

Stakeholder Engagement Plan

Elk Battery Energy Storage System (BESS) Project, Greenvolt Power, Poland

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Acronyms and Abbreviations

Acronym	Description
BESS	Battery Energy Storage System
CESMP	Construction Environment Social Management Plan
CLOs	Community Liaison Officer
DC	Direct Current
EBRD	European Bank of Reconstruction and Development
EHSS	Environment, Health, Safety and Social
EIA	Environmental Impact Assessment
E&S	Environment and Social
ESAP	Environmental, Social Action Plan
EU	European Union
GBVH	Gender-Based Violence and Harassment
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
HR	Human Resources
H&S	Health & Safety
IFC	International Finance Corporation
IPP	Independent Power Producer
NGO	Non-Governmental Organisation
NTS	Non-Technical Summary
PAP	Project Affected Person
PRs	Performance Requirements
PSs	Performance Standards
PSE	Polskie Sieci Elektroenergetyczne S.A.
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
TMP	Traffic Management Plan

1. Introduction

This Stakeholder Engagement Plan (SEP) provides a framework for Greenvolt Power (“Greenvolt”) to engage stakeholders throughout the construction and operation of its battery energy storage system (BESS) project at Nowa Wieś Ełcka (the Ełk site).

The SEP is a live public document that sets out the commitments of Greenvolt relating to stakeholder engagement, consultation and disclosure activities in relation to its BESS site.

The SEP will be reviewed and updated regularly as the Project progresses, incorporating any changes and development in Project activities and impacts as well as newly identified stakeholders.

The the Ełk site is one of two BESS sites being developed in northeaster Poland by Greenvolt Power, with the other at Turośń Kościelna (“Turośń” or “TK”) near Białystok.

2. Objectives of the SEP

The SEP is designed to guide a timely, inclusive and effective approach to ongoing engagement with Project stakeholders and affected communities in line with international standards. Through effective engagement, the Project will:

- Disclose relevant and accessible information in a timely manner and keep stakeholders informed of Project progress, activities and impacts;
- Manage Project impacts, informed by stakeholder input;
- Promote opportunities for stakeholders to participate in consultation and have a say on Project matters;
- Report to communities on how impacts are being managed and their feedback incorporated into decision making;
- Identify opportunities to share benefits with stakeholders and affected communities in meaningful ways; and
- Promote the community grievance mechanism so that grievances can be effectively managed.

3. Scope of the SEP

This SEP relates to Greenvolt’s operations at the Ełk site, including contractor activities and defining how stakeholder engagement will be undertaken throughout the Project lifecycle. The SEP includes:

1. **Introduction:** Describing the purpose and scope of the SEP;
2. **Project overview:** A description of the project site and current status of the development;
3. **Legislation and Policy Framework:** Outlining national, international and lender requirements and how they relate to the Project;

4. **Stakeholder identification and analysis:** Identifying, mapping and assessing affected parties and other interested stakeholders, including how they may be affected by or interested in the Project (including vulnerable groups / individuals);
5. **Stakeholder engagement undertaken to date:** A summary of the engagement undertaken to date with landowners, neighbours, nearby communities and local authorities and other key stakeholders;
6. **Stakeholder engagement programme:** Including appropriate methods, tools and timeframes to meaningfully engage stakeholders and affected communities as well as processes and avenues for receiving and responding to communication and queries from stakeholders;
7. **Grievance Redress Mechanism:** A description of the community grievance mechanism and procedures for receiving and handling grievances; and
8. **Monitoring, Reporting and Responsibilities.**

This SEP is accompanied by a Non-Technical Summary (NTS) document which highlights the Project's main environmental and social risks and impacts along with the corresponding mitigation measures.

4. Project Description

What is a Battery Energy Storage System (BESS) Project?

Battery Energy Storage Systems (BESS) are devices that store energy in batteries. BESS technology is increasingly being used to support the growth in renewable energy and address the need to capture and store energy when it is in abundance, for use when renewable sources are producing less energy. They are designed to balance supply and demand and support the reliability of the electricity grid. Energy is collected from the grid or a power plant and stored. Figure 1 below shows an example of a BYD BESS Unit. BYD will supply BESS units to the Project at both sites.



Figure 1: BYD BESS Unit: Source – BYD product page

Project Rationale

The Polish government has acknowledged the growing role of energy storage within the National Energy and Climate Plan (NECP) which was resubmitted in March 2024. The plan does not set out specific BESS related targets, but it identifies energy storage as a key enabler for the integration of utility-scale renewable energy into the Polish system. The NECP includes measures to support energy storage development such as market reforms and investment incentives.

In March 2025, Poland's Ministry of Climate and Environment announced a new public aid programme for investments in energy storage infrastructure to enhance the country's storage infrastructure through grants and loans for developers. Projects of 2 MW and above are eligible grants covering up to 65% of eligible costs for small businesses¹. The programme aims to add at least 5.4 GWh of new storage capacity nationally. The Polish energy storage market is subsequently accelerating.

Project Overview

The European Bank for Reconstruction and Development (the "EBRD") and the International Finance Corporation (the "IFC") (together the "Lenders") are considering the provision of financing to Greenvolt to fund the construction of the two BESS projects in northeastern Poland. The two Elk site is at the start of the construction phase. It will include 200 MW capacity, 220kV voltage and a storage capacity of 800 MWh.

The Project is being developed by Greenvolt Power, the Polish subsidiary of Greenvolt Group S.A. which is a Portuguese independent power producer (IPP) and renewable energy company based in Lisbon. The Elk project site is owned by a Special Purpose Vehicles (SPV) Magazyn EE Elk sp. z o.o. The SPV is owned by Greenvolt. The general Contractor is P and Q, a Polish renewable energy contractor and development company based in Bialystok, northeastern Poland.

