



## Stakeholder Engagement Plan

288 MW Dunărea East Farm, Constanța  
County, Romania

30 April 2026

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Midmar Callatis S.R.L

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## CONTENTS

### Contents

<b>1.</b>	<b>INTRODUCTION .....</b>	<b>3</b>
1.1	Background .....	3
1.2	Scope of this SEP .....	3
1.3	Stakeholder Engagement objectives .....	4
<b>2.</b>	<b>PROJECT DESCRIPTION .....</b>	<b>5</b>
2.1	Project Organisation .....	5
2.2	Project Description .....	5
2.3	Project Area of Influence (AoI) .....	7
2.4	Project Schedule .....	8
<b>3.</b>	<b>NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT .....</b>	<b>10</b>
3.1	Romanian national regulations .....	10
3.1.1	Romanian Constitution .....	10
3.1.2	Romanian permitting regulations .....	10
3.2	EU Legal Framework .....	10
3.2.1	Aarhus Convention .....	10
3.2.2	EU Directive 2003/35/EC for Public Participation .....	11
3.3	International Lender Requirements .....	11
<b>4.</b>	<b>SUMMARY OF PREVIOUS ENGAGEMENT FOR THE PROJECT .....</b>	<b>13</b>
4.1	Regulatory engagement .....	13
4.2	ESIA Engagement .....	14
4.2.1	Scoping engagement .....	14
4.2.2	ESIA engagement .....	15
<b>5.</b>	<b>PROJECT STAKEHOLDERS .....</b>	<b>18</b>
5.1	Stakeholder identification .....	18
5.2	Disadvantaged and Vulnerable Groups & Individuals .....	20
5.3	Stakeholder analysis .....	22
<b>6.</b>	<b>ENGAGEMENT APPROACH AND PLANNING .....</b>	<b>23</b>
6.1	Overview .....	23
6.2	Project phases .....	23
6.2.1	Pre-Construction .....	23
6.2.2	Construction Phase Engagement .....	24
6.2.3	Operations Phase Engagement .....	24
6.2.4	Decommissioning Phase Engagement .....	25
<b>7.</b>	<b>ENGAGEMENT TOOLS .....</b>	<b>25</b>
<b>8.</b>	<b>RESOURCES AND RESPONSIBILITIES .....</b>	<b>26</b>
<b>9.</b>	<b>EXTERNAL GRIEVANCE MECHANISM .....</b>	<b>27</b>
9.1	Purpose .....	27
9.2	Grievance procedure .....	28
9.2.1	<i>Step 1: Receipt, Admissibility, Acknowledgment and Filing</i> .....	29
9.2.2	<i>Step 2: Screening, Risk Evaluation and Coordination</i> .....	30
9.2.3	<i>Step 3: Investigation and Resolution</i> .....	31
9.2.4	<i>Step 4: Communication to Stakeholder and Agreement</i> .....	31
9.2.5	<i>Step 5: Grievance Close Out, Monitoring and Evaluation</i> .....	32
9.3	Gender-Based Violence and Harassment (GBVH) Provisions .....	33

9.4	Administering and Publicizing the Community Grievance Mechanism .....	33
<b>10.</b>	<b>MONITORING, EVALUATION AND REPORTING .....</b>	<b>34</b>
10.1	Overview .....	34
10.2	Monitoring and evaluation activities.....	34
10.3	Reporting to stakeholders.....	34
	<b>APPENDIX A PROJECT INFORMATION LEAFLET (RO/EN) .....</b>	<b>36</b>
<b>APPENDIX B</b>	<b>ENGAGEMENT ACTION PLAN FOR ESIA DISCLOSURE .....</b>	<b>6</b>
<b>APPENDIX C</b>	<b>ENGAGEMENT ACTION PLAN FOR CONSTRUCTION, OPERATION AND DECOMMISSIONING .....</b>	<b>9</b>
<b>APPENDIX D</b>	<b>SAMPLE GRIEVANCE FORM .....</b>	<b>13</b>
<b>APPENDIX E</b>	<b>SAMPLE GRIEVANCE REGISTER.....</b>	<b>14</b>

### List of Tables

Table 1-1	Stakeholder Engagement Objectives .....	4
Table 2-1	Dunărea East Wind Farm Project Schedule .....	8
Table 7-1	Stakeholder engagement tools .....	25

### List of Figures

Figure 2- 1	Dunărea East Project Layout.....	6
Figure 9-1	Grievance Procedure diagram .....	28
Figure 9-3	Grievance Risk Evaluation.....	30

### Acronyms and Abbreviations

Name	Description
Aol	Area of Influence
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
ERM	Environmental Resources Management
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
GBVH	Gender-based Violence and Harassment
ILO	International Labour Organization
NTS	Non-Technical Summary
PR	Performance Requirement
PS	Performance Standard
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
ToR	Terms of Reference
WTG	Wind Turbine Generator

## 1. INTRODUCTION

This document represents the Stakeholder Engagement Plan (SEP) for the 288 MW Dunărea East Windfarm (the “Project”), located in Constanța County, Romania.

The Project was developed by Midmar Callatis S.R.L.<sup>1</sup> (Project SPV) with Rezolv Energy<sup>2</sup> contributing to the project development, finance, construction, and operation, as Projects’ Sponsor (hereafter collectively referred to as the “Company”).

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

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

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

The SEP is to be cascaded to all relevant contractors and subcontractors.

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

### 1.1 Background

At current stage of development, the Project qualifies as Category A according to the Environmental and Social (E&S) policies of major international finance institutions, commercial banks, and export credit agencies signatory to Equator Principles.

To access international finance, Category A projects need to comply with the international standards. These international standards call for the preparation of the following documents, along with the present Stakeholder Engagement Plan (SEP):

- a Project specific Non-Technical Summary (NTS)
- an Environmental and Social Impact Assessment (ESIA)
- an Environmental and Social Management Plan (ESMP)

In line with EBRD’s Environmental and Social Requirement 10 (ESR, 2024), and IFC Performance Standard 1, this SEP presents the Company’s commitment and approach in terms of disclosure of Project information and engagement of Project stakeholders to ensure meaningful consultation.

The Project development started with wind assessment and first design in 2010. The initial development started as one project comprising two sub-projects: Danube East WF (former Deleni, subject of this SEP) and Danube West WF (former Adamclisi), which separately followed the national permitting procedures.

### 1.2 Scope of this SEP

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

This translates into an ongoing process that involves different elements such as stakeholder identification, analysis, planning, consultation and participation, information disclosure, grievance

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<sup>1</sup> and Consenswind S.A (back in 2024)

<sup>2</sup> and Low Carbon (back in 2024)

management and ongoing reporting to affected communities, scaled to each development phase of the Project.

The approach presented in this SEP builds on public engagement provisions of Romanian legislation and international good practice. It outlines the Company's commitments and strategy in terms of engaging external stakeholders during Project pre-construction, construction, and operation.

The SEP is considered a framework document, and it is to be updated and amended as the Project progresses and outputs of engagement actions conducted are integrated in the decision-making process.

Key elements of this SEP include the following:

- Company's commitment to engage external Project stakeholders effectively and actively
- description of national and international requirements for consultation and disclosure
- initial identification and characterization of stakeholders to determine appropriate ways of engagement
- strategy and timetable for sharing information and consulting with stakeholders
- tools for engagement
- resources and responsibilities for implementing stakeholder engagement activities
- external grievance mechanism for the Project and
- description of how stakeholder engagement activities will be incorporated into the company's overall management system, defining reporting methods, channels and frequency.

### 1.3 Stakeholder Engagement objectives

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

**Table 1-1 Stakeholder Engagement Objectives**

Objective	Rationale
Identify relevant stakeholders for the Project and Associated Facilities	Identify and categorise individuals or organisations that may be affected by the Project and its Associated Facilities or influence how the operations are run or the Project is implemented, noting that this is an ongoing process which may change throughout the life cycle of the Project.
Distribute accurate information in an open and transparent manner	Ensure that stakeholders, particularly those directly affected by the Project, have all relevant information available to them, to enable them to make informed comments and plans. This helps reduce levels of uncertainty and anxiety. Information should allow affected parties to develop an understanding of potential impacts, risks and benefits and an open and transparent approach is central to achieving this aim.
Create partnerships to promote constructive interaction between all parties and create opportunities	Develop relationships of trust between the Project and stakeholders to contribute to proactive interactions and avoid, where possible, unnecessary conflicts based on rumour and misinformation. Identifying structures and processes to deal with conflicts and grievances from early stages allows the Company a better understanding of stakeholder concerns and expectations, thereby providing opportunities to increase the Company's value to local stakeholders.
Record meetings outcomes and address public concerns, issues, and suggestions	Document stakeholder issues, concerns, and comments to allow the rationale for Project decisions to be tracked and understood. Records also assist during reviews and audits of the Project, in identifying thematic issues, which may need a more holistic response, and during follow up engagement with the affected people.
Manage stakeholders' expectations	Expectations, both positive and negative, may not be aligned with the realities of the Project. Ensuring that expectations are kept at realistic levels (e.g., around job opportunities; provision of local infrastructure; community investments; and

Objective	Rationale
	disruption) limits disappointments and frustrations of directly affected parties at later stages of project implementation and therefore mitigates the potential for conflict with stakeholders.
Fulfil national and international requirements for consultation	Ensuring compliance can avoid potential business interruption risks and project delays based on procedural issues rather than substantive ones and contribute to obtaining the <i>social license to operate</i> and building effective and trustful relations with stakeholders.

## 2. PROJECT DESCRIPTION

### 2.1 Project Organisation

The Project will be implemented by Midmar Callatis S.R.L as the Project Company (registered in Romania) for development, construction and operation of the Project, with Rezolv Energy (registered in Czech Republic ) contribute to the Project development, finance, construction and operation, as Project Sponsor/Project Owner.

Rezolv Energy is a highly experienced, independent renewable energy producer, with customers operating across Central and South-eastern Europe. Their team previously created and operated the largest wind farms in Croatia and the Czech Republic, and the largest independent wind farm in Romania.

### 2.2 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.

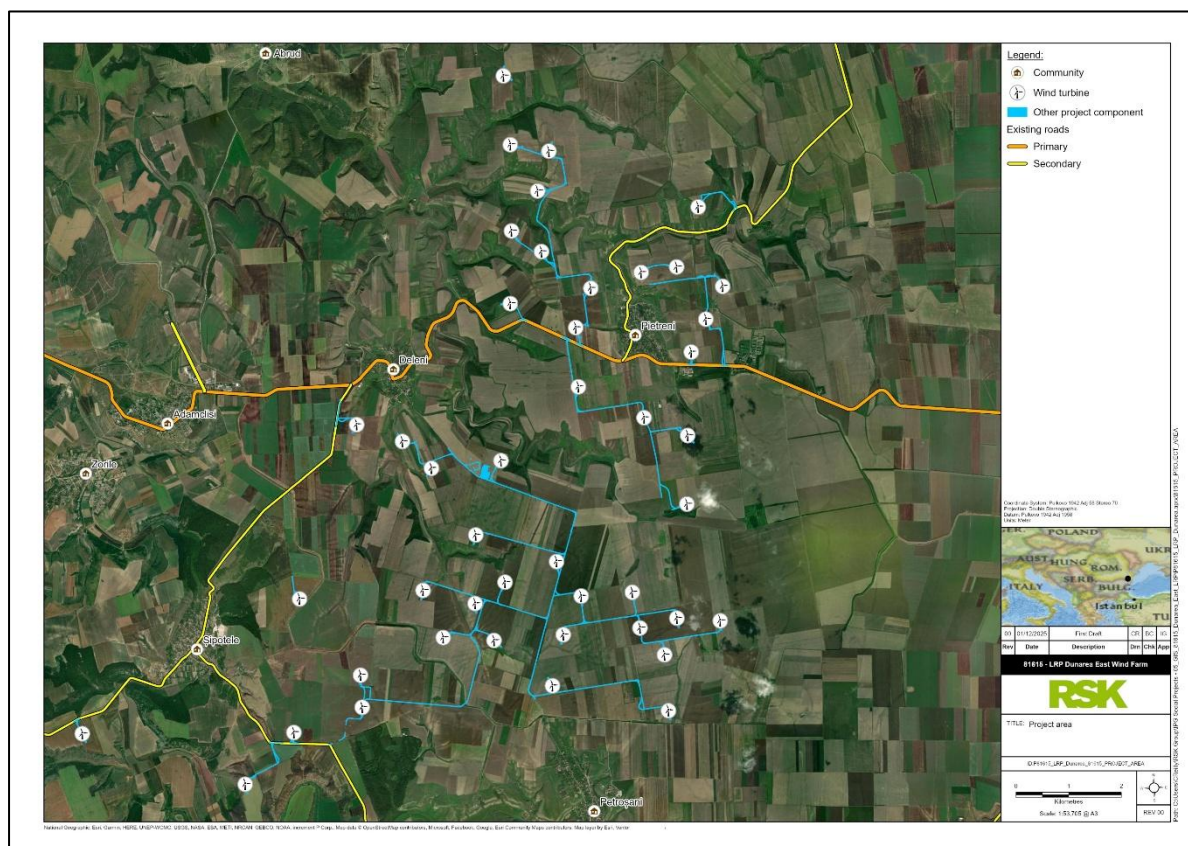
The project consists of:

- 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.

