

Stakeholder Engagement Plan

130 MWp solar photovoltaic (PV) plant project in Menzel Habib in the governorate of Gabes



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1 INTRODUCTION

As part of its energy transition strategy, Tunisia has set itself the target of achieving a share of renewable energies in the electricity mix of 35% by 2030 and 50% by 2035. This will result in the installation of a total functional renewable capacity of 4,850 MW by 2030 and 8,350 MW by 2035 using photovoltaic and wind.

Voltalia (hereafter referred to as "the Developer"), was awarded in December 2024, an Agreement for the development of a 130 MWp Photo Voltaic (PV) Solar power plant in the governorate of Gabes hereafter referred to as "the Project" or 'PV Plant Menzel Habib'. Voltalia was selected after an international competitive call of tenders launched by the Government of Tunisia under the reference AO-01-2022, represented by the Ministry of Industry, Energy and Mining (MIME).

The Developer aims to finalize the project financing by December 2025 and to start construction of the solar PV plant in January 2026, with a planned duration of 18 months. The estimated commissioning date of the solar PV plant is June 2027.

This document is the Stakeholder Engagement Plan (SEP). The SEP describes the policy and regulatory framework associated with stakeholder consultation and information disclosure, reflecting the combined requirements of Tunisian national legislation, International Finance Corporation (IFC) of the World Bank Group including the IFC Performance Standards (2012 edition) and Environmental Social Policy (ESP - 2024) of the European Bank for Reconstruction and Development (EBRD).

This SEP is prepared for the solar PV plant in Menzel Habib. It will be regularly reviewed and revised throughout the duration of the IFC and EBRD loan (at least annually) to reflect the status of the project at that time and any changes to the project design.

1.1 The Project

The Project site is located within Gabes Governorate in the delegation of Menzel Habib, and within El Mehemla sector. The nearest community to the project site is El Mehemla, located 2.3 km to the north. Menzel Habib lies 11 km away, while the city of Gabes is situated 70 km from the solar PV plant.

The project also includes the construction of 200 m of transmission line (including 3 pylons) located south of the solar PV plant, designed to evacuate the electricity generated to the existing Bouchamma–Mdhilla150 kV transmission line linking Bouchamma to Mdhilla substations through a LILO (Loop-In Loop-Out) connection. Although, the Developer will undertake reinforcement works to upgrade its voltage from 150 kV to 225 kV.

A map of the Project is provided below.

The construction and operation of the solar PV plant will be carried out on uncultivated and un-inhabited land. The land is under private ownership and covers an area of 200 hectares of which only 175 hectares will be used for the project. The land is being leased to one landowner under a willing lessee, willing lessor arrangement. The undeveloped land is currently used for herding activities by the landowner for his own livestock. The activities are carried out by his employees. Additionally, consultations with the landowner confirmed that no informal grazing activities are being conducted.

The site is generally flat, accessible from the nearby national road of RN15 following by an access track of approximately 4 km.

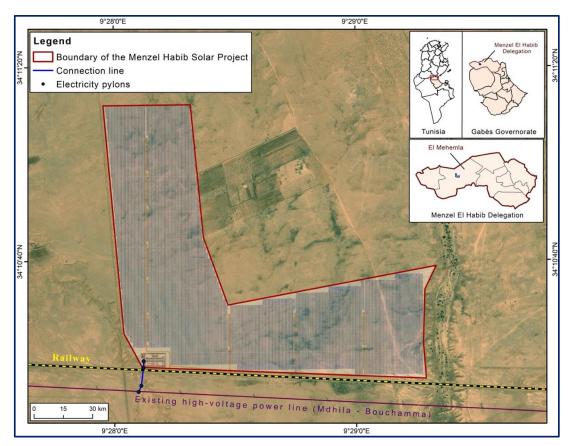


Figure 1 Administrative map of the study area

1.2 The Potential Stakeholders

The closest community to Solar PV Plant is El Mehemla at a distance of 2.3 kilometers. The solar PV plant site is in a rural area and is easily accessible via a road branching off from National Route 15 (RN15).

