



European Bank
for Reconstruction and Development

Stakeholder Engagement Plan (SEP)

Premier Energy Distribution, Moldova

3 November 2022

Project No.: 0645184



STAKEHOLDER ENGAGEMENT PLAN (SEP)

Premier Energy Distribution, Moldova

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Acronyms and Abbreviations

ANRE	The National Agency for Energy Regulation of the Republic of Moldova
DSO	Distribution System Operator
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESAP	Environmental Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESP	EBRD Environmental and Social Policy
HV	High-Voltage
IPAM	Independent Project Accountability Mechanism
LPA	Local Public Administration
LV	Low-Voltage
MV	Medium-Voltage
OHS	Occupational Health & Safety
SEP	Stakeholder Engagement Plan

1. INTRODUCTION

1.1 Background

This document represents the Stakeholder Engagement Plan (SEP) for ICS Premier Energy Distribution S.A. (“Premier Energy” or the “Company”), the largest and solely privately-owned distribution system operator (DSO) in Moldova. The company is seeking a potential co-financing by European Bank for Reconstruction and Development (EBRD) and by the European Investment Bank (EIB), collectively referred to throughout this report as “the Lenders”, of part of the Company’s 2021-2025 investment programme (the “Project”).

In order to finance the Project, the Lenders require the Company to comply with all applicable Moldovan laws and regulations, as well as international environmental and social standards and guidelines, such as those of the EBRD and EIB or other relevant International Financing Institutions. 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) and an independent Environmental and Social Due Diligence (ESDD) process leading to an Environmental and Social Action Plan (ESAP), agreed with the Company. In line with EBRD Performance Requirement 10, and EIB Performance Requirement 2, this SEP presents the Company’s commitment and approach in terms of disclosure of Project information and engagement of Project stakeholders.

1.2 Scope of the SEP

This Corporate SEP is based on international good practice/guidance, e.g. the EBRD *Guidance Note on Grievance Management and EBRD Gender Toolkit*¹, the International Financing Corporation (IFC) *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*²; the *Guidance note for EIB Standards on Stakeholder Engagement in the EIB Operations*³.

This SEP is a framework document, which outlines commitments and strategy in terms of stakeholder engagement for the different Premier Energy’s activities, including the construction works associated with distribution network maintenance, upgrade, and extension works. The SEP may be supported by power distribution sector and upon needs by project-specific SEPs (e.g. in case of major network upgrade or extension projects), with the goal of having a fit-for-purpose approach addressing local and project area-specific circumstances.

It is important to mention, that all the commitments of SEP plan are subordinated to the main requirements of the company's activity, no-disruption of the distribution process and low cost - high efficiency regarding the consumers. In case if any of action will go against this principles, the actions will be necessary to revise and adjust.

¹ Source: https://www.ebrd.com/downloads/sector/gender/Gender_toolkit_matrix2.pdf

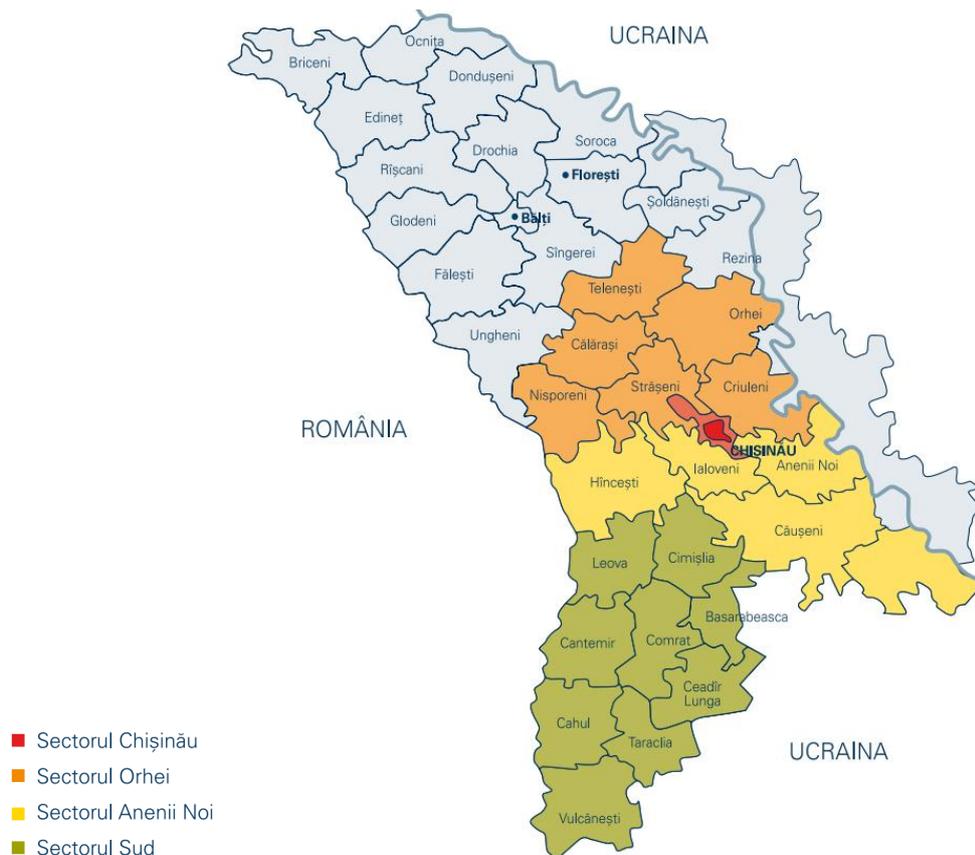
² Source: IFC *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*, available at https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_handbook_stakeholderengagement_wci_1319577185063, accessed in October 2019

³ Source: EIB Stakeholder Engagement Guidance [Guidance Note for EIB Standard on Stakeholder Engagement in EIB Operations](#)

2. PROJECT DESCRIPTION

ICS Premier Energy Distribution serves approximately 70% of the Country territory including the capital Chisinau and 21 districts (of the 37 total) in the central and southern Moldova.

Geographically, the operations are grouped in four sectors including Chisinau, Orhei, Anenii Noi and South Sectors as shown in figure below.



