower than 3,000 RON²² (EUR 589). The income of 21% households is 3,000 to 5,000 RON (EUR 589 to 982). Higher income brackets include 5,000 to 7,000 RON (EUR 982 to 1,374) for 10% households; 7,000 to 10,000 RON (EUR 1,374 to 1,964) for 14% households; and over 10,000 RON (above EUR 1,964) for 14% households, while 14% did not know and 3% preferred not to answer.

The primary occupation of member of the affected households whose representatives were interviewed is relatively diversified as shown in Figure 6-5. The largest share are farmers (23%) and employees (23%), followed by pensioners (20%). Housewives represent 12% and students 9%, while entrepreneurs and unemployed persons each account for 2%. In 9% of responses, no information was provided. The data indicates a mixed profile combining economically active individuals and pensioners.

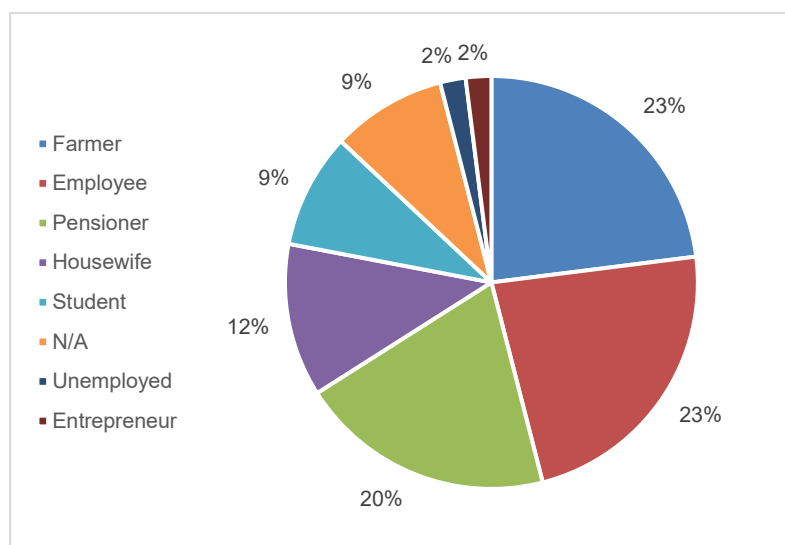


Figure 6-5: Primary occupation of PAPs

A high percentage of respondents (84%) reported having no secondary occupation (Figure 6-6). Among those with additional economic activities, farming represents the largest share (57%), followed by pension-related income (22%). Other secondary occupations, such as assistant teacher, company administrator and construction worker, each account for 7%.

The PAPs and businesses cultivate the following types of crops: wheat, corn, barley, sunflower, rapeseed, peas, mustard, alfalfa, and forage crops such as hay for livestock.

²² RON – Romanian Leu. The conversion rate is EUR 1 = RON 5.0915 (according to the exchange rate of the European Central Bank as of 17.03.2026)

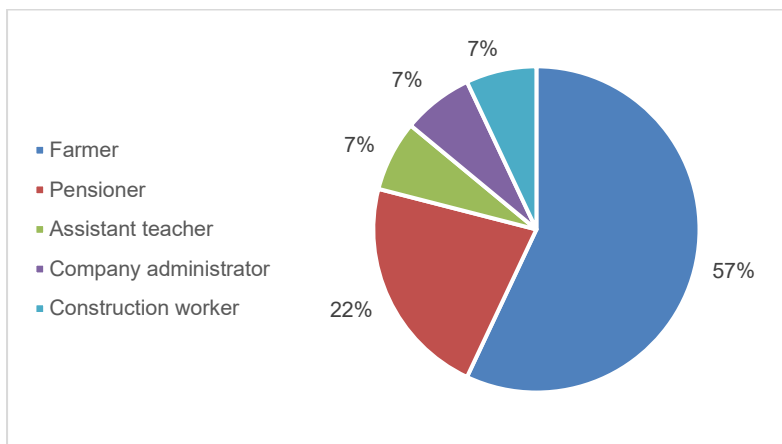


Figure 6-6: Secondary occupation of PAPs

For 42% of households whose representatives were interviewed, the main source of livelihood relates to salary payments (Figure 6-7). A smaller share of households reported pension payments as their main source of livelihood (27%). For 19% of households, the main source of livelihood is income from agricultural activities, for 8% - business revenues and for 4% - lease payments for renting out land plots.

The data indicates that salaried employment and pensions are the primary sources of livelihood for most affected households, highlighting the predominance of non-land-based income streams. While 23% of respondents identified their primary occupation as farmers, only 19% reported agriculture as their main source of livelihood. This difference suggests that, for some households, agricultural activities represent a supplementary rather than primary source of income, often combined with salaries or pensions.

Overall, the findings indicate a mixed livelihood structure, in which approximately one fifth of households rely primarily on land-based income, while the majority depend on non-agricultural income sources.

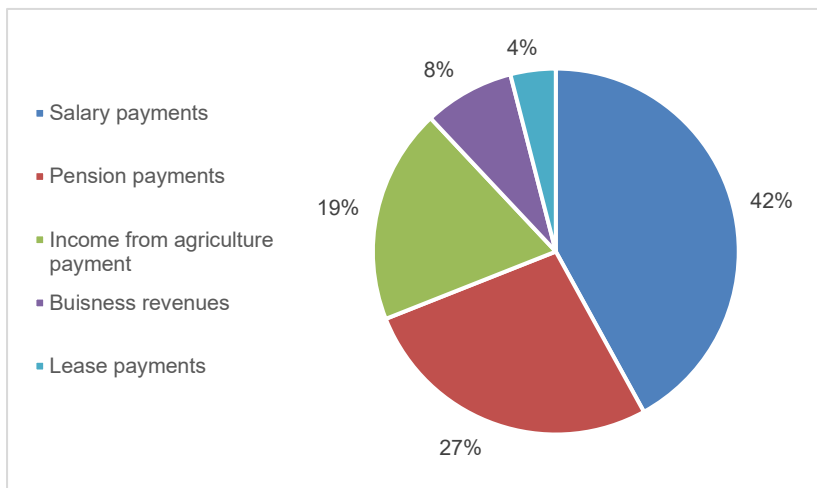


Figure 6-7: Main sources of household livelihoods

The second largest contribution to household livelihood is diversified, as shown in Figure 6-8. Pension payments and income from agricultural activities are the second-largest contributors to livelihood for 27% and 19% of households, respectively. Approximately 8% of households reported that their second-largest source of livelihood is income from cereal transportation activities, while 4% report lease payments as their secondary source. Smaller proportions include salary, animal husbandry and social security payments, while some respondents reported no secondary contribution to their livelihoods. The

data indicates that agricultural-related income and pensions remain important complementary financial sources for affected households. This largely corresponds with the data on secondary occupations (Figure 6-6), which indicates farmers and pensioners as the most frequently reported secondary occupations. Approximately 84% of respondents reported no secondary source of livelihood, suggesting limited income diversification at household level. However, the presence of pensions, subsidies and agricultural payments in some cases indicates that income streams are often layered rather than singular.

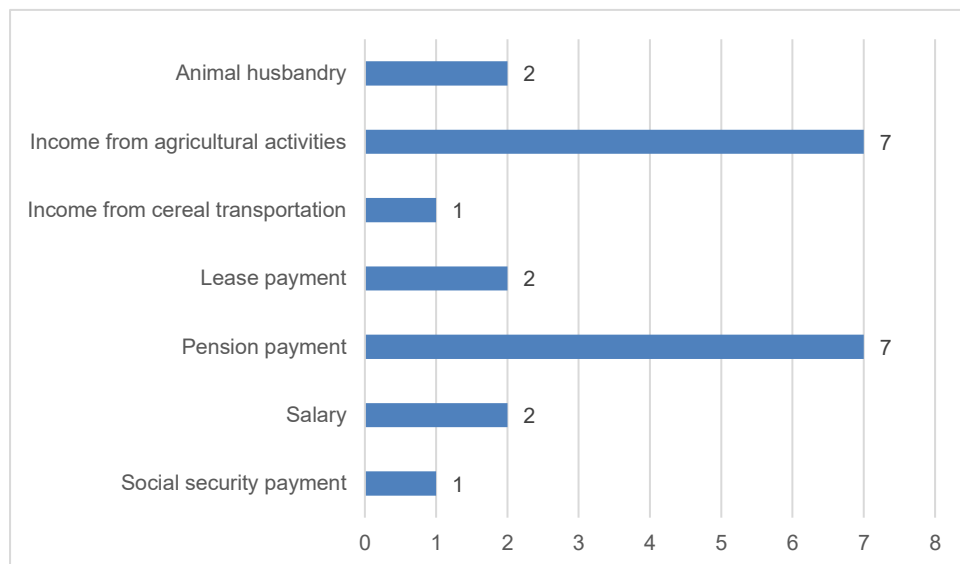


Figure 6-8: Secondary sources of household livelihoods, PAHs²³

The land affected by the project is widely used for crop cultivation, and only one land parcel is reportedly used for grazing activities. Most of the crops or animal produce (live animals, milk, cheese) are sold as income, while only 21% is used for household consumption.

Among the respondents, 72% confirmed that they have good road access to their land plots. The majority, 83%, of respondents reach their plots by private vehicle. Some of the respondents (4%) reported accessing their land by public transport, while about 5% indicated that they also have to travel at least part of their way on foot. The remaining 8% use alternative means of transport, such as horse-drawn carts.

Agricultural land rent is typically paid by the land user under a formal lease contract or agreement. Among the interviewed respondents, 85% reported paying rent, with lease durations ranging from one year up to ten years. Rent levels vary, although 59% of respondents did not disclose the amount or indicated that they did not know it. Of those who provided information, 21% reported paying approximately 1,000 RON (EUR 196) per ha/year.

Half of the respondents (50%) reported receiving subsidies related to land use, while the remaining 50% indicated that they do not receive such payments. Among those receiving subsidies, the majority are related to agricultural activities. Out of the 50% that receive subsidies, approximately 48% reported

²³ The figure provides data on those PAHs that reported having secondary sources of livelihoods and who were represented directly by members of these households.

subsidies for grazing areas or per head of animals per year²⁴, while 47% receive payments for crops per hectare per year.

The data confirms that subsidies are primarily linked to agricultural land use. Among respondents who reported receiving subsidies, 25% indicated values between 501 to 1,000 RON (EUR 98 to 196), representing the largest identified bracket. Smaller proportions reported 1,001 to 1,500 RON (EUR 197 to 295) (7%), over 1,500 RON (above EUR 295) (5%), and 0 to 500 RON (EUR 0 to 98) (5%). A significant number of respondents (50%) did not provide information, while 8% stated that they did not know the value.

The majority of respondents (75%) reported that they are not members of any agricultural cooperative or other business organisation. Only 25% indicated membership in such entities. During the field work, it was identified that some of PAHs and businesses are part of five or six different agricultural cooperatives (one of the interviewed PAPs was not able to remember the exact name of the cooperative). None of these cooperatives were identified as having a significant number of PAHs among its members. In addition, according to the administration of Deleni commune, the practice of joining agricultural cooperatives is not widespread among the local farmers. Reportedly, farmers prefer not to join cooperatives, as they associate them with the former Soviet-era practices.

6.2.2 Affected organisations

The ownership status of the affected land plots shows that 70% are owned by individual persons, 13% owned by sole traders / individual enterprises, and 17% by agricultural organisations (Figure 6-9).

