

Stakeholder Engagement Plan (SEP)

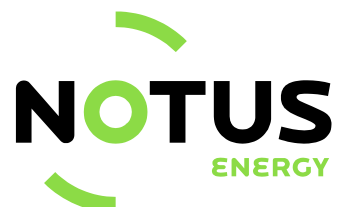
[REDACTED]

Wind farm Notus Wind

[REDACTED]

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The following information was determined to be the best of our knowledge and belief.

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1 Introduction

1.1 Purpose

This document forms a Stakeholder Engagement Plan (SEP) for Libental Wind Farm (the Project).

The SEP describes the planned stakeholder consultation and engagement process for the Environmental and Social Impact Assessment (ESIA). It outlines a systematic approach to stakeholder engagement that will inform the scope of the ESIA and gather information on environmental and social topic areas that will assist the identification, assessment and mitigation/monitoring of predicted project impacts.

The SEP has been produced in accordance with the international standards required by the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD), as well as other international financial institutions (IFIs).

The SEP is a live document, and it will be regularly monitored, reviewed and updated as necessary in line with new or changed activities, including changes in Project design, or newly identified stakeholders. The SEP shall be read in conjunction with the ESIA and the ESMP.

SEP is covering preconstruction, construction, operation and decommissioning phases of the Project.

1.2 Objectives

The objectives of this Stakeholder Engagement Plan (SEP) are to:

- Describe the regulatory and Lender requirements for consultation and disclosure.
- Identify and prioritise key stakeholder groups, focusing on Affected Communities.
- Describe the strategy and present the timetable for sharing information and consulting with each of these groups.
- Describe the internal resources and individual responsibilities assigned to implement stakeholder engagement activities.
- Describe how the effectiveness of the SEP will be monitored and how lessons learned will be recorded, with the aim of improving stakeholder engagement activities during the lifecycle of the project.

Communication will continue as further planning and design activities are progressed and through project implementation.

Key stakeholders have been identified in this document, however, as the document is considered a 'live' document, the stakeholder list will continue to be updated as the ESIA process progresses. If any stakeholders have not been identified, they should contact [REDACTED] (Company) Notus and ask to be included in future communications/engagement opportunities. Furthermore, this document describes the way in which any concerns or grievances will be handled by [REDACTED] (Company) /Notus.

The SEP provides a time schedule for consultations, which may be subject to revisions during project initiation, design and implementation. The resources available to implement the SEP are also described in this document.

2 Libental Wind Plant Project

2.1 Project Description

Notus Wind Project is an onshore wind farm in Ukraine. [REDACTED] (Company) is the Special Purpose Vehicle (SPV) created for the WF Notus Wind Project which holds the necessary rights and permits for its implementation. All activities during the development, construction, and operational phases will be supported by **NOTUS Group**, a leading wind energy developer

NOTUS is a fully integrated, owner-managed wind farm developer and independent power producer (IPP) based in Potsdam, Germany. With extensive experience in the renewable energy sector, NOTUS covers the entire value chain of wind farm development, including project acquisition, development, financing, engineering, procurement, construction (EPC), and ongoing technical and commercial management. As part of the project, **NOTUS ENERGO** is responsible for the design and national permitting processes, working in close collaboration with **Ukrainian authorities, local stakeholders, and landowners** to ensure compliance with environmental and social impact regulations. Through this approach, the project aims to align with best practices in responsible wind energy development while fostering strong community engagement.

The current project layout foresees the installation of 21x 5.9 Wind Turbine Generators (WTGs), with a total installed capacity 123.9 MW capped at a maximum injected capacity to the grid of 120 MW as per Grid Connection Agreement¹. An additional 3.9 MW will minimize grid losses and better utilize grid capacity and wind resources.

[REDACTED] (Company) secured land rights for 22 land plots for wind turbines. After careful assessment of social, environmental and economic aspects the Project is expected to be implemented using 21 out of the 22 potential turbine locations. The rated power of each WTGs is 5.9 MW, and rotor diameter is 163 m.

The projected Wind Farm foresees the construction of the following objects:

- 22 potential WTG locations of which 21 will be used assuming 5.9 MW per turbine. The total wind farm capacity is expected to be 123.9 MW.
- Internal roads 25.25 km, intended for transportation of equipment and movement of construction machinery and mechanisms during the construction period.
- Underground cables. The turbines will be connected to a power distribution point (substation) via underground medium voltage cables (35 kV) and fibre-optic control and communication cables with a total length of approximately 45 km.
- Substation [REDACTED] 110/35 kV is intended for temporary accumulation of generated electric capacity and increase of the voltage class of the generated electrical energy to 110 kV.
- OHL (110kV). A total of 48 OHL poles with a length of 8 km is expected to be installed for the transportation of the generated electricity to the [REDACTED] substation (330/110/10 kV) from where electricity is transmitted to the unified energy system of Ukraine.
- Construction compound/camp

¹ According to the Letter No.10660/17.1.3/7-24 from the National Commission for State Regulation of Energy and Public Utilities (NKREKP or NCREPU) dated 23.09.2024

2.2 Project Location

The site territory is located outside of residential territories. The topography of the Project site is largely flat and consists of cultivated land used by local farmers for growing cereals and berries amongst other crops. The topography of the site is generally flat. The site consists mainly of areas of cultivated agricultural lands.

Distances to the nearest residential areas

The projected facilities are to be installed outside the residential settlements. National requirements on sanitary protection zone (SPZ) and safe distance between residential buildings and wind turbines have been followed and is more than 700 m minimum requirement.

2.3 Project Components

The proposal is for the construction, operation, and decommissioning of a wind farm comprising the following components:

The projected Wind Farm foresees the construction of the following objects:

- 21 (+1 optional) WTGs, each with an individual capacity of up to 5.9 MW.
- Wind farm Substation (110/35 kV – 4x45 MVA) within the Project area.
- Overhead line (OHL) from the wind farm substation to [REDACTED] substation of approximately 8 km length and consisting of 48 OHL poles.
- Reconstruction of [REDACTED] substation.
- Underground cables.
- Internal roads.
- Construction compound/camp.

The existing road network will provide the ability to deliver wind turbine equipment, as well as materials and household supplies to the construction site.

3 Roles and responsibilities

NOTUS Group companies, acting on behalf of **[REDACTED] (Company)**, will be responsible for developing, reviewing, and updating the **Stakeholder Engagement Plan (SEP)** and **Environmental and Social Management Plan (ESMP)**. As the Project Developer and EPC Manager, Notus will oversee the day-to-day management and ensure the effective implementation of these plans, as well as compliance with relevant contractual obligations by contractors. Additionally, it will conduct regular monitoring and audits to assess the implementation and effectiveness of the **SEP** and **ESMP** throughout the project's lifecycle.

NOTUS energo Construction LLC has been appointed under an Engineer, Procure and Construct (EPC) contract to carry out the detailed project design, source plant and materials and construct the project. Given the role in the project, the EPC Contractor shall have the responsibility of managing the HSE performance of most of the workforce. The Lenders and Shareholders will require compliance with the respective performance standards and requirements.

The Project Manager/Project Director

The project manager (PM) is responsible for overseeing and coordinating all activities associated with stakeholder engagement. The PM is responsible for the following activities.

- Ensure that all stakeholder engagement aspects are a permanent item on all high-level management agendas, and that all actions arising from management decisions regarding stakeholder participation are implemented;
- Determine necessary resources for effective implementation of this SEP and submits to his/her line managers; and

E&S Manger

The E&S Manager will monitor and manage all the activities during the stakeholder engagement process. More specifically.