Premier Energy Distribution Operation Areas (source: Premier Energy Distribution)

The Company is the successor of the former state-owned distribution system operators ICS RE Chisinau, ICS RED Centru and I.C.S. RED Sud which were initially taken over through privatization by the Spanish utility company Union Fenosa International in 2000.

The three companies merged and operated under the Î.C.S. „Red Union Fenosa” S.A. name starting 2008. Following 2015, as result of the mandatory unbundling of energy supply and energy distribution, the energy supply was split and taken over by the newly-established Î.C.S. „Gas Natural Fenosa Furnizare Energie” S.R.L. company.

In 2019, the Company was taken over through acquisition by Duet Private Equity Limited and operates under Premier Energy Distribution name starting with December 2019.

Currently the Company operates the following main facilities:

- 110-35 kV Transformer Stations: 95 units (including 170 Transformer units of 110-35 kV);
- 1,802 km of overhead High-Voltage (HV) (110-35 kV) distribution lines;
- 1 km of underground High-Voltage (HV) (110-35 kV) distribution lines;
- 10-6 kV Transformer Substations: 7814 units (including 9349 Transformer units of 10-6 kV);

- 12,768 km of overhead Medium-Voltage (MV) (10-6 kV) distribution lines;
- 1,792 km of underground Medium-Voltage (MV) (10-6 kV) distribution lines;
- 17,592 km of overhead Low-Voltage (LV) (0.4 kV) distribution lines, and
- 1,687 km of underground Low-Voltage (LV) (0.4 kV) distribution lines.

Further, the Company operates a central warehousing facility at the Company Headquarters in Chisinau and an electric meters laboratory unit located in Chisinau as well and a number of smaller warehousing units throughout Moldova.

Also, at the central warehousing facility in Chisinau also accommodates an oil storage and recovery facility.

As all equipment maintenance activities (e.g. transformer units and other equipment requiring maintenance and repairs ex-situ in specialised facilities) were outsourced since 2012, the Company does not operate any electrical equipment maintenance workshops.

The 2021-2025 Investment Programme (the “Project”)

The investment programmes implemented by the Company comprise investments that can generally be grouped in two main categories:

- mandatory investments, i.e. distribution system extensions subject to regulator’s (ANRE, The National Agency for Energy Regulation) approval, and
- system rehabilitation and upgrade investments.

The system extensions are implemented based on the programs established for 3 years. The investment planning is performed on annual basis, in response to the needs for intervention in the electrical installations and the pre-established mandatory investments. Therefore investment planning is performed on annual basis, in response to the needs for intervention in the electrical installations and the pre-established mandatory investments (as per the 3-years development plan).

Annual investment programme comprises the following type of projects (exemplification for 2022):

- HV (110-35 kV) distribution lines rehabilitation and upgrade (11 projects in 2022);
- Distribution stations equipment and buildings rehabilitation and upgrade (35 projects in 2022);
- Distribution stations extension (no such projects in 2022);
- MV and LV overhead and underground distribution lines rehabilitation and upgrade (366 projects in 2022);
- MV and LV overhead and underground distribution lines extension (53 projects in 2022);
- Buildings rehabilitation and upgrade works (15 projects in 2022);
- Transformer stations rehabilitation and upgrade works (55 projects in 2022);
- Transformer stations capacity extension (23 projects in 2022);
- Transformer units capacity extension (1 project in 2022);
- Metering system-related investments (53 projects in 2022);
- Telecommunications system-related investments (no such projects in 2022);
- Other systems and equipment rehabilitation and upgrade (16 projects in 2022).

3. NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

3.1 Moldovan Legal Requirements

The following national laws and regulation govern the legal context of the Project, in terms of public consultation and information disclosure, directly or indirectly:

- Republic of Moldova Constitution / 1994, republished, amended and completed. The Constitution acknowledges that the access to information is one of the fundamental human rights and stipulates it in Article 34;
- Law no.982 / 2000 on Access to Information, amended, provides that information of public interest should be made available, for free, upon request from applicants;
- Law no.86 / 2014 on Environmental Impact Assessment. As the projects implemented by the Company are not subject to EIA procedure, a formal public consultation process in relation to potential associated works impacts is not required under the national law;
- Law no.107 / 2016 on Electrical Energy, regulating land access for Company projects, more specifically by Chapter IX On land use and rights regarding third-party property and supporting regulations. Article 59 of the Law is establishing the legal framework in which damages to the property can be claimed and compensated;
- Order of the Government of Republic of Moldova, No.514/2002 on Approval of Rules of Protection of Power Networks;
- ANRE 94/2019 Regulation regarding the development of electric power distribution network . The development of the Investment Plan is regulated by the ANRE 94/2019 Regulation, which requires consultation of interested parties, via the public website of the DSO. When examining the Plan, ANRE can request the DSO to specifically consult the public authorities, energy companies and certain system users, existing or potential and to present the Agency with the result of these consultations;
- ANRE decision 537/2020 on Regulation regarding the quality of transport and distribution of electric power services;
- Land Code no.828-XII / 1991, as amendment in 1999;
- Law no.218 / 2010 on Protection of Archaeological Heritage;
- Law no.64 / 2010 on Freedom of Expression, amended in 2015;
- Law no.239 / 2008 on Transparency in Decision Making;

3.2 International Requirements

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

The EBRD and EIB include specific guidance on conducting stakeholder engagement throughout the project lifecycle. Stakeholder engagement requirements are outlined in *PR10 (EBRD) and ESS2 (EIB) respectively: Information Disclosure and Stakeholder Engagement*. The key requirements for consultation and disclosure through the life of the project are summarized in **Error! Reference source not found.** below (Environmental and Social Policy 2019).

Box 3-1 Outline of EBRD PR 10 and EIB ESS2

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.

Disclosure of Relevant Project Information

Information should be provided to stakeholders on relevant 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; and (iv) 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 in accordance with legal requirements 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 as possible and continue throughout the project, as appropriate and (v) be documented, as necessary.