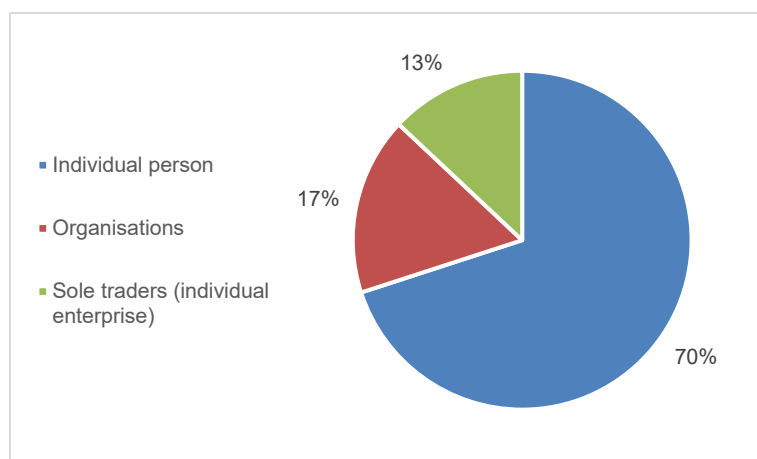


Figure 6-9: Owners of affected land plots

In total, four businesses owning land and operating within Deleni commune are affected by the project-related land acquisition: Agrodania SRL, Newco Agro Land SRL, Zoo Agro Traiani SRL and Nostalgic SRL. These organisations are active in the agricultural sector and are currently using the affected land plots under lease agreements or ownership arrangements.

In addition, three other businesses (Amagenic SRL, Arosan Pietreni SRL and Agrodip Com SRL) have been identified as land users of affected plots, as they are not landowners.

The affected organisations conduct large-scale agricultural activities, primarily focused on crop production (e.g. cereals and oilseed crops), using mechanised farming equipment. During the interviews, their representatives reported that the affected parcels represent only a fraction of their total

²⁴ It should be noted that only one land parcel affected by the project is reportedly used for grazing activities (approximately 2% of this parcel will be acquired by the project on a temporary basis). Therefore, when reporting that they receive subsidies for grazing areas, most respondents are referring to other land plots they use that are not affected by the project.



operated land portfolio. No processing facilities, storage infrastructure or permanent business premises are located on the affected plots.

The businesses employ a limited number of permanent staff, mainly agricultural machinery operators and administrative personnel. Based on the information collected during interviews, no reduction of workforce, suspension of activity or operational disruption is anticipated as a result of the project.

All interviewed businesses stated that the anticipated impact is limited to temporary or partially restricted use to the affected land, with no significant financial or operational risks to business continuity.

Typical income over the past three years was analysed in relation to reported typical expenses and average sales. The results show substantial differences between sole trader enterprises and agricultural businesses. Despite the purpose of the question being clearly explained, a number of respondents chose not to provide this information. Non-responses are likely due to the sensitive nature of financial information or difficulties in recalling such data. In the context of small-scale agriculture and sole trader enterprises, such information is often considered commercially sensitive and may also be associated with concerns related to taxation, subsidies, or regulatory oversight. Additionally, challenges in accurately recalling financial data over a multiyear period contributed to partial nonresponse.

The typical income varies depending on the size of the organisation. Typical income of sole traders is between 200,000 RON (EUR 39,300) and 2,000,000 RON (EUR 392,800). Whereas typical income of larger organisations is from 400,000 RON (EUR 78,600) to 14,000,000 RON (EUR 2,749,000).

Consistent with the workforce gender profile in the agricultural sector, employment data from the surveyed businesses indicate that the workforce is predominantly male, particularly within limited liability companies (SRLs). Across the seven SRLs in the dataset, 87 employees were reported, including 69 men and 18 women (79% male and 21% female), while the five sole traders together employ 21 workers, including 18 men and 3 women (86% male and 14% female). Overall, the data suggest that agricultural and related economic activities in the project area rely primarily on male labour, with comparatively limited female participation.

7 Stakeholder engagement

7.1 Objectives and principles

Information disclosure and engagement with relevant stakeholders affected by land acquisition and economic displacement are key requirements of IFC PS 5 and EBRD ESR 5. The key objectives of engagement activities are as follows:

1. **Good faith negotiation:** processes will be put in place to ensure MC establishes and maintains good relationships with PAPs. This will include the establishment of a two-way communication stream with stakeholders to encourage open and respectful conversations with the affected people regarding any issues.
2. **Disclosure of information:** affected stakeholders should be informed of the project plans throughout all stages of the project lifecycle, from planning to completion and operation. Information will be provided in a timely manner. In relation to economic displacement, stakeholders will be provided with information regarding the project's land acquisition and livelihood restoration strategy. The Company will disclose the draft and final LRP. It will also issue a brochure with brief information on the project and the livelihood restoration process.
3. **Meaningful participation:** stakeholder engagement will be facilitated in a culturally appropriate way in order to engage all relevant stakeholders and ensure no vulnerable or marginalised groups are excluded. The project will facilitate the participation of affected people in the LRP development and implementation.
4. **Engagement of vulnerable groups and gender sensitivity:** the project will identify vulnerable groups and make an effort to ensure these groups are adequately engaged on livelihood restoration strategies. Women may often be disproportionately impacted by the economic displacement. The project will implement additional measures to facilitate gender inclusivity as part of the stakeholder engagement processes, and gender-specific aspects are to be considered within the socio-economic survey where FGDs with women are to be conducted.
5. **Ongoing engagement:** throughout the entire project lifecycle, MC will carry out ongoing engagement with PAPs through information disclosure and consultation activities, reporting, and the maintenance of a Grievance Redress Mechanism (GRM) (see Section 8).

7.2 Completed stakeholder engagement

Stakeholder engagement has previously been conducted as part of the wider Dunarea Windfarm Project which included both the West and East sites. Below is a summary of these engagement activities.

7.2.1 Stakeholder engagement as part of regulatory approvals

Stakeholder engagement for the project in line with Romanian legislation began at inception from 2010 to 2011 and subsequently in 2019. These engagement activities were carried out throughout the zoning stage, during the national EIA process, and as a follow up in 2019 updating affected people and other stakeholders on the project commencement. These public disclosure and consultation activities are summarised in Table 7-1 below (SEP, 2025).

Table 7-1: Overview of stakeholder engagement activities in line with national legislation

Date	Engagement Type	Location / Notification method	Description
Zoning Stage			
31 January 2011	Public meeting	Adamclisi Town Hall	public debate for the zoning of the wind park development with access roads and interconnectors to the

Date	Engagement Type	Location / Notification method	Description
			<ul style="list-style-type: none"> national energy system of Adamclisi commune, Constanta County announcement was posted at Adamclisi Town Hall and published in the local newspaper on 10th and 13th December 2010.
01 February 2011	Public meeting	Deleni City Hall	<ul style="list-style-type: none"> public debate for the zoning of the wind park development with access roads and interconnectors to the national energy system of Deleni commune, Constanta County announcement was posted at Deleni City Hall and published in the local newspaper on 10th and 13th December 2010.
EIA Stage			
04 April 2011	Information publication	Local media	<ul style="list-style-type: none"> decision of Environmental Protection Agency Constanta published.
07 May 2011	Information publication	Local media, Commune Halls of Adamclisi and Deleni and APM Constanta website	<ul style="list-style-type: none"> information on public hearing of EIA Report and the possibility of reviewing the documentation published in multiple sources.
31 May 2011	Public meeting	Adamclisi Commune Hall	<ul style="list-style-type: none"> public meeting with no comments raised by the meeting participants.
01 June 2011	Public meeting	Deleni Commune Hall	<ul style="list-style-type: none"> public meeting where a representative of local NGO, Ocean Club, asked for clarifications on the impact of the project on certain species of rodents and birds.
19 July 2011	Confirmation issuance	Local media and Adamclisi/Deleni Commune Halls	<ul style="list-style-type: none"> confirmation of issuance of the environmental agreement was published.
Update Stage			
2019 [date TBC by MC]	Public meeting	[location TBC by MC]	<ul style="list-style-type: none"> project developer organised a public meeting with local authorities and communities with 50 landowners attending the meeting.

7.2.2 ESIA-related stakeholder engagement

In addition to national regulatory stakeholder engagement, key stakeholders were further engaged in 2022 and 2023 to align the project with IFC and EBRD standards. These activities occurred as part of the scoping phase (November 2022) and socio-economic baseline data collection phase (March to April 2023) for the larger Dunarea East and West WF project as part of the ESIA process. Below is a summary of the consultations conducted according to information provided in the SEP, 2025 (Table 7-2).

Table 7-2: Overview of ESIA-related stakeholder engagement activities

Date	Location	Stakeholders engaged
Scoping phase		
15 November 2022	Deleni commune	<ul style="list-style-type: none"> ▪ Deleni Commune Mayor ▪ Commune Hall Secretary
15 November 2022	Adamclisi Commune	<ul style="list-style-type: none"> ▪ private landowners impacted by Project land acquisition ▪ Adamclisi Commune Mayor ▪ population register office representative ▪ counsellor and Director of Archaeological Museum Adamclisi ▪ Adamclisi Priest ▪ local business representative (local roads company, accommodation facility and restaurant).
ESIA baseline data collection phase		
14 June 2023	Deleni Commune Hall	<ul style="list-style-type: none"> ▪ Deleni Commune Mayor ▪ Deleni Commune Vice Mayor ▪ Nine Farmers ▪ Social Department in Deleni ▪ Accounting Department in Deleni ▪ Agricultural Register Department in Deleni ▪ Urbanism Department in Deleni ▪ Commune Local Councilor ▪ police representative ▪ doctor.
15 June 2023	Adamclisi Commune	<ul style="list-style-type: none"> ▪ Adamclisi Commune Mayor ▪ Priest from Adamclisi Commune ▪ Seven Farmers ▪ Social Assistance Department of Adamclisi Commune.

More detailed information on these activities is provided below.

7.2.2.1 Scoping engagement

Scoping phase engagement occurred on the 15 November 2022 when a public consultation meeting was held. The aim of this meeting was to:

- share relevant information about the project and the forthcoming ESIA process
- validate the Social Area of Influence
- establish communication channels with institutional stakeholders, introduce and provide contact details for the contact person representing the project
- gain an understanding of project related concerns, grievances and questions from stakeholders, and either provide a response or commit to a follow up.

The key comments from stakeholders recorded at scoping phase meetings include:

- road infrastructure concerns:
 - ✓ potential construction damage to existing roads, particularly the recently asphalted Deleni-Petrosani road
 - ✓ expectation that the road will be reinstated to its current quality after heavy use for material transportation

- ✓ negative past experience from 2008 Fantanele-Cogealac Windfarm construction that degraded local roads
- administrative request that future project communications maintain the separation between Adamclisi and Deleni elements, as the project is permitted as two distinct sub-projects
- positive perceptions:
 - ✓ local authority views the project as beneficial for community development
 - ✓ impact of temporary restricted access to pastureland during construction is considered minimal and manageable through timely engagement with shepherds who currently lease the land (once the final design and construction schedule are confirmed).