- Develop, coordinate, and monitor all stakeholder engagement activities included in this Plan.
- Regularly update the SEP in collaboration with the Project manager and Project company
- Ensure that all stakeholder engagement aspects are a permanent item on all high-level management agendas and that all management decisions regarding stakeholder participation are implemented.
- Responsible for the Implementation of the grievance mechanism.
- Determine necessary resources for effective implementation of this SEP and submits to his/her line managers.
- Prepare periodical reports

Community liaison Officer (CLO) / Land Manager

The community liaison officer (CLO) will be responsible for implementing engagement activities; this assignment plays a critical role as an internal agent for social and stakeholder related matters. The CLO will be based in close vicinity to the Project and its affected stakeholders.

The CLO shall participate in all planned stakeholder engagement activities. Furthermore, the responsibilities of the CLO include the following:

- Liaise with communities and stakeholders to ensure their overall engagement.
- Organise and participate in all engagement activities performed.
- Liaise with other project managers (PMs of contractors and subcontractors) s to ensure that stakeholder engagement requirements/protocols are understood.
- Proactively identify stakeholders and their needs/interests/concerns, Project risks and opportunities and inform the PM / senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.
- Stakeholder mapping and analyses of all parties interested in the Project.
- Manage stakeholder mapping and prepare communications to stakeholders and respond to stakeholder enquiries.
- Provide briefings and support to technical teams for meetings with stakeholders.
- Provide all necessary information to the E&S Manager for the preparation of periodical reports.
- Oversee the practical day to day running of the grievance system.

4 Regulatory Requirements

4.1 National Requirements

The Constitution of Ukraine (1996) guarantees Ukrainian citizens' right to participate in public consultation, to have access to environmental information, and to appeal against authority decisions. Notable laws and regulations pertaining to information access are as follows:

- The right of citizens of Ukraine to receive information, as well as disclosure principles, are set out in the Law of Ukraine "On Information" (1992).
- Rules of submitting complaints on social matters are regulated by the Law of Ukraine "On Citizen Right to Appeal" (1996).
- The Law of Ukraine "On Regulating Urban Planning Activity" (2011) states that approval of Master Plans, plans of territorial zoning, and detailed plans of territories by authorities is forbidden without prior public disclosure of information, collection of propositions and public hearings. The Law outlines a procedure for resolving consultations-borne disputes and requires the authorities to disclose the consultations' evaluation results and explain how these have been considered.
- Procedure for Facilitating Public Review by Executive Authorities (Decree No 976 of the Cabinet of Ministers of Ukraine, 2008) regulates the obligations of authorities for carrying out the Public Review on request of NGOs, other associations, social organizations, trade unions, employers and representatives of local administrative bodies.
- The Law "On Environmental Protection" (1991) defines the roles and procedure as regards the public disclosure of information about the environment and its protection.
- The Law of Ukraine "On Environmental Impact Assessment" (2017) defines public participation in the environmental protection proceedings and other environmental and social procedures. The Law also gives a right to perform the public environmental review by individual experts and /or NGOs.
- Regulation on Public Participation in Decision Making on Environmental Protection Issues (Decree No. 168 of the Ministry of Environmental Protection of Ukraine) defines the public consultation and information disclosure process.
- Resolution of the Cabinet of Ministers of Ukraine "On Approval of the Procedure for Conducting Public Hearings in the Process of Environmental Impact Assessment" dated № 989 (2017).

The national requirements to inform and take the public interests into account are set out by the EIA Ukrainian procedure.

Some provisions of the Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters have been incorporated into this State Construction Norms (DBN) following the ratification of the Convention by Ukraine in 1999. According to the DBN, the project proponent is obliged to:

- Communicate information about the planned project to the public through the local authorities.
- Define the place and procedure of public hearings.
- Collect the public comments and suggestions and take them into consideration.
- Publish "Statement of Intent" and "Statement of Environmental Consequences of Activity" in the mass media.

4.2 EBRD and IFC Requirements

Performance Requirement 10 (PR10) promotes the principle of strong stakeholder engagement as a focal point to achieve and build strong, constructive and responsible relationship essential for the successful management environmental and social impacts and issues throughout the Project lifecycle.

International Finance Corporation (IFC) addresses stakeholder engagement primarily through IFC Performance Standard 1 (PS1): Assessment and Management of Environmental and Social Risks and Impacts, which establishes stakeholder engagement as an integral part of the Environmental and Social Management System (ESMS). IFC PS1 requires clients to identify project stakeholders, disclose relevant information, undertake meaningful consultation, and establish and maintain a grievance mechanism throughout the life of the project. For projects affecting local communities, stakeholder engagement is not a one-off activity but a continuous, adaptive process that evolves as risks, impacts, and stakeholder concerns change over time.

The overall objectives of EBRD PR10 and IFC PS1 are closely aligned and include the following:

- to outline a systematic approach to stakeholder engagement that enables the client to build and maintain constructive relationships with stakeholders;
- to provide means for effective, inclusive, and culturally appropriate engagement with project stakeholders throughout the project cycle;
- to ensure timely disclosure of relevant environmental and social information in an understandable and accessible manner;
- to ensure that meaningful consultation is carried out with affected stakeholders, and that views and concerns raised are duly considered in Project decision-making; and
- to establish and operate an effective grievance mechanism to receive, assess, and resolve stakeholder concerns and complaints in a transparent and timely manner

The goal of consultation under both EBRD and IFC requirements is to ensure that adequate and timely information is provided to interested and potentially affected parties regarding the Project, its potential impacts, and the policies guiding its implementation, and that these groups are given sufficient opportunity to express their views, concerns, and expectations.

Stakeholder engagement should be conducted on the basis of providing local communities and other relevant stakeholders that are directly affected by the project and other relevant stakeholders, with access to timely, relevant, understandable and accessible information, in a cultural appropriate manner, free of manipulation, interference, coercion, discrimination and intimidation in line with both EBRD PR10 and IFC PS1 principles.

In accordance with EBRD PR10 and IFC PS1, stakeholder engagement shall incorporate the following core elements:

- Stakeholder identification and analysis.
- Stakeholder engagement planning.
- Disclosure of information.
- Consultation and participation.
- Establishment and operation of a grievance mechanism.
- Ongoing reporting to relevant stakeholders.

The nature and frequency of stakeholder engagement shall be commensurate to the project scale.

The EBRD PR10 and IFC PS1 require that grievance mechanism be established early in the Project lifecycle and remain operational throughout construction and operation, to receive and facilitate resolution of stakeholder grievances in a predictable, transparent, and culturally appropriate manner.

5 Stakeholder Identification and Analysis

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation during the ESIA process, taking into consideration the range of engagements that have already been completed. Stakeholder identification is an ongoing process, and potentially new stakeholders will continue to be identified during different stages of the Project.

5.1 Stakeholder Mapping and Defining the Area of Influence

Stakeholders for the ESIA were identified through the following steps:

1. Using information from the National EIA , project aspects (activities that require a degree of environmental and/or social management) and the potential impacts (arising from the activity) activities were reviewed.
2. The geographical area of influence (as defined by IFC and EBRD) was analysed to map areas that may be directly or indirectly affected for specific topic areas. The combined area identified reflects the project's Area of Influence (AOI).
3. Existing secondary data on environmental and social conditions within the Project AOI was reviewed, to identify the presence of possible environmental and social sensitivities. Information sources used include the latest satellite imagery from Google Earth, and local knowledge from Wood's local consultant who has extensive experience of working in the region.
4. Stakeholders were subsequently discussed at a stakeholder engagement session.