Informed Consultation and Participation

Disclosure and consultation requirements will be embedded into each stage of the Project development, leading to the client's incorporating into its decision-making process the views of the affected parties on matters that affect them directly, such as proposed mitigation measures, the equitable sharing of benefits and opportunities from projects, and implementation issues. The process should be documented, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected stakeholders. The stakeholders should be informed about how their concerns have been considered. In addition, the consultation process must meet any applicable requirements under national environmental impact assessment laws and other relevant legislation.

Engagement During Project Implementation and External Reporting

The Company will provide information to identified stakeholders, on an ongoing basis, appropriate to the nature of the project and its adverse environmental and social impacts and issues, and the level of public interest throughout the life of the project. In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability.

Grievance Mechanism

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

On-going Reporting to Affected Stakeholders

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

3.3 The Company's Corporate Requirements

Premier Energy recognizes that stakeholder engagement constitutes the basis for building up constructive and strong relationships, which are essential for successful business risk management and shared value creation.

In support of this, the Company implements a CSR Policy and publishes every year a CSR Report, in order to maintain accountability and communication with its stakeholders on its operational, environmental, and social performance.

The 2021 CSR Report lists a number of engagement commitments in support of the Company objectives:

- *promoting an active two-way communication, that enables a good understanding of the clients' expectations and opinions, as well as the adaptation of the solutions the Company offers to their clients' needs;*

- *promoting involvement in the local communities and respecting the mentalities, norms and the environment, so that their concerns are adequately and promptly addressed;*
- promoting information transparency and responsible, accurate, efficient, complete and straightforward communication by periodic publishing of financial and non-financial information, outlining the company's activities and offering a specific answer to the information needs of the different stakeholder groups;
- maintaining permanent dialogue with the interest groups via the most adequate and accessible communication channels'.

4. SUMMARY OF PREVIOUS ENGAGEMENT FOR THE PROJECT

The existing infrastructure rehabilitation projects are typically associated with small-scale works at the existing facilities, and not associated with relevant environmental impacts. No projects, which are subject to EIA or located within natural protected areas, have been implemented to date and no such projects are planned for implementation by the Company, thus public information and consultation around environmental and social impacts and benefits is conducted on a voluntary basis.

The Company established several communication channels available for stakeholders to engage with the Company around operational performance issues, planned electricity cuts, accidental damages compensations and overall company activities. These are communicated to all clients on the monthly energy bill. These available communication channels include:

- postal address of the main Premier Energy Distribution office, for regular mail communication;
- telephone numbers, for customer service available 24/7, 365 days;
- telefax number;
- email address;
- Company's social media page.
- Additionally, the Company has a Telegram account, used mainly for service updates.

The Company website (www.premierenergydistribution.md) is available in Romanian and Russian language and features:

- Presentation of the Company, its organisation structure and key policies (CSR policy, Human Rights Policy, Ethical Conduct Policy, Anticorruption Policy);
- commercial information on the company services, tariffs, and relevant legal framework
- company reports: yearly financial, distribution system and CSR reports; yearly Investment Plan; the three-year Development Plans, as approved by ANRE;
- Company press releases, covering both operational aspects and community investment initiatives.
- Contact details for the Company and the local offices.

The communication with local stakeholders regarding matters of land access and land-related compensation is coordinated by the Distribution Sector Manager and the supporting functions locally.

In response to its CSR commitments, Premier Energy Distribution implemented a number of society driven initiatives, in partnership with public institutions and national and international NGOs. Some of them are mentioned below:

- **Electrical safety:** informative "Safe Summer Holiday" campaign in 2021, complemented by additional campaigns implemented with Chisinau City Council and UNICEF Moldova to address the risks of children accidents due to ignorance and non-compliance. The Company website

has a dedicated section to Electrical Safety, including educational materials, information videos and useful information.

- **Energy efficiency:** energy efficiency recommendations on invoices sent to all customers, a special section on the Company website, and weekly posts on the company's Facebook page.
- **Social actions targeted at vulnerable groups:** activities targeting socially vulnerable families across Moldova through Internal Charity Fund, aimed at supporting low-income families, people with disabilities, children in need.
- **Educational initiatives:** development of a dual education project started in 2016 in collaboration with the Vocational School no.9, which resulted in a Centre of Excellence in Energy. Ludobus Project was launched in partnership with "Diaconia" Mission to support vulnerable communities, mainly in rural areas, where children have limited access to games and extracurricular activities.
- **COVID 19 related initiatives.** Partnerships with Moldovan Health Ministry, Chisinau City Hall and UNICEF Moldovato disseminate health and safety information and to provide medical equipment to Chisinau Municipal Hospital.
- **Addressing gender issues:** partnership with UN Women Moldova for condemning any manifestation of sexual harassment, discrimination, and/or violence. During the November-December period, Premier Energy clients received the invoice containing informative messages about the "*16 days of activism against gender-based violence*" campaign. The message was accompanied by emergency telephone numbers, where victims of abuse can address their reports and calls. Information was printed both in Romanian and Russian languages.

5. STAKEHOLDERS

5.1 Stakeholder Identification

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

Stakeholder identification related to the Company at the national level is more general, a more detailed identification is to be done for power distribution sector and, upon needs, project-specific SEPs (e.g. in case of major network upgrade or extension projects), based on the following generic groups provided in **Error! Reference source not found.** below.

The Company will further detail the identification and analysis of stakeholder groups (based on the in-depth knowledge of local context and stakeholder relationship with the Company) to allow understanding of:

- why each stakeholder group is relevant to the Company, what is their influence, interest in, and impact on the Project/ Company activities;
- stakeholder groups that may be differentially or disproportionately affected by the Company activities due to their vulnerabilities and may have different concerns and priorities about the impacts, mitigations, and benefits.

A list of key stakeholder categories and groups are outlined in the Appendix A.

5.2 Approach of 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:

- *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.
- *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.
- *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.
- *Elderly/retired.* The elderly have specific vulnerabilities relating to income levels and limited ability to change or increase access to additional finances and access to health care, as well as being more susceptible to disease and disability. Elderly residents in rural settlements may be reliant on subsistence farming and are particularly vulnerable and these settlements are more likely to have limited service availability and are more prone to isolation.
- *Households with low income, including subsistence farmers.* Their lack of assets make them vulnerable to shocks and change. Their vulnerability is reinforced by a lack of social, medical and educational facilities, and proper housing.
- *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.
- *Uninsured.* Uninsured individuals do not have access to preventative and other basic healthcare services, making them more vulnerable to adverse health outcomes.