Dunărea Wind Farm Project location in relation to the administrative areas of Deleni commune (in the vicinity of the communities of Deleni, Pietreni, Sipotele, and Petrosani) is illustrated in Figure 2-1 below.



**Figure 2- 1 Dunărea East Project Layout**



Source: Land Restoration Plan, 2026

The Project, including 45 wind turbine generators (WTG) and the ancillary infrastructure, is not associated with any physical displacement of people or built structures. In terms of 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. The number of land plots affected by each of the core project components<sup>3</sup> 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.

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

<sup>3</sup> 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.



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 Midmar Callatis S.R.L through a land exchange contract with a private landowner and 0.49 ha are reportedly purchased by Midmar Callatis S.R.L (data based on Land Restoration Plan, 2026).

The area is geographically located within South Dobrogea Plateau area, in the subunits of Oltina and Cobadin Plateaus, in an area with a general tabular aspect, but strongly fragmented by the valleys of Urluia River and tributaries. The entire area is covered mainly by agricultural lands, and secondary by pastures, highlighting also some forestland. The Project area partially overlaps the Natura 2000 sites ROSCI0071 Dumbraveni - Valea Urluia - Lacul Vederoasa, ROSCI0353 Pestera - Deleni, and ROSPA0001 Aliman - Adamclisi, and the Important Bird Areas (IBAs) sites Aliman - Adamclisi and Dumbraveni - Plopeni (internationally designated sites, Key Biodiversity Areas).

## 2.3 Project Area of Influence (Aoi)

Definition of the Aoi for the Dunărea East Wind Farm Project has been derived following the guidance provided in EBRD PR1. The process has also considered the relevant environmental and social aspects included in PR's 2 through 8, and the IFC EHS Guidelines for Wind Energy (2015). Thus, the Project Aoi encompasses the physical boundaries of the Project's components and activities as the core area/s, plus a wider buffer zone covering access to the Project, and any natural or community receptors which may be affected by the Project.

The Project's Aoi is set out below:

- **Environment Aoi** that include the Project components and the environmental receptors which may be affected by the Project development:
  - **direct Environment Aoi**, which comprises:
    - location of primary Project sites and related facilities that the Company develops and/or controls (e.g. *permanent*: wind turbines, central power collection station, underground cable lines and overhead lines, existing roads and additional access roads, culverts; and *temporary*: borrow and disposal areas, lay-down areas, concrete batching station, temporary offices, construction/ management sites, etc).
    - additional areas in which aspects of the environment could conceivably experience significant impacts. We are considering an area of up to 2 km applied around the Project sites and facilities,
  - **indirect Environment Aoi**, including any other additional areas where impacts from unplanned but predictable developments caused by the Project may occur later or at a different location.
- **Social Aoi** that include the area surrounding the Project, where various social interactions will take place:
  - **direct Social Aoi**, also understood as the study area for the socio-economic qualitative baseline data collection field survey, which comprises:
    - all settlements impacted by land take for the Project components (restricted or lost access to the project area) – all land plots required by the Project belong to the administrative territorial units of Adamclisi and Deleni communes;
    - the settlements that could be affected by potential temporary environmental impacts during the construction phase and long-term during operations, such as noise, shadow flicker, visual change to the landscape, etc. located in a 2 km buffer from the WTG.

- **indirect Social Aol** (considered as study area for the desktop data review), including the entire Constanța County.

Further, for each Environmental & Social topic, separate Aols are identified, depending on the specifics of the respective factor, Project phase and estimated impacts. These separate Aols are identified and described at with the project baseline conditions and the environmental and social impact assessment chapters.

Among them stand out:

- As per the EHS Guidelines for Wind Energy, preliminary noise modelling should focus on sensitive receptors within 2 km of any wind turbines. Given that noise will be one of the more critical aspects to consider during the ESIA process, a Project Aol of 2 km has been applied around the Project wind turbine locations;
- Project Aol for shadow flicker impact during operational phase is determined as 10 times of rotor diameters (162 m) from each turbine location;
- Project Aol for blade throw impact during operational phase is determined as 1.5 times of turbine height (247 m hub height and rotor radius);
- Project Aol for biodiversity of 2 km radius has been applied around the Project wind turbine locations, to define habitat values in the immediate project vicinity where species may regularly dwell.

## 2.4 Project Schedule

This project schedule below was considered for the ESIA<sup>4</sup> and was taken into consideration when evaluating the environmental and social impact correlated with each component of the wind farm and each topic/aspect.

Detailed schedule will be confirmed by the construction contractor, when engaged.

Table 2-1 Dunărea East Wind Farm Project Schedule

Project Phase	Key Activities	Estimated Duration	Milestone / Target Date
<b>Planning</b>	This phase includes the preparation of technical documentation, permitting, land use planning, and environmental assessment activities. It lays the foundation for all future project activities. It also includes the financing period.	4 months	March 2026
<b>Construction</b>	This phase will start at the Notice to Proceed (NTP) date and will comprise: site preparation works, BoP Engineering, roads and Crane Pads, WTG foundations and soil improvement, Collector System, Substation, Execution of OHL, TSA Equipment Manufacturing, anchor cages delivery to site, WTG Equipment delivery to site, turbine erection and mechanical completion in two stages and grid compliance.	About 24 months	July 2028
<b>Operation</b>	Commissioning, energy production, maintenance. COD is expected to start in a first stage in May 2028.	30 years (up to 35 years)	

<sup>4</sup> DNV, 2026. International Environmental and Social Impact Assessment (ESIA)

Project Phase	Key Activities	Estimated Duration	Milestone / Target Date
<b>Decommissioning</b>	Turbine dismantling, removal of infrastructure, land restoration	About 24 months	

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

#### 3.1 Romanian national regulations

##### 3.1.1 Romanian Constitution

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

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

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

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

In Romania, public participation is mainly regulated in relation to plans, programmes (Governmental Decision 564/2006 and Governmental Decision 1076/2004) and projects (Law 292/2018<sup>5</sup>).

##### 3.1.2 Romanian permitting regulations

In Romania, disclosure of project information and public consultation in decision-making for investment projects is regulated by a number of laws, regulations and guidelines, including:

- Environmental Protection Law - Law No. 90/2021 amending GEO No. 195/2005 - sets up the permitting framework (including EIA)
- Application methodology for the Environmental Impact Assessment (EIA) Procedure for public and private projects - Environmental Minister Order No. 135/2010. This regulation defines the projects for which an Environmental Impact Assessment is needed. Transposes the EU Directive 2011/92/UE and respectively 2014/52/EU for EIA, as well as Directive 2003/35/EC related to public participation.
- Guidelines for the EIA screening and scoping and review, based on EU Directives edited by the DG Environment.

#### 3.2 EU Legal Framework

##### 3.2.1 Aarhus Convention

The Aarhus Convention (signed in 1998 and entered into force in 2001) was ratified by Romania in 2000. The Convention establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary

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<sup>5</sup> The transposition of the revised EIA 2014/52/EU has been fulfilled in December 2018. Law No. 292/2018 on the assessment of the impact of certain public and private projects on the environment was adopted and published on 10/12/2018 in the Romanian Official Journal (Official Gazette No. 1043, Part I). This Law provides the public with the possibility to participate in the EIA procedure before the final development consent is granted.

provisions so that public authorities (at national, regional, or local level) will contribute to these rights becoming effective. The Convention provides for the following:

- The right of everyone to receive environmental information that is held by public authorities ("access to environmental information"). This can include information on the state of the environment, but also on policies or measures taken, or on the state of human health and safety where this can be affected by the state of the environment. Applicants are entitled to obtain this information within one month of the request and without having to say why they require it. In addition, public authorities are obliged, under the Convention, to actively disseminate environmental information in their possession.
- The right to participate in environmental decision-making. Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organisations to comment on, for example, proposals for projects affecting the environment, or plans and programmes relating to the environment, these comments to be taken into due account in decision-making, and information to be provided on the final decisions and the reasons for it ("public participation in environmental decision-making").
- The right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general ("access to justice").

### 3.2.2 EU Directive 2003/35/EC for Public Participation

The European Parliament and Council Directive 2003/35/EC provides for public participation regarding drawing up certain plans and programmes relating to the environment. According to this Directive, Member States shall ensure that:

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

### 3.3 International Lender Requirements

It is envisaged that the Project will be financed by international development banks, which in turn results in the need for the Project to be compliant with the following standards which were considered for this assessment:

- International Finance Corporation (IFC) Performance Standards (2012);
- World Bank Group Guidelines;
- European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2025).

The EBRD's Environmental and Social Policy (ESP) outlines how the Bank manages the sustainability of its operations, sets out its commitments, and defines the implementation arrangements for projects it finances. It specifies minimum requirements for managing environmental and social risks and impacts throughout the project lifecycle and defines the respective roles and responsibilities of both

the EBRD and its clients. The current ESP (2024, with effected date 01/01/2025) supersedes the 2019 Environmental and Social Policy and its associated Performance Requirements (PRs).

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

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

Stakeholder engagement requirements are outlined in PR10: Information Disclosure and Stakeholder Engagement. The key requirements for consultation and disclosure through the life of the project as well as requirements around Grievance Mechanism are summarized in Box 3.2 below (EBRD Environmental and Social Policy, 2019).

### Box 3-2 Outline of EBRD PR 10 Requirements

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

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

#### **Disclosure of Relevant Project Information**

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

#### **Meaningful Consultation**

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

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

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

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

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

#### **Grievance Mechanism**



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

**On-going Reporting to Affected Stakeholders**

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

## **4. SUMMARY OF PREVIOUS ENGAGEMENT FOR THE PROJECT**

The stakeholder engagement conducted for the Dunarea East Wind Farm project has evolved through several phases, starting with national regulatory requirements in 2011 and progressing to stakeholder engagement supporting the development of the international environmental and social impact assessments (ESIA) and livelihood restoration planning (LRP).

As the Dunarea Wind Farm Project extends across the communes of Deleni and Adamclisi, the subsequent engagement activities were carried out in both locations. However, for the purpose of this SEP, only the engagement activities conducted within the commune of Deleni are described below.

### **4.1 Regulatory engagement**

Regulatory stakeholder engagement was conducted for the Project since its inception, in line with Romanian legislation.

Information disclosure regarding environmental or social impacts from the Project and public consultation has been conducted as part of the national permitting process, during 2010 – 2011. Public consultation around zoning and EIA process has been supported by public announcements in the local media and public meetings organised in the Deleni commune.

The zoning stage of the permitting process included the following public consultation activities:

- On February 1<sup>st</sup> 2011, a public meeting took place at Deleni City Hall for PUZ "Wind park development with access roads and interconnectors to the national energy system – total power 510 MW- outside the buildable area (extravilan) of Deleni commune, Constanta County ". The announcement for the public debate was posted at Deleni City Hall and published in a local newspaper on 10 and 13 December 2010.

The EIA process included the following public consultation activities:

- The decision of the Environmental Protection Agency Constanța was published in local media on the 4<sup>th</sup> of April 2011.
- Information on the public hearing of the EIA Report and the possibility of consulting the documentation was published in local media on the 7<sup>th</sup> of May 2011 and at the Commune Halls of Adamclisi and Deleni (9<sup>th</sup> of May 2011), as well as on the website of APM Constanta.
- On the 1<sup>st</sup> of June 2011, a public meeting took place at Deleni Commune Hall. At this public debate, a representative of local NGO Oceanic Club made observations and asked for clarifications on the impact of the project on certain species of rodents and birds. The clarification provided by the environmental consultant were transmitted and accepted as satisfactory.
- The confirmation issuance of the environmental agreement was published in local media and at the Deleni Commune Hall on the 19<sup>th</sup> of July 2011.

Engagement has been resumed in 2019, when the Project developer has organised a public meeting with local authorities and the local communities. More than 50 landowners have attended the meeting, according to the information provided to ERM by the local mayors and local landowners during the site visit meeting and engagement has been ongoing since. Local stakeholders have confirmed that these engagement efforts have reinstated their trust that the Project will be implemented, albeit the long wait since the permitting process in 2011.

The Company representatives were in permanent contact with the Local Council and Mayor's office, as permitting process progresses.