Definition of the Area of Influence by Environmental & Social Topic Area		
Impact Receptor Type	Area of Influence by Project Phase	
	Construction	Operation
Air quality	The area within which construction-related air emissions and dust may affect receptors, defined as up to 250 m from active construction areas and along access and transport routes, based on dispersion of dust and exhaust emissions from construction plant and vehicles.	N/A – there are no significant sources of emissions during operation.
Noise	800 m in the direction of the nearest noise-sensitive receptors, consistent with noise assessment methodology and modelling assumptions.	800 m in the direction of the nearest noise-sensitive receptors, consistent with noise assessment methodology and modelling assumptions.
Ecology, biodiversity and ecosystem services	The physical footprint of the Project from the clearance of vegetation and civil works associated with the installation of access roads, WTGs foundations, construction laydown working areas, cable installation, OHL works and similar activities.	The area within which Project activities could affect biodiversity, including the WTG array, internal infrastructure, transmission line corridor, and surrounding areas assessed for species-specific impacts (e.g. bats and birds)
Visual & landscape services	A 500 m distance from the edges of working areas to reflect the use of artificial lights and physical presence of the workforce and machinery, until the OHL is developed, and WTGs are installed and not yet commissioned or working, upon which time the AOI will expand to the same as the operational phase.	Defined as the Zone of Theoretical Visibility (ZTV). The visual change arising from the WTGs shall be most noticeable at night with white lighting.
Cultural heritage & archaeology	Areas where known or potential archaeological features may be affected by construction, including statutory protection zones around identified heritage assets, in accordance with national legislation and Chance Find Procedure.	No additional operational Aoi beyond statutory protection zones, as operational impacts on cultural heritage are not anticipated

Definition of the Area of Influence by Environmental & Social Topic Area		
Community health, safety & wellbeing	The AoI includes: transport routes used by Project traffic; areas where construction workers may interact with local communities (e.g. accommodation locations); and construction sites and fenced working areas, where temporary safety restrictions apply.	The AoI includes: areas assessed for noise and shadow flicker impacts in accordance with performed modelling; and ice throw risk envelope, defined conservatively as a radial distance from each WTG based on turbine dimensions and risk assessment assumptions, within which access restrictions and safety measures apply.
Land use	Defined as the land that may be temporary/permanently used by the Project. This includes the area of land acquired under a lease agreement for the WTGs, construction of access roads, the substation and for installation of the transmission line. Temporary areas may include working areas for the storage of materials, etc. Permanent areas of land include land required for the access roads, WTG installations and transmission lines, etc.	Defined as the area occupied by the WTG foundations, substation and where land-use restrictions will be enforced immediately surrounding the WTGs (if applicable), or along buried cables where the use of agricultural machinery shall not be possible, and land occupied by internal access roads. In addition, land use restrictions shall be in force either side of the transmission line.
Public infrastructure	Defined as the specific locations where modifications and impact to public infrastructure need to be made to ensure the safe passage of the WTGs being transported along the public road network as extra-wide/heavy loads. This includes raising pedestrian bridges, relocation of lighting poles, temporary road closures.	Same as construction if WTG components require transportation to the Project site.
Employment & other expectations of the Project.	Defined as the area where nearby communities are present, and residents expect to benefit (in various ways) from the project. This could include, for example, where preferential access to employment opportunities shall be offered, beneficiaries of a Community Development Plan and other initiatives.	Same as construction.
Procurement & the generation of energy	Defined as the geographical area within which Small Medium Enterprises (SMEs) are based at, who may be used during construction for the procurement of goods and services.	Same as construction.

Definition of the Area of Influence by Environmental & Social Topic Area		
<p>Overhead lines (OHL), cables, SS</p>	<p>According to the Resolution of CMU No654 of 02.06.2021 and CMU №1455 of 27.12.2022:</p> <ul style="list-style-type: none"> - Protective zone alongside OHL 110 kV - 20 m on both sides from the line; - Protective zone alongside OHL 35kV - 15 m on both sides from the line; - underground cables- 1 m on both sides - SS - 3m from the site limits. 	<p>Same as construction.</p>
<p>Rivers protected zones</p>	<p>According to the Art. 88 of the Water Code of Ukraine, the following protection zone are established on both banks of rivers and around water bodies:</p> <ol style="list-style-type: none"> 1) for small rivers and streams, as well as ponds with an area of less than 3 ha - 25 m.; 2) for medium-sized rivers, reservoirs on them, as well as ponds with an area of more than 3 ha - 50 m.; 3) for large rivers, reservoirs and lakes on them - 100 m. 	

5.2 Stakeholder Identification

For the purposes of the Project, a stakeholder is defined as any individual or group who is potentially affected by a project or who has an interest in the project and its potential impacts. The objective of stakeholder identification is therefore to establish which organisations and individuals may be directly or indirectly affected (positively and negatively) by, or have an interest in, the Project.

As a part of the development of the public consultation program for the ESIA, stakeholder identification was performed in order to determine all individuals, local communities, organizations, educational, research, and design organizations, and governmental authorities who might be potentially affected by, or might affect the outcome of, the proposed Project. The criteria used in the stakeholder identification process included the proximity of local residents' households to the Project site, the level of potential interest in the Project among federal and local governmental authorities, and local/international NGOs with interest.

The following stakeholder groups were defined during the identification process:

- Government agencies related to the Project's approval and review.
- Non-governmental organizations (NGO's) including Professional associations and Public organizations.
- Local communities.
- Farmers, landowners/users.
- Vulnerable groups.

Stakeholder identification is an ongoing process, requiring regular review and updating of the stakeholder database as the Project proceeds.

A summary of the various stakeholder groups is provided below.

5.3 Stakeholder groups

Regulatory Authorities

National and regional Government agencies are important stakeholders within the Project's engagement process, both as sources of information, and as those issuing the necessary permits for the Project. It is therefore important to engage with all appropriate regulators from an early stage and to maintain relationships with these agencies throughout the Project lifecycle. The following regulatory authorities were identified for consultations:

5. Ukrainian Government Ministries:
 - a. Ministry of Nature Protection and Natural resources
 - b. Ministry of Energy .
 - c. Ministry of Social Policy.
 - d. Ministry of Economy.
 - e. Ministry of Culture and Strategic Communications.
6. Regional State Administration.

Local and District Authorities

[REDACTED]

National and International NGOs

Key national and international NGO stakeholders include:

- Ukrainian Wind Energy Association.
- Agency for Rational Energy Use & Ecology.
- Alliance New Energy of Ukraine.
- National Ecological Centre of Ukraine.
- Environment, People, Law (EPL).
- European-Ukrainian Energy Agency.
- NGO Working Group on Climate Change.
- Birdlife International.

Communities and Community Leaders

Chairmen and Chairwomen of local communities (Village Councils) should be engaged on a continuous basis in a discussion of all aspects of the Project that may impact on their community, lands and other assets. Meetings with these groups will follow local practices and norms and will be held prior to any wider communication in the villages in order to respect existing structures.

Notus will make reasonable efforts to verify that such persons do, in fact, represent the views of affected communities and that they are facilitating the communication process by communicating the information to their constituents and conveying their comments to Notus, as appropriate.

There are five affected communities immediately surround the Project and previous engagement will continue throughout the project lifecycle.

Residents

The following residents most likely to be impacted by the Project:

- Land users, including farmers and others whose access to land may be disrupted by the Project.
- Households located in the zone of shadow flicker impact.
- Households or land users located in areas susceptible to increased dust levels.
- Households or communities located along transport route who may experience disturbance, increased noise and nuisance and health and safety impacts.

Agricultural Companies and Agricultural Land Users

Agricultural companies, farming enterprises, and other organised land users represent a distinct and important stakeholder group due to the agricultural character of the Project area. These stakeholders may hold land lease agreements, conduct commercial farming activities, or rely on continued access to agricultural land within or adjacent to the Project footprint.

Engagement with agricultural companies will focus on land access arrangements, construction scheduling, reinstatement of land following works, protection of topsoil and drainage systems, prevention of crop damage, and maintenance of safe access for agricultural machinery during

construction and operation. This group will also be consulted regarding any temporary or permanent land-use restrictions associated with turbine locations, access roads, underground cables, and overhead lines.