7.2.2.2 *Engagement during ESIA baseline data collection*

Further stakeholder engagement was conducted in 2023 as part of the wider social baseline data collection process for the ESIA for the Dunarea East and West WF project. Sessions were organised in collaboration with the newly appointed CLO for the project. The primary goal of these activities was to collect baseline information on the socio-economic baseline and engage around key potential risks and opportunities associated with the project. In total, 38 persons participated in meetings, of which 18 were women (approximately 47%). The stakeholder engagement process consisted of:

- distribution of Project Information Leaflet (PIL) and Project Information Sheet, in Romanian, for information disclosure and comment
- development of maps to support engagement
- conducting KIIs with relevant stakeholders (elected community representatives and civil servants in charge of agricultural, social assistance or planning departments, health and education professionals and policemen)
- conducting FGDs with farmers
- collection of feedback on past engagement and suggestions for improving future engagement processes
- establishment of grievance mechanism, in partnership with local authority representatives, in both communities.

7.2.3 *Stakeholder engagement related to land acquisition*

During the land acquisition process conducted by Rezolv Energy (Section 4.2), engagement with affected landowners was led directly by the Rezolv Energy team on behalf of MC, which managed all negotiations and contractual procedures.

Engagement with affected people and organisations was conducted entirely through face-to-face negotiations. No prior public announcements, written notices, or mailed information were used; instead, discussions were initiated directly with each landowner during on-site or in-person meetings.

Additional acts (contract addenda) were signed when necessary, mainly due to:

- changes in the project design
- changes in market conditions, and / or
- changes in land ownership.

Payments under the signed lease agreements are being paid in accordance with the contractual conditions. As discussed in Section 5.2.2, no land valuation process was performed to determine the lease price, and no asset inventory of land, annual crops, perennial crops or trees was undertaken at the time of contract signing. This has been conducted by RSK in February, 2026 (Section 5.2).

It should be noted that during primary data collection in February 2026, the vast majority of the interviewed PAPs indicated that they consider the engagement activities (including information disclosure and consultation) regarding land acquisition sufficient. Only one of the interviewed PAPs indicated that insufficient information on the land acquisition process had been received. However, due to the lengthy process of land acquisition and changes in the project design, some of the PAPs reported a lack of clarity regarding:

- whether their land will be used for the project or not
- whether any restrictions will apply to the use of the affected land plots (including restrictions on the use of land that forms part of affected cadastral land plots but is not directly affected by the project).

The above indicates the necessity for ongoing engagement with PAPs throughout the development, public disclosure and implementation of the LRP and of the need to ensure the effective functioning of the GRM.

7.3 LRP-related stakeholder engagement

7.3.1 Key activities

The Company is committed to engaging with stakeholders who are directly impacted by land acquisition and economic displacement, based on the principle of meaningful participation. The CLO and the LRP Manager (to be engaged by the project) will facilitate the engagement activities outlined in Table 7-3 below.

Table 7-3: Overview of the planned LRP-related stakeholder engagement

Activity and information to be disclosed	Indicative timeframe/frequency	Target stakeholders	Responsible party	Materials/methods
LRP preparation phase				
Engagement with PAPs during draft LRP preparation, including: <ul style="list-style-type: none"> ■ socio-economic survey ■ asset inventory/verification. 	February 2-7, 2026	PAPs	RSK	<ul style="list-style-type: none"> ■ LRP leaflet ■ LRP questionnaire and FGD's guidelines.
Disclose the draft LRP: <ul style="list-style-type: none"> ■ hard copy of draft LRP will be made available in Deleni ■ copy of the draft LRP will be provided to each PAP affected by economic displacement under request by email or in hard copy²⁵ ■ Draft LRP to be disclosed on the project / Rezolv Energy website. 	April-May, 2026	PAPs and other external stakeholders	RSK	<ul style="list-style-type: none"> ■ LRP leaflet ■ digital and hard copies of the draft LRP (in English and Romanian).
Conduct meeting(s) in Deleni to present key provisions of the draft LRP to the PAPs and obtain their feedback (to be reflected in the final LRP)	March April/May, 2026	PAPs	RSK / MC	<ul style="list-style-type: none"> ■ presentation ■ LRP leaflet ■ digital and hard copies of final LRP.
Disclose the final LRP:	April 2026	PAPs and other external stakeholders	MC	<ul style="list-style-type: none"> ■ LRP leaflet

²⁵ Hard copies may be provided under request.

Activity and information to be disclosed	Indicative timeframe/frequency	Target stakeholders	Responsible party	Materials/methods
<ul style="list-style-type: none"> hard copy of the final LRP will be made available in Deleni Final LRP to be disclosed on the Project website (any personal data will be removed from the disclosed document) 				<ul style="list-style-type: none"> digital and hard copies of LRP.
Conduct individual meetings with PAPs to negotiate and sign supplemental compensation packages and livelihood restoration measures	April – May, 2026	PAPs	MC	<ul style="list-style-type: none"> private meetings.
Identification of and engagement with PAPs that couldn't be contacted during the LRP preparation (were away, etc.)	April 2026 and ongoing	PAPs	MC	<ul style="list-style-type: none"> private meetings.
LRP implementation phase				
Ongoing updates on status of the key LRP implementation activities	Q2 2026 and ongoing	PAPs, other external stakeholders	MC	<ul style="list-style-type: none"> progress reports meetings with PAPs disclosure of information on the project website.
Grievance mechanism				
<ul style="list-style-type: none"> disclose the grievance mechanism which is to be used as the primary channel for submission of comments, claims and complaints provide updates on grievances received and their management. 	February 2026 and ongoing	PAPs	MC	<ul style="list-style-type: none"> LRP leaflet progress reports meetings with PAPs disclosure of information on the project website.
Monitoring and evaluation				
Engagement with PAPs as part of internal and external monitoring	Q2 2026 and ongoing	PAPs	MC	<ul style="list-style-type: none"> group/private meetings.
Completion audit				
Engagement with PAPs as part of the completion audit	3 years after the start of the LRP implementation (TBC)	PAPs	MC	<ul style="list-style-type: none"> group/private meetings.

7.3.2 Gender aspect of stakeholder engagement

MC will implement processes to ensure equal engagement of both women and men. Gender-sensitive issues were discussed during the socio-economic survey, including during a FGD with female members of households affected by economic displacement. This includes discussion of whether women in affected households have specific roles or activities, whether they are more disadvantaged than men (and why), whether they might be particularly affected by the project, and whether targeted assistance should be provided to them during land acquisition and livelihood restoration. The FGD with women were conducted by female experts.

The Company will ensure that both women and men can participate in all information-sharing and participation activities throughout the LRP implementation.

7.3.3 Stakeholder engagement with vulnerable groups

Vulnerable groups and individuals are discussed in Section 12.1. Engagement with vulnerable groups as part of the land acquisition and livelihood restoration process is an iterative process which will be adapted throughout the LRP development and implementation to better accommodate their needs. At this stage, this will include the following measures to facilitate participation:

- Vulnerable groups were identified as part of the socio-economic survey and specific provisions needed to facilitate their participation in the LRP development and implementation were determined. This included carrying out an FGD with women to identify their specific needs in relation to the impact of economic displacement.
- Meeting times and venues for stakeholder engagement have been and will continue to be selected to facilitate participation of vulnerable groups. For example, MC will ensure a number of stakeholder engagement events are held during school hours to ensure women with childcaring responsibilities are not barred from participating. Additionally, effort will be made to hold events in locations accessible to community members affected by economic displacement, such as venues with nearby reliable public transportation links.
- If vulnerable persons are identified who would be prevented from public participation due to financial barriers (such as an inability to afford transportation costs, etc.), MC will provide assistance to facilitate participation (Section 12).
- Multiple channels of grievance access (mail, email or direct communication with CLO) will be established to ensure vulnerable groups are able to submit grievances through the channel they find most accessible. If any vulnerable PAPs highlight the inaccessibility of these channels, alternative methods will be established on case-by-case basis.

Assistance provided to vulnerable groups is discussed in Section 12.2.

8 Grievance redress mechanism

8.1 Objectives

It is necessary to develop and implement a grievance management process designed to review, address, and respond to grievances related to land acquisition and livelihood restoration processes, as well as to record and monitor the process. MC has established a Grievance Redress Mechanism (GRM) based on the grievance mechanism established as part of the SEP for the Dunarea East and West WF project (it is RSK's understanding that a new SEP will be developed for the project as part of the ESIA process to be conducted specially for the Dunarea East WF project). MC will ensure coordination between the GRM developed under the new SEP and the GRM discussed in this document.

The GRM has the following objectives:

- Provide channels for the submission of grievances by affected people, businesses and other stakeholders related to the planning and implementation of the land acquisition and livelihood restoration activities in a transparent, constructive, timely, confidential, culturally appropriate and accessible manner. Individuals can submit grievances anonymously with measures being put in place to ensure anonymity. The Company will strive to accommodate any specific needs such as language, literacy level or preference in relation to the gender of the individual lodging a grievance.
- Record, categorise and prioritise all grievances (including those presented informally or verbally) to establish statistics about concerns of affected households, businesses and other stakeholders, as well as how these can be addressed
- Investigate the causes of the grievances to be able to provide an informed response to the claimant. An appropriate investigation will allow the Company to provide relevant solutions for addressing grievances and concerns.
- Define the maximum number of days to respond and address a grievance, as well as to keep the claimant updated on progress
- Providing affected people and other stakeholders with a clear mechanism to express their concerns and seek appropriate remedies, contributing to establishing good-faith and trustworthy relationships with the project.
- Contribute to obtaining social license to operate by the MC.

The mechanism must not involve any costs nor retribution associated with lodging a grievance. Eligibility of affected people for compensation and other related support measures must not be affected by grievances they lodge. MC will commit to ensuring that no stakeholders face any reprisal or retaliation as a result of their grievance or actions taken to speak to other organisations or groups regarding the case.

8.2 Gender based violence and harassment

In order to mitigate risk and facilitate remediation, opportunities to lodge grievances related to gender-based violence and harassment (GBVH) will be provided as part of the GRM determined as part of the SEP / management plans and policies for the Dunarea East and West WF and the LRP.

MC will commit to the strict implementation of policies to mitigate the risk of GBVH and will enact a zero-tolerance policy for GBVH as part of the land acquisition and livelihood restoration processes.

8.3 Grievance management

MC will implement the following procedure for the management of grievances related to land acquisition and economic displacement. The procedure operates in accordance with the guiding principles and objectives of providing fair, efficient and effective handling of grievances expressed by PAPs in relation to land acquisition and displacement. The key stages of the GRM are presented in Figure 8-1 and elaborated in the text below:

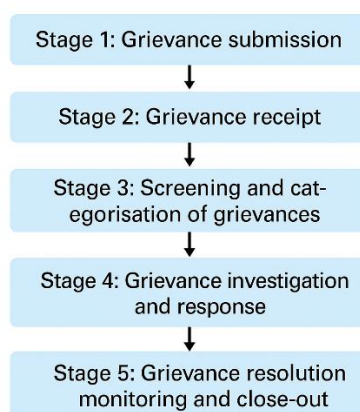


Figure 8-1: Key stages of the GRM

8.3.1 Stage 1: Submission

The following methods may be used for submitting a grievance (Table 8-1):

Table 8-1: GRM contact details

Contact details	
Phone number	+40 768 064 467 (Sorin Blidaru, CLO)
E-mail address	blidaru.sorin@yahoo.com (Sorin Blidaru, CLO)
Postal address	152 Blvd. Mamaia, Lot 2, 2nd Floor, Apt. 2, Constanta 900534
Project website	TBD

GRM contact details may be updated in the course of the LRP implementation and the project development as necessary.

Submission of grievances will not incur any costs for the complainant. Opportunity to lodge grievances anonymously will be ensured.