Additional regulatory engagement was in place during the Project update process:

- Public disclosure for PUZ approval for Deleni to include the Dunarea East Wind Farm, June 2024
- Public disclosure of the Environmental Impact Assessment (EIA) procedure to obtain the Environmental Approval, September 2024

## 4.2 ESIA Engagement

In support of the ESIA process and in alignment with the international applicable standards, key stakeholders were consulted during the following stages:

- Scoping process for the ESIA, November 2022
- Socio-economic baseline data collection for the ESIA, March – April 2023

Communication and consultation activities with stakeholders have been conducted at different stages since the Dunarea Wind Farm's inception in 2011, following its various phases of development and periods of break.

### 4.2.1 Scoping engagement

In support of the ESIA scoping study and in alignment with the international requirements, key stakeholders were consulted and engagement round held on 15<sup>th</sup> of November 2022.

Engagement during the scoping stage of the ESIA is presented in in Table 4 - 1 below.

The purpose of engagement meetings was to:

- Share relevant information about the Project and the forthcoming ESIA process including planned activities.
- Validate the Social Area of Influence defined for the Project.
- Establish communication channels with key institutional stakeholders and introduce the contact person for the Project and their communication details.
- Understand concerns, grievances, and questions that stakeholders may have about the Project. Address these where possible or commit to providing a response.
- Understand sentiment to the Project.

**Table 4 - 1 Overview of scoping phase engagement**

Date	Stakeholders met	Feedback
15 November 2022	Deleni commune <ul style="list-style-type: none"> <li>■ Deleni Commune Mayor</li> <li>■ Commune Hall Secretary</li> </ul>	<ul style="list-style-type: none"> <li>■ The mayor of Deleni is very concerned about the impact of the construction phase on the quality of the existing roads.</li> <li>■ The road Deleni-Petrosani was recently asphalted and as it will be used for traffic during</li> </ul>

		<p>construction, the expectation is to get it back at the same quality after usage by the project. The experience following the Fantanele-Cogealac Windfarm constructed in the area starting 2008 confirmed that the quality of existing local roads used during construction was negatively impacted by the Project.</p> <ul style="list-style-type: none"> <li>■ The Project is permitted as two separate sub-projects and the request is to maintain the split between Adamclisi and Deleni elements in the future Project communication</li> <li>■ The Project is perceived to positively contribute to the development of the local community and the impact of the limited access to pastureland during construction phase is perceived by the Local Authority to be minimal and manageable via timely and effective engagement with the existing shepherds currently leasing the land, once the project design is final and construction schedule can be confirmed.</li> </ul>
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#### 4.2.2 ESIA engagement

A socioeconomic and health baseline qualitative data collection field survey was undertaken by ERM between March –April 2023 in the Project area.

This included key informant interviews and focus group discussions and field observations and ground truthing in the settlements of the Social Aol.

The meetings were organised in collaboration with the newly appointed Community Liaison Officer (CLO) for the Project, who attended the meetings with the elected representatives and local farmers.

The primary goal of these activities was to collect baseline information on perceived socioeconomic and health factors and engage around key potential risks and opportunities associated with the Project.

A Project Information Leaflet (PIL) and a Project Information Sheet were elaborated and distributed to local stakeholders in Romanian for information and comment – see Appendix A.

Additionally, dedicated maps for each territorial administrative units (ATU) were developed to support engagement with farmers and other stakeholders engaged.

During the disclosure period updated Information Leaflets presenting the final layout will be disseminated throughout the Project ATUs.

The meetings consisted of:

- Key Informant Interview (KII) with relevant stakeholders (elected community representatives and civil servants in charge with agricultural, social assistance or planning departments, health and education professionals and policemen).
- Focus groups discussions with farmers in both communes.

Data collected during these meetings was integrated in the sections of the Socioeconomic Baseline Study (SEBS) and in the impact assessment, as appropriate.

The summary of key topics discussed in each meeting are described in Table 4 - 2.

**Table 4 - 2 Overview of ESIA baseline engagement**

Date	Stakeholders met
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14 June 2023, Deleni, Commune Hall	<ul style="list-style-type: none"> <li>■ Deleni Commune Mayor</li> <li>■ Deleni Commune Vice Mayor</li> <li>■ 9 Farmers</li> <li>■ Social Department in Deleni</li> <li>■ Accounting Department in Deleni</li> <li>■ Agricultural Register Department in Deleni</li> <li>■ Urbanism Department in Deleni</li> <li>■ Commune Local Councilor</li> <li>■ Police</li> <li>■ Doctor</li> </ul>
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An additional goal of the local engagement was to build on the local knowledge to refine stakeholder identification for the Project, resulting in a more comprehensive stakeholder identification – see Section 5 below for more details.

Further feedback was collected on past engagement, along with suggestions for improving engagement in the following Project phases – see Section 6 below for more details on engagement tools to be used by the Project.

Additionally, a community grievance mechanism (CGM) was established, in partnership with local authority representatives. Grievance boxes were set up in the Commune Hall– see Section 8 below for more details on the CGM.

### 4.3 LRP engagement

#### 4.3.1 Key activities

Further on, the Project company engaged with stakeholders who are directly impacted by land acquisition and economic displacement, based on the principle of meaningful participation.

A 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) .

A Project Information Leaflet (PIL) was elaborated and distributed to local stakeholders in Romanian for information and comment – see Appendix B.

**Table 4-3: Overview of the planned LRP-related stakeholder engagement (2 – 7 February 2026)**

Stakeholder group	Description	Format	Issues discussed
Local government administration	<ul style="list-style-type: none"> <li>■ Administration of Deleni commune (local level)<sup>6</sup>.</li> </ul>	KII	<ul style="list-style-type: none"> <li>■ clarification of the practices of informal land use in the project area</li> <li>■ key steps of the land acquisition process</li> </ul>

<sup>6</sup> 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"> <li>grievances and/or court cases related to the project land acquisition (if any)</li> <li>anticipated land acquisition impacts</li> <li>potential livelihood restoration support</li> <li>information on vulnerable groups.</li> </ul>
Women	<ul style="list-style-type: none"> <li>Women affected by land acquisition and economic displacement, including female landowners / land users or members of the affected households.</li> </ul>	FGD	<ul style="list-style-type: none"> <li>key steps of the land acquisition process</li> <li>grievances and/or court cases related to the project land acquisition (if any)</li> <li>anticipated land acquisition impacts – in general and specifically on women</li> <li>presence of informal land users</li> <li>potential livelihood restoration measures.</li> </ul>
Project Affected Households	A Project Affected Person (PAH) refers to a household that experiences economic, social, or environmental impacts due to a development project. These impacts can result from land acquisition, displacement, or restricted access to natural resources.	Household Survey	<ul style="list-style-type: none"> <li>Profile of affected households, including demographics, household size, and income sources</li> <li>Description of livelihoods and current land use practices, including expected impacts</li> <li>Summary of the land acquisition process and compensation arrangements</li> <li>Potential livelihood restoration assistance for affected households and businesses</li> <li>Identification of vulnerable individuals or groups needing additional support during acquisition and restoration processes</li> </ul>
Businesses (including sole traders)	An affected business is any formal or informal commercial enterprise experiencing economic displacement due to project-related land acquisition or restrictions on land use, including loss of assets, access, income sources, customers, or operational continuity	KII	<ul style="list-style-type: none"> <li>information on only 5 businesses was available prior to the field survey in February 2026; representatives of all these businesses were interviewed</li> </ul>

## 5. PROJECT STAKEHOLDERS

### 5.1 Stakeholder identification

IFC's Stakeholder Engagement Good Practice Handbook for Companies Doing Business in Emerging Markets defines stakeholder(s) as *any individual or group who is potentially affected by a project or activity or who has an interest in the project or activity, and/or the ability to influence its outcome, positively or negatively.*

According to EBRD's PR10: Information Disclosure and Stakeholder Engagement, *the first step in successful stakeholder engagement is for the client to identify the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project ("affected parties"), or (ii) may have an interest in the project ("other interested parties"). Paragraph 10 states that for Category A projects the client will engage in a scoping process with identified stakeholders to ensure identification of all key issues to be investigated as part of the Environmental and Social Impact Assessment (ESIA) process. The scoping process will also facilitate development of a Stakeholder Engagement Plan for the project. As part of the scoping process, stakeholders should be able to provide comments and recommendations on the draft Stakeholder Engagement Plan and any other scoping documents. Paragraph 11 states that the client will inform the EBRD how communication with the identified stakeholders will be handled throughout project preparation and implementation, including the type of grievance procedure (see paragraphs 24–26) envisaged. Different levels of engagement and consultation might be appropriate for affected parties and other interested parties. The client should develop separate processes for worker engagement and engagement with affected communities; engagement with workers about working conditions, including occupational health and safety, and the workplace relationship must follow the requirements of PR 2 at a minimum. Where stakeholder groups are identified as disadvantaged or vulnerable, dedicated approaches and an increased level of resources may be needed for communication with such stakeholders so that they fully understand the issues that are potentially affecting them. Clients should also inform the EBRD of any information provided or consultation activities conducted prior to approaching the EBRD for financing.*

The objective of stakeholder identification is therefore to establish which organizations and individuals may be directly or indirectly affected (positively and negatively) or have an interest in the Project and its activities.

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

**Table 5 - 1 Stakeholder groups**

Stakeholder Category	Stakeholder Group	Stakeholders
<b>National and County Government</b> National Government is of primary national political importance to the business and/or projects/activities in terms of establishing policy, granting permits or other approvals, and monitoring and enforcing compliance with Romanian regulations throughout all stages of the Project life cycle.	National Government Key Ministries National Regulatory bodies	<ul style="list-style-type: none"> <li>■ Constanta County Council</li> <li>■ Ministry of Environmental Protection &amp; Constanta Environmental Protection Agency</li> <li>■ Ministry of Culture/ Constanta County Culture Directorate</li> <li>■ ANANP – National Association of Nature Protected Areas</li> <li>■ Agency for Payments and Intervention in Agriculture (APIA)</li> <li>■ Constanta County Employment Agency (AJOFM)</li> <li>■ Ministry of Transport</li> </ul>



Stakeholder Category	Stakeholder Group	Stakeholders
<b>Local Public Administration</b> Local government is of importance to the business or and/or project as they are responsible for implementation of legislation, and development plans and policies at the municipal or commune level. In addition, the municipalities and/or communes in the Project area will be impacted by the Project and will need to be kept informed of progress and plans in their area, to consider the Project activities in their policymaking, regulatory and other duties and activities.	Local Mayors Local Councillor Local inspectorates and public utilities (spatial & urban planning, cadastre, communal affairs, environment, social assistance, agricultural register, roads, etc.)	<ul style="list-style-type: none"> <li>■ Mayors and Local Councils of: <ul style="list-style-type: none"> <li>○ Adamclisi Commune</li> <li>○ Deleni Commune</li> </ul> </li> <li>■ Mayors and Local Councils of the communes/towns/ cities located in the Social Aol</li> <li>■ Spatial and Urban Planning Offices in each Commune of the Aol</li> <li>■ Social Assistance Offices in each Commune of the Aol</li> <li>■ Agricultural Register Offices in each Commune of the Aol</li> </ul>
<b>Parastatals</b> Parastatals may have land or other assets within the country (electrical grid, public roads), which could be affected by the project or activity, or whose assets are influencing the project/activities (underground pipelines /overhead lines crossing the project areas).	Government funded and/or private enterprises in charge of managing specific activities	Transelectrica – the national grid operator Other utility providers
<b>Communities or Settlements</b> Households and communities that may be directly or indirectly affected by the Project. This includes people living on land affected by the Project, through direct land take or by social and environmental impacts, and other people who visit or use land or resources that may be affected. Primary stakeholders include landowners and land users.	Land-affected stakeholders Local population affected in some form by the project/activity, including Project traffic	<ul style="list-style-type: none"> <li>■ Landowners and users of the Project area</li> <li>■ Local Animal Breeders Associations</li> <li>■ People living near the project site</li> <li>■ Residents of settlements located near roads used for project activities, such as transporting materials during construction and operation, contractor and supplier vehicles;</li> <li>■ Social / public infrastructure and service: local health, local police, emergency services</li> <li>■ High School Deleni</li> <li>■ Gymnasial School Adamclisi Commune</li> <li>■ Gymnasial School Deleni Commune</li> </ul>
<b>Vulnerable Persons/Groups</b> Vulnerable groups may be affected by the project or activity by virtue of their physical disability, social or economic standing, limited education, lack of employment or access to land.  Appropriate engagement practices and tools will be adopted to ensure the identification of vulnerable groups and their adequate access to information and participation.	Vulnerable groups	<ul style="list-style-type: none"> <li>■ Low-income households</li> <li>■ Unemployed youth</li> <li>■ Ethnic Minority Groups – e.g. Roma minorities</li> <li>■ Pensioners/ farmer pensioners</li> <li>■ Disabled persons</li> <li>■ Female-headed households, including single mothers and widows.</li> </ul>
<b>Non-Governmental Organizations (NGOs)</b> NGOs with direct interest in the Project and its social and environmental aspects and that are able to influence the project and/or activity directly or through public opinion.	International National Local	<ul style="list-style-type: none"> <li>■ Farmers associations</li> <li>■ Environmental and Cultural Heritage NGOs active locally</li> <li>■ Association Local Action Group (GAL) Deleni ( Deleni Commune)</li> <li>■ Association Local Action Group (GAL) Dobrogea South-West (Adamclisi Commune)</li> <li>■ Hunting associations</li> <li>■ Women associations</li> <li>■ Sports associations</li> </ul>