Vulnerable Groups

The following groups were identified:

- Single parent families, families with low income and / or a number of children as they have many dependants, and household income has to provide for all members of the household.
- The disabled who often require additional support for daily living, and access to high-quality health care facilities.
- The retired, elderly and those in ill-health who often require additional support for daily living, and access to high-quality health care facilities.
- Unemployed, including young people.
- Military veterans.

5.4 Stakeholder engagement up to date

A series of stakeholder engagement activities have been performed to date since start of the Project development and have covered the scoping phase. More detailed information on the engagement activities performed to date is provided in tables below:

Table 5-1 : Summary of Stakeholder Engagement in 2020

Date	Attendees	Key Discussions
06 July 2020	District representative from [REDACTED] rural council	<p>Recent improvements to the village asphalt road networks have economically benefited agricultural farmers and industry. However, availability of efficient and reliable public transport, the poor condition of minor roads, and a lack of shops and markets are still issues of concern to local residents. [REDACTED] rural council requires a landfill to improve their waste management arrangements.</p> <p>The best way for the wind developer to support the district would be to invest in public transport.</p> <p>Agriculture is the main economic activity, and smaller activities include hunting (including illegal hunting), and the collection of scrap metal.</p> <p>The rural council is trying to provide 120 military veterans a plot of land which they are entitled to but unfortunately there are no available land plots.</p> <p>Some local residents experience hardship due to their low income. Vulnerable people include households with many children.</p> <p>The rural council believes that it is unlikely that people will move into the project area during construction seeking work as the area is located [REDACTED] which is a significant distance.</p> <p>Local people in the rural council are generally not interested in the development of the wind farm as they do not see any direct benefits to themselves.</p>

Date	Attendees	Key Discussions
08 July 2020	District representative from [REDACTED] rural council	<p>The rural council has the largest population in the district and the poorest population. Key local challenges are the poor quality of local roads and inadequate street lighting. There are no locally active NGOs or civil society groups. Hunting is practiced locally although it is not widespread and is illegal.</p> <p>Some local people are in dispute with each other and this is, according to the rural council, due to a high rate of alcoholism. Other problems are caused by occasional heavy rainstorms.</p> <p>According to the rural council, it is unlikely that people will arrive into the area during construction seeking employment as they are located far from the city.</p> <p>The representative estimated that 50% of the people support the Project, as some do not believe in renewable energy. This could be due to a lack of education and awareness associated with the potential of this energy resource to provide a significant contribution to the energy mix.</p>
09 July 2020	District representative from [REDACTED] rural council	<p>One of the main economic activities for the residents is their involvement in the vegetable processing sector which involves the production of tomato juice.</p> <p>Slowly, economic conditions across the rural council as a whole are improving due to the investment of street lighting and the creation of small businesses. Key challenges remain a lack of investment and more is still needed.</p> <p>Local people are not particularly interested in the Project as the overhead transmission line passes through the boundary of the village and there are no nearby WTGs to people's houses.</p>
06 July 2020	Community representative from [REDACTED] rural council	<p>The main feature of [REDACTED] river which flows through the village. The main challenge is a lack of investment in roads. Hunting takes place in small numbers in the region.</p> <p>Retired people are often vulnerable as they typically have a low level of income.</p> <p>There are no locally active NGOs or civil society organisations. Local people are not in conflict with each other.</p> <p>There is no significant support for this Project as the investment has been discussed for a long time and little has happened.</p>

Date	Attendees	Key Discussions
08 July 2020	Community representative from [REDACTED] rural council	<p>The main feature of [REDACTED] is the extensive agricultural lands and [REDACTED] river. Community needs include improvements to the road networks and assistance to remove silt and other debris from the river. There is a school and a cemetery in the middle of the village.</p> <p>There are no locally active social organisations and few conflicts between people. One of the key challenges local people face is the seasonality of labour demanded from the agricultural sector, where there are many months without any work.</p> <p>Local people are generally in favour of the Project as it is expected to generate economic growth and employment. There are older people who believe in rumours and do not currently provide their support, these may be linked to the perceived impacts to people's health.</p> <p>The best way the Project developer could engage with local people is to hold public meetings where many people will attend. This will promote open discussion and transparency</p>
09 July 2020	Community representative from [REDACTED] rural council	<p>The rural council covers a large population and economic activities are dominated by a major agricultural firm [REDACTED]. Recently, new shops and market stalls have opened which is encouraging. The main needs of the community comprise a social/cultural house for local events to take place, repair of a rural health post and repairs to the local kindergarten.</p> <p>Some local hunting takes place and fishing occurs along the river. There are no local conflicts between people associated with land or other issue.</p> <p>Vulnerable people include disabled persons as they are often unable to work. There is a possibility that local people arrive into the area during construction seeking work. Overall, people are neutral towards the Project. The Project developer should engage with local people using social media and also through the rural council.</p>
07 July 2020	Affected farmer from [REDACTED]	<p>The affected farmer lives 15 minutes drive from this land where cereals and oil crops are cultivated. His fields are not irrigated. Crops are transported to the market using his own truck and rented vehicles.</p> <p>Farming livelihoods have become harder due to climate change and there is an increasing need to apply more fertilisers. There are occasional conflicts between farmers, and these are resolved without the involvement of the courts. Local people use the land within the Project Area for the hunting of animals, including pheasant, quail, duck, goose and rabbits.</p> <p>Women are involved in agricultural activities approximately 10% as it is manual work mostly. The farmer does not support the Project as it is an expensive way to generate energy and will generate sound, some of which the human ear cannot detect. This may cause health impacts.</p>

Date	Attendees	Key Discussions
06 July 2020	Affected farmer from [REDACTED]	<p>The affected farmer lives 15 minutes drive from this land where cereals and oil crops are cultivated. His fields are not irrigated. Crops are transported to the market using his own truck.</p> <p>Farmers are involved in a social collective organisation: the [REDACTED]Climate change has modified the recent practice of farming, whereby seeds are sown earlier, the harvest is earlier in the year and there is an increasing need to apply fertilisers. There are occasionally conflicts over land and these are solved through the court system. Other economic activities undertaken include hunting and the collection of scrap metal.</p> <p>The Project will result in a land plot becoming inaccessible which is an economic loss although the farmer supports the Project as it will generate green energy. The wind farm should have been constructed many years previously.</p>
10 July 2020	Affected farmer from [REDACTED]	<p>The affected farmer lives 5 minutes drive from this land where cereals, vegetables, berries, and technical crops are cultivated. His fields are irrigated through a network of hoses connected to a water source. Crops are transported to the market using his own truck.</p> <p>The farmer is a member of a vegetable growers association which is based in [REDACTED]. In the last five years, agricultural livelihoods have become harder due to a lack of investment in road infrastructure. Hunting and tourism activities also occur locally.</p> <p>Women are involved in agricultural activities and drive tractors, work as accountants and undertake manual labour as well.</p> <p>The farmer does not support the Project as it will generate electromagnetic fields that will cause health effects.</p>
08 July 2020	Female from an affected farmer household from [REDACTED]	<p>Household tasks undertaken only by women include looking after the children, cooking, buying goods for the household and cleaning. Tasks undertaken just by men include making decisions on the types of crops to cultivate, and when to apply fertiliser.</p> <p>Employment opportunities in the district are generally equally available to both men and women. Women will have an equal voice in relation to how any future compensation owned to them, will be spent, should the household be eligible for compensation.</p> <p>It is unclear how the Project will benefit local women. Vulnerable people include retired persons as they typically have a low income. There is no violence against women in the local community and state welfare services provide support, if a violent incident were to occur.</p> <p>The female does not support the Project as it will result in negative impacts to health and damage the condition of local roads.</p>