5.3 Stakeholder Analysis

In order to develop tailored and effective means of engagement with each category of stakeholders (see **Error! Reference source not found.** above), the Distribution Sectors will undertake an analysis and mapping of the identified stakeholders such that engagement can be tailored to meet their interest in the project and/or activity and their likely key issues. Stakeholders will be mapped according to the following:

- *Influence on the Project:* Influence refers to the power that the stakeholders have in relation to decisions either taken by, or affecting the project. This power may be in the form of stakeholders that have 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:* Interests refers to the connection between the stakeholders and the project, for example they may or have something to either gain or lose because of project implementation. Understanding stakeholder level of interest can help clarify the motivations of different stakeholders and the ways in which they might be able to influence the project.

Stakeholder mapping is an iterative process, resulting in tailored communication with each stakeholder group identified.

Table 5-1 below presents an overview of key stakeholder groups and associated communication methods.

Table 5-1 Stakeholder Identification and associated Communication Methods

Stakeholder Category	Stakeholder Group	Stakeholders	Communication Method
<p>National Regulatory Authorities</p> <p>National Government is of primary national political importance to the business and/or projects/activities in terms of establishing policy, granting permits or other approvals, and monitoring and enforcing compliance with Moldovan regulations throughout all stages of the project or activity life cycle.</p>	<ul style="list-style-type: none"> ■ National Government ■ Key Ministries ■ National Regulatory bodies ■ Government Agencies and Institutions 	<ul style="list-style-type: none"> ■ MD Parliament “Committee on Public administration, Regional development, Environment and Climate Change” ■ Ministry of Environment ■ Ministry of Infrastructure and Regional Development ■ Energy Efficiency Agency ■ ANRE (National Agency of Energetic Regulation) ■ Ministry of Agriculture and Food Industry ■ Ministry of Transport and Road Infrastructure ■ State Inspectorate Geodesic – Technical Supervision and Land Regime ■ Moldovan Waters ■ Forestry Agency Moldsilva ■ National Archaeological Agency ■ Inspectorate for Environmental protection ■ Environmental Agency “Agentia de Mediu” ■ Labor Inspection ■ National Inspectorate of the Police ■ National Public Health Agency 	<p>Communication with authorities follows established procedures in line with Moldovan regulations. The communication takes place through the following distribution channels:</p> <ul style="list-style-type: none"> ■ official letters, phone or email, ■ meetings with the administration / representatives of the company, ■ tenders for the purchase of services or goods, ■ public events / meetings,.
<p>Local Public Administration</p> <p>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.</p> <p>In addition, the municipalities and/or communes in the Project area will be impacted by the Project</p>	<ul style="list-style-type: none"> ■ Municipal authorities ■ Local Authorities 	<ul style="list-style-type: none"> ■ Municipal Council ■ Regional Ecologic Agencies in (Orhei; Anenii Noi, Calarasi, Telenesti, Nisporeni, Straseni, Criuleni, Hancesti, Ialoveni, Causeni, Leova, Cimislia, Cantemir, Comrat, Basarabasca, Ceadir-Lunga, Taraclia, Cahul, Vulcanesti and Chisinau Municipality) 	<p>Communication with local Government will follow established procedures in line with Moldovan regulations. The communication takes place through the following distribution channels: official letters, meetings with the administration / representatives of the company, phone or email;</p>

Stakeholder Category	Stakeholder Group	Stakeholders	Communication Method
and will need to be kept informed of progress and plans in their area, to consider the Project activities in their policy-making, regulatory and other duties and activities.		<ul style="list-style-type: none"> ■ City Mayor ■ Village Mayor 	
<p>Parastatals 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).</p>	<ul style="list-style-type: none"> ■ Government funded and/or private enterprises in charge of managing specific activities 	<ul style="list-style-type: none"> ■ Moldelectrica ■ SA ENERGOCOM (CERS Moldova) ■ other utility providers. 	<p>Communication with Parastatals will follow established procedures in line with Moldovan regulations. The communication takes place through the following distribution channels:</p> <ul style="list-style-type: none"> ■ Company website ■ Formal notifications ■ Direct Audience with the Procurement Directorate ■ Letters ■ Email ■ Phone
<p>Customers</p>	<ul style="list-style-type: none"> ■ End customers 	<ul style="list-style-type: none"> ■ Private customers of Premier Energy Distribution ■ Economic agents 	<p>Communication with Company clients takes place via the following channels:</p> <ul style="list-style-type: none"> ■ postal address of the main Premier Energy Distribution office, for regular mail communication; ■ telephone numbers, for customer service available 24/7, 365 days; ■ telefax number; ■ email address; ■ email notifications and dedicated section on company website regarding service disruptions and ongoing works; ■ Company's social media page.
<p>Communities or Settlements Households and communities that may be directly or indirectly affected by the project and/or activity. This includes people living on land affected by the project and/or activity, through direct (temporary) land take or by social and environmental impacts, and other people who visit or use land or resources that may be affected.</p> <p>Primary stakeholders include landowners and land users.</p>	<ul style="list-style-type: none"> ■ Local population affected in some form by the project/activity 	<ul style="list-style-type: none"> ■ People living near the project site ■ Land users (grazing, farming or other activities) ■ Community members who use access roads to access nearby natural resources ■ End customers purchasing electricity ■ Residents of settlements located near roads used for project activities, such as transporting materials during construction and 	<p>Communication with local residents around Company operations and activities is performed through local municipality and village councils, or other relevant bodies, and subject to comment by the public involved. This will differ depending on location, rural/urban setting, and types of impacts and interest levels. Local communication will focus on disclosure of routine information, meetings with relevant authorities and councils if needed, and use of the grievance mechanism;</p>