Stakeholder Category	Stakeholder Group	Stakeholders
<b>Other interest groups</b> Regional and national level media will typically have a higher level of influence over the Project and may be leveraged to influence local stakeholders' perceptions of the Project.	Media End customers	<ul style="list-style-type: none"> <li>■ Regional and local radio stations</li> <li>■ Regional and local media</li> <li>■ TV stations</li> <li>■ Internet</li> <li>■ End customers purchasing electricity</li> </ul>
<b>Potential partners</b> Organizations, businesses and individuals with direct interest in the Project e.g. running businesses or providing services and supplies to the project.	Employees Contractors and subcontractors Suppliers Other businesses operating within the region/ villages. Company shareholders (for example, lenders)	<ul style="list-style-type: none"> <li>■ Other Windfarm Operators in the area</li> <li>■ Companies operating in the Project area.</li> <li>■ Vestas, Civil and Electrical Contractors</li> </ul>

## 5.2 Disadvantaged and Vulnerable Groups & Individuals

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

- **Elderly/retired.** The elderly has specific vulnerabilities relating to income levels and limited ability to change or increase access to additional finances and access to health care, as well as being more susceptible to disease and disability. Elderly residents in rural settlements may be reliant on subsistence farming and are particularly vulnerable and these settlements are more likely to have limited-service availability. Moreover, many local pensioners benefit from farmers pensions, raising additional financial constraints.
- **Youth.** Youth are reported to be potentially vulnerable in rural areas due to their lack of land ownership or other method of securing a livelihood, particularly where they have a young family. They may also be vulnerable to poor labour practices due to lack of experience. Especially, local unemployed youth from the area who have dependents and financial obligations (i.e., families, rents, etc.) are considered more vulnerable. This characterizes the unemployed youth who may not have benefited from training and skill-building opportunities to be able to benefit from employment opportunities in urban areas or internationally or lost their job and had to come back to their hometown. Qualified youth who do have the qualifications may still face challenges in obtaining employment opportunities due to a lack of job opportunities in the area.
- **Ethnic minority groups – the Roma community.** Roma communities are considered vulnerable across a range of diverse indicators ranging from access to services (including education and health care), level of education and literacy, participation in decision-making, risk of marginalisation and access to financial resources. Within this group, there are specific individuals such as children and young people who may have an increased vulnerability in terms of risk of child labour, poor working practices and limited access to education. Roma population is present throughout the Project area
- **Children.** Vulnerable children may be present throughout the Project area, where they are not adequately cared for and protected by an adult and are potentially participating in work that is hazardous or prevents them from continuing education or access proper healthcare. Levels of vulnerability vary greatly and are likely to be linked to additional factors such as overall household income and ethnicity.
- **Physical /mental health and disability.** Disabled people throughout the project area are vulnerable in terms of participation in decision-making and access to employment opportunities. Disabled

people may also experience varying levels of social exclusion, community marginalisation, and are more vulnerable to change.

- *Women, including female-headed households.* Specific areas of vulnerability related to poverty and lack of access to basic services. Women have less options on the labour market than men, and are more involved in human trafficking, which make them more vulnerable to poverty. Female precariousness is most prevalent among elderly women, particularly in the instances when they live alone.
- *Individuals with pre-existing health conditions.* A pre-existing condition generally refers to any health condition, such as hypertension, diabetes, cancer, or chronic respiratory disease that already affects the health of an individual. Individuals with pre-existing conditions are at more at risk for health complications and are more susceptible to becoming ill due to other diseases, including communicable diseases. Chronic diseases are the leading cause of death, and circulatory diseases in particular are the leading cause of clinical visit in the Project Aol.

### 5.2.1 Gender considerations

Gender-sensitive issues were discussed during the LRP 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.

### 5.2.2 Stakeholder engagement with vulnerable groups

- Engagement with vulnerable groups in development, construction and operation phases is an iterative process which will be adapted throughout the different Project phases 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, 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 or other Project impacts, 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.
- 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 individuals highlight the inaccessibility of these channels, alternative methods will be established on case-by-case basis.

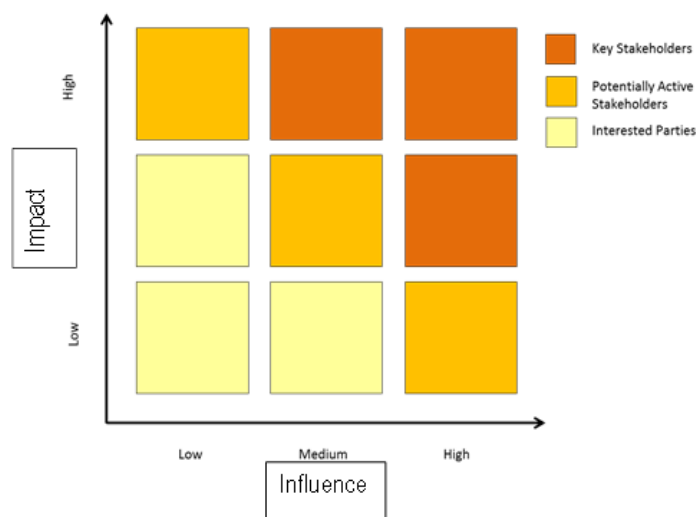
### 5.3 Stakeholder analysis

To develop a tailored and effective engagement process with each stakeholder category (see [Table 5.1](#) above), the Company will continuously map and analyse the identified stakeholders so that the engagement meets their interest in the Project and their likely key issues of interest. Stakeholders will be mapped according to the following:

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

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

**Figure 5 - 1 Stakeholder Mapping Matrix**



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

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

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

## 6. ENGAGEMENT APPROACH AND PLANNING

### 6.1 Overview

This SEP addresses engagement activities as part of the ESIA disclosure and presents a high-level outline of the engagement to be implemented for all the phases of the Project.

For each phase, specific Engagement Action Plans will be developed and included as appendices to this SEP, prior to the initiation of the respective activities.

Specific planning and engagement activities will be necessary at each Project phase, however some activities will be ongoing throughout the entire Project life cycle and therefore common to the different phases.

Common activities include the following:

- Regular updates to the stakeholders as the Project moves forward and activities, schedules and milestones evolve.
- Regular updates of the Project Information Leaflet (PIL), to be distributed to stakeholders, reflecting the current status of the Project activities.
- Regular update and revision of the stakeholder register including stakeholder analysis and re-evaluation, as necessary throughout the different Project phases.
- Addressing comments, questions and grievances regularly and through appropriate channels, and issuing information to stakeholders. This includes regular refreshers to stakeholders about the Grievance Mechanism and related processes.
- Regular reporting to the different stakeholders as appropriate (see Section 10).

### 6.2 Project phases

The SEP is a living document. It will be regularly updated with the results of stakeholder engagement activities carried out by the Project team. The engagement activities program will be adapted to the project evolution and will reflect any significant change in the project design or execution. More particularly, the SEP will be updated before commencement of the construction and operation stages.

#### 6.2.1 Pre-Construction

##### 6.2.1.1 Community Liaison Officer

The Community Liaison Officer (CLO) will oversee community and stakeholder engagement activities for the Project. The CLO will be responsible for interfacing between the stakeholders and the Project and managing the grievance mechanism.

The CLO will need to be acquainted with the stakeholders and stakeholder process as outlined in this SEP, and have a clear understanding of the Project schedule and engagement milestones in order to inform stakeholders appropriately about the development of the Project.

##### 6.2.1.2 Engagement for draft ESIA disclosure

The draft ESIA disclosure will involve engaging with local, county and national stakeholders via available channels and integration of their feedback in the final ESIA report. The Company will disclose the results of the impact evaluation in a way culturally and technically adapted to each group of stakeholders. It will particularly present the project characteristics and its associated impacts in layman terms to local communities to ensure they are fully understood.

The Engagement Action Plan for ESIA disclosure is presented in Appendix C of this SEP.

### *6.2.1.3 Disseminate and implement the Project's grievance mechanism*

The grievance mechanism presented in Section 9. External Grievance Mechanism will be disseminated in the affected communities during the pre-construction phase, at the time of consulting the local communities on different topics (PUZ / SEA, ESIA scoping, land acquisition). It will continue to be presented in detail during the EIA and ESIA disclosure processed, to ensure it is accepted and used by stakeholders, well in advance to the start of Project construction works.

## **6.2.2 Construction Phase Engagement**

### *Develop and maintain Stakeholder Engagement Plan for Construction*

During the construction phase, the Company will continue its dialogue with stakeholders, in synergy with the EPC contractor and subcontractor(s).

A specific Engagement Action Plan will be developed as the Project progresses within this phase in an effective and culturally appropriate manner, in order to maintain an open dialogue with those affected, both positively and negatively, by the Project.

The goal is to ensure that the Company remains in contact with all interested parties, that it is aware of their concerns related to project activities and that these are addressed in a timely manner.

### *Regular Engagement with Stakeholders*

Stakeholder engagement will take place regularly to inform stakeholders on the advancement of the Project works and of any significant change to the Project planning. Specific information activities will be carried out in advance of any work taking place in a given location.

Stakeholders will be informed of the nature of works, the number of workers on site and the duration of works.

### *Maintain Grievance Procedure*

During the entire construction phase, the Company will maintain an open communication channel with stakeholders to allow them to share any relevant feedback about the ongoing works and raise any concerns through the project grievance mechanism. This will be regularly reviewed to ensure it allows to appropriately capture community grievances and is fit for purpose. The grievance mechanism will be implemented and managed by the CLO, in collaboration with the relevant contractor teams.

## **6.2.3 Operations Phase Engagement**

### *Develop and maintain Stakeholder Engagement Plan for Operation*

During the operation phase, the Company will continue engagement with Project stakeholders. A specific Engagement Action Plan will be developed as the Project progresses into operation and will reflect any significant changes in the Project.

The SEP for operation will define the engagement activities planned and their frequency as well as the human resources that the Company has allocated for stakeholder engagement during this Project phase.

The SEP information to be shared regularly with stakeholders during operation will include:

- information on Project performance, planned annual maintenance schedule and duration;
- information on key environmental and workforce monitoring results;
- information on community investment initiatives.

The SEP will be regularly updated to reflect engagement conducted to date and any changes required to adapt it to the Project conditions and stakeholder expectations.



## Disclose and implement Grievance mechanism

The grievance mechanism will be revised and will undergo any changes, in terms of structure and/or management, deemed necessary by the Company to adjust it to the operation phase. These changes will be presented to affected stakeholders to ensure a smooth transition between the two phases and that grievances are managed appropriately by the Company.

### 6.2.4 Decommissioning Phase Engagement

The Company will define the SEP for decommissioning and engagement activities will be done in a manner appropriate with the laws and regulations in force at that time.

The Engagement Action Plan for Construction, Operation and Decommissioning is presented in Appendix D.

## 7. ENGAGEMENT TOOLS

The consistent use of best practice tools that have been tailored to local context and stakeholders needs maximizes the effectiveness of the Engagement Action Plan for the Project. Information addressed to the local stakeholders will be presented in Romanian language.

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

**Table 7-1 Stakeholder engagement tools**

Tool	Description
Project Information Leaflet (PIL)	A Project Information Leaflet was developed to support the ESIA engagement. The PIL provides a description of the proposed Project, the estimated Project schedule, the Project parties and benefits and includes contact details for the CLO and information on the grievance mechanism. As the Project progresses, this document will be reviewed and updated as often as necessary to ensure accuracy of information at any given time.
Project Information Hotline	A serviced Project Information Hotline will be available during normal business hours to all stakeholders during the environmental review process: +40752 243 522.
External Grievance form and Stakeholder Grievance Register/Database	External Grievance forms will be made available to local stakeholders in key locations across the Aol. The Project team will ensure these are accessible and easy to use by all local stakeholders.
Notice Boards	Notice boards will be erected at agreed locations in the area impacted by the Project, accessible to the local communities, and updated on a regular basis. The notice board will serve as an information dissemination tool. For example, the Project team will be able to display contact details, grievance mechanism and public consultation schedule. Wherever possible, maps or visual aids will be employed to increase accessibility of the notices.
Project website	A dedicated Project website will host relevant reports and announcements of consultation campaigns. Additionally, the website will include information about the grievance mechanism, an online grievance form and supporting contact details.
Regular Internal Reporting	The CLO will prepare regular reports to the Project team. These reports will include a summary of stakeholder engagement activities and all grievances received in the reporting period, any material deviations or non-compliances to the requirements of this SEP, planned activities for the next reporting period and any other issues of potential concern – please see section 10 for more details.
Reporting to Stakeholders	The Project team (CLO, EHS Manager, etc.) will provide Project updates to different stakeholder groups at agreed timelines and following engagements conducted. Moreover, during construction and operation phases, The Company

	will report on the environmental and social performance of the Project on an annual basis.
Stakeholder Engagement Log	The CLO will maintain a Stakeholder Engagement Log to plan, record and track engagements related to the different Project components and activities – see section 10 for more details.