8.3.2 Stage 2: Grievance receipt

The grievance receipt process is discussed below:

- Step 1: After receiving a grievance, an explanation of the grievance management process will be provided by MC to the complainant. MC will acknowledge the receipt of the grievance within 5 working days (in writing), using the channel of communication preferred by the complainant.
- Step 2: All grievances will be recorded in the grievance database (including those submitted verbally). The database will include, but not be limited to, the following information: grievance number, submission date, submission method, complainant, grievance description, parties responsible for addressing the grievance, actions taken and date of closure.

MC will regularly check grievances submitted through the project website and comment boxes (no later than on a bi-weekly basis). Anonymous grievances will be managed similarly to other grievances (MC will omit Step 1 for such grievances).

8.3.3 Stage 3: Screening and categorisation of grievances

Within five working days after receipt of the grievance, MC will screen it to establish its eligibility using the following criteria: the grievance relates to the project activities and/or the land acquisition process, and the grievance description is clear and includes sufficient information for it to be considered further.

If the complaint is ineligible, MC will inform the complainant of the reason for ineligibility and refer the complainant to the appropriate party (if possible). If the complaint is eligible, MC will categorise it accordingly:

- Categorisation by topic
 - ✓ general inquiry about the project
 - ✓ inquiry about the project layout and economic displacement impact
 - ✓ eligibility to be considered as a PAP
 - ✓ compensation
 - ✓ results of asset inventory
 - ✓ livelihood restoration requests
 - ✓ conduct of the project staff (including GBVH-related issues)
 - ✓ other.
- Categorisation by complexity:
 - ✓ Tier 1: Grievances can be addressed by the Company (this can involve engagement of the project contractors)
 - ✓ Tier 2: Grievances can require the involvement of external parties to resolve them (such as local administrations, NGOs, etc.).

MC may update the above categories as deemed relevant in the course of the LRP implementation.

8.3.4 Stage 4: Grievance investigation and response

Tier 1 investigation and response

Grievances related to land acquisition and livelihood restoration will be addressed by the LRP Manager and CLO (with the potential involvement of representatives of the project contractors). They will investigate, engage relevant staff or external parties, and inform the complainant of the outcome, remedies, and appeal options. Responses will be provided within 10 working days, with expected resolution time communicated.

Tier 2 investigation and response

When grievances cannot be resolved during the Tier 1 grievance resolution, they will be taken to a Resolution Committee. This Committee will include:

- LRP Manager
- CLO
- MC's senior manager
- project contractor's representative (as appropriate)
- representative of Deleni commune administration (as appropriate)
- relevant external experts (as appropriate)
- other parties (such as authorities or NGOs).

The Committee will hear grievances within two weeks of referral, and resolution should occur within two months. The complainant will be informed of the outcome, any remedies, the justification for decisions, and appeal options (including appeals to the courts and to the relevant lenders' grievance management bodies)²⁶.

²⁶ Such as the IFC's Compliance Advisor Ombudsman (if applicable).



8.3.5 Stage 5: Grievance resolution monitoring and close-out

MC will implement actions to address the grievance and record them in the database. If the complainant is satisfied, the grievance is closed with written confirmation from the complainant. If not, a further investigation is conducted. If the grievance remains unresolved after a second attempt, it is closed as unresolved, with all actions implemented by MC fully documented. The complainant is informed of appeal options, including courts and relevant lenders' grievance bodies.

9 Compensation framework

9.1 Approach to compensation and valuation in Romania

In Romania, three primary approaches are widely used to determine the value of land and other assets, consistent with both International Valuation Standards (IVS) and national regulations. These approaches are recognized by the National Association of Authorized Valuers in Romania (ANEVAR) and are applied in accordance with the Romanian Valuation Standards (SEV), which are harmonised with the IVS.

The commonly used approaches are:

- income approach
- cost (asset-based) approach
- comparative (market) approach.

These methods are supported and regulated under Romanian legislation, including Law No. 243/2019 on alternative investment funds, and fiscal norms related to property tax valuation, such as GEV 500²⁷ and provisions of the Fiscal Code.

9.1.1 Income approach

The income approach provides an indication of value by converting future income, cost savings, or cash flows into a single present value. This approach is particularly used in the valuation of income-generating properties such as commercial real estate or rental assets.

Methods under the income approach include:

- **Discounted Cash Flow Method**
Projects net cash flows over time and discounts them to present value using a rate that reflects market and asset-specific risks.
- **Capitalisation Method**
Converts a single year's income into value using a capitalisation rate that reflects current market conditions and risk. This is typically used when income is stable and predictable.

These methods are applied in accordance with SEV adopted by ANEVAR, and are consistent with valuation practices required under Law 243/2019, especially for investment property assets held by regulated entities.

9.1.2 Cost approach

The cost approach estimates value based on the cost to reproduce or replace an asset with another of equivalent utility, minus depreciation and obsolescence. This method is particularly relevant for public infrastructure, special-purpose buildings, or assets not commonly traded on the open market.

Methods under the cost approach include:

- **Depreciated Replacement Cost Method**
Estimates all direct and indirect costs required to replace the asset, then deducts depreciation (physical, functional, and economic).
- **Depreciated Reproduction Cost Method**
Calculates the cost to reproduce an identical asset, adjusted for all forms of depreciation.

This approach is commonly used for fiscal valuation purposes, particularly when determining the taxable value of buildings under GEV 500 ("Determination of the Taxable Value of a Building") issued by ANEVAR. It is also recognized under the Romanian Fiscal Code, which

²⁷ GEV 500 is a valuation standard in Romania, part of the National Association of Authorized Valuers of Romania standards.

allows or requires use of cost-based valuation for certain tax declarations (e.g., for non-residential properties not revalued in the previous 5 years).

Failure to revalue properties in accordance with these standards may result in higher property tax rates, as stipulated in Law No. 296/2023 on fiscal-budgetary measures.

9.1.3 Comparative (market) approach

The comparative or market approach estimates value based on observed prices of similar assets recently sold in the market. It is the most commonly used approach for residential real estate and land.

The market comparison method involves gathering reliable transaction data from market sources and making adjustments for differences between the subject asset and comparable properties.

The use of this method must comply with SEV guidelines, including documentation and justification of all adjustments made. It is required in most mortgage valuations, real estate transactions, and taxation contexts where market data is available.

Special case: Liquidation Value

In specific circumstances, valuers may estimate liquidation value – the price an asset could fetch under constrained sale conditions.

Types of liquidation value include:

- **Voluntary Liquidation Value**

Reflects value in a sale conducted under time pressure but without compulsion, typically below market value. All direct and indirect realisation costs are considered.

- **Forced Liquidation Value**

Represents the lowest price expected under distress or forced-sale conditions. This is used in bankruptcy proceedings or enforcement scenarios, in accordance with valuation guidance issued by ANEVAR.

9.1.4 Opinion on value

The final opinion on value is the result of applying one or more approaches deemed appropriate based on the asset type and available data. The valuer must be confident in the reliability of the chosen method(s) and provide full documentation and justification in the valuation report.

Valuation reports in Romania must comply with the Romanian Valuation Standards (SEV) and are subject to review and quality control by ANEVAR. For certain types of assets (e.g. those held by Real Estate Investment Funds, as per Law 243/2019), valuations must also comply with regulations set by the Financial Supervisory Authority and be performed by registered, independent valuers.

9.1.5 Approach applied for compensation and valuation for the agricultural land

Most of the land affected by the project is agricultural land. Typically, agricultural land is valued using the comparative/market approach in accordance with SEV and IVS requirement.

9.2 Compensation and valuation in line with international standards

The IFC and EBRD require full replacement cost as the basis for compensation.

According to the IFC PS 5, full replacement cost should be used as the basis for compensation: *“When displacement cannot be avoided, the client will offer displaced communities and persons compensation for loss of assets at full replacement cost and other assistance to help them improve or restore their standards of living or livelihoods... Compensation standards will be transparent and applied consistently to all communities and persons affected by the displacement. Where livelihoods of displaced persons*

are land-based, or where land is collectively owned, the client will, where feasible, offer the displaced land-based compensation. The client will take possession of acquired land and related assets only after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation. The client will also provide opportunities to displaced communities and persons to derive appropriate development benefits from the project”.

“Replacement cost is defined as the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow Affected Communities and persons to replace lost assets with assets of similar value. The valuation method for determining replacement cost should be documented and included in applicable Resettlement and/or Livelihood Restoration plans”.

9.3 Project’s approach to asset valuation and compensation

This section determines the compensation to be provided to the affected people and organisations in line with national requirements and international standards.

9.3.1 Land

By the time of preparation of this LRP, most land plots have been already acquired from PAPs / businesses. The compensation for land was determined by an ANEVAR-certified valuation expert. Compensation has been determined at market value, using comparative (market) approach. Depreciation costs didn’t apply. According to information provided by the Company, transaction costs have also been covered and compensated by the Company. Therefore, compensation for land has been determined at full replacement cost.

In addition, land was acquired on a willing seller / willing buyer basis. Landowners had an opportunity to reject the offer to provide their land. By the time of this LRP preparation, payment of cash compensation for land to some landowners has already started. All the PAPs who started receiving compensation payments that were interviewed during the field survey in February 2026, confirmed that the amount of compensation was sufficient/adequate²⁸.

Compensation for land is considered to be provided in line with national requirements and international standards. No additional corrective measures are required.

9.3.2 Structures

Compensation for structures is based on fair market value, consistent with Romanian legislation and IFC PS 5, and includes applicable transaction costs. Where required, compensation reflects replacement cost, ensuring that affected parties can restore their structures to similar size, quality, and functionality.

The value of structures is determined by independent licensed valuers certified by ANEVAR using internationally recognised approaches:

- market approach – based on comparison with similar properties recently sold or let in the area
- income approach – based on capitalisation of net income the property could generate under proper management
- cost approach – based on the current cost of constructing a replacement structure, adjusted for depreciation as appropriate.

²⁸ One of the PAPs indicated that the amount of compensation provided was “more than enough / more than anticipated”. None of the PAPs who have started receiving compensation have indicated that the amount was insufficient.



According to the results of the field work conducted in February 2026, no structures were identified on the affected land plots. Therefore, no compensation for structures is currently anticipated.

9.3.3 Trees and perennial crops

Compensation for trees and perennial crops is also based on fair market value, in line with national legislation and IFC PS 5, including any applicable transaction costs. Where required, compensation reflects the costs necessary to replace lost trees or crops with equivalent species, quality, and age, ensuring that affected parties can restore productive capacity.

The valuation of trees and perennial crops is conducted by independent licensed valuers or agricultural specialists, taking into account:

- species and variety – including commercial and local varieties
- age and productive life – the stage of maturity and remaining productive years
- condition and quality – health, size, and yield potential
- market value – based on recent local sales or prevailing prices for similar trees or crops.

Replacement cost – including costs of planting, labour, maintenance, and necessary inputs to establish replacement crops to the same productive stage.

The compensation calculation covers:

- the full replacement cost of the trees or crops, including planting and establishment expenses
- lost income until the replacement trees or crops reach maturity and productive capacity, where applicable
- transaction and administrative costs associated with the replacement.

According to the results of the field work conducted in February 2026, no trees or perennial crops were identified on the affected land plots. Therefore, no compensation for these assets is currently anticipated.

9.3.4 Annual crops

Compensation for annual crops is based on fair market value, in accordance with Romanian legislation and IFC PS 5, and includes any applicable transaction costs. Where required, compensation reflects the costs necessary to replace lost crops for the affected season, ensuring that affected parties can restore their productive capacity without loss.