Stakeholder Category	Stakeholder Group	Stakeholders	Communication Method
		operation, contractor and supplier vehicles <ul style="list-style-type: none"> ■ Social / public infrastructure and service companies 	The community also receives information disclosure through CSR informative national campaigns that are broadcasted through national TV and radio stations.
<p>Vulnerable Persons/Groups</p> <p>Vulnerable groups may be affected by the project or activity by virtue of their physical disability, social or economic standing, and limited education, lack of employment or access to land.</p> <p>Appropriate engagement practices and tools will be adopted to ensure the identification of vulnerable groups and their adequate access to information and participation.</p>	Vulnerable groups	<ul style="list-style-type: none"> ■ Ethnic minority groups, that may have limited access to main communication channels used locally and may face language barriers ■ Female-headed households including single mothers and widows, as they may not have access to the same livelihood opportunities as men and therefore they are often reliant on assistance from family members or the state in order to survive ■ Low-income households – due to limited access to resources, like savings and access to credit and more likely lower education levels; ■ Unemployed youth, reliant on other household members, which means that youth are often disenfranchised ■ Elderly and orphans ■ Disabled persons ■ Ukraine war refugees that are resettling or transiting Moldova 	<p>Once the Company identifies vulnerable groups and/or individuals, these will be engaged with to identify any specific information or consultation needs in order to take any concerns or impacts into account.</p> <p>Communication is to be tailored based on their needs and will include face-to-face meetings, phone, and email/ mail communication, according necessity. Dedicated CSR campaigns for vulnerable groups are implemented throughout the year, being the intention of the company to treat the Vulnerable Persons/Groups by the Foundation of the PE Group, in case if apply.</p>
<p>Non-Governmental Organizations (NGOs) and civil society</p> <p>NGOs with direct interest in the project and/or activity & associated facilities and their social and environmental aspects and that are able to influence the project and/or activity directly or through public opinion.</p>	<ul style="list-style-type: none"> ■ International ■ National ■ Local 	<ul style="list-style-type: none"> ■ European Business Association (EBA) ■ AmCham ■ Chamber of Commerce and Industry (CCI) ■ Green City Lab ■ UNICEF Moldova ■ UNFPA Moldova (UN Population FUND) ■ CCF Moldova ■ Association Motivation from Moldova 	<ul style="list-style-type: none"> ■ Company website ■ Formal consultation mechanisms; ■ Meetings ■ Letters ■ Email ■ Phone

Stakeholder Category	Stakeholder Group	Stakeholders	Communication Method
<p>Other interest groups</p> <p>Municipal and national level media will typically have a higher level of influence over the project and may be leveraged to influence local stakeholders' perceptions of the Project. Administrators of national and/or natural parks influence the project or activity because their opinion is consulted by the environmental regulatory authority during the legal permitting procedure to grant the consent for the development of the project.</p>	<ul style="list-style-type: none"> ■ Media ■ Administrators of national and/or natural parks 	<ul style="list-style-type: none"> ■ Mission "Diaconia Moldovei" ■ Municipal, county- and national radio stations ■ Municipal and national newspapers ■ TV stations ■ Internet 	<p>Communication with the media will be done through the Company website, press releases, and newspaper announcements, TV and Radio Campaigns, articles, and interviews.</p> <p>Communication with administrator of national and/or natural parks will follow established procedures in line with Moldovan regulations.</p>
<p>Internal Stakeholders</p> <p>Groups or individuals who work within the Company.</p>	<ul style="list-style-type: none"> ■ Employees ■ Company shareholders (for example, lenders) 	<ul style="list-style-type: none"> ■ Labour Union Association ■ Shareholders ■ Employees 	<p>Engagement with these groups is subject to different plans and procedures, including information disclosure and grievance mechanism. They are not covered in this document.</p> <ul style="list-style-type: none"> ■ General Meeting of Shareholders ■ Financial reports ■ Letters ■ Internal meetings with the administration / Human Resource representatives ■ Local Committee on the Code of Ethics ■ Internal releases ■ Internal magazine "Our Energy" ■ Posters ■ Corporate events ■ Internal social projects ■ Internal competitions ■ Training courses. ■ Email ■ Phone
<p>Business Environment</p> <p>Businesses and individuals with direct interest in the project and/or activity e.g. running businesses or providing services and supplies to the Company.</p>	<ul style="list-style-type: none"> ■ Contractors and subcontractors (construction, maintenance, consulting and engineering services providers, installations and 	<ul style="list-style-type: none"> ■ Construction contractors ■ Maintenance contractors ■ Potential energy suppliers ■ Equipment and spare parts suppliers ■ Other Businesses 	<p>Company website along with its log for registering requests of information from suppliers.</p> <p>Tender opportunities for buying or selling to/from Premier Energy Distribution available on the dedicated page of the company's portal.</p> <p>The communication with potential partners takes place through the following communication channels:</p>

Stakeholder Category	Stakeholder Group	Stakeholders	Communication Method
	equipment suppliers) ■ Suppliers ■ Project Developers and Investors		<ul style="list-style-type: none"> ■ meetings with the administration / representatives of the Procurement Department ■ Business associations, EBA, Amcham ■ tenders for the purchase of services or goods ■ letters, press releases ■ public events ■ email, phone.

6. STAKEHOLDER ENGAGEMENT ACTION PLAN

This SEP will serve as the framework for stakeholder engagement conducted by Premier Energy.

The following table provides a generic Engagement Action Plan with examples of action items that can be defined for stakeholder engagement at different stages of a project lifecycle. This action plan will be amended as required for each Distribution Sector/ project-specific SEP.

The proposed Stakeholder Engagement Action Plan will be further detailed and refined in order to:

- include further engagement activities intended to disclose information on projects E&S performance and potential impacts;
- enable stakeholders to understand the risks, impacts and opportunities of each project.
- feed back into communities at appropriate levels how stakeholders opinion and inputs during consultation process were considered by the Company.