## 8. RESOURCES AND RESPONSIBILITIES

The overall responsibility for the effective engagement of the project stakeholders, as outlined in this SEP, lies with the Project Company.

The Project has a Community Liaison Officer (CLO) appointed since April 2023 to oversee community and stakeholder engagement activities for the Project.

The CLO is well acquainted with the local context and stakeholders' specific needs and also with the stakeholder engagement process as outlined in the SEP.

Working in close collaboration with the Project team, the CLO will have a clear understanding of the Project schedule and engagement milestones and engage stakeholders appropriately in line with the Project progress.

Moreover, the CLO will be responsible for interfacing between the stakeholders and the Project and managing the grievance mechanism.

### *CLO specific responsibilities*

The specific responsibilities of the CLO are:

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

The dedicated CLO for the Project is: Sorin Blidaru

- Telephone: +4(0) 768 064 467
- Email: blidaru.sorin@yahoo.com

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

## 9. EXTERNAL GRIEVANCE MECHANISM

### 9.1 Purpose

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

For the Project-affected communities, an effective grievance mechanism provides an accessible, yet formalised (identification, tracking and resolving of grievances) alternative to an external dispute resolution process.

However, a stakeholder will always have the right to complain to the relevant authorities or the legal system, in accordance with the existing legislation in Romania.

The CGM is tailored to the local context of the Project environment and has the aim of finding mutually beneficial solutions to settle issues and developing a trust-based Company-community relationship. The Company commits to process any grievance received in a timely manner, via a procedure that is transparent, culturally appropriate, at no cost, and without retribution for the party presenting the grievance.

The Project's CGM is based on the core principles indicated below:

- *Communities face no barriers to accessing and using the mechanism.*

The mechanism will be well known and understood by the community and the user will not incur significant costs, effort, or any fear of reprisal, as these factors could have the result of deterring use of the mechanism. The CGM will be culturally appropriate and available in the language used by the affected communities. Use of the CGM will not impede access to any other existing legal recourse available to the community. The mechanism must also take into account potential cultural, linguistic, physical, and literacy barriers, and seek to eliminate these in its design.

- *The mechanism is established early on.*

The mechanism will be developed early on before issues have developed, with the aim to facilitate good community relations rather than addressing issues in a reactive, ad hoc manner.

- *The mechanism is based on a transparent, predictable process and it is well publicized and understood.*

The community shall be well informed about the basic steps that will be followed after they submit a grievance, along with the timeframe for each step and for the overall resolution of the complaint. There shall be consistency and predictability in the process and clarity on roles and responsibilities. As part of this process, the Project shall require contractors to be responsible and willing to coordinate with the Company regarding any grievances presented against the company and/or their employees. Monitoring and evaluation activities, including feedback from complainants on process and outcomes, will be used to identify areas for improvement in the mechanism.

- *Communities can build trust in the legitimacy and fairness of the mechanism.*

To build the trust of communities, there must be assurance that the grievance mechanism is not biased in favour of the company but rather achieves an equitable balance of the company's and community's interests. Where significant imbalances exist in knowledge and power, engaging third parties can help raise confidence about the impartiality of the procedure. The grievance process should set a timeframe and grievance risk evaluation within which complainants can expect acknowledgement of receipt of

grievance and a response and/or resolution of grievance. Anonymous grievances will be given the same due process.

- *The organizational structure and mind-set support the implementation of the mechanism.*

Allocating adequate capacity, resources and training to support the principles and objectives of the mechanism are an important design consideration. It will be important to ensure that these principles and objectives are well understood internally to ensure that the Project personnel have confidence in the mechanism and do not fear any repercussions of passing on reports of complaints.

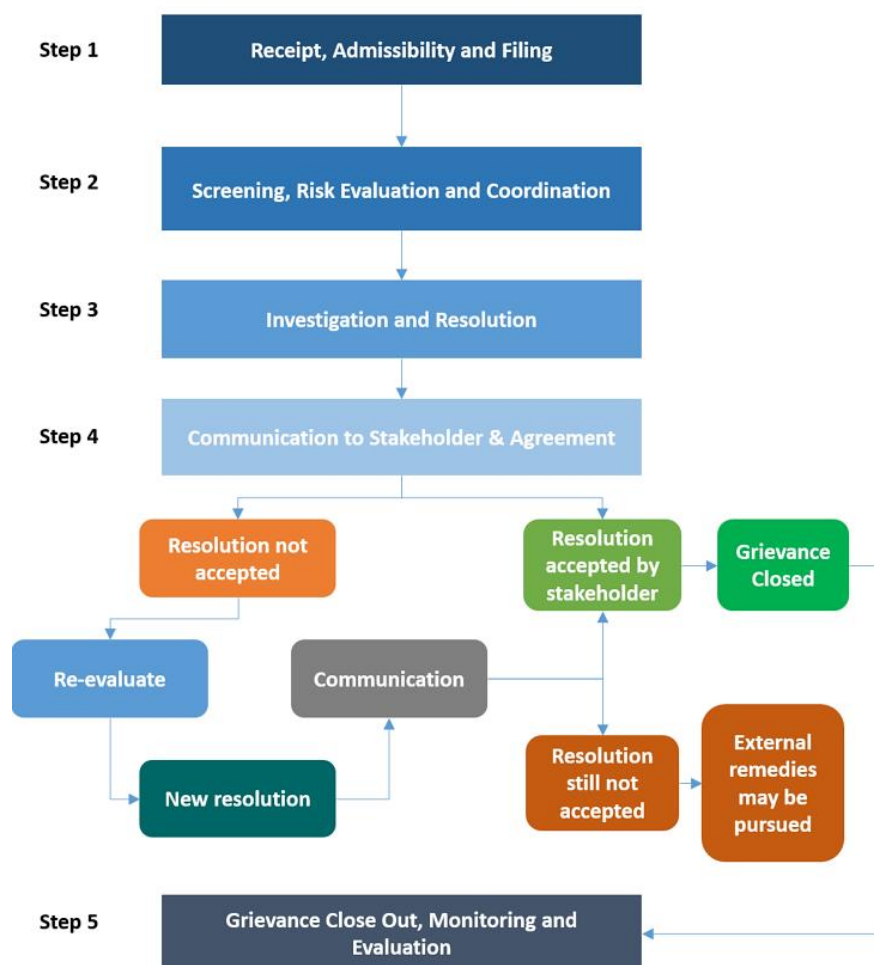
- The mechanism enables Gender-Based Violence and Harassment (GBVH) to be reported in a safe and confidential way. Establish an inclusive CGM and investigation procedures that enable reporting of GBVH incidents, with effective channels at Project level, for workers and communities.

## 9.2 Grievance procedure

The Figures below have been developed to ensure an effective and timely response to community grievances and maintain good community and stakeholder relations.

The timeframe for each step in the process will be adjusted according to the grievance risk and complexity categorisation (further detailed in Section 9.2.2). Each step of the process is described in the subsections below.

**Figure 9-1 Grievance Procedure diagram**



### 9.2.1 Step 1: Receipt, Admissibility, Acknowledgment and Filing

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

- verbally to the CLO or other relevant Contractor Team members;
- verbally through the Community Grievance Mechanism telephone hotline;
- in writing via a form on the Project website or in the dedicated boxes already made available throughout the Aol, in the Commune Mayoralty Offices of Adamclisi and Deleni.

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

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

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

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

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

During this process, the Company shall also acknowledge receipt of the complaint within a standardised time period (ideally at reception or within 12 hours, for example from the collection of the grievances from the dedicated boxes) and explain the process to the complainant, including timelines of the remaining steps in the procedure, e.g. if further 5, 15 or 30 days are required as indicated in **Error! Reference source not found.** above.

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

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

### 9.2.2 Step 2: Screening, Risk Evaluation and Coordination

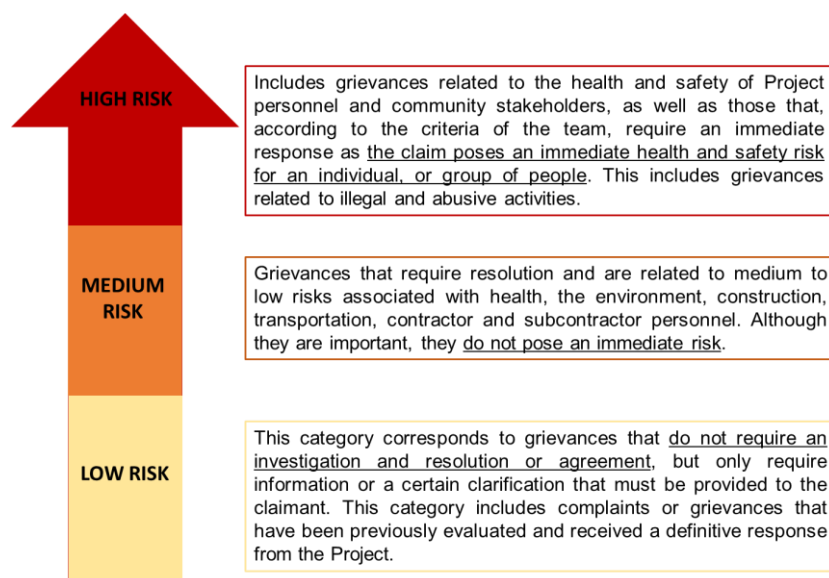
All grievances will need to undergo some degree of screening, risk evaluation and prioritisation. The Company will be responsible for managing the grievance resolution process. Management of the grievance will entail determining the nature of the investigation based on the type of grievance and the potential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

Prior to beginning the investigation process, the Company shall establish the nature of the grievance and risk level to determine the resolution timeframe, measures needed for review and investigation. Based on the grievance complexity (e.g. number of stakeholders involved, legal implications, need for external mediation), the Company will ensure that grievances will not only be prioritized correctly but also given the appropriate resources and time for resolution.

Depending on the circumstances of the grievance, various units or departments may need to get involved, including subcontractors and senior management if their input is required. The screening and risk evaluation phase is expected to be carried out in a target timeframe of 24 hours. Following this preliminary assessment, the Company will organise the review and investigation process of each grievance received. Once the admissibility of the claim is verified (*Step 1*), the risk level and severity of the grievance will be determined as follows:

Figure 9-2 Grievance Risk Evaluation





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

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

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

- **Low risk** grievances shall be solved and closed in a maximum of 30 days.
- **Medium risk** grievances are registered and evaluated in a maximum of 10 days. Medium risk claims will be solved and closed in a maximum of 15 days.
- **High risk** grievances will be evaluated immediately when received and should be investigated and solved in a maximum period of 5 days. If a persons' life or health is at risk, the complaint will be addressed and solved immediately. In highly complex cases, such as allegations of human rights, environmental damage, protest, that require detailed investigation and senior management or external stakeholders' involvement, the response time will be 20–30+ working days.

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

### 9.2.3 Step 3: Investigation and Resolution

The Company will organise telephone or face to face meetings to investigate the complainant's allegations and verify the validity and gravity of the grievance. If necessary, if the grievance relates to a given site or location, the Company along with the relevant local authority representative will organise a site inspection.

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

### 9.2.4 Step 4: Communication to Stakeholder and Agreement

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

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

If the complainant is not satisfied with the resolution or the outcome of the agreed corrective actions, the response should be reviewed and, if appropriate, amended in light of any discussions or negotiations. If the complainant is still not satisfied, they should be free to take their grievances to a dispute resolution mechanism outside of the company's grievance mechanisms, including legal actions.

In such cases, the CLO is responsible to coordinate with the Company's legal department and/or the Project contractor's legal representative as needed, remaining up to date on the case and completing close out activities in the management system when a resolution is ultimately achieved.

Proposed resolution actions may be of the following types:

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

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

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

### **9.2.5 Step 5: Grievance Close Out, Monitoring and Evaluation**

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

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

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

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

The CLO shall be in permanent communication with the contractor's CLO and the HSES manager to be informed about the critical grievances' resolution status. The Company will ensure that all

grievances raised by all Project stakeholders are treated impartially, respectfully and, if required, confidentially.

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

### 9.3 Gender-Based Violence and Harassment (GBVH) Provisions

According to the EBRD/IFC /CDC Group Toolkit regarding GBVH<sup>7</sup>, GBVH risks can intensify within local communities when there are large influxes of male workers from outside the area. Such workers often come without their families and have large disposable incomes relative to the local community, and can pose a risk in terms of sexual harassment, violence and exploitative transactional relationships. These risks are higher where workers come into close contact with the local community, for example on access routes or when living together in remote areas.