The valuation of annual crops is conducted by independent agricultural specialists or licensed valuers, taking into account:

- type of crop – e.g., wheat, maize, sunflower, barley, or other cultivated crops
- area affected – the size of the plot impacted by the project
- yield and productivity – expected production per hectare based on historical yields and local agronomic data
- market value – prevailing local market prices for the crops at the time of loss.
- input costs – including seeds, fertilisers, crop protection, labour, and irrigation required to re-establish the crop.

Compensation typically covers:

- replacement cost of lost crops for the current agricultural season
- associated production costs necessary to replant or restore the crop
- transaction and administrative costs where applicable.

Based on information obtained during the field survey conducted in February 2026, the PAPs and businesses cultivate the following types of crops: wheat, corn, barley, sunflower, rapeseed, peas, mustard, alfalfa, and forage crops such as hay for livestock.



Table 9-1: Compensation rate for annual crops²⁹

Annual crop	Compensation per ha, RON	Compensation per ha, EUR
Wheat	4,500	883.8
Corn	4,945	971.2
Barley	4,050	795.4
Sunflower	6,500	1,276.6
Rapeseed	6,697.5	1,315.5

The compensation rates above are provided based on the Valuation Report issued by Dobrogea EVAL SRL for MC in December, 2025 (the document was prepared and signed by the ANEVAR-certified evaluator).

All crops affected by the project will be compensated at the rate of the most valuable crop. Compensation for annual crops will be provided only if PAPs/businesses are not allowed to harvest these crops prior to the project construction. Compensation will not be provided for any crops cultivated after the cut-off date. If PAPs/businesses harvest their crops, no compensation for loss of crops will be provided.

²⁹ The Valuation Report doesn't provide information on the value of peas, mustard, alfalfa, or forage crops such as hay for livestock. However, all these crops are generally less valuable than rapeseed; therefore, the value of rapeseed will be used as the basis for compensation as part of this LRP.

10 Eligibility and entitlements

10.1 Eligibility

According to the national legislation, only registered (formal) landowners and land users are entitled to compensation. Under the IFC and EBRD requirements, unregistered (informal) landowners and land users are also eligible for compensation, in addition to those registered. However, as discussed in Section 4.3, no informal land users are affected by the project.

People/businesses eligible for compensation for loss of land or other assets, as well as for livelihood restoration assistance, include:

- landowners/shareholders
- land users, including businesses and their employees affected by economic displacement.

Eligibility of the affected people / businesses has been verified during collection of the primary data as discussed in Section 5.2.

10.2 Cut-off date

According to the international requirements, *“effective resettlement planning entails conducting a detailed socio-economic census of displaced persons and an inventory of affected land and assets at the household, enterprise, and community level. The date of completion of the census and assets inventory represents a cut-off date”* (IFC GN 32). *“Information regarding the cut-off date will be well documented and disseminated throughout the project area”* (IFC PS 5, i.12).

10.2.1 Previous cut-off dates used

No cut-off dates have been set during the completed project land acquisition. No asset inventory has been conducted. The compensation amount has been determined based on face-to-face negotiations with affected people and organisations on willing seller / willing buyer basis.

10.2.2 Cut-off date applied during the preparation of the LRP

RSK has announced the cut-off date to affected households and businesses at the time of conducting the socio-economic survey and asset inventory in February 2026. Interviewees were informed that the information they provide would be considered final and used in the preparation of the LRP, and that no changes would be made to the information provided. At the end of the asset inventory, the results were validated by the affected individuals or representatives of affected businesses, who confirmed that the inventory accurately reflects their affected assets.

Not all the PAHs/businesses have been contacted during the socio-economic survey and asset inventory conducted during the February 2026 survey and inventory, as information on some of them was not been available prior to the primary data collection (Section 5). The Company will continue the identification and engagement of these PAHs/businesses. The cut-off dates for them will be announced at the time the socio-economic survey and asset inventory are conducted with such PAHs/businesses.

10.3 Entitlement matrix

Table 10-1 below presents the entitlement matrix describing all types of loss experienced by different categories of affected households and/or businesses. In particular, it discusses:

- entitlements as required by IFC and EBRD requirements
- compensation already provided to affected households and businesses in line with national requirements
- supplemental compensation measures to achieve compliance with IFC and EBRD requirements.



Information on livelihood restoration (support) measures to be provided in addition to measures discussed in Table 11-1 is in provided Section 11 below.

Table 10-1: Entitlement matrix

Type of loss	Category of affected people / businesses	Entitlements as per the IFC and EBRD Standards	Compensation provided as per national requirements	Supplementary measures to ensure compliance with national and the IFC and EBRD requirements
Loss of land				
Loss of land	Landowners/ shareholders	<p>Option 1</p> <ul style="list-style-type: none"> in-kind replacement of land of similar size and quality. <p>or</p> <p>Option 2</p> <ul style="list-style-type: none"> cash compensation at full replacement cost (compensation for loss of land-based livelihoods is discussed below). 	<p>Most land plots were acquired from PAPs / businesses between 2009 and 2025.</p> <p>The compensation has been paid based on the cadastral data and the size of acquired land plots (based on the standard rates for temporary and permanent land acquisition). The compensation amount has been determined based on face-to-face negotiations with PAPs on willing seller / willing buyer basis.</p> <p>Payment of cash compensation for land to some landowners has already started. For one of the landowners, replacement land has been provided.</p>	<p>Compensation has been determined at market value. Depreciation costs didn't apply. Transaction costs have been compensated. Therefore, compensation for land has been determined at full replacement cost.</p> <p>In addition, land was acquired on a willing seller / willing buyer basis. Landowners had an opportunity to reject the offer to provide their land. All the PAPs who started receiving compensation payments that were interviewed during the field survey, confirmed that the amount of compensation was sufficient/adequate³⁰. No additional corrective measures are required to ensure compliance with international standards.</p> <p>For the land plots to be further acquired:</p> <ul style="list-style-type: none"> provide cash compensation at full replacement cost or provide in-kind replacement of land of similar size and quality should an affected landowner prefer this option.

³⁰ One of the PAPs indicated that the amount of compensation provided was "more than enough / more than anticipated". None of the PAPs who have started receiving compensation have indicated that the amount was insufficient.

Type of loss	Category of affected people / businesses	Entitlements as per the IFC and EBRD Standards	Compensation provided as per national requirements	Supplementary measures to ensure compliance with national and the IFC and EBRD requirements
	Formal land users ³¹	No compensation for land. Cash compensation to be provided for loss of structures, annual / perennial crops and trees (see below).	No compensation for land has been provided to formal land users (unless a formal land user is also a landowner – see above) as this is not required under national law.	N/a (no compensation for land is required for land users)
	Informal land users ³²	No compensation for land. Cash compensation to be provided for improvements to the land, as well as for loss of structures, annual / perennial crops and trees (see below).	No informal land users are affected by the project. No compensation to informal land users is required under national law.	N/a (no informal land users affected by the project)
Loss of structures				
Loss of primary dwellings	Owner residing full-time in a house/dwelling, part-time in a house/dwelling, not residing in a house/dwelling (but it is in habitable condition)	Option 1 <ul style="list-style-type: none"> cash compensation at full replacement cost support to purchase alternative dwelling (for permanent residents) relocation assistance (for permanent residents) or Option 2 <ul style="list-style-type: none"> construction of a replacement house/dwelling valley plus cash compensation at replacement 	N/a (no loss of primary dwellings)	N/a (no loss of primary dwellings)

³¹ Documents supporting land use rights are available.

³² No formal evidence of ownership or use of a land plot is available.

Type of loss	Category of affected people / businesses	Entitlements as per the IFC and EBRD Standards	Compensation provided as per national requirements	Supplementary measures to ensure compliance with national and the IFC and EBRD requirements
		<p>value for any square m reduction in overall house/dwelling size.</p> <ul style="list-style-type: none"> assistance with provision of access to basic infrastructure: road, waste treatment, water and electricity services. <p>All owners of residential houses/dwellings will be entitled to support to salvage materials from their houses and transport to move their belongings to their new residence.</p>		
Tenants	Tenant of a house/ dwelling	Cash compensation for 6 months' rent to enable tenant to find an alternative residence.	N/a (no loss of tenancy)	N/a (no loss of tenancy)
Loss of homestead structures (kitchens, storerooms, outside bathrooms, etc.)	Person or organisation owning / using ³³ a non-residential structure	<p>Option 1</p> <ul style="list-style-type: none"> in-kind replacement of structures of similar size and quality. <p>or</p> <p>Option 2</p> <ul style="list-style-type: none"> cash compensation at full replacement cost. 	N/a (no loss of homestead structures)	N/a (no loss of homestead structures)
Loss of ancillary farming structures (storerooms,	Person or organisation owning / using a non-residential structure	<p>Option 1</p> <ul style="list-style-type: none"> in-kind replacement of structures of similar size and quality. <p>or</p>	Most land plots were acquired from PAPs / businesses between 2009 and 2025.	<p>N/a (no loss of homestead structures)</p> <p>If the asset inventory/verification conducted for any PAPs not yet engaged identifies any</p>

³³ An owner of a structure receives compensation for this structure. If the structure has no official owner, it is presumed that it is owned by a person/business using this structure with relevant compensation being paid accordingly.

Type of loss	Category of affected people / businesses	Entitlements as per the IFC and EBRD Standards	Compensation provided as per national requirements	Supplementary measures to ensure compliance with national and the IFC and EBRD requirements
granaries, animal pens, chicken coups, etc.)		Option 2 <ul style="list-style-type: none"> cash compensation at full replacement cost. 	No inventory of assets such as structures, annual and perennial crops, trees has been conducted. No compensation for such assets has been provided.	ancillary farming structures, the following measures will be implemented: <ul style="list-style-type: none"> provide compensation for structures at full replacement cost provide support to salvage materials from the structures and transport to move their belongings to the new location.
Loss of trees and crops				
Loss of trees and perennial crops	Person or organisation owning / using ³⁴ trees and perennial crops	<ul style="list-style-type: none"> cash compensation at full replacement cost 	Most land plots were acquired from PAPs / businesses between 2009 and 2025. No inventory of assets such as structures, annual and perennial crops, trees has been conducted. No compensation for such assets has been provided.	N/a (no loss of trees and perennial crops) If the asset inventory/verification conducted for any PAPs not yet engaged identifies any trees or perennial crops, the following measures will be implemented: <ul style="list-style-type: none"> allow PAPs/organisations to harvest trees and perennial crops prior to construction and <ul style="list-style-type: none"> provide compensation at full replacement cost based on results of the asset inventory. The amount of compensation to be provided is to cover relevant taxes (income tax, etc.) and transaction costs.
Loss of annual crops	Person or organisation	<ul style="list-style-type: none"> cash compensation at full replacement cost 	Most land plots were acquired from PAPs / businesses between 2009 and 2025.	<ul style="list-style-type: none"> PAPs/organisations will be allowed to harvest annual crops prior to construction

³⁴ An owner of a trees and/or perennial crops receives compensation for these trees and/or perennial crops. If the trees and/or perennial crops have no official owner, it is presumed that these are owned by a person/business using these trees and/or perennial crops with relevant compensation being paid accordingly.