Date	Attendees	Key Discussions
06 July 2020	Female from an affected farmer household from [REDACTED]	<p>Household tasks undertaken only by women include looking after the children, cooking, buying goods for the household, cleaning and working in formal waged employment. Women find employment in local schools, health posts, kindergartens, etc. Local women’s skills include cooking Ukrainian cuisine.</p> <p>Employment opportunities in the district are generally equally available to both men and women. Women have an equal voice in relation to how any future compensation owned to them, will be spent.</p> <p>Vulnerable people include disabled persons and alcoholics as they are not supported by the government.</p> <p>Many local women support the Project as it is expected to generate investment and local employment, improving local budgets of the rural council. However, some women are afraid of new technologies and the potential health impacts.</p>
09 July 2020	Female from an affected farmer household from [REDACTED]	<p>Household tasks undertaken only by women include looking after the children, cooking, buying goods for the household, and cleaning. Local women’s skills include bead weaving and flower planting and arranging.</p> <p>Employment opportunities in the district are generally equally available to both men and women. Women have an equal voice in relation to how any future compensation owned to them, will be spent.</p> <p>Vulnerable people include disabled people as they are not supported enough by the government. Overall, women support the Project as it involves the development of green energy. There are no Project impacts that are expected to occur differently between women and men.</p> <p>The best way for the Project Developer to support the local community is through providing funds to repair local cultural houses and organise recreational activities for local residents.</p>

Table 5-2: Stakeholder Engagement Activities Completed in 2025

22 January 2025	CECA consultants, Notus representatives, Authorities of [REDACTED]TCs	<ul style="list-style-type: none"> • Project Status & Stakeholder Perception: No objections to the project were raised, but local authorities expressed regret over delayed construction. • Concerns about [REDACTED]criticized the project owner for failing to meet Social Agreement commitments due to reduced green tariffs, leading to insufficient financial support for community projects. • Demographic & Social Issues: Communities are experiencing a declining population, including children, due to migration abroad after the war began in 2022. • Labor force shortages pose a significant challenge, with workplace automation seen as a potential solution. • Alcoholism remains a persistent social issue affecting local communities.
23 January 2025	CECA consultants, Notus representatives, [REDACTED]	

		<ul style="list-style-type: none"> • Agriculture & Economy: The majority of residents engage in agriculture and gardening, with greenhouse farming (especially tomatoes) being common. • Farming was severely affected by droughts in 2020 and 2021. • Soil salinity is another key challenge impacting agricultural productivity. • Coastal communities rely on tourism-related services, while residents of [REDACTED] are primarily employed in servicing the port of [REDACTED]. • Waste Management & Environmental Concerns: No waste sorting is currently conducted in the local communities. • Following the amended Law of Ukraine “On Waste Management” (2022), non-compliant landfills are being decommissioned and recultivated. • The [REDACTED] Landfill remains the only viable waste disposal option for these communities. • No objections to the project were declared but local authorities expressed regret about delayed construction.
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Stakeholder engagement activities were completed in line with the national regulatory requirements during preparation of Detailed Plan of Territory (DPT) (2012), Environmental Impact Assessment (EIA/OVD) (2019) and EIA (2023) and updated ESIA (2025). EIA (2023) to the updated project was unanimously supported by all stakeholders. The community views became more in favour of the Project as a result of the ongoing war and frequent electricity shutdowns and blackouts.

Table 5-3: Summary of Stakeholder Engagement under National Regulation

Date	Key Discussions
EIA (2019)	Public hearings on the discussion of the Environmental Impact Assessment (EIA) Report for the planned activity took place on [REDACTED]. During the public discussion of the EIA Report, including throughout the public hearings, no proposals or objections were submitted by the public to the Department of Ecology and Natural Resources of the [REDACTED]
EIA (2023)	<p>During the public consultation period, three public hearings were held to discuss the Environmental Impact Assessment (EIA) Report for the project. These hearings took place on [REDACTED]AM via video conference.</p> <p>The hearings were conducted in accordance with Clause 3 of the Procedure for Public Hearings in the Environmental Impact Assessment Process, approved by Resolution No. 989 of the Cabinet of Ministers of Ukraine on December 13, 2017, and amended by Resolution No. 967 on September 8, 2023. Due to the ongoing martial law in Ukraine, all public hearings were conducted in a virtual format.</p> <p>The public discussion process covered all stages of the Environmental Impact Assessment (EIA) procedure. The initial public discussion on the scope of studies and level of detail required for the EIA Report lasted 20 working days from the official publication of the project notice. This phase began on [REDACTED]</p> <p><i>Written Comments and Proposals from the Public</i></p>

	<p>During the public consultation period, the Ministry received comments and proposals from the public regarding the planned project, the scope of studies, and the level of detail included in the EIA Report. These submissions were primarily made by the Ukrainian Environmental Protection Group (NGO). The Ministry reviewed these inputs and provided their responses, indicating whether each suggestion was fully accepted, partially accepted, or rejected with justification.</p> <p>Additionally, the report states that no further comments or proposals from the public were received regarding the EIA Report itself.</p>
DPT (2024)	<p>[REDACTED]</p> <p>The purpose of the plan was to develop, construct, operate, and maintain renewable energy facilities, including wind and solar power stations, along with the necessary infrastructure.</p> <p>[REDACTED]. There were no representatives from the public.</p> <p>[REDACTED]Eighteen plots have been allocated for energy equipment, with land use designation changes from agricultural to industrial.</p> <p>Several restrictions and adjustments were noted. The Department of Culture, Nationalities, Religion, and Cultural Heritage Protection identified burial mounds near but not within the project area. The maximum equipment height was increased from 200 meters to 250 meters following investor recommendations. Fire safety measures include additional water storage tanks on access roads. Since the site will not have more than 50 workers at a time, no shelters are required. Despite the limited human presence, a waste disposal site has been included in the plan.</p> <p>The public was duly informed of the public hearing and was provided with the opportunity to participate and submit comments, including the option to provide written comments within the established consultation period following the meeting. No objections, comments, or proposals were received from members of the public during the public hearing or within the subsequent period for written submissions. As a result, the hearing concluded with the approval of the detailed plan, which was recommended for adoption by the [REDACTED]</p>

6 Social impacts and proposed mitigation

Any action of the size and nature of the present Project will not only have a positive impact on its beneficiaries but also has associated risks and affects the wider population of the targeted villages. The below table serves to give an overview of these risks and opportunities. It will allow [REDACTED] (Company)/Notus to plan accordingly and mitigate risks where possible.

All impacts (ecological, environmental, social etc.) and mitigation measure will be provided in Environmental and Social Impact Assessment report.

The impact can be divided in short-term (during construction phase) and long-term effects (after commissioning):

Table 6-1: Possible social impact and proposed mitigation measures

Receptor	Impact	Mitigation
Possible to occur during construction phase		
Construction noise	General nuisance to local population caused by construction activities.	No noisy work between 22pm and 8 am; and during weekends. In case some urgent construction activities arise during nighttime, the normative noise limit will be met - LA equivalent =45 dBA.
Construction workforce	Potential for direct short term negative impacts on a local scale if accommodation for a diverse workforce is not provided	Contractors will be responsible for meeting the labour and working condition requirements.
Air quality	Construction activities will result in fugitive dust	Implementation of Traffic and Transportation Management Plan (TMP) Use of properly maintained vehicles and construction equipment with emission controls and dust suppression measures. Monitor any complaints filed (via grievance mechanism) from local stakeholders as an additional tool to monitor of dust issue
Transport – heavy goods vehicle (HGV) traffic during construction General safety risks from traffic	Impact of Project-related HGV traffic during construction on the existing road. Increased total daily traffic flow on the local road network The increase in HGV traffic during construction presents a risk of accidents. Possible damage to local roads	The Project will monitor the efficiency of deliveries of construction materials to the site and if necessary sufficient storage provision will be made available on site to prevent any delays to the construction process. TMP implementation adhered to in order to reduce risks to drivers, local road users and pedestrians (where applicable).