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

- Develop confidential grievance reporting, referral and support systems for workers;
- Establish safe, confidential and accessible grievance mechanisms for local communities;
- Include options to report anonymously if preferred;
- Include the option to report to a focal point person of either gender as preferred; and
- Consider engaging expertise to conduct mappings of formal services (healthcare, counselling) and informal resources (including through women's organisations) to support those who have experienced GBVH.

In addition, the Company will deliver periodic mandatory training on GBVH to all workers, including contractors, subcontractors and core suppliers, as well as relevant consultants and Companies.

The Company will include assessment of gender and safety risks in bidding process for contractors, vet contractors for prior efforts to address GBVH through prevention and response and ensure contracts include clauses on GBVH (for example all workers and staff sign codes of conduct).

All GBVH related allegations and grievances will be also reported to dedicated focal point at EBRD.

### 9.4 Administering and Publicizing the Community Grievance Mechanism

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

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

The Community Grievance Mechanism will be publicized among all the Project's stakeholders and affected persons. Communication tools such as posters and flyers with contact information as well as the CGM process outline will be distributed. The language use will be clear and concise.

In addition to Project external grievance process, EBRD's as a potential lender financing this project, has an Independent Project Accountability Mechanism (IPAM), which is an independent last resort

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<sup>7</sup> Source: Addressing Gender-Based Violence and Harassment (GBVH) in the Construction Sector, available at [https://toolkit.cdcgroup.com/wp-content/uploads/2020/12/GBVH-SB\\_Construction\\_Final\\_WEB-2.pdf](https://toolkit.cdcgroup.com/wp-content/uploads/2020/12/GBVH-SB_Construction_Final_WEB-2.pdf)

tool (if the project mechanism fails), aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.<sup>8</sup>

## 10. MONITORING, EVALUATION AND REPORTING

### 10.1 Overview

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

### 10.2 Monitoring and evaluation activities

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

The following documentation will be used and maintained by the Company during the project:

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

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

In accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679, the Company is committed to protecting the privacy and personal data of all stakeholders engaged throughout the project lifecycle. Personal data collected during stakeholder engagement activities (e.g., names, contact details, opinions, and feedback) will be used solely for the purpose of effective communication, consultation, and documentation of stakeholder input relevant to the project.

### 10.3 Reporting to stakeholders

#### 10.3.1.1 Internal Reporting

The following internal reports will be developed:

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<sup>8</sup> <https://www.ebrd.com/ipam>

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

These reports will be discussed at quarterly internal meetings and will be circulated internally as required, including to the relevant company Contractors.

### 10.3.1.2 External Reporting

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

The Company will keep track of commitments made (using the Commitments Tracker) and communicate externally on progress made against these commitments on a regular basis (for instance during regular meetings with the community representatives, via its own website or on notice boards by the Project placed in key accessible locations for stakeholders).

Moreover, during construction and operation the Company will be reporting annually to stakeholders, including local communities, on the environmental and social performance of the Project, using relevant communication channels.

Evidence of the external reporting will be presented by the Project, including photographic evidence, examples of publications through the website, etc.

## **APPENDIX A ESIA PROJECT INFORMATION LEAFLET - 2023 (RO/EN)**

## Project Information Leaflet (RO)

### Proiectul Parc Eolian Adamdel

Comunele Adamclisi și Deleni, Județul Constanța, Romania

#### Despre Proiect

Parcul eolian Adamdel este un proiect care se dorește a fi implementat în comunele Adamclisi și Deleni, județul Constanța. Terenul necesar Proiectului este constituit din teren arabil privat (aprox. 95%) și pașune teren public privat deținută de Consiliile Locale ale celor două comune. Proiectul se suprapune peste zone protejate Natura 2000 și situri arheologice.

Proiectul a fost dezvoltat și autorizat conform legii în 2011, fiind format din două sub-proiecte: Adamclisi (121 turbine și putere totală instalată de 400 MW, dezvoltat de SC CONSENSWIND SA) și Deleni (123 turbine și putere totală de 510 MW, dezvoltat de SC MIDMAR CALLATIS SA). Condițiile pieței nu au permis implementarea proiectului la acea vreme, însă procesul de obținere a autorizațiilor a fost reluat în 2021, cu emiterea unui nou certificat de urbanism de către fiecare comună. Ultima variantă a Proiectului include 104 turbine, iar procesul de proiectare, avizare și evaluare continuă.

Faza de construcție va dura minim 24 de luni de la momentul obținerii autorizației, iar faza de operare va dura aproximativ 30 de ani, cu posibilitatea extinderii ciclului de viață în funcție de evoluția tehnologică.

#### Investitori

Low Carbon a cumpărat drepturile de dezvoltare a Proiectului în iulie 2020 și lucrează activ pentru a atrage alți co-investitori și pentru a dezvolta și construi Proiectul în manieră durabilă. În 2022, Rezolv Energy s-a alăturat drept co-investitor al Proiectului.

Low Carbon este o companie de investiții și administrare a investițiilor din Marea Britanie, fondată în 2011 și angajată să genereze un impact semnificativ asupra schimbărilor climatice prin investiții în proiecte ample de energie regenerabilă.

Rezolv Energy este un producător independent de energie regenerabilă, deservind clienți din centrul și SE Europei. Echipa Rezolv a construit și operat cele mai mari proiecte eoliene din Croația și Republica Cehă și cel mai mare proiect eolian independent din România.



#### Beneficii

- venituri din închirierea terenurilor pentru proprietarii privați și consiliile locale de-a lungul celor aproximativ 30 de ani de funcționare a parcului eolian;
- contribuții la bugetele locale prin închirierea terenurilor și taxe locale;
- livrarea de energie către instituțiile publice din comunele Deleni și Adamclisi de până la 100.000 kWh/ an pentru fiecare 100 MW instalați;
- consolidarea drumurilor agricole existente și construirea unor drumuri agricole noi, care vor fi deschise pentru uz public;
- contribuție la îndeplinirea angajamentelor României de producere a energiei verde.

#### Pașii următori

Echipa Proiectului lucrează la optimizarea tehnică și a inițiat studiile sociale și de mediu necesare pentru a dezvolta Proiectul în conformitate cu cele mai bune practici la nivel internațional și cu un impact minim asupra mediului și comunităților învecinate. O serie de studii cu privire la aspecte sociale și de mediu au fost realizate, inclusiv monitorizări extinse ale biodiversității și studii arheologice.

Echipa continuă să lucreze la actualizarea Proiectului și se concentrează pe:

- obținerea tuturor avizelor și autorizațiilor necesare, conform legislației naționale - înnoirea PUZ și obținerea autorizației de construcție;
- elaborarea unei Evaluări a Impactului Social și de Mediu (ESIA), conform standardelor internaționale, de către ERM Environmental Resources Management Romania, un consultant internațional de sustenabilitate; și
- atragerea de finanțare pentru Proiect.

#### Contact

Echipa este angajată să dezvolte Proiectul conform legislației naționale și celor mai bune practici internaționale, prin respectarea mediului și considerarea impactului asupra comunității locale. Scopul nostru este să construim un Proiect durabil și să contribuim la dezvoltarea locală, în parteneriat cu autoritățile locale și cetățenii. Vă vom ține la curent cu privire la evoluția Proiectului și a procesului de autorizare și ne dorim să colaborăm cu dumneavoastră pentru a ne asigura că opiniile și viziunea dumneavoastră sunt reflectate în procesul de evaluare a impactului Proiectului.

Contactați-ne pentru a ne comunica orice sugestie, întrebare sau plângere aveți cu privire la Proiect.

Persoana de contact: Spiridon Vitan

Mobil: +4(0) 726 222 230 / Email: [spiridon.vitan@gmail.com](mailto:spiridon.vitan@gmail.com)



## Project Information Leaflet (EN)

### Adamdel Windfarm Project

Adamclisi and Deleni Communes, Constanta County, Romania

#### About the Project

Adamdel Windfarm Project is to be implemented on the territories of Adamclisi and Deleni Communes, in Constanta County. The Project area is constituted by privately-owned arable land (approximately 95%) and public-private pastureland owned by the Adamclisi and Deleni local councils. The Project area overlaps with Natura 2000 protected areas and archaeological sites.

The Project was initially developed and permitted by Romanian authorities in 2011 and consisted of two sub-projects: Adamclisi (121 WTGs and 400 MW total installed capacity, developed by SC CONSENSWIND SA) and Deleni (123 WTGs and 510 MW total installed capacity, developed by SC MIDMAR CALLATIS SA).

The Project could not be implemented at the time due to market conditions and was permitting process was re-initiated in 2021, when a new Urban Certificate was obtained. The latest layout consists of 104 WTGs and the update is ongoing.

Construction phase will take a minimum of 24 months from the moment the Project obtains the building permit. The windfarm is expected to operate for a period of approximately 30 years, with a possibility to further extend its lifecycle depending on the technology available at the time.

#### Project Investors

Low Carbon acquired the development rights to the Project in July 2020 and is working to attract other co-investors and develop and construct the Project in a sustainable manner. In 2022, Rezolv Energy joined Low Carbon as co-investors in the Project.

Low Carbon is a privately-owned UK investment and asset management company founded in 2011, committed to making a positive and significant impact on climate change by investing in large-scale renewable energy projects.

Rezolv Energy is a highly experienced, independent renewable energy producer with customers operating across Central and South Eastern Europe. Their team previously created and operated the largest wind farms in Croatia and the Czech Republic, and the largest independent wind farm in Romania.



#### Project benefits

- Private landowners and Deleni and Adamclisi Local Councils will benefit from land leases for approximately 30 years of windfarm operation;
- Contribution to local public budgets of from land leases and local taxes;
- Consolidation of existing agricultural roads and construction of new agricultural roads, open for public use;
- Free-of-charge electricity for public institutions in Deleni and Adamclisi Communes of up to 100.000 kWh/year for each 100 MW installed;
- Contribution to the renewable energy production commitments of Romania.

#### Next steps

The Project team is working on optimisation of the design and is conducting environmental and social studies in order to ensure the Project is developed in line with best international practice and with minimum impact on the environment and the neighbouring communities. Several studies related to environmental and social aspects have been undertaken, including extensive biodiversity surveys and archaeological studies.

The Project team continues to work on updating the Project:

- obtaining all required approvals and permits in line with national legislation: updating the Zoning Certificate (PUZ) and obtaining the building permit;
- elaboration of an Environmental and Social Impact Assessment (ESIA) in line with international standards by ERM Environmental Resources Management Romania, an international sustainability consultant; and
- attracting financing for the Project.

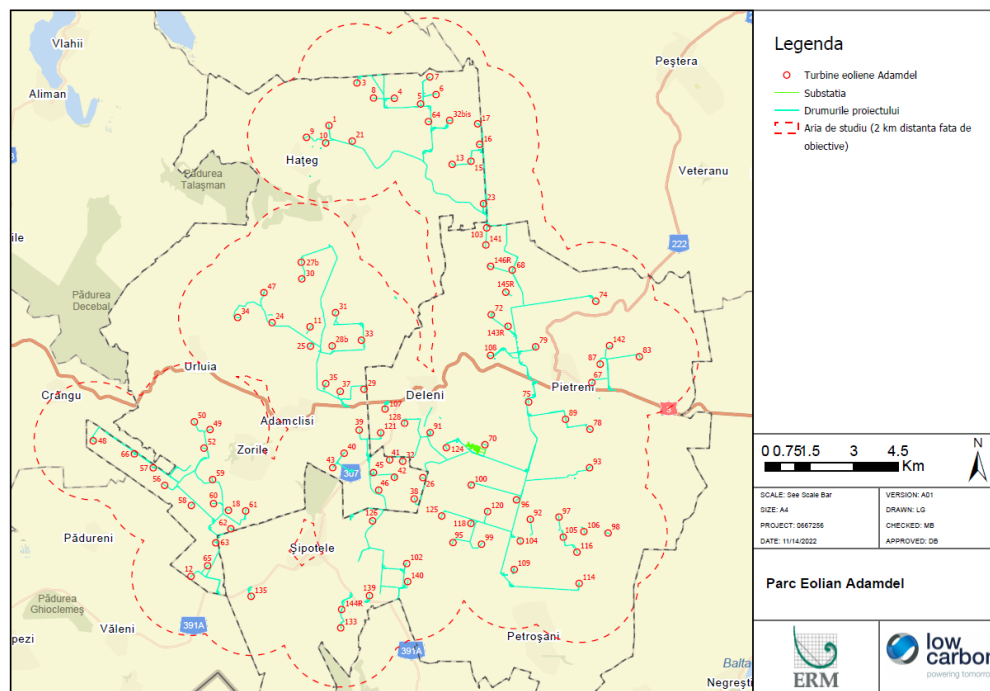
#### Contact us

The Project team is committed to develop the Project in line with Romanian legislation and international best practice, by respecting the environment and by carefully considering the impact on the local community. Our goal is to build a sustainable project and contribute to local development, in partnership with local authorities and residents. We will keep you informed regarding the evolution of the Project development and permitting and will work with you to ensure your views and opinions are reflected in the environmental and social impact assessment of the Project.