Table 6-1 Engagement Action Plan

Activity/Action	Stakeholders targeted	Purpose of activity/action	Timeframe	Responsibility
<i>Examples of actions during pre-construction</i>				
Engage stakeholders on the development of the Investment Plan	All stakeholders	<ul style="list-style-type: none"> Disclose the Investment Plan via the company website and other relevant communication channels and document and feedback received from the public via the available monitoring tools 	<ul style="list-style-type: none"> ongoing 	External Relations and Communication Department
Disseminate the SEP, NTS and other relevant Project Information	All stakeholders	<ul style="list-style-type: none"> ensure the publication on web of the SEP plan 	<ul style="list-style-type: none"> Prior to initiation of construction works 	External Relations and Communication Department
Communicate about grievance forms which could be used by web and other channels.	All stakeholders	<ul style="list-style-type: none"> provide a means for stakeholders to communicate grievances, including for impacts related to construction works associated with network upgrade and extension works 	<ul style="list-style-type: none"> As early as possible in the project planning stage 	Distribution Sector Manager, with the support of the External Relations and Communication Department
Regular communication and meetings at necessity between the Distribution Sector Manager and the LPA	Municipal and/or local public administrations	<ul style="list-style-type: none"> coordinate information about project activities, disseminate information on expected traffic flows and construction timeline. Ensure technical specifications and routing (considering infrastructure location, safety buffer requirements and associated land access restrictions) are communicated in timely manner in order to avoid potential livelihood impacts. 	<ul style="list-style-type: none"> Communication during pre-construction Additional immediate meetings if necessary 	Distribution Sector Manager
Identification and engagement with affected land owners and users	Land owners affected by the construction works	<ul style="list-style-type: none"> Identify land owners and users that may be affected by the construction works in order to obtain the access approval when necessary and to prevent eventual damages. 	<ul style="list-style-type: none"> Prior to accessing the land 	Distribution Sector Manager

Activity/Action	Stakeholders targeted	Purpose of activity/action	Timeframe	Responsibility
Regular communication and meetings at necessity with the affected communities	Local population	<ul style="list-style-type: none"> ■ identify vulnerable groups and define appropriate means of making contact, explaining the project and understanding their views; ■ build trust; ■ listen and collect grievances; ■ share information; 	<ul style="list-style-type: none"> ■ Communication during pre-construction ■ Additional immediate meetings if necessary (for instance for vulnerable groups) 	Distribution Sector Manager, Construction Contractors
Voluntary Public meetings if needed	All stakeholders	<ul style="list-style-type: none"> ■ discuss environmental and social impacts associated with the works, including land access and compensation for accidental damages, community health and safety mitigation measures 	<ul style="list-style-type: none"> ■ Prior to initiation of construction works 	Distribution Sector Manager, Construction Contractors
<i>Examples of actions during construction</i>				
Dissemination of key information about Project activities to LPAs and request for information/publication as appropriate in the town hall/other public places in the affected localities in order to bring the given information to the locals in local language.	Local population	<ul style="list-style-type: none"> ■ disseminate key announcements on Project activities (e.g. construction schedule, grievance procedure and forms, contact details) 	<ul style="list-style-type: none"> ■ Updated appropriately during the entire construction period 	Distribution Sector Manager, Construction Contractors, who will address specific language barriers
Regular communication and meetings at necessity with the affected communities	Local population	<ul style="list-style-type: none"> ■ listen and collect grievances; ■ share information; 	<ul style="list-style-type: none"> ■ Communication during construction ■ Additional immediate meetings if necessary (for instance for vulnerable groups, or if a specific concerns arises, or if the works are conducted on private property) 	Distribution Sector Manager, Construction Contractors
<i>Examples of actions during operation</i>				
Start of operation of the distribution network sector	Mayors of affected settlements and community members	<ul style="list-style-type: none"> ■ inform stakeholders of the start of operation, any health and safety risks for the communities and mitigation measures 	prior to start of operation	Distribution Sector Manager, Construction Contractors

Activity/Action	Stakeholders targeted	Purpose of activity/action	Timeframe	Responsibility
Up to date and complete information regarding the grievance mechanism and the compensation procedure ⁴	All stakeholders; Mayors of affected settlements and community members	<ul style="list-style-type: none"> ■ inform stakeholders of the scheduled maintenance and network extension works (duration, location, etc.) ■ Disseminate the Compensation Procedure online on the company website and inform the LPAs; 	ongoing	External Relations and Communication Department, supported by Distribution Sector Manager, Construction Contractors
Ongoing information on the annual environmental and social performance of the Company	All stakeholders; Mayors of affected settlements and community members	<ul style="list-style-type: none"> ■ Inform stakeholders of the project annual environmental and social performance by publishing the yearly CSR report on the Company website 	Yearly	External Relations and Communication Department

⁴ Compensation of damages resulting from the distribution activity or the associated construction and maintenance works

7. ENGAGEMENT TOOLS

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

The tools outlined in **Error! Reference source not found.** 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
Company website	<p>The Company website (www.premiereenergydistribution.md) will provide relevant and up to date information regarding:</p> <ul style="list-style-type: none"> ■ construction works and operational aspects. ■ the Project NTS, ESAP and SEP, prepared as part of the environmental and social review package will be translated into Romanian (and Russian, as needed) and made accessible, online and offline, to all interested stakeholders. ■ the description of the External Grievance Form will be made available to the public on web. ■ Dedicated section on the website regarding Electrical Safety, including commitment, from the Company, guidelines and teaching material.
Social Media Platforms	<ul style="list-style-type: none"> ■ Facebook and Telegram accounts for frequent updates
Monthly invoices sent to Clients	<ul style="list-style-type: none"> ■ The monthly invoices sent to clients includes information on contact details and social awareness campaigns (e.g. electrical safety, energy efficiency, gender based violence and harassment).
Brochures and leaflets	<ul style="list-style-type: none"> ■ Printed brochures or leaflets supporting information and awareness campaigns
Electronic and postal mail	<ul style="list-style-type: none"> ■ Subscription emails and postal letters exchanges.
Company 24/7 Call Centre	<p>The Company provides around the clock client support via a dedicated Hotline: 022-43-11-11; 022-83-11-11; 022-43-15-15.</p>
Regular Internal Reporting	<p>The External Relations Department will prepare regular reports to the Management team. These reports will include a summary of stakeholder engagement activities and all grievances received in the reporting period, any material deviations or non-compliances to the requirements of this SEP, planned activities for the next reporting period and any other issues of potential concern – please see section 10 for more details.</p>
Reporting to Stakeholders	<p>The External Relations and Communication Department will provide Project updates to different stakeholder groups if needed. A CSR Report including reporting on environmental and social performance of the Company will be published annually and disseminated in the local communities via local authorities and local partners.</p>