Receptor	Impact	Mitigation
		<p>Set baseline survey of the conditions of existing roads along construction areas. This will help to assess whether bad conditions, e.g. identified through stakeholder feedback, were pre-existing or can be attributed to the Project.</p> <p>Provide appropriate traffic safety training to all drivers as part of their induction and on an ongoing basis.</p> <p>Proactive project-led monitoring of driver conducts and compliance with traffic management arrangements, supported by regular inspections, supervision, and enforcement of corrective measures where required, with the grievance mechanism used as a complementary feedback channel rather than the primary means of monitoring.</p>
Security	Increased risks to community safety and security are likely as a result of inflow of workers	Ensure that Project security is aware of the Project's goals to establish good relationships with local stakeholders; the grievance mechanism for communities to voice concerns; and security receives human rights and cultural sensitivity training to ensure the respect and protection of the local community.
Health services	Project activities will result in an increase of workforce, which in turn could increase pressure on local health services and infrastructure.	Ensure that all contractors are provided with adequate health care
Alcohol use	Project activities will increase the size of the workforce. This is likely to result in increased demand for alcohol in the area. This could also result in a potential increase in aggression or conflicts between workers and locals/neighbours members.	Enforce and monitor the zero-alcohol tolerance policy, for workers during working hours. Ensure random alcohol testing is conducted for workers entering and leaving the site. Design a system of penalties for anyone found with alcohol within the workers camp or on site.

Receptor	Impact	Mitigation
Injury from construction activities and emergency events	Potential for harm to workers due to accidents related to construction activities and emergency events.	<p>Keep Project site and equipment to pre-defined routes and areas. Use appropriate signage. Inform locals that they should not enter the construction area</p> <p>Develop an emergency response plan ERP.</p> <p>Communicate potential risks and ERP to those potentially most affected by emergency events.</p> <p>Communicate with nearest police, fire and ambulance stations in case of any related accidents.</p>
Employment opportunities	<p>Temporary jobs during the construction phase of the Project.</p> <p>Indirect job creation from service and supply jobs to meet demands from resident workforce.</p>	<p>Communicate employment estimates, timeframes and skills requirements clearly to the locals.</p> <p>Implement a local hiring plan in consultation with community representatives</p> <p>Enhancement measures include:</p> <ul style="list-style-type: none"> Investigate local sourcing and procurement opportunities to promote sustainable small business development.
Local property	Damage of local property, structure, buildings, etc.	<p>Construction activities will be conducted in such a way as to minimise the effects on locals' property.</p> <p>All grievances related to any property damage should be provided through the grievance mechanism, which helps to investigate and assess the reason and responsible party for the damage. Damages due to construction activities should be covered or rectified.</p>
Land use (both temporary and permanent)	Damage of agricultural land	The compensation process is set out in the contract with the farmer and/or landlord.
Possible to occur after commissioning		
Schadow flicker effect ²	Approximately 21 sensitive receptors are expected to experi-	In order to ensure impacts are reduced to below the IFC limit indicated in IFC Wind Farm EHS

² According to international recommendations, the icefall risk zone is calculated using the formula $1.5 \times (\text{tower height} + \text{rotor diameter})$. For our project, this does not exceed 500 metres. At the same time: the nearest residential buildings are located more than 800 metres away and the nearest public road is more than 1,400 metres from the wind turbine

Receptor	Impact	Mitigation
	ence shadow flicker beyond recommended limits, caused by WTGs 6, 7, 26, 27, 28, 30, 32, and 39.	Guidelines, WTGs which are identified as causing shadow flicker impacts shall be fitted with a shadow flicker module. This mitigation would be required for WTGs 6, 7, 26, 27, 28, 30, 32 and 39.

7 Disclosure of Information and Schedule

7.1 Disclosure during Baseline Data Gathering

During the ESIA process, information shall be shared with all stakeholders using culturally appropriate methods with the aim of working towards informed participation and meaningful two-way consultation.

The way in which project information is to be shared comprises the following:

- Verbal summaries during meetings and discussions (held in Ukrainian).
- Questions and answers during meetings and discussions (held in Ukrainian).
- A Project Information Leaflet (English and Ukrainian).
- A Grievance Mechanism Leaflet (English and Ukrainian).
- Videos that show the impact of shadow flicker on the ground using portable tablets.
- Large printed A0 posters (English and Ukrainian).
- Public noticeboards that provide a copy of the large, printed poster (above).
- Messengers (messengers that are quite broadly used by locals)

7.2 Disclosure

The Non-Technical Summary (NTS) and SEP will be published on the Project's official website, (www.notus.de/en) in Ukrainian and in English. The National EIA has been already published on the Ministry of Ecology's official website in accordance with national requirements³.

Notus managers and staff will cooperate with relevant local municipal authorities and departments during project design and throughout the implementation of each Project component.

Notus with the assistance of local municipal authorities and local community councils will ensure that the local population, particularly residents and businesses living or operating in the vicinity of the Project or using land which may be affected are informed about the project. This particularly pertains to the start of construction activities and expected impacts.

7.3 Timetable

Based upon the current ESIA schedule the timetable for disclosure is summarized below:

³ <http://eia.menr.gov.ua/places/view/4112>

- Disclosure of the NTS = May 2026
- Disclosure of the SEP = May 2026

All above mentioned documents will be published on the Project’s official website, in Ukrainian and in English as well information will be placed on information board/ announcement in respective communities’ buildings and announcements in local media. The period of disclosure is 30 days before start of construction phase.

7.4 Other Engagement Activities

Stakeholders will be engaged throughout the implementation process for consultation, information dissemination and grievance management. There will be continuous sharing of Project information with community leaders in order for stakeholders to be informed about construction activities and progress, to minimize grievances, and to manage expectations.

7.5 Methods of Communication

The methods of communication to be utilised during pre-construction and construction phase of the project will include:

- Publication for public review of the SEP and Non-technical Summary.
- Meetings with regulatory bodies.
- Public meetings.
- Published updates on local council website.
- Announcements in local media.
- Provision of general information on noticeboards at key public locations.
- Disclosure of monitoring reports.
- Announcements in wide used messengers by locals.

Table 7-1: Future Stakeholder Engagement Program⁴

Activity	Project Timescales and Frequency	Type of Activity to be Undertaken / Information Disclosed	Forms of Communication
Land acquisition, land use restrictions and land use agreements	Pre-Construction and Construction A new land plot is required for the project needs	Formal meetings and informal personal meetings with landlords and land tenant	Meetings in person and as follow up records of all formal and informal meetings Records shall include: a list of participants, the meeting agenda, all decisions taken, and any agreements reached
Announcement of the Project’s construction phase start.	Pre-Construction Once before start of construction	Continued update on project progress during construction, including introduction and presentations on project schedules and timescales, operations plan, updates to the ESMP, and SEP.	Information board/ announcement in respective communities’ buildings Announcements in local media

⁴ According Law of Ukraine "On the legal regime of martial law" a restriction on public meeting can be applied by local authority

Regular consultation prior during construction and operation phases with farmers and local representative.	Pre-Construction and Construction Constant communication and updates	Updated of local farmers on the construction process.	Farmers notifications to be communicated at on-going meetings Regular update via information boards Constant communication with villages head In person (via Land manager/CLO)
Local community, local cultural heritage authorities and police (in case of human remains to be informed should chance finds be discovered.	Construction Chance find is discovered	Notification to community should chance finds be discovered. Detail regarding chance find to be provided.	As required by law and Chance Find Procedure
Announcement of any changes to construction programme to local residents.	Construction On changes to the construction programme	Details of any future changes to proposed construction programme including proposed work on local roads and transportation programme for major components	Internet – company website. Local newspapers/radio. Information board/announcement in respective communities’ buildings. Distribution of information leaflets to local residents.
Announcement of the Project’s commissioning and start-up.	Before start of operational phase Once before commissioning and start-up	Formal notification of operation of the Wind Farm	As soon as possible after commissioning, if not before: Internet – company website. Local newspapers/radio. Information board / announcement in respective communities’ buildings. Constant CLO presents and communication
Provision of Project information via information boards	Construction / Operation Once per three months during construction phase Once per year during operation phase	Information board to be installed at Project site entrance with key Project information and Project contact details.	Information boards
Bird and bat surveys	Construction / Operation Once per year	Publication of bird and bat survey undertaken during construction and monitoring results undertaken during operation on an annual basis.	Internet – company website. In line with EIA Monitoring requirements.