Project Location

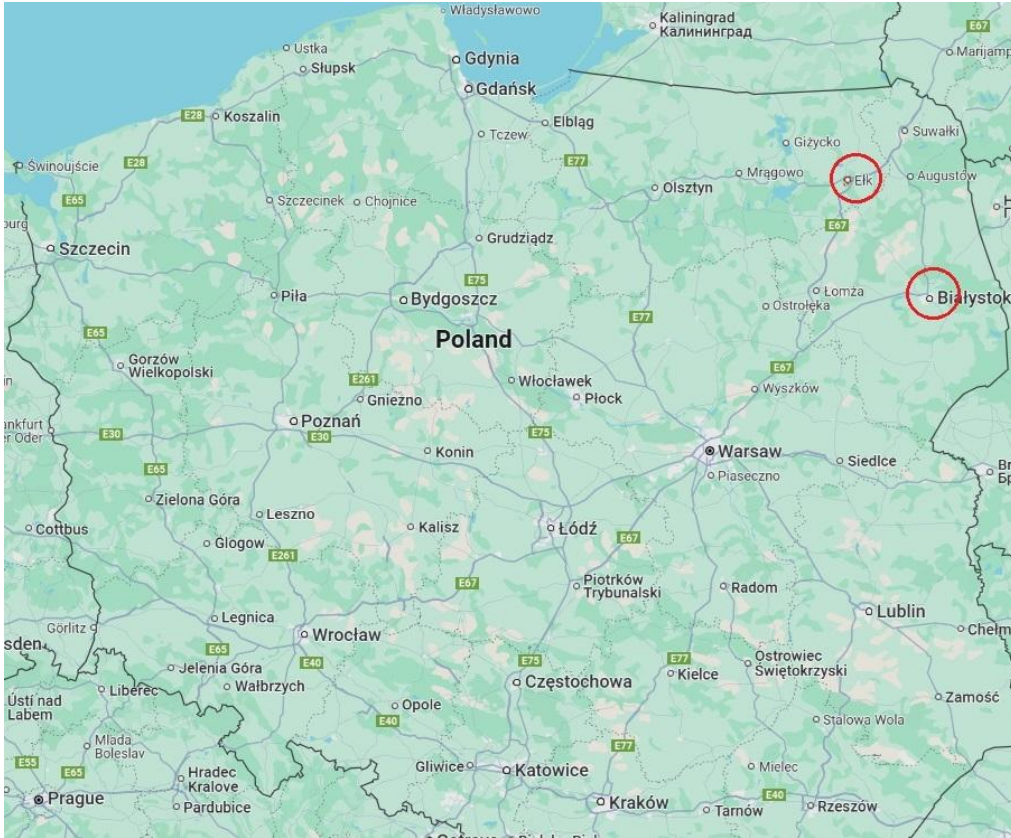
The Elk site is located approximately 7km SE of the city of Elk in Elk County in northeastern Poland. The nearest major settlements to the site and their approximate populations are:

- Nowa Wieś Ełcka (approximately 1,870 residents as of 2021, situated within 1km from the Project site).
- Elk (approximately 64,348 residents as of 2025, situated approximately 7 km from the Project site).

Figure 1 below shows the location of the Elk site, as well as the other site being developed near Bialystok.

Figure 2-4 – Greenvolt BESS site locations in Poland

¹ Strategic Energy Europe: <https://strategicenergy.eu/storage-poland-subsidise-65-projects-2-mw/>



Source: Google Maps

Project Technical Description and Components

BESS projects function to capture and store electrical energy within rechargeable battery cells for later use. The battery cells are Direct Current (DC) devices that discharge electrochemical energy as required and this can be used to meet peaks in demand, balance the grid and stabilise supply during shortages and surpluses.

The Elk site will have the following key components:

- A total of 196 BESS units with a total capacity of 200.6 MW, providing 842 MWh on the grid side;
- An on-site 400/110/MV kV substation;
- A temporary Overhead Transmission Line (OHTL) connecting the site to an existing high voltage connection line (220kV) approximately 0.7km in length; and
- After 2-4 years, a final 0.5km long OHTL will connect the on-site substation to the Transmission System Operator (TSO) substation to the southwest of the site. The TSO substation is operated by Polskie Sieci Elektroenergetyczne SA (PSE), Poland's electricity transmission system operator.

The site plots and surrounding land have, in recent time, been used for agriculture. To the south of the site, although not in immediate proximity to the BESS units, is a small cluster of residential and farm buildings, including a wood chip workshop.

Project Status and Milestones

The planned timeline and Project milestones are as follows:

- Road Works and sub station: May 2025 - September 2025
- BESS delivery and assembly: Q3 2025 - Q1 2026
- Civil Works Completion: January 2026
- Energy management system completion: Q1 2026
- Use Permit: December 2025 – June 2026
- Final completion and COD: September 2026

5. Legal and Policy Framework

Polish legislation on stakeholder engagement

This national legislative requirements and lenders' environmental and social policy requirements of relevance to stakeholder engagement and consultation are described below.

There are no specific BESS related environmental and social regulatory requirements within Polish law, however more general national environment and social (E&S) regulatory requirements can apply to the development of potential BESS projects. This includes:

- **The Act of 3 October 2008 on access to environmental information, public participation in environmental protection, and environmental impact assessment (often referred to as the EIA Act).** This law implements EU directives and the Aarhus Convention and calls for public participation, access to information, and access to justice to be integrated into the decision-making processes related to projects with potential environmental impacts. An EIA was not required for the Greenvolt BESS Project and therefore there was no requirement for formal public consultation. However, public authorities are involved in permitting the Project which means that provisions within the Act relating to the public's right to request information and challenge decisions that relate to environmental impacts can apply.

Other applicable laws relating to public consultation and / or access to information as well as grievance avenues and right to remedy include:

- **The Polish Constitution of 1997** – Under Article 74 of the Polish Constitution, everyone has the right to be informed about the state and protection of the environment. Under Article 78, everyone has the right to appeal decisions made by public administrative authorities. This legislation will apply to the Project as it has been approved by public administrative authorities and may affect the local environment.
- **Act of 6 September 2001 on Access to Public Information** – This law that guarantees the public's right to access information held by public authorities. As the Project is privately funded, this is unlikely to directly apply unless related to interactions with public interests.
- **Polish Civil Code (Kodeks Cywilny) and the Code of Civil Procedure (Kodeks Postępowania Cywilnego)** – These civil codes provides a mechanism

for resolving civil disputes and breaches of rights. This would apply in the context of the Project if a grievance was not satisfactorily managed by the Project.