Please get in touch with the Project team for any feedback, questions, or complaints you have.

Contact person: Spiridon Vitan

Mobile: +4(0) 726 222 230 / Email: [spiridon.vitan@gmail.com](mailto:spiridon.vitan@gmail.com)



## **APPENDIX B LRP PROJECT INFORMATION LEAFLET - 2026 (RO/EN)**

### NATIONAL ENVIRONMENTAL IMPACT ASSESSMENT AND PERMITTING

An environmental impact assessment has been conducted for the project in line with the national requirements.

Dunarea East Wind Farm Project has obtained

- an aviation permit
- an environmental permit
- building permits for all 45 wind turbines, the 400 kV substation and the overhead line.

The permit for the common infrastructure (e.g., roads) is expected to be obtained by March 2026.

### INTERNATIONAL ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

Rezolv Energy has commissioned an independent consultant to conduct an environmental and social impact assessment (ESIA) in accordance with the requirements of the

- International Finance Corporation
- European Bank for Reconstruction and Development.

The ESIA is an iterative process conducted over 2025–2026. The ESIA materials will be disclosed to and discussed with the local communities and other stakeholders.

### GRIEVANCE MECHANISM

A grievance mechanism has been established to give local communities, landowners, land users and other stakeholders an opportunity to express their comments, grievances and suggestions regarding the project during the construction and operation stages.

The project contact details for submission of comments and grievances are as follows:

- **Community Liaison Officer: Sorin Blidaru**
- **Telephone number: +40 768 064 467**
- **E-mail address: blidaru.sorin@yahoo.com**

Comments and grievances submitted through this mechanism will be processed in a timely and sensitive manner. If necessary, they may be provided anonymously.

### LIVELIHOOD RESTORATION PLAN

Rezolv Energy and Midmar Callatis aim to ensure the land acquisition process for the Dunarea East Wind Farm project follows best international practice. For that reason, Rezolv Energy engaged international consultancy RSK to review how the land acquisition was conducted and to determine any measures needed to comply with both Romanian law and international standards.

RSK, with the support of the Romanian consultancy AUDITECO GES, will develop a livelihood restoration plan (LRP). The goals of this document are to

- establish the project's approach to land acquisition, compensation and livelihood restoration
- ensure that land acquisition activities related to the project are conducted in line with national requirements and international standards
- analyse the already completed land acquisition activities and determine measures if any non-compliances are identified
- ensure that compensation and relevant assistance are provided to affected people and organisations in compliance with national law and international standards
- facilitate the engagement of affected people (including vulnerable groups) and organisations in the LRP development and implementation
- ensure that land acquisition and livelihood restoration processes are transparent, consistent and equitable.

RSK will conduct a socioeconomic survey and asset inventory to collect baseline data on the affected people and organisations, their livelihoods and business activities, and the land acquisition process. This information will inform the preparation of the LRP.

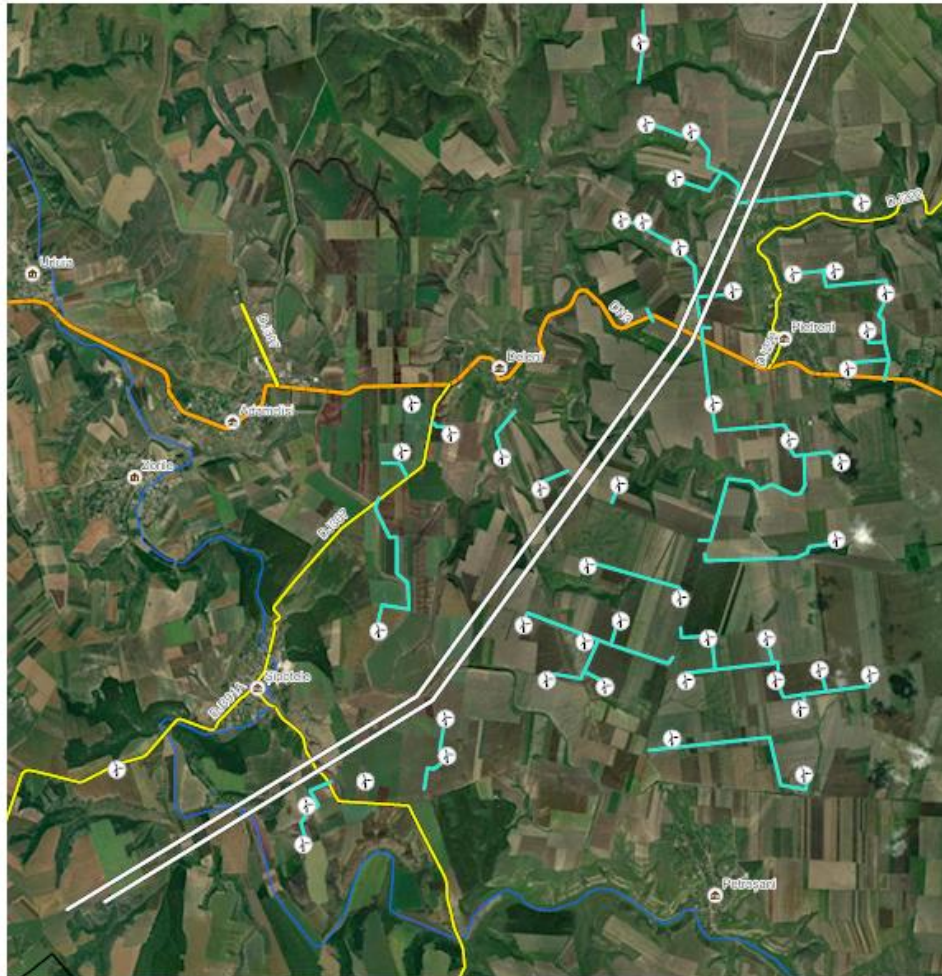
Once prepared, the LRP will be disclosed to affected people, organisations and other stakeholders.



**REZOLV ENERGY & MIDMAR CALLATIS  
DUNAREA EAST WIND FARM PROJECT  
CONSTANTA COUNTY, ROMANIA**







## DUNĂREA

### DUNĂREA EAST WIND FARM PROJECT

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 south eastern Europe.

Through its project company Midmar Callatis, Rezolv Energy plans to develop the Dunărea East Wind Farm. It will be located within the Deleni commune of Constanța County, south-east Romania.

The project includes

- 45 wind turbines with a total capacity of 288 MW
- associated underground and overhead electrical infrastructure
- a 33/400 kV transformer substation
- new and upgraded access roads.

Dunărea East Wind Farm will be near the Dunărea West Wind Farm in Adamclisi commune. These two wind farms will share the same grid connection point and have a combined capacity of up to 600 MW, constituting one of the largest onshore wind projects in Europe.

Project construction is estimated to start in summer 2026.

### EVALUAREA IMPACTULUI ASUPRA MEDIULUI ȘI PROCEDURA DE AUTORIZARE

A fost realizată o evaluare a impactului asupra mediului pentru proiect, în conformitate cu cerințele naționale.

Pentru proiectul: Parc eolian Dunărea de Est, au fost obținute următoarele:

- Avizul de amplasare aeronautică,
- Acordul de mediu,
- Autorizații de construire pentru cele 45 de turbine eoliene, stația de 400 kV și linia electrică aeriană.

Autorizația de construire pentru restul elementelor proiectului (de exemplu, drumuri) este estimată a fi obținută până în martie 2026.

### EVALUAREA INTERNAȚIONALĂ A IMPACTULUI ASUPRA MEDIULUI ȘI SOCIAL

Rezolv Energy a contractat un consultant pentru a efectua o evaluare a impactului asupra mediului și social (ESIA) în conformitate cu cerințele:

- Corporația Financiară Internațională (*International Finance Corporation*)
- Banca Europeană pentru Reconstrucție și Dezvoltare (*European Bank for Reconstruction and Development*).

ESIA este un proces iterativ, ce se va desfășura în perioada 2025-2026. Documentele rezultate din această evaluare vor fi făcute publice și vor fi discutate cu comunitățile locale și cu ceilalți factori interesați.

### MECANISMUL DE RECLAMAȚII

A fost instituit un mecanism de soluționare a reclamațiilor pentru a oferi comunităților locale, proprietarilor de terenuri, utilizatorilor de terenuri și altor părți interesate posibilitatea de a-și exprima comentariile, reclamațiile și sugestiile cu privire la proiect, pe durata etapelor de execuție și operare.

Datele persoanei de contact pentru transmiterea comentariilor, reclamațiilor, pentru proiect, sunt următoarele:

- **Responsabil pentru Relația cu Comunitatea:**  
Sorin Blidaru
- Număr de telefon: +40 768 064 467
- Adresă de e-mail: [blidaru.sorin@yahoo.com](mailto:blidaru.sorin@yahoo.com)

Comentariile și reclamațiile transmise prin acest mecanism vor fi procesate într-un mod adecvat și în timp util. Dacă este necesar, pot fi furnizate și informații în mod anonim.

### PLAN DE REABILITARE A MIJLOACELOR DE TRAI (LIVELIHOOD RESTORATION PLAN)

Rezolv Energy și Midmar Callatis doresc să se asigure că procesul de achiziție a terenurilor pentru proiectul Parc eolian Dunărea de Est respectă cele mai bune practici internaționale. Din acest motiv, Rezolv Energy a contractat compania internațională de consultanță RSK pentru a analiza modul în care a fost realizată achiziția terenurilor și pentru a identifica eventualele măsuri necesare pentru a asigura conformitatea atât cu legislația românească, cât și cu standardele internaționale.

RSK, cu sprijinul companiei de consultanță românești, AUDITECO GES, va elabora un Plan de rehabilitare a mijloacelor de trai (LRP). Obiectivele acestuia sunt:

- Stabilirea unei abordări privind achiziția de terenuri, compensarea și rehabilitare a mijloacelor de trai, pentru proiect;
- Asigurarea că activitățile de achiziție a terenurilor aferente proiectului sunt desfășurate în conformitate cu cerințele naționale și standardele internaționale;
- Analiza activităților de achiziție a terenurilor deja finalizate și identificarea măsurilor, în cazul în care sunt constatate neconformități;
- Asigurarea că persoanele și organizațiile afectate primesc compensațiile și asistența relevantă, în conformitate cu legislația națională și standardele internaționale;
- Facilitarea implicării persoanelor afectate (inclusiv a grupurilor vulnerabile) și a organizațiilor în dezvoltarea și implementarea LRP;
- Asigurarea că procesele de achiziție a terenurilor și de rehabilitare a mijloacelor de trai sunt transparente, coerente și echitabile

RSK va realiza un sondaj socio-economic și un inventar al bunurilor pentru a colecta date privind persoanele și organizațiile afectate, modul lor de trai și activitățile economice desfășurate, precum și procesul de achiziție a terenurilor. Aceste informații vor sta la baza elaborării LRP.

După finalizare, LRP va fi pus la dispoziția persoanelor afectate, organizațiilor și celorlalți factori interesați.



REZOLV ENERGY & MIDMAR CALLATIS  
PROIECT: PARC EOLIAN DUNĂREA DE EST  
JUD. CONSTANȚA, ROMÂNIA





### EVALUAREA IMPACTULUI ASUPRA MEDIULUI ȘI PROCEDURA DE AUTORIZARE

A fost realizată o evaluare a impactului asupra mediului pentru proiect, în conformitate cu cerințele naționale.

Pentru proiectul: Parc eolian Dunărea de Est, au fost obținute următoarele:

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Autorizația de construire pentru restul elementelor proiectului (de exemplu, drumuri) este estimată a fi obținută până în martie 2026.

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### MECANISMUL DE RECLAMAȚII

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Datele persoanei de contact pentru transmiterea comentariilor, reclamațiilor, pentru proiect, sunt următoarele:

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Comentariile și reclamațiile transmise prin acest mecanism vor fi procesate într-un mod adecvat și în timp util. Dacă este necesar, pot fi furnizate și informații în mod anonim.

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Rezolv Energy și Midmar Callatis doresc să se asigure că procesul de achiziție a terenurilor pentru proiectul Parc eolian Dunărea de Est respectă cele mai bune practici internaționale. Din acest motiv, Rezolv Energy a contractat compania internațională de consultanță RSK pentru a analiza modul în care a fost realizată achiziția terenurilor și pentru a identifica eventualele măsuri necesare pentru a asigura conformitatea atât cu legislația românească, cât și cu standardele internaționale.