Monitoring indicator for checking implementation of the SEP.

Table 7-2: Monitoring indicator for SEP implementation

Area	Indicators
Information Disclosure	<ol style="list-style-type: none"> 1. Number of public information sessions 2. Availability of project information on website and in local notice boards 3. Number meetings with farmers
Stakeholder Coverage	<ol style="list-style-type: none"> 1. Percentage of identified stakeholder groups reached (e.g., local residents, farmers, local authorities, NGOs) 2. Number of vulnerable/at-risk stakeholders consulted (e.g., elderly, minority groups, women-led households – especially during war time)
Quality of Engagement	<ol style="list-style-type: none"> 1. Percentage of meetings with interpretation services provided for non-dominant language speakers 2. Stakeholder feedback on clarity and usefulness of information provided
Grievance Mechanism	<ol style="list-style-type: none"> 1. Number of grievances received per month (construction noise, dust, traffic, land access, employment, human rights concern, harassment (including sexual harassment), discrimination, retaliation for raising a grievance etc.) 2. Percentage of grievances that are recurrent

8 Internal and External Resources and Responsibilities

In relation to the implementation of the SEP, [REDACTED] (Company) /Notus shall be responsible for the following:

- Approval of all documentation containing project information that will be used for stakeholder engagements, before they are used.
- Approval of the content of this SEP and any subsequent revisions.
- Operation of the grievance mechanism.
- Providing information to stakeholders using the disclosure materials.
- The practical and logistical organisation of all stakeholder engagement activities including contacting stakeholders to arrange meeting times/locations.
- The preparation and issuing of all stakeholder engagement invitation letters.
- Attendance/facilitation of all stakeholder engagement meetings/discussions, including room meeting bookings, refreshments, and the recording of all results and issues raised.
- Generating an accurate record of all stakeholder engagement activities and noting any future actions required.

9 Grievance Mechanism

The purpose of this section is to describe the grievance mechanism to be used to receive and facilitate the resolution of a third-party or Affected Communities' concerns and grievances about the Project during preparation of the ESIA.

The grievance mechanism aims to resolve concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible, at no cost and without retribution to the party that originated the grievance. The mechanism has been designed so that it does not impede access to a future judicial or administrative process and guarantees the confidentiality of the person/group raising the grievance.

Details of the grievance mechanism specifically designed for this project shall be disclosed through distributing paper copies of the Grievance Mechanism leaflet (provided below in chapter 9.7) during all stakeholder engagement activities. Contact details should also be placed on the public posters and on printed posters used during the meetings.

9.1 Key Performance Indicators

The following performance indicators have been developed for the grievance mechanism:

- Usage – the target is for all grievances (100%) to be channelled through the grievance mechanism before the concerns of Affected Communities are raised to another party, such as the environmental regulator or media outlets.
- Number – the total number of grievances received during each month shall be closely monitored to identify trends.
- Type – the number of grievances associated with categories associated with the results of the census and asset inventory survey valuation, etc.
- Gender – the gender of the person raising the grievance shall be recorded.
- Resolution targets - the target is for at least 80% of grievances to be resolved within a period of 15 calendar days, starting from the date the grievance was recorded. All appeals should be fully resolved within a further period of 15 calendar days, starting from the date the initial response was provided.
- Reoccurrence – the target is to reduce the number of grievances that are focused on similar issues over time through improvements in environmental and social performance.

9.2 Scope

The grievance mechanism is designed to be used by a third-party or an Affected Community in relation to any issue associated with the Project.

The grievance mechanism is accessible to all stakeholders. Assistance will be provided to illiterate persons, persons with disabilities, or vulnerable groups, including the option to submit grievances verbally or with support from Project staff. Alternative formats and assistance will be provided upon request.

9.3 Roles and Responsibilities

Notus has a designated CLO and E&S Manager they both will be responsible for (depending who will be present on the construction site or backup each other):

- Receiving and logging grievances.
- Processing grievances.
- Suggesting ways to resolve the grievance in coordination with Notus senior management and other relevant parties.
- Communicating Notus response to the complaining party and recording that a response has been communicated.
- Monitoring and ensuring compliance with the general processes established in the grievance mechanism, including issues associated with confidentiality.

Notus acknowledges that local authorities may receive grievances related to the Project. While local authorities may assist in facilitating communication, they will not act as a filter or decision-making body within the grievance mechanism. All grievances, irrespective of the channel through which they are received, will be registered, assessed, and managed directly by the Project Company through the CLO and E&S Manager.

9.4 Recording and Logging Grievances

A written and/or verbal complaint will be recorded by the Notus CLO and E&S Manager using the electronic grievance log and paper record form, noting the following information:

- Complaint's name, community name, address of residence/business.
- Date, time, and place where the complaint was received.
- Description of complaint and any third parties (including key contractors) involved.
- The preferred means of future communication with the person making/leading the grievance during the future resolution process.

A template grievance log and paper record form are provided. The CLO and E&S Manager will maintain all records in confidence by ensuring that paper records are kept stored in a locked file, and that a secure password is used to keep electronic records confidential.

Grievances related to human rights, harassment, discrimination, or retaliation will be treated as sensitive cases. Such grievances will be handled with enhanced confidentiality, restricted access to information, and in line with survivor-centred principles. Complainants will be informed of available support services, including legal, medical, or psychosocial assistance, where appropriate.

The grievance log (Appendix B) will be used to record, on an ongoing basis, grievances as they are reported, evaluated and resolved and will be electronically stored on the companies' computer network.

9.5 Analysis of Grievances

The CLO and E&S Manager, after recording the information correctly, communicate with the person who raised the grievance to learn as much as possible about the case. It will be important to

listen attentively to the person in order to reflect the fact that Notus takes grievances seriously, and to try and build a positive relationship with the person at the start of the resolution process.

Thereafter, the CLO and E&S Manager will take responsibility to discuss the case with other personnel in the organisation and other parties, as applicable, and propose a resolution response.

The CLO and E&S Manager will subsequently communicate the response to the person/group raising the grievance with the aim of resolving the issue. The target response time from the date a grievance is received until a resolution response is sent back to the person/group is 15 calendar days. A determination will be made if any modifications are required to working procedures to prevent a reoccurrence of the same grievance rising again.

Before the grievance can be closed out and considered to be 'resolved' the CLO and E&S Manager will check with the person/group that raised the grievance that they are satisfied with the response provided. The person/group representative will be asked to sign the paper record form indicating that they are satisfied with the response. If they are not satisfied, then they have the right to appeal the decision (see below).

9.6 Right of Appeal

If the person/group raising a complaint is not satisfied with the initial response and wishes to continue the complaint, they have the right to appeal. For all appeals, details of the grievance will be passed to a third-party (neutral) organisation contracted by Notus (such as a consultant, representative of an NGO, etc.) who will give a recommendation on how to resolve the case and will attempt to resolve it through mediation. The target date for resolving appeals is a further 15 calendar days, starting with the date the initial response was sent by Notus.