Type of loss	Category of affected people / businesses	Entitlements as per the IFC and EBRD Standards	Compensation provided as per national requirements	Supplementary measures to ensure compliance with national and the IFC and EBRD requirements
	owning / using annual crops		<p>The compensation has been paid based on the cadastral data and the size of acquired land plots (based on the standard rates for temporary and permanent land acquisition). The compensation amount has been determined based on face-to-face negotiations with PAPs on willing seller / willing buyer basis.</p> <p>No inventory of assets such as structures, annual and perennial crops, trees has been conducted. No compensation for such assets has been provided.</p>	<p><u>or</u></p> <ul style="list-style-type: none"> Provide compensation at full replacement cost based on results of the asset inventory/verification conducted in February 2026. The types of crops cultivated by PAPs/businesses include wheat, corn, barley, sunflower, rapeseed, peas, mustard, alfalfa, and forage crops such as hay for livestock. The Company made a commitment to compensate for the most expensive type of crop as determined by the valuation expert (Section 9). Compensation will be provided only for crops planted before the cut-off date. <p>The amount of compensation to be provided is to cover relevant taxes (income tax, etc.) and transaction costs.</p>
Loss of source of livelihood				
Loss of land-based livelihood	<p>Affected households – individual farmers, not businesses</p> <p>(for compensation for businesses, see below)</p>	<ul style="list-style-type: none"> support in finding alternative land of similar size and of same or higher quality assistance in obtaining an official land title for a new land plot other forms of support to ensure successful acquisition of alternative land plot by a PAP (e.g., help with preparing new the land for agricultural activities). 	No compensation for the loss of land-based livelihood has been provided.	<p>Based on the primary data collection conducted in February 2026, there is no evidence that the project will result in significant impact on land-based livelihoods for any PAPs. However, affected land users may experience loss of income due to the reduced area cultivated as a result of the project land acquisition. Compensation measures include the following:</p> <ul style="list-style-type: none"> provide compensation to landowners for loss of land (as above)

Type of loss	Category of affected people / businesses	Entitlements as per the IFC and EBRD Standards	Compensation provided as per national requirements	Supplementary measures to ensure compliance with national and the IFC and EBRD requirements
				<ul style="list-style-type: none"> provide compensation to land users for loss of crops (as above) provide transitional support to land users to reestablish their agricultural activities affected by the project (see Section 11) provide compensation for the verified value of lost subsidies (see below) provide support to find alternative land of the same size and equal or higher quality (if requested).
Loss of wage-based livelihood	Employees of businesses affected by the project	<ul style="list-style-type: none"> where a person loses employment (or his/her employment is suspended) because a business is affected by a project, the company provides compensation during the period required to re-establish the business if a business closes permanently, the company will provide compensation equivalent to 6 months' salary to the affected employees. 	No compensation for the loss of wage-based livelihood has been provided as it is not required under national law.	<p>N/a. No impacts on persons practicing wage-based livelihoods due to the project land acquisition have been identified. Implementation of the project will not lead to losing or suspension of employment of any workers. No interviewed business representatives expect any changes in worker employment due to the project. No provision of additional compensation is required.</p> <p>If during the LRP implementation impacts on wage-based livelihoods are identified, the following measures will be provided:</p> <ul style="list-style-type: none"> if employment is suspended, provide cash compensation equivalent to a salary for the period of suspension to the affected employees, whose period of employment and previous income have been verified by the employer if business has to close, provide cash compensation equivalent to a 6-month salary to the affected employees, whose period of employment and previous

Type of loss	Category of affected people / businesses	Entitlements as per the IFC and EBRD Standards	Compensation provided as per national requirements	Supplementary measures to ensure compliance with national and the IFC and EBRD requirements
				<p>income have been verified by the employer</p> <ul style="list-style-type: none"> provide opportunity for participation in relevant livelihood restoration programmes (Section 11).
Loss of enterprise-based livelihood	Affected households practicing enterprise-based activities and businesses	<ul style="list-style-type: none"> compensation to landowners for loss of land (as above) compensation for loss of structures (as above) compensation for loss of income experienced between the occurrence of impact and the time when the business can reasonably be expected to resume operations (typically 3 to 6 months for small businesses in emerging economies) compensation for the cost of physical relocation of equipment and structures (as applicable) compensation for legal (e.g., re-registration) and other costs. 	<p>No compensation for loss of income to affected businesses has been provided.</p> <p>For landowners:</p> <p>Individual landowners leasing their land plots to agricultural organisations might be affected by the loss of rental income:</p> <ul style="list-style-type: none"> their rental income is likely to decrease due to the reduced amount of land available for lease following the project's land acquisition. However, landowners who previously generated income by renting land to agricultural organisations will receive compensation through lease payments from the project. This compensation will be provided as part of lease agreement payments; it is considered as part of the compensation for the loss of land (see above) it is not anticipated that the value of parts of affected land plots not acquired for the project will decrease due to the WF project. 	<ul style="list-style-type: none"> provide compensation to landowners for loss of land (as above) provide compensation for land users for loss of crops (as above) restore temporarily acquired land following project construction to enable continued agricultural use provide transitional support to affected land users for the loss of income due to the lower area cultivated (Section 11) provide land preparation support (Section 11) provide compensation for the cost of physical relocation of equipment and structures (as applicable) provide compensation for other costs (as relevant).

Type of loss	Category of affected people / businesses	Entitlements as per the IFC and EBRD Standards	Compensation provided as per national requirements	Supplementary measures to ensure compliance with national and the IFC and EBRD requirements
			For land users: Land users' income may be affected due to the lower area cultivated due to the project land acquisition.	
Other				
Loss of access to land	Landowners and land users – formal and informal	<ul style="list-style-type: none"> ensure continuous access to land if feasible if ensuring access to land is not feasible, provide compensation for loss of land (for formal land users), assets (structures, trees and crops) and/or relevant loss of livelihood. 	No compensation for loss of access to land has been provided.	N/a (no impact associated to loss of access to land is anticipated ³⁵). If during the LRP implementation such impacts are identified, the following measures will be provided: <ul style="list-style-type: none"> ensure continuous access to land if feasible if ensuring access to the land is not feasible, provide compensation for the loss of land, assets, and any related loss of livelihood (see above).
Loss of subsidies	Formal landowners / land users, receiving subsidies	<ul style="list-style-type: none"> compensation for the verified value of lost subsidies transitional support (if relevant) to restore pre-project income levels. 	No compensation for loss subsidies has been provided.	<ul style="list-style-type: none"> provide compensation for the verified value of lost subsidies.

³⁵ None of the PAPs or representatives of affected businesses have also reported anticipating any impacts related to loss of access to land.

11 Livelihood restoration

11.1 Approach to livelihood restoration

This section describes livelihood restoration measures for people and businesses affected by project-related economic displacement. These measures will be implemented alongside the compensation measures determined in the entitlement matrix (Table 10-1).

According to the IFC PS 5, project developers are required “to improve, or restore, the livelihoods and standards of living of displaced persons”. PS 5 indicates that “cash compensation alone... is frequently insufficient to restore livelihoods”. The IFC PS 5, GN 12 recommends design of measures to improve and/or restore livelihoods that are land-based, wage-based or enterprise-based:

- **Land-based livelihoods:** Depending on the type of economic displacement and/or the site to which affected women and men are relocated, they may benefit from: (i) assistance in acquiring or accessing replacement land, including access to grazing land, fallow land, forest, fuel and water resources; (ii) physical preparation of farm land (e.g., clearing, levelling, access routes and soil stabilisation); (iii) fencing for pasture or cropland; (iv) agricultural inputs (e.g., seeds, seedlings, fertilizer, irrigation); (v) veterinary care; (vi) small-scale credit, including rice banks, cattle banks and cash loans; and (vii) access to markets (e.g., through transportation means and improved access to information about market opportunities)
- **Wage-based livelihoods:** Wage earners in the affected households and communities may benefit from skills training and job placement, provisions made in contracts with project sub-contractors for temporary or longer-term employment of local workers, and small-scale credit to finance start-up enterprises. Affected women and men should be given equal opportunities to benefit from such provisions.
- **Enterprise-based livelihoods:** Established and start-up entrepreneurs and artisans may benefit from credit or training (e.g., business planning, marketing, inventory and quality control) to expand their business and generate local employment. Clients can promote local enterprise by procuring goods and services for their projects from local suppliers.

The livelihood restoration measures determined in this section are developed based on the above guidelines and are informed by the results of socio-economic survey and relevant stakeholder engagement.

11.2 Livelihood restoration measures

Livelihood profile of the affected PAPs is discussed in Section 6.2.

During the primary data collection in February 2026, the key challenges indicated by PAPs and representatives of affected businesses interviewed were related to the lack of irrigation and poor road conditions. Accordingly, the improvement of access roads and support with irrigation were the most frequent potential support measures reported.

Table 11-1 describes the set of livelihood restoration measures to be implemented by the Company to support livelihoods of people affected by the project. Affected households may benefit from more than one category of livelihood restoration measures discussed in the table, as applicable.

Table 11-1: Livelihood restoration measures

Livelihood type	Livelihood restoration measures
Land-based livelihoods	<p>All PAPs conducting land-based activities will be eligible for the following measures:</p> <ul style="list-style-type: none"> ▪ Land preparation support for agricultural development. This will enable land users to carry out agricultural activities on a new land plot,

Livelihood type	Livelihood restoration measures
	<p>as well as support the reinstatement of the agricultural capacity of the land affected by project construction. The support will be commensurate with the area affected. The value of the support for new land preparation is EUR 600 per ha³⁶.</p> <ul style="list-style-type: none"> ▪ Transition livelihood support (TLS). The aim of TLS is to provide affected households/businesses with financial assistance during the reasonable period required to restore their income-generating capacity and standard of living. <p>The Company will provide transitional support to PAPs/businesses to cover the expected income from crops for one season, assisting them in reestablishing their agricultural activities. TLS is calculated on the basis of value of crops on the affected area, using rate of the most valuable crop.</p> <p>The Company will provide transitional support to affected PAPs/businesses as a one-off cash payment.</p> <ul style="list-style-type: none"> ▪ Support for the improvement of road access to land plots. Support may be provided to land users for minor improvements of road access on a case-by-case basis. ▪ Other types of support to land users on a case-by-case basis ▪ Support for transition to alternative employment, for those interested (see below).
Wage-based livelihoods	<ul style="list-style-type: none"> ▪ Vocational training for PAPs <p>Rezolv Energy will conduct a skills development course to support the diversification of income of its participants. While this course will not be developed as part of the LRP scope, it will be also open to participation of PAPs affected by the project economic displacement.</p> <p>PAPs will be informed of the opportunity to take part in the course and will receive appropriate guidance and assistance to support their participation.</p>
Enterprise-based livelihoods	<p>All agricultural organisations and sole traders conducting land-based activities will be eligible for the following measures:</p> <ul style="list-style-type: none"> ▪ Land preparation support for agricultural development (see above) ▪ Transition livelihood support (see above) ▪ Support for the improvement of road access to land plots. Support may be provided on a case-by-case basis. ▪ Training <p>No request for business development (or similar) training has been requested by the affected businesses. No specific support is envisaged as part of the LRP. However, the Company may provide the following forms of assistance under request (in collaboration with business development centers / NGOs, if available):</p> <ul style="list-style-type: none"> ✓ provision of opportunity to take part in financial management training for individual landowners

³⁶ The value of EUR 600/ha reflects the estimated average cost of basic land preparation and crop establishment in the project area.

Livelihood type	Livelihood restoration measures
	<ul style="list-style-type: none"> ✓ provision of opportunity to take part in business development trainings tailored to small business enterprises ▪ Other types of support on a case-by-case basis.

The livelihood restoration measures may be updated and/or elaborated in the course of the LRP implementation and engagement with the PAPs.