The area surrounding the Solar PV Plant is characterized by agricultural land with olive groves to the east; to the south, a railway line connecting Gabes to Gafsa (used to transport phosphate from the CPG) and a 150 kV high-voltage overhead transmission line (single-circuit type) connecting the Bouchemma and Mdhilla substations. To the north, in addition to El Mehemla village, lies Sebkhet Sidi Mansour, a Ramsar site, about 3.2 kilometers away.

In terms of health and education, there is a local health dispensary and a private school in El Mehemla, while Menzel El Habib hosts a middle school and a secondary high school. Residents expressed concern about the potential closure of the El Mehemla school due to its low student population (around 10 pupils). Electricity supply is generally satisfactory, but the quality of water provided by SONEDE is poor, forcing residents to rely on water from traditional storage wells (Majel) or to purchase filtered water from uncertified sources, which is relatively cheaper than bottled water. Waste collection services are not provided by the municipality, compelling residents to manage their own waste, often resorting to burning it.

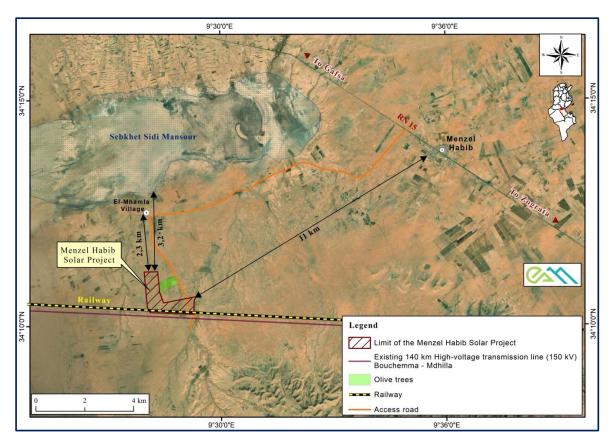


Figure 1: Proximity of Communities/ to the Project Location

Socio-economic analysis of the project area highlights a rural context marked by geographical isolation and limited access to basic infrastructure and services.

The EI Mehemla sector, in the Menzel Habib delegation (Gabes governorate), has a population of around 2,254 (2014 INS general population and housing census) and shows a downward demographic trend, with a decline of 3.47% between 2004 and 2014, mainly due to strong internal and international emigration motivated by job-seeking (INS, 2014).

Half of the working population in the Menzel Habib delegation is employed in the agricultural sector (49%), followed by education, health and administrative services (19%), then construction and public works (16%).

Unemployment affects 10.65% of the working population, with a marked gap between men (6.17%) and women (21.55%), while the poverty rate reaches 33.6%, more than double the national average of 15.2% (INS, National Survey of Household Budget, Consumption and Living Standards, 2015).

According to the public consultation carried out on August 12, 2025 with the community of El Mehemla, the main agricultural activities in the region are growing olives and the cultivation of annual cereals, such as barley and wheat, which are grown during the rainy season. Livestock farming, particularly grazing, is also an important source of income for the inhabitants.

In the Menzel Habib delegation, basic infrastructure is unevenly developed: drinking water coverage is 53.73% versus 84.6% nationally (SONEDE, 2023), electricity is 90.14% versus 96.4% nationally (STEG, 2023), and sanitation remains very limited, with only 5.47% of households connected to the ONAS network (ONAS, 2023). Educational provision includes 8 elementary school and 2 secondary schools (Ministry of Education, 2023), but access to higher education requires travel to Gabes. In terms of health, the absence of hospitals and clinics is offset only by 10 basic health centers offering primary care (Ministry of Health, 2023). Overall, the area's fragile economy, dependence on agriculture, high levels of structural poverty and lack of public services make it a vulnerable territory with significant socio-economic development needs.