International requirements

Aarhus Convention (ratified in 2001) on Access to Information, Public Participation in Decision-Making, and Access to Justice in Environmental Matters

This Convention establishes several rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional, or local level) will contribute to these rights becoming effective. The Convention provides for the following:

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

The Convention has been transposed into Polish law through Acts such as the Polish Constitution, the The Act of 3 October 2008 on access to environmental information, public participation in environmental protection, and environmental impact assessment and the Environmental Protection Law. The provisions contained within these laws may apply to the Project as public authorities are involved in the permitting process and it is connected to public infrastructure (e.g. the grid).

The European Parliament and Council Directive 2003/35/EC

This directive provides for public participation regarding drawing up certain plans and programmes relating to the environment. According to this Directive, Member States shall ensure that:

- "The public is informed, whether by public notices or other appropriate means such as electronic media where available, about any proposals for such plans or programs or for their modification or review and that relevant information about such proposals is made available to the public including inter alia

information about the right to participate in decision-making and about the competent authority to which comments or questions may be submitted;

- The public is entitled to express comments and opinions when all options are open, before decisions on the plans and programs are made;
- In making those decisions, due account shall be taken of the results of the public participation;
- Having examined the comments and opinions expressed by the public, the competent authority makes reasonable efforts to inform the public about the decisions taken and the reasons and considerations upon which those decisions are based, including information about the public participation process”.

This Directive is transposed into Polish law through Acts including the Environmental Protection Law (2001) and the Act of 3 October 2008 on Access to Information on the Environment and its Protection, Public Participation in Environmental Protection, and Environmental Impact Assessments. The provisions may relate to the Project if a member of the public was to seek environmental information from a public authority, for example one involved in permitting. It also allows citizens to challenge decisions (for example relating to permitting) that affect the environment in court.

Regulation (EU) 2016/679 – General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) is a directly applicable EU regulation that sets out the legal framework for the protection of personal data of individuals within the European Union. It applies wherever stakeholder engagement activities involve the collection or processing of personal data. This includes information collected during consultations, surveys, grievance submissions, or other forms of communication with community members and stakeholders.

The Regulation establishes key data protection principles, including lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, and integrity and confidentiality. Under the GDPR, individuals have specific rights in relation to their personal data, including the right to access, rectify, or erase their data, and to object to its processing.

Where special categories of data (such as those relating to health, ethnicity, or social vulnerability) are collected, for example, through the grievance mechanism, Greenvolt ensures that such data is only processed with the data subject’s explicit consent and handled with a high degree of confidentiality.

The GDPR is binding across all EU Member States and is supplemented in Poland by the Act of 10 May 2018 on the Protection of Personal Data. Greenvolt’s stakeholder engagement activities are aligned with these requirements and appropriate measures are taken to ensure compliance, including the implementation of privacy notices, secure data handling procedures, and restricted access to sensitive data.

IFC and EBRD Requirements

This SEP has been prepared according to the IFC Performance Standards on Environmental and Social Sustainability (2012) and European Bank for Reconstruction and Development (EBRD) Performance Requirements (PRs) (2024)).

The pertinent objectives and requirements of IFC PS 1 and EBRD PR10 are presented below.

Table 1: IFC requirements for stakeholder engagement

Objective	Key Requirements
Stakeholder Analysis and Engagement Planning	<ul style="list-style-type: none"> • Clients should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders. • The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage and be tailored to the characteristics and interests of the affected communities. • Where applicable, the Stakeholder Engagement Plan will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. • In cases where the exact location of the project is not known, but it is reasonably expected to have significant impacts on local communities, the client will prepare a Stakeholder Engagement Framework, as part of its management program, outlining general principles and a strategy to identify affected communities and other relevant stakeholders.
Disclosure of Information	<ul style="list-style-type: none"> • The client will provide affected communities with access to relevant information²⁶ on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.
Consultation	<ul style="list-style-type: none"> • When affected communities are subject to identified risks and adverse impacts from a project, the client will undertake a process of consultation in a manner that provides the affected communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them. • The extent and degree of engagement required by the consultation process should be commensurate with the project's risks and adverse impacts and with the concerns raised by the affected communities.
Informed Consultation & Participation	<ul style="list-style-type: none"> • For projects with potentially significant adverse impacts on affected communities, the client will conduct an Informed Consultation and Participation (ICP) process that will build upon the steps outlined above in Consultation and will result in the affected communities' informed participation.

Indigenous Peoples	<ul style="list-style-type: none"> For projects with adverse impacts to Indigenous Peoples, the client is required to engage them in a process of ICP and in certain circumstances the client is required to obtain their Free, Prior, and Informed Consent (FPIC).
Private sector responsibilities under government-led stakeholder engagement	<ul style="list-style-type: none"> Where stakeholder engagement is the responsibility of the host government, the client will collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with the objectives of this Performance Standard.
External communications	<ul style="list-style-type: none"> Clients will implement and maintain a procedure for external communications that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate.
Grievance mechanism for affected communities	<ul style="list-style-type: none"> Where there are affected communities, the client will establish a grievance mechanism to receive and facilitate resolution of Affected communities' concerns and grievances about the client's environmental and social performance.
Ongoing reporting to affected communities	<ul style="list-style-type: none"> The client will provide periodic reports to the affected communities that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on affected communities and on issues that the consultation process or grievance mechanism have identified as a concern to those communities. The frequency of these reports will be proportionate to the concerns of affected communities but not less than annually.