8. RESOURCES AND RESPONSIBILITIES

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

The External Relations and Communication Department is responsible for overall stakeholder engagement at corporate level. This unit will be supported by Distribution Sector managers and their teams, who will have the following key tasks:

- implementation of this framework SEP and cascading the requirements for Distribution Sectors;
- supervise the implementation of the SEP, if applicable;
- manage the corporate/central grievance database including major grievances from the Distribution Sectors and/or projects/activities;
- identify risks associated with grievances filed at Distribution Sector and/or projects/activities and define corrective actions (in collaboration with the technical departments and relevant personnel). The department "Petitions and Complains" is the key responsible for the management of external grievances, in collaboration with all other relevant functions, moreover the Departments Operation of Low and Medium Voltage Networks and Operation of High Voltage Networks;
- engage regularly with the Distribution Sector teams and the relevant construction contractors to identify local matters that require management attention and specific engagement.

9. EXTERNAL GRIEVANCE MECHANISM

9.1 Purpose

The External Grievance Mechanism is in place 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 Moldova.

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

9.2 Grievance Mechanism

Recognizing the different activities of the company and presence of various contractors, each Distribution Sector, and new project/activity follow the Company's grievance mechanism based on existing specific grievance management procedures. These is transparent, culturally appropriate, at no cost, and without retribution for the party presenting the grievance. The Company monitors the the using of the grievance management procedures by each responsible area.

Specific grievance procedures are in line with the EBRD Guidance Notes on Grievance Management and are structured around the following common elements listed below (also see

Figure 9-1 below):

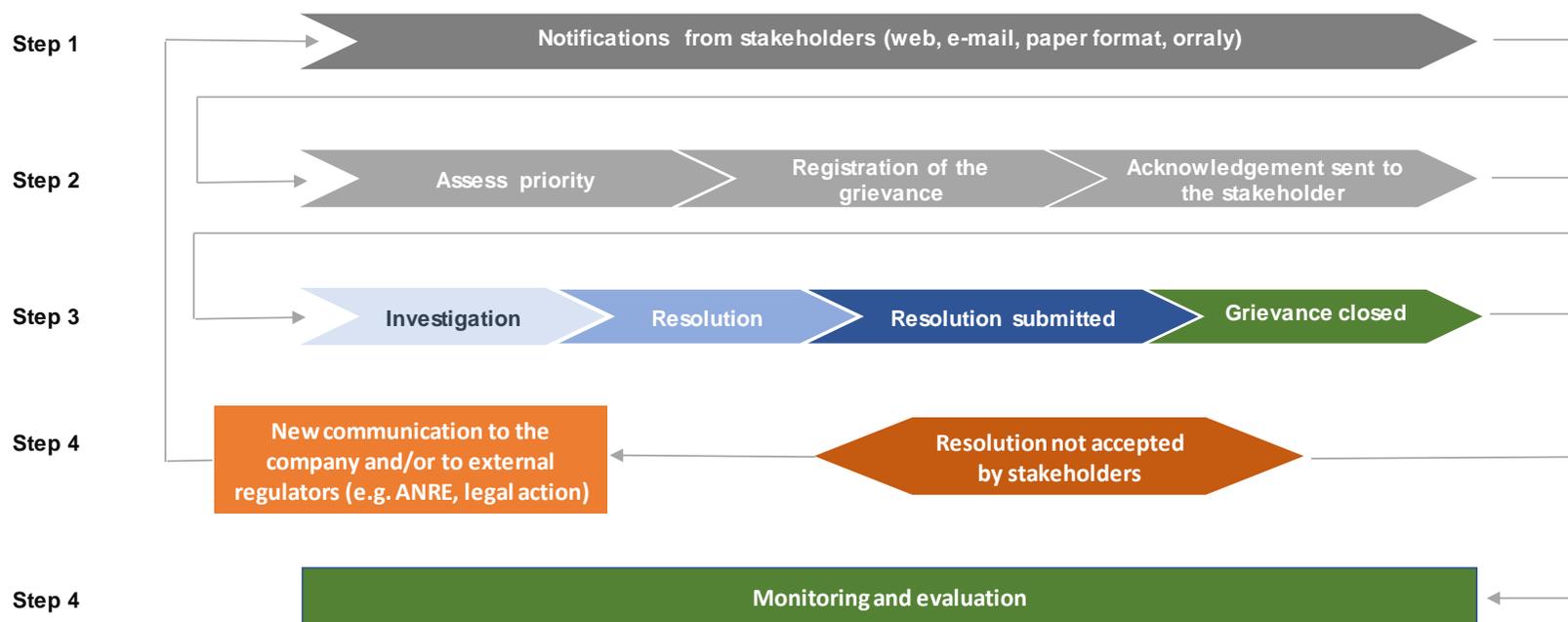
- Receives the complaint, whether it was made verbally or in writing in free form or on the basis of forms on the website, and records it in the complaints register/database. The template forms on the website contain the fields to be filled in depending on the subject of the complaint, for the most efficient and rapid handling. The 'other' type of request form allows any type of complaint from any person concerning the Company's activity. Complaints can be submitted in Romanian/Russian. A list of grievance forms is available on the website and a sample of database are provided in Appendices B and C to this SEP⁵;
- formally acknowledges receipt of the complaint to the complainant and assigns it an entry number: for those received electronically, notification is sent by e-mail at the time of their registration in the Correspondence Management System (SEC), being prioritized by content for the purpose of notification of receipt and handling within the shortest possible time; for those received in physical format, the company's official acknowledgement stamp is applied, containing the assigned entry number; if the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step;
- assess priority and assign responsibility for resolution: significant concerns and incidents will be immediately brought to the attention of senior management;
- investigate the issue;
- respond to the complainant;
- reflect in the Correspondence Management System (SEC) the history of the actions taken, the list of the persons responsible who have analysed the address, the status of the complaint, if necessary documents are attached;;
- monitor and evaluate in line with the provisions of Section 10.