1.3 Identified Social and Environmental Risks and Impacts

The potential risks and impacts, both positive and negative, arising from the project are described in detail in the Environmental and Social Impact Assessment (ESIA) and include the following:

Table 1 - Summary of anticipated impacts during the planning and construction phase of the PV Solar plant

Designation		Likely impact of the Project
	Landscape and Visual	Visual and landscape impacts due to the presence of typical construction site elements such as equipment and machinery. However, the site is relatively isolated and far from the RN15 main road, at around 10 kilometers and 2.3 km from the village of El Mehemla, from where the construction site will barely be visible.
Physical	Soil, groundwater and surface water	The topography of the solar PV plant site is relatively flat, with no significant topographical variations. Construction could result in soil compaction, the creation of trenches and changes to surface runoff, but the impact remains limited by the flat topography. The lithology consists of fine dune sands on the surface and carbonated sandy-clay silts at depth, with mechanical characteristics suitable for surface foundations and metal piles. There is a risk of soil pollution in the event of fuel leaks, and the camp will generate solid and liquid waste. The region is also prone to sandstorms.
environment	Flood Risk	The layout of the photovoltaic panels considered the results of the hydrological study. The hydrographic network was taken into consideration to avoid any installation in areas at risk of flooding. In addition, the layout of the site has been adjusted in its southern part, with a shift in the location initially planned, to exclude the area under the railroad bridge, identified as sensitive in the event of flooding.
	Air quality	Construction activities will result in dust emissions (earthworks, traffic on unpaved tracks) and exhaust gases (SO ₂ , NOx, CO, CO ₂). Local sandstorms may accentuate dust, but the impact remains limited thanks to the site's isolation, located around 10 km from the RN15.
	Noise	Noise generated by machinery, vehicles and the transport of materials on the site and on the RN15 trunk road. However, there are no receptors adjacent to the solar PV plant site, the nearest village being El Mehemla, around 2.3 km from the project site.
	Flora and habitats	The earthworks will result in the complete uprooting and trampling of the plant species present on the site. However, the majority of the site (59.9%) is composed of bare soil, as well as sparse vegetation (35.7%), medium vegetation (3.7%) and dense vegetation (0.7%). The site is dominated by a sparse steppe of species typical of arid environments, such as <i>Astragalus armatus</i> , <i>Haloxylon salicornicum</i> , <i>Anabasis articulata</i> , <i>and Gymnocarpos decander</i> , as well as clumps of <i>Zizyphus lotus</i> located in the wadi bed. However, none of these species is classified as rare or endangered.
Biological environment	Fauna	Construction of the solar PV plant will result in localized changes to habitats, affecting vegetation and terrestrial fauna (insects, reptiles, small mammals) through destruction of shelter, noise, dust and machine movements, with the risk of accidental mortality. The local fauna, typical of arid steppe environments and resilient, includes rodents, canids, reptiles and a few invertebrates, including Androctonus australis. None of these species is classified as Endangered (EN) or Critically Endangered (CR) on the IUCN Red List (version 2025.1).
	Avifaune	Potential impacts on avifauna are expected mainly during the project's construction phase, due to noise pollution, vibrations and site machinery traffic. These disturbances may cause temporary disturbance to birds, particularly during sensitive nesting, feeding and migration periods. No birds of prey or waterfowl were observed on the site, indicating the absence of any major ornithological issues. Only one species of particular interest was identified: the Southern Shrike (<i>Lanius meridionalis</i>), classified as "Vulnerable" on the IUCN red list (2025.1) and on the national list. The project site is approximately 3.2 km from the Sebkhet Sidi Mansour Ramsar wetland. However, no functional interaction between this wetland and the project site has been identified, and no ecological exchange likely to trigger a Critical Habitat criterion has been identified.