Table 2: EBRD requirements for stakeholder engagement

Objective	Key Requirements
Stakeholder Identification	<ul style="list-style-type: none"> Identify Project affected stakeholders, including disadvantaged or vulnerable groups who are affected or likely affected by the Project; or may have an interest in the Project. Develop and implement a Stakeholder Engagement Plan and Grievance Mechanism.
Information Disclosure	<ul style="list-style-type: none"> Provide stakeholders with access to timely, relevant, understandable, accessible information in a culturally appropriate manner. Including access to: <ul style="list-style-type: none"> The purpose, nature, scale and durations of the Project; Any risks, potential impacts and mitigation measures; Proposed stakeholder engagement process;

	<ul style="list-style-type: none"> ○ Time and venue of public consultation meetings; and ○ A grievance mechanism. <ul style="list-style-type: none"> ● Where applicable, differentiated measures will be implemented to allow the effective participation of those identified as disadvantaged or vulnerable groups.
Meaningful Consultation	<ul style="list-style-type: none"> ● Consultation will be in line with the degree of potential project impacts and will: <ul style="list-style-type: none"> ○ Begin early and continue throughout the Project lifecycle; ○ Be based on prior disclosure and dissemination of information; ○ Be free of manipulation, interference, coercion or intimidation; ○ Enable meaningful participation; and ○ Be documented.
Ongoing Engagement and External Reporting	<ul style="list-style-type: none"> ● Provide stakeholders, on an ongoing basis, with appropriate information on the Project regarding risks, impacts and grievances raised. ● Communicate any updates to stakeholders on the Project, including disclosure of updated ESMP if adverse impacts, risks, concerns are identified or raised. ● Report to the community with frequency that is proportionate to the concerns of affected communities but not less than annually.
Grievance Mechanism	<ul style="list-style-type: none"> ● Establish a grievance mechanism to receive and facilitate resolution of stakeholders' concerns and grievances about the Project. ● The grievance mechanism should: <ul style="list-style-type: none"> ● Resolve concerns promptly and effectively; ● Use a transparent, culturally appropriate and readily accessible consultative process; and ● Allow for anonymous complaints to be raised and addressed.

The SEP has been developed in line with the guidance document prepared by EBRD, International Finance Corporation (IFC) and CDC Groups on 'Addressing Gender-Based Violence and Harassment – Emerging Good Practice for the Private Sector' (2020). This guidance has informed the stakeholder engagement procedures and Project grievance mechanism to ensure that capacity and resources are in place to prevent and respond to gender-based violence and harassment (GBVH).

6. Stakeholder Identification and Analysis

The objective of stakeholder identification is to identify and prioritise project stakeholders for consultation. Stakeholder identification is an ongoing process, and key stakeholders will continue to be identified during different stages of the Project. A stakeholder mapping exercise has been undertaken to identify and analyse the

stakeholders, stakeholder groupings and organisations likely to affect or be affected by the Project. Stakeholder mapping is based on a comparative rating of the geography (i.e., where they live or operate in relation to the Project area), influence and representation of the respective institutions to determine the significance of that stakeholder group. Project stakeholders are categorised into two main categories:

1. **Primary stakeholders** – the individuals and groups who are affected directly by the Project or have significant influence; and
2. **Secondary stakeholders** – those parties which have influence on, but are not necessarily directly impacted by, the Project.

Key stakeholder groups are identified in Table 3. The list of stakeholder groups should be regularly reviewed and updated throughout the Project lifecycle and whenever new information is received.

Table 3: Key Stakeholder Groups and Interests in the Project

Stakeholder Category	Stakeholder Type	Stakeholders	Role / Interest in the Project	Method/s of Engagement
Primary	Internal: Contractors and Subcontractors; Engineers; Employees and workers	P&Q (main contractor) and Tensec (supervising engineer)	Engineers, contractors and suppliers are responsible for contributing to project delivery. Engineers, contractors and subcontractors will be directly involved in creating and managing impacts associated with project delivery. They will be required to adhere to corporate rules and compliance with environmental and social legislation. Directly affected by decisions regarding financing, continued construction, changes in contract terms. Risks associated with construction and operational phase of the Project, including work accidents, occupational diseases (skin irritation, noise, etc.), contamination of soil, water and health due to hazardous and non-hazardous waste.	Performance reporting by contractors, progress meetings between Greenvolt and Contractors. Bulletin updates (via email, SMS & notice boards) on Project developments and Worker Grievance Procedure. Training on social and environmental responsibilities. Worker feedback mechanisms.
		Suppliers including BESS (BYD), transformers (Sieyuan Electric)	Participation in the implementation of the Project. Affected by labour and working conditions on the Project (e.g., H&S, child/forced labour, employment rights, labour union issues, grievance management, non-discrimination).	Risk screening, adherence with Greenvolt Supplier Code of Conduct. Due diligence prior to selection of supplier, prior to construction and as needed throughout construction period ² .

² Supplier management processes are outlined within the supply chain management plan

Local authorities	Elk Commune	<p>Issue the Environment Decision and other relevant decisions such as those related to zoning, tree felling and exclusion of arable land.</p> <p>Engage in relation to relevant Project activities and impacts that may require advice or authorisation.</p> <p>Support for Project implementation at the local level.</p> <p>Protect the rights of inhabitants in the Project area. Represent local communities and PAPs. Receive and address any feedback and grievances from communities.</p>	<p>Formal consultations and workshops to discuss regulations, permitting and Project relations.</p> <p>Face-to-face meetings to explain the project's objectives, potential impacts, and benefits for their communities.</p> <p>Official letters and emails.</p>
	Elk County Office	Issue building permits and ensure that all relevant decisions have been obtained from the Commune.	Official correspondence by letter / email, meetings as required.
	County Building Supervision Inspectorate in Elk	Issuing of operating permits, verifying that the investment is being developed in accordance with the obtained permits.	Official correspondence by letter / email, meetings as required.
National Electricity Grid Operator	Polskie Sieci Elektroenergetyczne S.A. (PSE)	Commissioning / operation – they will be providing frequency regulation, storage and discharge for the national grid.	Official letters and emails.
Local Communities	Landowners, neighbours and local communities affected by Project activities.	Directly affected by the construction of civil works (noise, dust air quality), increased traffic and the influx of workers in accommodation within the community.	<p>Community consultations and town hall meetings.</p> <p>Face to face meetings and focus groups with neighbouring landowners, users and</p>

		<p>Potential impacts due to construction of associated facilities e.g., road closures.</p> <p>Benefit sharing and investments in the local community.</p>	<p>other individuals to ensure that local communities concerns are understood.</p> <p>Frequent interactions with the development team as required throughout construction and operation to resolve grievances raised via the GRM.</p> <p>Information dissemination in local government channels, local newspapers and via Greenvolt's website.</p> <p>Bulletin updates about potential disruptions, health and safety risks and construction activities prior to any planned activities or changes.</p>
	<p>Vulnerable groups: For example, women, persons with disabilities, elderly people, unemployed youth.</p>	<p>Any specific vulnerable groups identified currently or in the future i.e., disabled persons, elderly persons, women etc. near the site.</p> <p>Women may have reduced input into decision making if consultations are not designed and scheduled to be convenient for both men and women in terms of timing and location. The influx of Project workers also increases risks of gender-based violence and harassment.</p> <p>Engagement can be challenging as persons with disabilities may be 'invisible' due to social taboos. Their physical and/or</p>	<p>Design community events to best enable participation of vulnerable groups.</p> <p>Focus groups and consultations if needed.</p> <p>Female focal points with Greenvolt's team to encourage women to raise any potential concerns.</p> <p>Accessible engagement methods, such as providing written materials in accessible formats. Community events held in accessible locations with accessibility considered in design and delivery of all events.</p>