11.3 Delivery partners

At the time of preparation of this LRP, no specific delivery partners have been identified (or reported by PAPs or other stakeholders). However, the Company will look for opportunities to cooperate with delivery partners while implementing livelihood restoration measures. The potential partners include:

- District, national and international NGOs operating in the fields of agricultural development, income and livelihoods
- Employment centres
- Business development centres
- Government agencies supporting agricultural development.

The indicative criteria for selection of the delivery partners are as follows:

- Experience working in local communities and within the district
- Prior experience in implementing livelihood restoration programmes
- Relevant technical expertise and qualifications
- Existing relationships with government bodies, administrations and businesses.

12 Vulnerable persons

12.1 Identification of vulnerable persons

Vulnerable persons include individuals or households who, due to factors such as gender, age, ethnicity, physical or mental disability, economic disadvantage, social status, or other circumstances, may be disproportionately or more severely affected by displacement than others, and who may have limited capacity to claim and benefit from livelihood restoration assistance. The list of vulnerable persons below is adapted from the SEP (May, 2025) prepared for the larger 600 MW WF project (which includes the Dunarea WF project) and updated for LRP purposes based on information obtained during the primary data collection in February 2026. The vulnerable persons include:

- **Elderly (over 65) /retired:** vulnerabilities relate to income levels and limited ability to change or increase access to additional finances in response to economic shocks, access to health care, coupled with higher susceptibility to disease and disability. Elderly residents in rural settlements may be reliant on subsistence farming and may experience limited public services availability. Many local pensioners also benefit from farmers' pensions, raising additional financial constraints if availability of these pensions is limited.
- **Minors (below 18: children and youth):** children may be particularly vulnerable with respect to changes in environmental conditions and the effects on health. In rural areas, children often walk through communities unaccompanied by adults, which makes them more vulnerable to any health and safety impacts, including those related to traffic. Children from low-income families and/or children of ethnic minorities may face heightened vulnerabilities.
Youth in rural areas may be vulnerable due to lack of land ownership and/or methods for securing livelihoods, particularly those with dependents. They are more likely to be engaged with poor labour practices due to a lack of experience. Lower-educated youth may face unemployment and are less likely to be able to enter jobs in urban areas, where unemployment rates are lower and wages higher. 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.
- **Unemployed:** unemployed individuals are considered vulnerable because they often have limited and unstable income sources, reducing their ability to cope with project-related changes or disruptions. The rent income they receive from leasing the affected land may be their sole source of income.
- **Low-income families:** may not have sufficient financial resources to cover basic needs. This makes them more vulnerable to environmental and economic change and can limit their ability to protect their rights and interests, including those related to land. They can also have limited transportation options that, in turn, limit their opportunities to engage in stakeholder engagement and decision-making processes.
- **People with physical / mental health disabilities (people with handicap³⁷):** people with disabilities face barriers in terms of participation in decision-making and access to employment opportunities. They may also experience varying levels of social exclusion, community marginalisation and are more vulnerable to change, in particular to land-acquisition impacts.
- **Roma community (ethnic minority):** Roma community is considered vulnerable across a range of indicators, including access to services, level of education and literacy, participation in decision-making and access to financial resources. Child labour and poor working practices are also a heightened risk among this community.
- **Single-headed households:** single-headed households, including female-headed households, may be more vulnerable to change, have limited financial resources and limited opportunities to protect their rights and interests, including those related to land. They can also have limited ability to participate in stakeholder engagement and decision-making processes.
- **Women:** according to the SEP, specific areas of vulnerability for women are related to poverty and lack of access to basic services. Women have less options on the labour market than

³⁷ According to Romanian law (to Art. 86 of Law no. 448/2006), the categories of handicap are mild, medium, accentuated and severe.

men. Female vulnerability is most prevalent among elderly women, particularly in the instances when they live alone.

Persons not covered by the national social security system and adults without primary education were also considered as potential vulnerability categories during the primary data collection in February 2026; however, no such cases were identified among the affected households.

KIIs with PAPs and other stakeholders, as well as the FGD with women conducted during the field survey in February 2026, did not identify any evidence of systemic gender-based economic disadvantage within the project area. Women are actively involved in land management, agricultural activities, and, in several cases, business ownership. No specific livelihood risks or disproportionate project-related impacts affecting women were reported by either male or female respondents.

However, gender remains an important consideration as it may interact with other factors such as age, dependency, or employment status in shaping vulnerability. Accordingly, female PAPs were considered a vulnerable group to ensure continued gender-sensitive oversight during the LRP implementation.

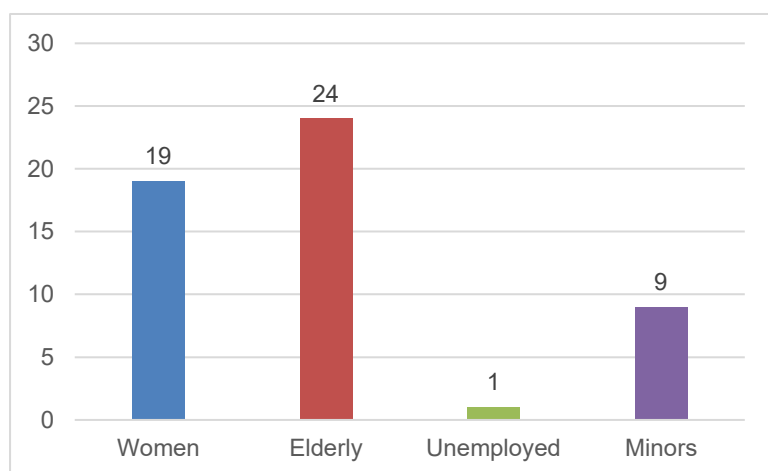


Figure 12-1: Vulnerable groups among the PAPs

Among the 35 surveyed PAHs who provided information about their household members, vulnerability factors have been identified based on age, gender and employment status, as presented in Table 12-1.

It should be noted that in cases where PAHs were represented by relatives or authorised representatives, the questions about the vulnerability of members of the represented households were not asked during interviews to avoid the collection of inaccurate data. Therefore, the information provided reflects the situation of PAHs whose representatives were directly interviewed.

Table 12-1: Vulnerable groups among the PAPs

Category	Number of individuals
Elderly (over 65) / retired (men and women)	24
Minors	9
Unemployed	1
Low income family	0
Ethnic minority (including Roma)	0
Single parent	0
Women	19



Category	Number of individuals
Total with double-counting	63
Total without double-counting	53

Some individuals fall into more than one vulnerability category. Therefore, Table 12-1 above provides information both including and excluding double counting of individuals appearing in multiple categories.

12.2 Vulnerability assistance

Potential support measures available for vulnerable members of affected households include (but are not limited to) the following:

- legal assistance
- explanation of details of land acquisition, compensation and livelihood restoration processes (including assistance in clarifying compensation packages, livelihood restoration measures and administrative support)
- clearing and preparation of alternative land (if applicable), assistance in planting crops, etc.
- provision of transport to enable participation in engagement activities related to land acquisition and livelihood restoration
- clarification of available livelihood restoration measures.

Applicability of potential support measures will be further assessed on an ongoing basis as issues arise. Support to vulnerable persons will be provided on a case-by-case basis.

Opportunities to receive support will be announced during the LRP disclosure and related engagement activities (Section 7.3). Vulnerable individuals and households will be able to request assistance through the GRM or by contacting the Company's CLO.

13 Monitoring and evaluation

Monitoring provides project management and PAPs with timely information about whether compensation, livelihood restoration and other measures are being delivered in accordance with LRP commitments, and whether key outcomes are achieved. Monitoring identifies where adjustments are needed and recommends corrective actions. It is usually conducted both internally by the project team, and externally by independent parties.³⁸

Monitoring verifies that:

- LRP commitments are implemented fully and on time
- entitled persons receive their compensation
- livelihood restoration activities are implemented, and are achieving sustainable restoration and improvement in the wellbeing of PAPs
- post-restoration characteristics of affected livelihoods are equal to or better than before the project implementation
- comments and grievances are addressed in a timely manner
- vulnerable persons are assisted as necessary.

Monitoring allows the Company, lenders and other stakeholders to make sure the LRP implementation process is on track, as well as to make necessary adjustments to the process if necessary.

Details of internal and external monitoring are provided below.

13.1 Internal monitoring

The Company is responsible for conducting internal monitoring. The LRP Manager will ensure monitoring of the input/output and outcome indicators as discussed below. A database of livelihood restoration monitoring information will be established and updated on a monthly basis.

Input and output monitoring indicators and the frequency of monitoring activities are provided in Table 13-1:

Table 13-1: Input and output indicators

#	Monitoring indicator	Frequency
1	Identification and involvement of PAPs and affected businesses	
1.1	Percentage/number of PAPs covered by the LRP among the total number of PAPs	Monthly
2	Compensation	
2.1	Number of individual land lease/purchase agreements ³⁹ signed	Monthly
2.2	Percentage/number of individual land lease/purchase agreements signed compared to the total number of individual land lease/purchase agreements	Monthly
2.3	Percentage/number of compensation payments made on time (in line with the schedule established in the agreements) according to land lease/purchase agreements compared to the total number of individual compensation agreements signed	Quarterly

³⁸ IFC, 2023. Good Practice Handbook: Land Acquisition and Involuntary Resettlement.

³⁹ Agreements necessary to acquire land in line with national requirements.

#	Monitoring indicator	Frequency
2.4	Number of supplemental compensation agreements ⁴⁰ signed	Monthly
2.5	Percentage/number of supplemental compensation agreements signed compared to the total number of supplemental compensation agreements	Monthly
2.6	Percentage/number of compensation payments made on time (in line with the schedule established in the agreements) according to supplemental compensation agreements in the total number of supplemental compensation agreements signed	Quarterly
3	Livelihood restoration	
3.1	Number of engagement activities conducted related to livelihood restoration with eligible PAPs and affected businesses	Quarterly
3.2	Number of PAPs participating in engagement activities related to livelihood restoration	Quarterly
3.3	Number of businesses participating in engagement activities	Quarterly
3.4	Number of livelihood restoration programme events / activities	Quarterly
3.5	Number of participants in each livelihood restoration programme	Quarterly
3.6	Number of sessions/activities conducted within each livelihood restoration programme	Quarterly
3.7	Percentage/number of livelihood restoration programmes completed	Quarterly
4	Engagement and grievance management	
4.1	Number of information disclosure and consultation activities held with eligible PAPs (through face-to-face interaction, phone calls or other activities)	Monthly
4.2	Number of PAPs participating in information disclosure and consultation activities	Monthly
4.3	Number of grievances received related to land acquisition, compensation and livelihood restoration	Monthly
4.4	Percentage/number of unresolved grievances related to land acquisition, compensation and livelihood restoration in the total number of such grievances	Monthly
4.5	Number of ongoing court cases	Monthly

Outcome monitoring indicators and the frequency of monitoring activities are provided in Table 13-2 below:

Table 13-2: Outcome monitoring indicators

#	Monitoring indicator	Frequency
1	Livelihood restoration	
1.1	Changes to PAPs' income levels	

⁴⁰ Supplemental agreements in line with the provisions of this LRP.