In the event that the claimant does not accept the recommended solution from the second review, the case (including all the documents connected with the grievance) will be passed back to the claimant so that they are free to pursue a legal or other form of administrative process.

9.7 Grievance Mechanism Leaflet

Notus has developed a grievance mechanism, which aims to receive and resolve concerns and grievances among affected communities about the Project. The grievance mechanism seeks to resolve concerns promptly, using an accessible and transparent consultative process. The purpose of this leaflet is to describe how you are able to make a grievance, how we record the information about the grievance, our investigation procedure, and how you will hear back from us with a proposed response and resolution.

Any person, group or other type of stakeholder can contact us and raise a grievance. However, the grievance must be related to any activity associated with the Project. You can submit a grievance by depositing a grievance in a suggestion box (company office) by phone, letter, through our website, email, or in person, by contacting the person below:

CLO

Email: mykola.berzabint@notus.ua

Cell phone: +380677831741

E&S Manager

Email: info@notus.ua

Cell phone: +380676212228

Physical address: 04071 Kyiv, 58 Yaroslavskaya St., block B

Physical address: 04071 Kyiv, 58 Yaroslavskaya St., block B

Any written and/or verbal complaint will be recorded by the CLO and/or E&S Manager, and potentially other Notus representatives. The following information shall be requested from you:

- Your name, community's name or occupation, and your preferred contact details.
- The date, time, place where the complaint was received and means of submission (i.e. paper grievance form, website grievance form, verbally, phone, etc).
- Description of complaint which may include any third parties (such as a construction contractor).
- Your preferred means of future communication (phone number, email) so that we can contact you in the future.

The information you provide our CLO and E&S Manager will be recorded in a grievance log. However, you are not obliged to provide your name and can place your complaint anonymously if you do not wish to disclose your identity.

After you have submitted a complaint, the CLO and E&S Manager who receives a grievance may follow up with you to ask you to provide more details about the grievance. When your grievance has been placed and details about your complaint have been recorded, the CLO and E&S Manager will discuss and investigate the case with other Projects personnel and other parties, as applicable. During this process, the CLO and E&S Manager will assess the significance of the grievance and investigate. The CLO and E&S Manager will provide you with updates during the investigation.

A response to the grievance will be developed by the CLO and E&S Manager within 15 calendar days after receiving the complaint and respond to you in writing. You will be notified about the proposed action taken to resolve the grievance and provide any clarifications required.

The CLO and E&S Manager will ask you if you are satisfied with the final response or if further action is needed. If you believe the problem has not been resolved by the response, the CLO and E&S Manager will re-assess your grievance.

You also have the right to appeal our final decision. If you wish to appeal then Notus shall invite the services of an independent party (such as an NGO or civil society group) and ask them to provide one, or more, representatives to help mediate the dispute. During the mediation process, Notus shall pay all reasonable costs incurred and you will not be asked for any money. The objective of the mediation process is to reach a mutually acceptable resolution of the grievance. The grievance will be considered closed only once the proposed resolution has been implemented to the satisfaction of the affected party and confirmation of satisfactory implementation has been obtained by the Project, as applicable.

At any time during the grievance resolution process, you can seek independent legal advice. If you wish to do so, Notus will provide support in introducing you to an independent legal advisor (if you request help with this) and may pay for reasonable costs incurred.

Information on the grievance mechanism is publicised through stakeholder meetings, printed leaflets, posters at public locations and the Project office, and the Project website to ensure all stakeholders are aware of how to access and use the mechanism.

Appendix A. Grievance Mechanism Leaflet

Notus aims to resolve grievances as soon as possible and has implemented a grievance mechanism specifically for the Libental Wind Farm Project. The purpose of this leaflet is to describe how you can make a grievance, how we record the information about the grievance, our investigation procedure, and how you will hear back from us with a proposed resolution response.

Any person, group or other type of stakeholder can contact us and raise a grievance. However, the grievance must be related to any activity associated with the Project

To contact us about a grievance about this project please use the following details below:

NOTUS:

CLO	E&S Manager
Email: mykola.berzabint@notus.ua	Email: info@notus.ua
Cell phone: +380677831741	Cell phone: +380676212228
Physical address: 04071 Kyiv 58 Yaroslavskaya St., block B	Physical address: 04071 Kyiv , 58 Yaroslavskaya St., block B

Any written and/or verbal complaint will be recorded by the Notus CLO and E&S Manager, and potentially other Notus representatives. The following information shall be requested from you:

- Your (or your group's) name and address (community name) and full contact details.
- The date, time, and place where the complaint was received.
- Description of complaint which may include any third parties (such as a construction contractor) and when and where the problem occurred.
- Your preferred means of future communication so that we can contact you in the future.

The information shall be incorporated into a grievance log and paper record. Notus CLO and E&S Manager will maintain all records in confidence by ensuring that paper records are kept stored in a locked file, and a secure password shall be used to keep electronic records confidential.

Notus CLO and E&S Manager who receives a grievance will contact you to learn as much as possible about the grievance. Thereafter, the Notus CLO and E&S Manager will take responsibility to discuss the case with other personnel in the organisation and other parties, as applicable, and propose a resolution response.

The CLO and E&S Manager will subsequently communicate the resolution response to you within a period which we hope will be less than 15 calendar days. Before the grievance can be closed out and considered to be 'resolved' the CLO and E&S Manager will check with you to ensure your satisfaction with the response and ask you to sign the paper form to confirm that the grievance is now resolved. However, if you are not satisfied then you have the right to appeal.

For all appeals, details of the grievance will be passed to a third-party (who is neutral such as a consultant, representative of an NGO, etc.) who will examine the case and provide a recommendation on how to resolve the outstanding issues, potentially resolving through discussion. The target date for resolving appeals is a further 15 calendar days starting with the date the initial resolution response was sent by Notus.

In the event that you do not accept the recommended solution from the second review, the case (including all the documents connected with the grievance) will be passed back to you so that you can use this information to pursue a legal, or any other form of administrative process.

Appendix B Grievance log

Colour coding	
Ongoing	
Closed-out	
Appeal process	

		Recording Actions				Response Actions				Preventing Reoccurrences
Grievance Ref No.	Status (see colour code)	Date received	Identify of the person/group raising the grievance	Summary of the grievance	Identity of other parties involved (contractors, etc.)	Response / actions taken (i.e. compensation, meeting, etc.)	Date and type of response actions (i.e. letter, phone call, etc.)	Has the satisfaction of the response been checked?	Paper record form completed?	Description of the actions taken to prevent a recurrence (i.e. change in working procedures, etc.)
1										
2										

Annex Grievance registration form (example)

Reference no. _____	
Full name	First name _____ Last name _____
Note: you can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent	<input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact information	<input type="checkbox"/> By post: please provide mailing address: _____ Please mark how you wish to be contacted (mail, telephone, email) _____ _____
	<input type="checkbox"/> By telephone: _____ _____
	<input type="checkbox"/> By email _____
Preferred language for communication	<input type="checkbox"/> [Insert relevant languages] [Insert relevant languages] <input type="checkbox"/> Other language or preferred, please state: _____ <input type="checkbox"/>
Description of incident or grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of incident/grievance	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> Ongoing (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Signature of complainant: _____ Date: _____	
Grievance received by: If received by project/company representative/other party please complete	Name of person receiving grievance: _____ Position of person receiving grievance: _____ Signature: _____ Date: _____
Please return this form to: [name], [position for example, grievance officer], [company name], Address _____: Tel.: _____ or Email: _____@_____.com	
COPIES:	
<input checked="" type="checkbox"/>	Complainant
<input checked="" type="checkbox"/>	Recipient/grievance officer
<input checked="" type="checkbox"/>	File record copy