			<p>psychological conditions may require specific engagement methods.</p> <p>Accessibility issues in relation to engagement. Health issues and physical limitations may hinder participation.</p>	
		Local businesses.	<p>Local Project impacts including disruptions to access or dust, noise and vibration.</p> <p>Businesses with interest in the Project's construction or operation providing services or supplies i.e., waste disposal.</p>	<p>Advance notification on any disruptions to businesses and local activities during construction and operational maintenance.</p> <p>Communicate any potential supply opportunities appropriately.</p>
		<p>Education / Community Institutions:</p> <p>Local schools, community organisations etc.</p> <p>E.g. Zespół Szkolno Przedszkolny W Nowej Wsi Etckiej school in Nowa Wieś Etcka.</p>	<p>Recipients of community investment activities and benefit sharing mechanisms.</p> <p>Interest in impacts such as dust, noise, traffic and access (e.g. road closures) etc.</p>	<p>Liaise with local school operators and community representatives to understand community needs.</p> <p>Advanced notifications of Project activities and anticipated impacts.</p> <p>Post regular Project updates on Greenvolt website.</p> <p>Meetings, working groups, focus groups, community reference groups – to explore and develop options for benefit sharing and community investment.</p>
Secondary	International Finance Institutions / Lenders	European Bank for Reconstruction and Development (EBRD)	Potential financial support and funding of the Project and supervision of compliance with applicable international environmental, health and safety and social (EHSS) standards.	<p>Periodic virtual meetings, emails and occasional face to face meetings to discuss updates on Project development.</p> <p>Periodic progress and annual E&S reports, including grievances and incidents/accidents.</p>

	International Finance Corporation (IFC)		
Regional authorities	Voivodeship Conservator of Monuments	To notify of any cultural heritage chance finds	
Non-Governmental Organizations (NGOs)	Local, National NGOs Local examples include Polish Green Network (Polska Zielona Siec - PGN) that focuses on promoting sustainable development and has a center in Białystok, and Razem that provides support to Ukrainian refugees.	Monitor Project performance in areas of their respective concerns. Represent the interests of different interested parties. Concerns over ensuring the protection of biodiversity, human rights, labour rights etc.	Meetings. Updates to Greenvolt website. Letters / Emails as appropriate.
Media	Local media such as Radio 5, Kurier Mazurski newspaper, Gazeta Olsztyńska	Intermediaries for informing the general public about planned activities and information disclosure concerning Project developments.	Media releases. Project website updates.

Vulnerable groups

The stakeholder identification and mapping process examined if there are any groups of affected people who might be more vulnerable to current and potential Project impacts. Due to their intrinsic characteristics, vulnerable groups include those who would be disproportionately affected by the Project. Vulnerable groups can be less capable of managing project impacts and require particular attention throughout the consultation process. EBRD defines vulnerable people as *“people who, by virtue of gender identity, ethnicity, age, disability, economic disadvantage or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits. Vulnerable individuals and/or groups may also include people living below the poverty line, the landless, the elderly, women and children headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected by national and/or international law”*³. IFC advises *“This disadvantaged or vulnerable status may stem from an individual’s or group’s race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. The client should also consider factors such as gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.”*⁴ Emphasis is therefore placed on identifying and managing impacts on vulnerable groups, families, and individuals throughout the Project lifecycle and associated stakeholder engagement processes.

Effective and equitable engagement with vulnerable groups and individuals often requires the application of specific measures and assistance to facilitate their participation in project-related decision-making so that their awareness of and input to the overall process are proportional to those of the other stakeholders.

Within the Project context, the following groups may be present and could potentially be vulnerable:

- Persons living with disabilities and/or chronic illness;
- Refugees;
- People living in poverty;
- The elderly; and
- Migrant workers.

Ongoing engagement with vulnerable groups identified and set out within this SEP will be facilitated by the development and central marketing teams to ensure minimum impact on these groups. If vulnerable groups are found to exist within the nearby community or are likely to be impacted by Project activities, Greenvolt will consider specific meetings, focus groups or workshops targeting these groups as needed. To promote the inclusion of vulnerable groups, consultation processes will be designed to support equal participation, including appropriate meeting times (e.g. considering school hours and childcare) and accessible

³ EBRD Performance Requirement 5, paragraph 12, footnote 11.

⁴ <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards>

meeting venues. Stakeholder engagement meetings should be held in central locations, that can be easily reached and accessed by persons that might face barriers, such as physical disabilities, as well as financial, such as access to reliable transport. Therefore, the venues and locations of the meetings as well as the methods of engagement with vulnerable people will be assessed against risks and consulted with vulnerable people themselves in first place by the development team.

7. Stakeholder Engagement Undertaken to Date

Stakeholder engagement undertaken to date is predominantly limited to local authorities, landowners and neighbours (in relation to land access). No EIA has been required and there has been no formal requirement for public consultation.

It is noted that these are the first BESS projects within Poland, and Greenvolt acknowledges the importance and opportunity to support the development of community understanding in relation to the technology and its project activities.

As outlined within this SEP, Greenvolt will allocate resourcing and commence implementation of a proactive engagement programme to share Project information, consult with local communities to understand their views and any concerns, communicate the stakeholder grievance mechanism, promote social investment initiatives and ensure ongoing and timely management of Project impacts.

Engagement with local authorities

Greenvolt has engaged with the commune of Elk with regard to planning and permitting of the project site. On 6 April 2023 Mayor of Elk municipality issued the Environmental Decision (ED) on building the energy storage with accompanying infrastructure. Prior issuing this decision, the following institutions were consulted: National District Sanitary Inspector, Director of the Water Supply Management Body of the state holding Wody Polskie, Regional Director of Environmental Protection. No comments, requests nor complaints were received during investigation period.