#	Monitoring indicator	Frequency
1.2	Changes to PAPs' employment levels	Quarterly during first year of monitoring; annually thereafter
1.3	Changes to affected businesses' income levels	
1.4	Share of PAPs / affected businesses whose income has been restored to pre-project level or improved	
1.5	PAPs' / affected businesses' overall views on changes to socio-economic conditions post-land acquisition	
1.6	PAPs' / affected businesses' overall satisfaction with compensation process	
1.7	PAPs' / affected businesses' overall satisfaction with livelihood restoration activities	
2	Engagement and grievance management	
2.1	PAPs' / affected businesses' knowledge of LRP-related engagement activities	Quarterly during first year of monitoring; annually thereafter
2.2	PAPs' / affected businesses' participation in LRP-related engagement activities	
2.3	PAPs' / affected businesses' overall satisfaction with engagement activities and grievance management	
3	Vulnerability	
3.1	Number of PAPs' with changes in vulnerability status (becoming vulnerable or no longer vulnerable)	Quarterly during first year of monitoring; annually thereafter

Monitoring data should be collected considering gender and vulnerability status where relevant. The monitoring indicators can be revised as appropriate throughout the monitoring process.

The LRP Manager will prepare Quarterly Monitoring Reports to provide information on the key indicators discussed above, including those related to:

- identification and involvement of PAPs and affected businesses
- compensation
- livelihood restoration
- engagement and grievance management.

The reports will also discuss any issues identified during monitoring and the actions taken to address them, as well as evaluate the overall alignment of the livelihood restoration process with IFC PS5 and EBRD ESR5. Based on the monitoring results, the LRP may be updated as necessary.

13.2 External monitoring

External monitoring will cover activities discussed in Table 13-3:

Table 13-3: External monitoring activities

Monitoring type	Description	Frequency
Regular monitoring	The regular external monitoring will begin one year after the start of the LRP implementation. The main purpose of this audit is to ensure that the PAPs are accurately identified and	Annually

Monitoring type	Description	Frequency
	to confirm that the LRP measures are adequate and effectively implemented.	
Completion audit	<p>The completion audit will be conducted one year after the completion of the LRP implementation, including all compensation payments and livelihood restoration programmes, or after whichever activity is completed last. It is expected to be undertaken approximately three years after the start of the LRP implementation.</p> <p>The objective of the external completion audit is to determine whether the Company's efforts to restore or improve PAPs' livelihoods have been effectively implemented and to evaluate their outcomes. The completion audit will verify that all physical inputs committed under the LRP have been delivered and that all services have been provided. Based on the results of this evaluation, a Completion Report will be prepared, confirming that the LRP has been fully implemented or outlining any additional actions required to ensure the successful completion of the livelihood restoration process.</p>	Once-off

To undertake the above activities, MC will engage qualified consultancies that are well versed in undertaking land acquisition and livelihood restoration assignments in line with IFC PS5 and EBRD PR5.

MC will share the results of the external monitoring with lenders (it is also recommended that the Terms of Reference for the consultancies engaged to perform the external monitoring be subject to lenders' approval).

14 Budget

This section determines the budget for compensation and livelihood restoration activities, as well as the overall LRP budget. However, it does not include the following costs:

- engagement of personnel for the LRP implementation (including the LRP Manager and the CLO)
- stakeholder engagement and grievance management during LRP implementation (including administrative and operational expenses, e.g., printing materials and venue rental)
- internal and external monitoring (including the completion audit)
- costs for running the skills development course (as discussed with Rezolv Energy, the course will not be implemented under the LRP scope or budget, but it will still be open to participation by PAPs affected by project-related economic displacement)
- transaction costs associated with delivering compensation and livelihood restoration measures (such as minor administrative expenses or bank fees). These costs are generally minimal relative to the overall scope of the LRP and are therefore not separately covered under the LRP budget.

14.1 Compensation budget

14.1.1 Compensation for loss of annual crops

According to primary data collected in February 2026, the types of crops cultivated by PAPs/businesses include wheat, corn, barley, sunflower, rapeseed, peas, mustard, alfalfa, and forage crops such as hay for livestock. In addition, PAPs/businesses may rotate the types of crops cultivated from year to year.

Rezolv Energy/MC has made a commitment to compensate PAPs/businesses for the most expensive type of crop. The budget for compensation for the loss of annual crops is provided in Table 14-1 below:

Table 14-1: Compensation for loss of annual crops

#	Item	Cost, EUR
1	Compensation for loss of annual crops	69,448.14
2	Income tax, 10% (for PAPs and sole traders ⁴¹)	3,556.68
3	Income tax, 16% (for businesses)	5,421.02
	Total	78,425.83

Detailed breakdown is provided in Appendix 4.

Compensation for crops will be provided only if PAPs/businesses are not allowed to harvest annual crops prior to the project construction (and only for crops planted before the cut-off date). If PAPs/businesses harvest their crops, no compensation for loss of crops will be provided.

The amount of compensation above does not include any unexpected or occasional losses of crops beyond the land plots acquired for the project. This type of compensation will be determined on a case-by-case basis in accordance with the provisions of this LRP.

⁴¹ The 10% income tax rate for sole traders (PFAs) is used as a conservative assumption for estimating compensation. The actual tax liability depends on the PFA's total annual income and applicable tax rules; however, the income tax will not exceed 10%.

The amount of compensation above also does not cover compensation for crops that may be occasionally damaged during project operations or facility maintenance. This type of compensation will be determined on a case-by-case basis based on the value of the actual crops affected.

14.1.2 Compensation for loss of subsidies

Land users (both PAPs and businesses) receive subsidies from the government for land cultivation. Reportedly, the amount of subsidies received varies from RON 800 to RON 1,750 (EUR 157 to EUR 344) per hectare per year.

Subsidies were reported to being received by vast majority of PAPs/businesses or users of their land (not receiving subsidies is rather an exception and should be double-checked when signing individual compensation agreements with PAPs/businesses).

The budget for compensation for the loss of subsidies is detailed in Table 14-2, using the higher reported amount of RON 1,750 (EUR 344) per ha. The actual compensation will be paid while signing individual compensation agreements based on the verified value of lost subsidies (as confirmed by PAPs/businesses through the provision of documented evidence of the subsidy amounts received). If no evidence of received subsidies is provided, no compensation for loss of subsidies will be paid.

Table 14-2: Compensation for loss of subsidies

#	Item	Cost, EUR
1	Compensation for loss of subsidies	18,160.52
2	Income tax, 10% (for PAPs and sole traders ⁴²)	930.06
3	Income tax, 16% (for businesses)	1,417.58
	Total	20,508.16

Detailed breakdown is provided in Appendix 4.

The Company will provide compensation for the loss of subsidies for the period of one year as a one-off payment. If PAHs and affected businesses experience the loss of more than one harvest cycle, compensation for lost subsidies will be extended accordingly.

14.2 Livelihood restoration budget

Table 3-1Table 14-3 provides the cost for the implementation of livelihood restoration measures. The budget will be specified in the course of the LRP implementation, following the identification of all the PAPs / affected businesses and confirmation of the number of beneficiaries for each measure.

Table 14-3: Livelihood restoration budget

#	Item	Cost, EUR
1	New land preparation support	35,770.05
2	Transitional support	78,425.83

⁴² The 10% income tax rate for sole traders (PFAs) is used as a conservative assumption for estimating compensation. The actual tax liability depends on the PFA's total annual income and applicable tax rules; however, the income tax will not exceed 10%.

#	Item	Cost, EUR
3	Support for the improvement of road access to land plots	28,000.00
4	Other types of support on a case-by-case basis	17,500.00
5	Vocational training for PAPs	N/a (budgeted separately)
6	Potential business training	13,000.00
7	Vulnerability assistance	13,750.00
	Total	186,445.88

Detailed breakdown is provided in Appendix 4.

14.3 Livelihood restoration budget

Table 14-4 Table 3-1 provides the total budget for the LRP implementation.

Table 14-4: LRP budget

Item	Cost, EUR
Compensation budget	98,934.00
Livelihood restoration budget	186,445.88
Total	285,379.88
Contingency (15%)	42,806.98
GRAND TOTAL	328,186.86

The budget may be updated/specified following the identification of all the PAHs / affected businesses and confirmation of the number of beneficiaries for each livelihood restoration measure.



15 Implementation schedule

Table 15-1 shows the LRP implementation schedule.

Table 15-1: LRP implementation schedule

#	Activity	Month											
		Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
1	LRP preparation												
1.1	Preparation of the LRF												
1.2	Socio-economic survey and asset inventory												
1.3	Preparation of the draft LRP												
1.4	Discussion of the draft LRP												
1.5	Preparation of the final LRP												
2	Supplemental compensation												
2.1	Signing individual compensation agreements												
2.2	Cash compensation payments												
3	Livelihood restoration												
3.1	Design of livelihood restoration programmes and activities												
3.2	Implementation of livelihood restoration programmes / activities												
4	Monitoring and evaluation												
4.1	Receipt and resolution of grievances												
4.2	Ongoing engagement with the PAPs												
4.3	Quarterly monitoring of the LRP implementation												
4.4	External completion audit (approximately in 3 years*)												

* The timeline for the completion audit will confirmed closer to the completion of LRP activities.

16 Roles and responsibilities

Roles and responsibilities relating to the LRP are discussed in Table 16-1 below:

Table 16-1: Roles and responsibilities

Role	Roles and responsibilities
Project staff and subcontractors	
Project Manager	<ul style="list-style-type: none"> oversee the LRP implementation by: <ul style="list-style-type: none"> ✓ coordinating with the LRP Manager and the CLO ✓ reviewing monitoring reports approve budgets for LRP implementation oversee resolution of grievances.
LRP Manager	<ul style="list-style-type: none"> ensure the LRP implementation, including but not limited to: <ul style="list-style-type: none"> ✓ compensation payment ✓ livelihood restoration activities ✓ LRP-related stakeholder engagement and grievance management maintain regular communication with PAPs – in collaboration with the CLO take part in the resolution of LRP-related grievances – in collaboration with the CLO coordinate with delivery partners on the LRP implementation conduct monitoring activities and prepare internal monitoring reports engage consultants for conducting external monitoring and advisory support (as needed) review and update the LRP on behalf of the Company during the implementation process.
CLO	<ul style="list-style-type: none"> support the LRP Manager in the communication with PAPs during the LRP implementation ensure effective implementation of the GRM and coordinate with the LRP Manager on LRP-related grievances. support the LRP Manager with LRP monitoring and reporting.
EPC contractor	<ul style="list-style-type: none"> submit the human resources plan to the Company for its consideration regarding vocational training and recruitment support the LRP Manager and the CLO with LRP implementation (as needed) inform the LRP Manager and the CLO of any potential damage to agricultural crops during construction works (for example, if any additional land plots beyond those acquired for the project are affected) and collaborate with MC to address it.
External parties	
Administration of Deleni commune	<ul style="list-style-type: none"> collaborate with MC on the resolution of grievances collaborate with MC on the implementation of livelihood restoration measures.
Consultant - advisory support	<ul style="list-style-type: none"> provide advisory support for LRP implementation (as needed). This may include assisting with the preparation of a template for compensation agreements, designing and/or delivering livelihood restoration measures, conducting socio-economic surveys and/or asset inventories for PAPs identified during LRP implementation, etc.
Consultant – independent monitoring	<ul style="list-style-type: none"> conduct independent monitoring of LRP implementation to ensure its compliance with national requirements and international standards.

Role	Roles and responsibilities
External auditor	<ul style="list-style-type: none"> conduct completion audit to assess the results of the livelihood restoration process and overall compliance with the IFC PS5 and EBRD ESR 5. The audit will verify that all measures determined by the LRP have been properly implemented and will determine whether the livelihoods of the affected people have been adequately restored/improved.



Appendix 1 – Main questionnaire



Appendix 2 – Guides for key informant interviews and focus group discussions



Appendix 3 – Project/LRP leaflet: English and Romanian versions



Appendix 4 – Detailed budget