RSK, cu sprijinul companiei de consultanță românești, AUDITECO GES, va elabora un Plan de reabilitare a mijloacelor de trai (LRP). Obiectivele acestuia sunt:

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- Analiza activităților de achiziție a terenurilor deja finalizate și identificarea măsurilor, în cazul în care sunt constatate neconformități;
- Asigurarea că persoanele și organizațiile afectate primesc compensațiile și asistența relevantă, în conformitate cu legislația națională și standardele internaționale;
- Facilitarea implicării persoanelor afectate (inclusiv a grupurilor vulnerabile) și a organizațiilor în dezvoltarea și implementarea LRP;
- Asigurarea că procesele de achiziție a terenurilor și de reabilitare a mijloacelor de trai sunt transparente, coerente și echitabile

RSK va realiza un sondaj socio-economic și un inventar al bunurilor pentru a colecta date privind persoanele și organizațiile afectate, modul lor de trai și activitățile economice desfășurate, precum și procesul de achiziție a terenurilor. Aceste informații vor sta la baza elaborării LRP.

După finalizare, LRP va fi pus la dispoziția persoanelor afectate, organizațiilor și celorlalți factori interesați.



REZOLV ENERGY & MIDMAR CALLATIS  
PROIECT: PARC EOLIAN DUNĂREA DE EST  
JUD. CONSTANȚA, ROMÂNIA



## **APPENDIX C      ENGAGEMENT ACTION PLAN FOR ESIA DISCLOSURE**



Ref	Engagement Action	Engagement Approach	Purpose and Content of Engagement	Timeframe	Action Owner
1.1	Disclose the draft ESIA Package in English and Romanian	<p>Ensure the ESIA package is made accessible to all interested stakeholders, in a way culturally and technically adapted to each group of stakeholders.</p> <p>As a minimum, the ESIA (ESIA documentation package) will be available in English and Romanian and will consist of:</p> <ul style="list-style-type: none"> <li>ESIA report and appendices (surveys results, specialist studies, etc.)</li> <li>Non-technical summary (NTS)</li> <li>Stakeholder engagement plan (SEP)</li> <li>E&amp;S management framework (ESMP umbrella)</li> </ul>	<ul style="list-style-type: none"> <li>Publish ESIA package on the Project website, in both Romanian and English versions</li> <li>Provide hardcopies of the ESIA non-technical summary, this SEP and grievance forms Deleni commune halls for consultation (Deleni, Pietreni, Sipotele, and Petrosani villages)</li> <li>Publish announcement of ESIA package availability for consultation on Project website in the local media and display posters in key locations in all settlements in the Project area</li> </ul>	<p>Disclosure of ESIA Package for a period of 60 days</p> <p>minimum of 60 calendar days prior to Project construction works commencing</p> <p>The ESIA package will remain in the public domain throughout the entire Project lifecycle</p>	The Company
1.2	Inform stakeholders regarding the upcoming ESIA consultation meetings to be held in the Project social Aol	Inform stakeholders using various communication channels regarding the upcoming ESIA disclosure meetings, outlining the purpose and the manner in which stakeholder feedback will be received and integrated.	<ul style="list-style-type: none"> <li>Publish the roadmap of consultation meetings in local media, on the Project website, via posters displayed in key locations in all settlements of the Project area.</li> <li>Collaborate with the local authorities to further disseminate the information locally.</li> <li>Issue a public announcement/ reminder to communicate the details of the ESIA disclosure meetings one week prior to the meetings.</li> </ul>	At least two weeks prior to the dates of the meetings	The Company
1.3	Organise Open Days events	Facilitate open discussions with stakeholders regarding the sub-projects to ensure understanding of impacts and mitigation measures	<ul style="list-style-type: none"> <li>Organise community level Open Days events during weekends, in the administrative territorial units in the social Aol at the schools premises or community centers (<i>camine culturale</i>)</li> <li>Revise the draft ESIA to incorporate feedback received during the open days</li> </ul>	At least one week after the event announcement	The Company

Ref	Engagement Action	Engagement Approach	Purpose and Content of Engagement	Timeframe	Action Owner
1.4	Organise other meetings depending on stakeholder interest	The Company will be available to organise additional meetings to focus on particular topics addressed in the ESIA.	<ul style="list-style-type: none"> <li>Organise dedicated meetings with relevant local, county and national stakeholders on key topics of interest (e.g. land access and compensation, transport, biodiversity, etc.)</li> </ul>	As needed	The Company
1.5	Develop ESIA disclosure report and submit to EBRD	Changes/ revisions of the ESIA package documents will be made if there will be material issues and concerns that require modification/ change of design, mitigation and monitoring measures and provisions included in the Management Plans.	<ul style="list-style-type: none"> <li>Present how stakeholders were consulted on the ESIA and how feedback provided was considered in the updated ESIA package.</li> <li>Web publication on Project website</li> <li>Distribution of hard copies in Deleni commune halls</li> </ul>	As needed	The Company

## **APPENDIX D    ENGAGEMENT ACTION PLAN FOR CONSTRUCTION, OPERATION AND DECOMMISSIONING**

Ref	Engagement Action	Engagement Approach	Purpose and Content of Engagement	Timeframe	Action Owner
1	<b>Construction phase</b>				
1.1	Update SEP (including detailed Engagement Action Plan for Construction)	Continue stakeholder dialogue in a structured manner, based on commitments outlined in the SEP.	<ul style="list-style-type: none"> <li>■ Ensure that the Company remains in contact with all interested parties, that it is aware of their concerns and that these are addressed in a timely manner</li> <li>■ Update SEP to include the engagement activities planned and their frequency as well as the human resources that The Company has allocated for stakeholder engagement during this Project phase, including contractors</li> <li>■ Disseminate updated SEP via Project website, Project notice boards and information point</li> </ul>	Prior to construction	The Company, CLO
1.2	Effective engagement of local stakeholder on worksite(s) establishment	Inform affected communities of the future presence of the work sites, the timeline of planned works, the health and safety risks associated with those works and the mitigation measures planned to control those risks Enable stakeholders to share any relevant feedback about the ongoing works and raise any concerns through the grievance mechanism	<ul style="list-style-type: none"> <li>■ Set up of notice boards in the mayoralty offices, in public places of the affected settlements and in key locations near the construction sites, in local language</li> <li>■ Disseminate grievance forms and grievance mechanism – ensure forms are available to all stakeholders</li> </ul>	Two weeks prior the start of construction works	CLO
1.3	Ongoing information on construction progress	Inform stakeholders of construction works progress and schedule. Maintain the community grievance mechanism. Give feedback on grievances received and associated resolution.	<ul style="list-style-type: none"> <li>■ Disseminate key announcements on Project activities (e.g. incoming transport of big Project equipment within week XX) to the local communities via all appropriate channels (notice boards, Project website, etc), in collaboration with the local authority representatives</li> </ul>	Upon major activities	CLO

Ref	Engagement Action	Engagement Approach	Purpose and Content of Engagement	Timeframe	Action Owner
			<ul style="list-style-type: none"> <li>Disseminate grievance forms and grievance mechanism – ensure forms are available to all stakeholders</li> </ul>		
1.4	Ongoing information and consultation on the annual environmental and social performance of the Project	Maintain trust by ensuring the Project is accountable to stakeholders regarding its environmental and social performance.	<ul style="list-style-type: none"> <li>Inform stakeholders of the project annual environmental and social performance.</li> <li>Organise open meetings in key locations in the Project Aol to present the Annual Reports and obtain stakeholder feedback on progress.</li> </ul>	Annually	The Company, CLO
1.5	Timely information of stakeholders regarding dismantlement of work site(s)	Inform stakeholders of dismantlement works start, progress and schedule. Maintain the community grievance mechanism.	<ul style="list-style-type: none"> <li>Inform local communities of the end of works and work site remediation measures.</li> <li>Inform local staff of retrenchment conditions.</li> <li>Disseminate grievance forms and grievance mechanism – ensure forms are available to all stakeholders.</li> </ul>	Prior to commencement of worksite dismantlement	CLO
<b>2</b>	<b>Operations phase</b>				
2.1	Update SEP (including detailed Engagement Action Plan for Operations)	Continue stakeholder dialogue in a structured manner, based on commitments outlined in the SEP.	<ul style="list-style-type: none"> <li>Ensure that the Company remains in contact with all interested parties, that it is aware of their concerns and that these are addressed in a timely manner</li> <li>Update SEP to include the engagement activities planned and their frequency as well as the human resources that the Company has allocated for stakeholder engagement during this Project phase</li> <li>Disseminate updated SEP via Proiect website, Project notice boards and information point</li> </ul>	Prior to start of operations	CLO

Ref	Engagement Action	Engagement Approach	Purpose and Content of Engagement	Timeframe	Action Owner
2.2	Inform stakeholders of the start of operation, any health and safety risks for the communities and mitigation measures	Inform affected communities of the future presence of the operations schedule and conditions, the health and safety risks associated with those works and the mitigation measures planned to control those risks (including noise and shadow flicker impacts) Enable stakeholders to share any relevant feedback about the ongoing works and raise any concerns through the grievance mechanism	<ul style="list-style-type: none"> <li>■ Inform stakeholders of the project annual operation works (duration, amount of people, health and safety risks and mitigation measures)</li> <li>■ Disseminate grievance forms and grievance mechanism – ensure forms are available to all stakeholders.</li> </ul>	2 weeks prior to start of operation	CLO
2.3	Ongoing information and consultation on the annual environmental and social performance of the Project	Maintain trust by ensuring the Project is accountable to stakeholders regarding its environmental and social performance, in line with monitoring commitments.	<ul style="list-style-type: none"> <li>■ Inform local and national stakeholders of the project annual environmental and social performance.</li> <li>■ Organise open meetings in key locations in the Project Aol to present the Annual Reports and obtain stakeholder feedback on progress.</li> </ul>	Annually	The Company, CLO
<b>3</b>	<b>Decommissioning phase</b>				
3.1	Update SEP (including detailed Engagement Action Plan for Decommissioning)	Continue stakeholder dialogue in a structured manner, based on commitments outlined in the SEP and in line with the laws and regulations in force at that time.	<ul style="list-style-type: none"> <li>■ Ensure that the Company remains in contact with all interested parties, that it is aware of their concerns and that these are addressed in a timely manner.</li> <li>■ Update SEP to include the engagement activities planned and their frequency, as well as the human resources that the Company has allocated for stakeholder engagement during decommissioning</li> <li>■ Disseminate updated SEP via Proiect website, Project notice boards and information point</li> </ul>	Prior to start of decommissioning	The Company

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## APPENDIX E      SAMPLE GRIEVANCE FORM

### GRIEVANCE FORM FOR SUBMITTING COMPLAINTS, OPINIONS AND SUGGESTIONS

**Name:**

**Surname:**

- ☐ I want to anonymously submit a complaint  
☐ I request that my identity not be revealed without my consent

*Note: You can remain anonymous if you prefer, or request that your identity not be disclosed to third parties without your consent.*

**Contact information**

☐ Via mail:

☐ Phone number:

☐ E-mail:

*Please indicate how you would like to be contacted (mail, phone, email).*

*Please indicate the contact details for us to use to respond to you.*

**Preferred language  
of communication:**

☐ Romanian

☐ English

☐ Other, please specify -----

**Description of the complaint/suggestion:**

**What steps would you like to be taken to resolve the issue stated in your complaint?**

**If the complaint is related to a specific event / incident:**

**Date of the incident:**

- ☐ Single Incident/Complaint (Date \_\_\_\_\_)  
☐ Happened several times (how many times? \_\_\_\_\_)  
☐ Ongoing (currently experiencing the reported issue)

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

Please submit this form to the specially arranged box at the Deleni Commune Hall or contact us directly:

**Sorin Blidary – Community Liaison Officer**

Mobile: +40 768 064 467 230 / E-mail: [dunarea@rezolv.energy](mailto:dunarea@rezolv.energy)



## APPENDIX F SAMPLE GRIEVANCE REGISTER

Annex Vb - Grievance mechanism DB GDB\_version2\_template 11 03 2011 [Read-Only] [Compatibility Mode] - Microsoft Excel

The image shows the Microsoft Excel interface with the following elements:

- File Name:** Annex Vb - Grievance mechanism DB GDB\_version2\_template 11 03 2011 [Read-Only] [Compatibility Mode]
- Formulas Bar:** J3, Description of the problem
- Worksheet Grid:** Columns A through P, Rows 1 through 17. The grid contains a table with the following headers in row 3:
  - Column A: Settlement
  - Column B: Type of the problem
  - Column C: Name
  - Column D: Date
  - Column E: Phone number
  - Column F: Name
  - Column G: Phone number
  - Column H: Others comment
  - Column I: Number
  - Column J: Description of the problem
  - Column K: Responsible department
  - Column L: Responsible person
  - Column M: Actions to be done
  - Column N: Due date
  - Column O: Results of the intervention
  - Column P: Closing date of the issue