It is also noted that community members often submit grievances on local matters through the Communes, in either written or verbal forms.

Engagement with landowners and neighbours

Engagement with landowners and neighbours has focused on negotiations and the securing of land lease agreements, and in some cases plans to purchase land. All of the land lease agreements for the BESS land plots were agreed under willing free market voluntary conditions.

Engagement with local communities

Engagement with local communities has been limited to date, although there are plans to commence with proactive engagement imminently.

Corporate Social Responsibility

Greenvolt has a corporate level Social Investment Policy. Examples of initiatives delivered under this policy include school workshops, community events focused on biodiversity enhancement and direct financial and time contributions for local and

national initiatives. Opportunities for such initiatives will be explored with communities local to the Elk site.

Any personal data obtained in connection with Corporate Social Responsibility (CSR) activities, including those involving schools or community organisations, will be processed in compliance with GDPR. Where children or minors are involved, Greenvolt will ensure that appropriate consents are obtained from parents or guardians prior to any data collection or use.

8. Stakeholder Engagement Programme

The following section describes the stakeholder engagement activities that will be carried out as the Project proceeds through construction and operation. This programme will be continuously reviewed and updated as the Project progresses and in response to ongoing stakeholder engagement.

Stakeholder engagement methods

A variety of methods and avenues enables effective engagement with different stakeholders, depending on the objective and level of engagement required. Table 4 below provides examples of methods that may be used to engage stakeholders on the Project, along with the corresponding level of engagement (which will vary depending on stakeholder, the issue or topic being consulted on, the project phase etc.). On this Project the level of engagement is predominantly Inform – Consult, as per the definitions in Table 4. In relation to Project elements such as benefit sharing initiatives, where there is a high level of scope for stakeholders to influence decisions / negotiable elements, the level of engagement is likely to include ‘Involve’ and ‘Collaborate’.

Table 4: Stakeholder Engagement Methods

Desired level of engagement	Example of methods and avenues
Inform: E.g. Information disclosure / one-way sharing of information with stakeholders.	<ul style="list-style-type: none"> • Website • Newsletters • Fact sheets • Notice boards • Media releases / public announcements – e.g. newspapers, radio
Consult: E.g. A two-way process to gather feedback from stakeholders to consider in decision-making processes.	<ul style="list-style-type: none"> • Community events • Surveys • Focus group discussions • Meetings • Interviews
Involve: E.g. Working directly with stakeholders to fully understand concerns and perspectives.	<ul style="list-style-type: none"> • Workshops • Working groups
Collaborate: E.g. Partnering with stakeholders throughout decision-making, developing solutions together to achieve consensus.	<ul style="list-style-type: none"> • Participatory processes • Community reference groups

Empower: E.g. Providing stakeholders with final decision-making power.	<ul style="list-style-type: none"> • Not anticipated on the Project.
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The proposed program for engagement and communication activities is presented in Table 5 below. In addition to scheduled engagement activities at key project milestones, stakeholders may also request ad hoc meetings or information sessions at any time. The project team will seek to accommodate such requests, particularly during periods of disruption, changes in construction schedules, or emerging community concerns.

All stakeholder engagement methods that involve personal data collection (e.g. registration for meetings, focus groups, or surveys) will be designed and implemented in accordance with the GDPR. Privacy notices and consent forms will be provided where applicable, and personal data will not be shared externally without the stakeholder’s explicit consent.

Table 5: Stakeholder Engagement Activities for the Project

Engagement Activity	Target Stakeholder/s	Purpose / Details of Activity	Responsibility	Timing / Frequency
Assign Community Liaison Officer (CLO)	All	Key contact point for external stakeholders. Responsibility for overseeing ongoing communication and engagement with stakeholders and affected communities and overseeing the external grievance mechanism.	Greenvolt	As soon as practical – to be in place throughout Project lifecycle.
Establish Project webpage	All	To provide a platform for the disclosure of Project information, including details of activities and timeframes, details of upcoming engagement activities, disclosure of the SEP and NTS, Project contact details, and details of the external grievance mechanism.	Greenvolt	As soon as practical – to be in place throughout Project lifecycle
Establish external grievance mechanism	All	To effectively receive and handle stakeholder grievances in accordance with international lender requirements. Including procedures for handling sensitive grievances such as those relating to GBVH. Establish channels for receiving grievances including grievance boxes (e.g. at Project site / Commune offices).	Greenvolt	As soon as practical – to be in place throughout Project lifecycle
One on one meetings with neighbours	Neighbours at Elk	Consult with neighbours on Project impacts to gather views, address queries and concerns. Consult on impacts that may affect neighbours, such as visual impacts relating to acoustic barriers and fencing, as well as anticipated noise, dust or access impacts. Make use of visual tools to support a shared understanding of impacts and consult on any negotiable aspects such as landscaping. Share details of the CLO and the grievance mechanism.	Greenvolt with Contractor	As soon as practical + ongoing engagement throughout Project lifecycle.
One on one meetings with landowners	Landowners	Engage on land agreements and project activities and impacts as well as potential land purchasing agreements.	Greenvolt	As needed throughout Project lifecycle.

Community information sessions	Local communities surrounding the Elk site	<p>Hold a community information session (e.g. pop up / drop-in session / presentation or briefing) to share details of the Project, raise awareness of BESS technology, the Project, potential impacts and how they will be managed, the planned engagement activities, avenues for disclosure of Project information and the stakeholder grievance mechanism.</p> <p>Prepare visual collateral to share details of the Project and develop community understanding, including in relation to the management of environmental and social impacts.</p>	Greenvolt	As soon as practical
Establish communication channels	All	<p>Establish and implement appropriate channels for ongoing communication and disclosure of Project information with communities (for example newsletters, notice for local notice boards, website updates).</p> <p>Continue to promote the availability of the Project's grievance mechanism and key contact avenues.</p>	Greenvolt	As soon as practical + ongoing engagement throughout Project lifecycle.
Dissemination of timely notifications	Local communities including neighbours, schools, local businesses, vulnerable groups	<p>Distribute notifications (by letterbox / website / noticeboards / media) of Project activities that may impact local communities, including risks of noise, dust and traffic impacts or temporary access restrictions.</p> <p>Notifications should also be shared with communities potentially impacted by worker accommodation, disseminating information including contact details and grievance mechanism details.</p>	Contractor	Construction
Engagement activities as required	All	<p>Undertake engagement activities to support ongoing communication with affected communities and the effective management of Project impacts.</p> <p>Engagement activities may also focus on benefit sharing and implementation at the local level of Greenvolt's Social Investment Programme.</p>	Greenvolt	As appropriate throughout Project lifecycle.