The overall process of closing a grievance will not exceed 30 calendar days⁶. Should the issue raised be complex and needing further investigation, the complainant will be notified of the time necessary to respond.

⁵ As per the EBRD Guidance Note on Grievance Management

⁶ As per the EBRD Guidance Note on Grievance Management

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



Source: ERM, 2022

In addition to Company’s external grievance mechanism, there is also EBRD’s grievance process entitled as an Independent Project Accountability Mechanism⁷ (IPAM), and a similar Complaints Mechanism⁸ is in place at EIB.

These represent independent last resort tools (if the project mechanism fails), which are available in the context of EBRD and EIB acting as potential lenders to the Company. These tools, aim at facilitating the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD and EIB financed projects among Project stakeholders or to determine whether the lenders complied with their environmental and social policies and the Project-specific provisions of their access to information policies; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the lenders.

⁷ <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>

⁸ <https://www.accountabilitycounsel.org/institution/european-investment-bank/>

10. MONITORING, EVALUATION AND REPORTING

10.1 Overview

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

10.2 Monitoring and evaluation activities

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

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

- **Stakeholder dialogue log:** Used to store, analyses and report on stakeholder dialogue activities mainly through the Correspondence Management System and Company 24/7 Call Centre evidence.
- **Commitments register:** used to keep track of the commitments made to various stakeholders, *through the letter to stakeholders managed by Correspondence Management System.*
- **Meeting minute** when needed.
- **Stakeholder list:** ongoing updates to the list, including key contacts and contact details⁹ (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 for the complainant *through the Correspondence Management System.*
- **Media monitoring** of press and radio stories relevant to the Project.

The Correspondence Management System functionality includes a continue process of control and monitoring which ensure that commitments and actions are taken forward.

10.3 Reporting to stakeholders

10.3.1 Internal Reporting

Premier Energy Distribution will act consequently – using feedback loop through Correspondence Management System and web sites, implement corrective measures when needed, both in the environmental and social field. Main issues to be monitored will include:

The following tools will be developed:

Red Flag Reports: actual control mechanism regarding terms of response in Correspondence Management System, immediate reporting for urgent items (e.g. critical concerns or grievances) or incidents of significant nature, orally, mails, etc. These red flag reporting correspond to each area according its responsibility, with the involving of External Relations and Communication Department when needs and sent to the management team, who will take action and/or escalate if necessary. The Grievance Mechanism contains the criticality of incident to be communicated in the red flag reports

⁹, The Company operates in line with its Policy In line with the requirements of Law no.133 of 08.07.2011 regarding data protection regulation, communicated on the Company website <https://premierenergydistribution.md/ro/protectia-datelor-cu-caracter-personal>

Grievance and requests log report: Defined register in Correspondence Management System (Appendix C), which could be extracted at the necessity. The details in the Correspondence Management System can include according necessity: relevant dialogue activities undertaken thus far, main concerns and expectations progress summary (actions to be taken and status); documents, answers of the company to consumers, etc.

The important issues are discussed when appears, as well as could be commented at monthly Company internal meetings and will be circulated internally as required, including to the relevant company Contractors as appropriate.

10.3.2 External Reporting

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

The Company will keep track of commitments made (commitments tracker) and communicate progress made against these commitments on a regular basis (for instance, through the Correspondence Management System, website, as appropriate). An Annual Stakeholder Engagement Progress Report will be prepared by Premier Energy Distribution, summarizing SEP results, based on which updated information will be delivered back to the community, included in the yearly CSR Report.

APPENDIX A GENERIC STAKEHOLDER GROUPS

Stakeholder Category	Stakeholder Group
<p>National Regulatory Authorities 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 Moldovan regulations throughout all stages of the project or activity life cycle.</p>	<ul style="list-style-type: none"> ■ National Government ■ Key Ministries ■ National Regulatory bodies ■ Government Agencies and Institutions
<p>Local Public Administration 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.</p> <p>In addition, the municipalities and/or communes in the Project area will be impacted by the Project and will need to be kept informed of progress and plans in their area, to consider the Project activities in their policy-making, regulatory and other duties and activities.</p>	<ul style="list-style-type: none"> ■ Municipal authorities ■ Local Authorities
<p>Parastatals 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).</p>	<ul style="list-style-type: none"> ■ Government funded and/or private enterprises in charge of managing specific activities
<p>Customers Communities or Settlements Households and communities that may be directly or indirectly affected by the project and/or activity. This includes people living on land affected by the project and/or activity, through direct (temporary) 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.</p>	<ul style="list-style-type: none"> ■ End customers ■ Local population affected in some form by the project/activity
<p>Vulnerable Persons/Groups 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.</p>	<ul style="list-style-type: none"> ■ Women ■ Children and youth ■ Elderly ■ Low-income households
<p>Non-Governmental Organizations (NGOs) and civil society NGOs with direct interest in the project and/or activity & associated facilities and their social and environmental aspects and that are able to influence the project and/or activity directly or through public opinion.</p>	<ul style="list-style-type: none"> ■ International ■ National ■ Local
<p>Other interest groups Municipal and national level media will typically have a higher level of influence over the project and may be leveraged to influence local stakeholders' perceptions of the Project. Administrators of national and/or natural parks influence the project or activity because their opinion is consulted by the environmental regulatory authority during the legal permitting procedure to grant the consent for the development of the project.</p>	<ul style="list-style-type: none"> ■ Media ■ Administrators of national and/or natural parks
<p>Internal Stakeholders Groups or individuals who work within the Company.</p>	<ul style="list-style-type: none"> ■ Employees ■ Company shareholders (for example, lenders)
<p>Business Environment Businesses and individuals with direct interest in the project and/or activity e.g. running businesses or providing services and supplies to the Company.</p>	<ul style="list-style-type: none"> ■ Contractors and subcontractors (construction, maintenance, consulting and engineering services providers, installations and equipment suppliers) ■ Suppliers ■ Project Developers and Investors