		Where vulnerable groups or individuals are identified, special requirements to enable inclusive and equitable participation in engagement events (such as through choice of timings, accessible venues, availability of public transport, childcare or interpreters, online vs in-person methods etc.) will be considered.		
Briefings and meetings with local Commune	Mayor of Elk	Ongoing engagement with local Commune representatives to share Project progress, respond to queries, and understand any concerns or views that they may have received from the communities that they represent.	Greenvolt.	Ongoing throughout Project lifecycle
Distribution of media releases	All	Share locally focused information on the Projects via local media by distributing media releases to relevant outlets. An opportunity also to raise awareness of the BESS Project, how impacts are managed and the benefits they seek to deliver. Media also potentially provides an opportunity to promote Greenvolt's Social Investment Programme and local activities.	Greenvolt	As appropriate throughout Project lifecycle.
Report on environmental and social performance of the Project	All	Communicate to stakeholders on the Project performance on an annual basis, including the management of impacts and implementation of social investment programmes. Communicate via avenues such as the Project website.	Greenvolt	Annually throughout the Project lifecycle.
Local supplier event/s	Local businesses	If potential supply opportunities are identified for local businesses, supply chain or job seekers, consider avenues to engage and promote these – potentially drawing on partners such as the Commune or local business networks.	Greenvolt / Contractor	If opportunity arises - Construction
Briefings / meetings with NGOs	NGOs	If NGOs express interest or raise concerns during project development, engage in dialogues and share information as appropriate.	Greenvolt	If required, throughout Project lifecycle

9. Grievance Redress Mechanism

Grievance management is an important component of any Project's implementation and is driven by a well-developed grievance mechanism, communication of the grievance mechanism and its provisions to key stakeholders and affected communities, and appropriate procedures for handling, recording and reporting grievances. The grievance mechanism and procedure should:

- Address concerns promptly and effectively, in a transparent manner that is free from manipulation, interference, coercion, intimidation and retribution, and readily accessible to all affected parties, at no cost;
- Ensure handling of grievances in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the stakeholders needs and concerns;
- Offer assurance that there will be no retaliation or discrimination against those who express grievances, and that grievances will be treated with confidentiality;
- Include confidential treatment of all grievances throughout the process;
- Ensure that the grievant is regularly informed about progress;
- Allow for the submission of anonymous complaints; and
- Not prevent access to judicial or administrative remedies.

An example grievance form is provided in Appendix 3.

Grievance avenues

A variety of avenues allows for the submission of grievances online, in person and anonymously. This should include:

- Greenvolt's website;
- Grievance boxes and forms available at the Project site and in surrounding locations (such as at the local Commune building) accessible to the community;
- In person via the development team and other Project / Contractor representatives;
- Via a nominated phone number (to be established);
- Via email (to be established); and
- Via post.

Communication of the grievance mechanism

The grievance mechanism will be promoted to stakeholders and local communities as described in this document, including through notice boards, media and project collateral. This will be accessible, considering language and literacy barriers if these are identified within local communities, and enabling access for vulnerable groups and individuals.

Grievance procedure

1. **Grievance received:** Via one of the avenues described above.
2. **Acknowledge, sort and process:** All verbal or written complaints or grievances will be logged immediately after they are received by the CLO, development team, or contractor representative. An acknowledgement will be sent to the complainant within five working days following complaint registration. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step. The

CLO will then categorise and sort the grievances and allocate the redress process and responsibilities.

3. **Verification, investigation and action:** The CLO will aim to respond to complainants and resolve the issues as quickly as possible from the date of receipt. All grievances will be verified via obtaining information about the grievance to verify its legitimacy and the facts surrounding it. Resolutions to complaints will be proposed within 10 working days, however, for more complex investigations this can take up to 30 working days. The complainant will be informed in writing of the reasons for the delay and must be updated on a fortnightly basis of progress on a delayed grievance. If the resolution is mutually acceptable, the CLO will discuss the proposed remediation with the grievant and develop an agreed timeline for the remediation process.
4. **Grievance close-out:** Upon resolving the grievance, a grievance closeout form will be prepared to be signed off by the CLO and the complainant, which will detail the solution that was implemented to resolve the grievance, date of implementation along with the timeline for their completion. The outcome of the grievance resolution form will be communicated to the complainant in accordance with the preferred method of communication specified. In the case the grievance resolution form identifies proposed actions to be implemented, the CLO will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form.
5. **Escalation:** If the grievance is not resolved to mutual satisfaction during the steps outlined above, the grievance will be escalated first within Greenvolt and then if required externally / through judicial processes. In Poland, the Code of Civil Procedure (Kodeks postępowania cywilnego) governs civil litigation, appealing decisions and mediation.

The grievance procedure is presented in Appendix 2.

To ensure full compliance with data protection requirements and to promote trust among community members, Greenvolt confirms that the Project's grievance mechanism allows for the submission of grievances fully anonymously. No stakeholder is required to provide personal data to access or use the grievance mechanism.

Furthermore, Greenvolt commits that personal data or identifiable information included in grievances will not be shared with external stakeholders, including Lenders, without the explicit and informed consent of the complainant. Grievance reporting to external parties will be limited to non-identifiable, aggregated data only (e.g. number of complaints, general themes or categories), in line with the principles of data minimisation and confidentiality under the GDPR.

Logging and reporting on grievances

All grievances received will be recorded in a confidential grievance log, to be stored securely in a password-protected file, accessible only to designated individuals. Sensitive grievances, such as those relating to GBVH, will be recorded in a separate grievance logbook that will only be accessible to a women/gender focal point – either a trained CLO or an appropriate representative within Greenvolt's central team. A sample grievance log sheet is provided in Appendix 1.

Sensitive grievances

Sensitive grievances such as those relating to gender-based violence and harassment (GBVH) require particular management. Greenvolt has trained female team personnel at the group level that

are available to support the handling of sensitive grievances. These should be treated confidentially. Depending on the severity of the grievance, it may be necessary to engage with or refer the grievant to third party providers for further support.

10. Monitoring, Reporting and Responsibilities

Reporting

Ongoing monitoring will support effective stakeholder engagement that adapts to changing circumstances and stakeholder needs. Engagement activities, stakeholder feedback and operation of the grievance mechanism will be monitored and reported on throughout the Project lifecycle.

Greenvolt’s CLO and central marketing team are responsible for the implementation of this SEP together with monitoring and reporting. The nominated CLO will deliver much of the on-the-ground engagement and will produce monthly progress reports summarising engagement activities and findings as well as any grievances logged, addressed and resolved. It is recommended that the reports include all stakeholder engagement activities during the period, new stakeholders identified, partnerships established / engaged and plans for the next period. It is recommended that this SEP is updated no less than quarterly throughout pre-construction and construction and annually thereafter.

Greenvolt should periodically assess stakeholder engagement activities and ensure that all consultations and disclosures are properly accounted for. Additionally, staff should monitor the way in which grievances are handled and ensure they are properly addressed within the deadlines specified.

Stakeholder engagement activities will be recorded and monitored throughout the Project lifecycle. All engagement consultations will be recorded by the CLO, along with minutes of the engagements and records of the attendance. The minutes and any other proof of participation will be uploaded to the company’s information management systems.

All grievances will be stored in the grievance logbook when first recorded and uploaded to the company’s information management systems with key findings and actions during assessment and after being resolved. Leadership will be informed about similar and/or consistent complaints, which may indicate that Greenvolt must undertake appropriate management interventions.

The performance of the activities identified in the SEP, and updated as necessary, will be monitored against the key performance indicators presented in Table 6 on a monthly basis. The monitoring reports will include supplementary documents to evidence activities undertaken, including attendance logs, photos, feedback and meeting minutes.

All data included in SEP monitoring and reporting, including gender-disaggregated statistics and grievance tracking, will be anonymised and will not contain any personal data. Where raw data includes identifiable information, appropriate pseudonymisation measures and access controls will be applied.

Grievance-related data shared with Lenders or other external stakeholders will remain strictly anonymised and aggregated. Greenvolt will not disclose any personal data collected through the grievance mechanism unless explicit and informed consent has been obtained from the data subject. Table 6: Stakeholder Engagement Key Performance Indicators

Aspect	Key Performance Indicator (KPI)	Monitoring Frequency	Parties Responsible
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Grievance Mechanism	<ul style="list-style-type: none"> • Grievances and resolutions database. • Number of registered grievances received through the Grievances Mechanism, by category (with gender-disaggregated data). • Number of grievances resolved / unresolved within the stipulated timeframe. • Number of grievances that are on hold / disagreed. • Repetition of the same grievance. 	Monthly	CLO
Stakeholder engagement	<ul style="list-style-type: none"> • The number of public consultations and other events held with the stakeholders, including the number of participants with a gender breakdown. • Meeting records of all consultations, workshops and trainings held. • Communications materials disseminated. • Stakeholder database. • Type and frequency of public engagement activities. 	Monthly	CLO

1.1 Roles and Responsibilities

Greenvolt has overall responsibility for Project implementation and safeguard compliance. The CLO will oversee the stakeholder engagement programme. They will carry out all stakeholder engagement activities with communities, facilitating information disclosure, stakeholder engagement and grievance management. The contacts below will be responsible for ensuring all Project-related grievances are received and managed in accordance with legislation as well as IFC's Performance Standards and EBRD's Environmental and Social Policy.

Name	Role	Address	Phone	Email
Natalia Radtke	CLO	aleja Wyścigowa 6, 02-681 Warszawa	+48 784 018 700	natalia.radtke@greenvolt.com
Adrian Góralski	Project Manager	aleja Wyścigowa 6, 02-681 Warszawa	+48 532 432 911	adrian.goralski@greenvolt.com
Piotr Skura	EHS Manager	aleja Wyścigowa 6, 02-681 Warszawa	+48 532 660 797	piotr.skura@greenvolt.com

The key roles for implementing the engagement programme and their key responsibilities are presented in Table 7 below.

Table 7: SEP Roles and Responsibilities

Role	Responsibility
Senior Management	<ul style="list-style-type: none"> • Review of escalated grievances.
Project Manager	<ul style="list-style-type: none"> • Overall accountability for the Project including delivery in line with applicable national and Lenders' standards.
CLO / Stakeholder engagement lead	<ul style="list-style-type: none"> • Oversee implementation of SEP and grievance mechanism. • Oversee periodic reviews and updates of the SEP. • Weekly checking of grievance boxes. • Monitor and submit reports on performance of stakeholder engagement and grievance mechanism. • Female CLO (or representative from Greenvolt's central marketing team) with responsibility as a gender focal point to handle external sensitive grievances.
Contractor	<ul style="list-style-type: none"> • Timely notifications to affected community members of Project activities. • Co-operate with Greenvolt in engagement with neighbours, communities and other stakeholders as appropriate. • Report on grievances received to the Greenvolt CLO.

Appendix 02 Grievance Procedure Flow Chart

Appendix 03 Example Grievance Submission Form

Grievance Reference No.			
Date			
COMPLAINANT INFORMATION			
Full Name			
Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	<input checked="" type="checkbox"/> I wish to raise my grievance anonymously <input checked="" type="checkbox"/> I request not to disclose my identity without my consent		
Contact Information Please mark how you wish to be contacted (mail, telephone, email).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By Email: _____		
Language Please mark your preferred language for communication	<input type="checkbox"/> Polish <input type="checkbox"/> English <input type="checkbox"/> Other		
DESCRIPTION OF CONCERN, INCIDENT OR GRIEVANCE			
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"/> On-going (currently experiencing problem)		
SOLUTION REQUESTED BY COMPLAINANT			
What would you like to see happen to resolve the problem?			
Registrar Name:		Complainant Name:	
Registrar Signature:		Complainant Signature:	

Date:		Date:	
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