Designation		Likely impact of the Project
	Agricultural activity	The site is not cultivated, but the olive grove to the east could be affected, especially by dust from the construction work, although the flat topography limits this impact.
	Local, regional and national economy	Local recruitment wherever possible, especially for unskilled staff. Some specific positions require national and international technicians and engineers (around 450 people). A local employment plan will be developed to ensure the creation and maximization of jobs for local communities, following a diagnosis of specific local needs and a focus on community development. Specific assistance measures will be provided to vulnerable groups, and specific measures will be developed to work towards gender equality, poverty eradication and gender-sensitive economic growth. Increased income for residents and SMEs through the purchase of materials and services, and by stimulating the regional and national economy. Elaboration of the Community Development Plan (CDP) by the Promoter to provide a series of indirect compensations to the people of the El Mehemla community.
Socio-economic	lealth and safety at work	Generic occupational health and safety risks. There will be some temporary risks to workers' health and safety, as working on the construction site increases the risk of injury from accidents such as working with rotating machinery and falling objects, as well as contact with hazardous materials. The presence of venomous species on the site also increases the risk of stings and bites.
environment	Community health, safety and security	The potential influx of workers could have several impacts on community health, safety and security. Increased construction vehicle traffic to the site increases the risk of road accidents for local communities, especially pedestrians and children.
	Supply chain	The use of a supply chain introduces the risk of labor law violations.
	Archaeology	No archaeological sites on the site of the solar PV plant. The nearest archaeological site to the project site is approximately 2.25 km north of the solar PV plant.
	Land use	The solar PV plant is privately owned and covers an area of around 200 hectares covering 3 land titles, all held by a single landowner. The land is secured by a lease agreement with the landowner. Based on the site visit carried out, it is concluded that the area is vacant and that there are no physical structures. Grazing activities are carried out on the site of the solar PV plant by the owners themselves. Grazing activity is generally undertaken on open land, which guarantees the landowners the possibility of grazing their livestock in other surrounding areas, as they have donated part of their land and it is extensive. In addition, the area in which the solar PV plant is to be located does not contain any significant or key habitat of importance for grazing that is different from the surrounding areas. Fencing around the solar PV plant will restrict access to land within the project footprint, even if the access routes remain open.
Public infrastructure	Water requirements	Water requirements, estimated at 500 m ³ /month for sanitary use, concreting, cleaning and dust control, will be supplied by tanker truck fed from the SONEDE network or provided through the drilling of an onsite borehole, subject to CRDA authorization.
	Solid and liquid waste	Solid and liquid waste utilities - it is important to ensure that existing utilities will be able to handle the amount of solid waste generated by the project during the construction phase.
	Railway line	A section of the new HV line (approximately 200 m) will be designed and constructed by the Developer through an EPC contractor, and subsequently operated by STEG, linking the solar PV plant and the existing 150 kV transmission line (Bouchema - Mdhilla) will cross the railroad owned by Compagnie des Phosphates de Gafsa (CPG), used for transporting phosphate between Gafsa and Gabes.

 Table 2 Summary of anticipated impacts during the operating phase

Designation	Likely impact of the Project
Landscape and visual	The 200-hectare site is minimally intrusive, visible only from its immediate surroundings, and the PV panels can be partially hidden by vegetation. The site's distance from the RN15 and the absence of tourist attractions limit the impact on the landscape. The risk of glare for train drivers is very low, due to the strict geometric conditions required and the short duration of passage along the track.
Soil and water resources	During operation, the partial sealing of the ground by the PV panels could locally modify runoff and encourage small gullies, but the spacing of the panels, the low rainfall and the division into separate zones limit this effect. Traffic is limited to light vehicles for maintenance, and the risk of accidental pollution remains negligible.
Biological environment	Flora The arid climate of the site should not have a major negative impact on vegetation; the partial shading of the PV panels may even reduce water and heat stress, promoting plant cover and habitat diversification. Certain wildlife species (reptiles, small rodents) could benefit from the shelter and microclimates created, mitigating the effects of extreme conditions and supporting biodiversity locally. Avifauna The most significant impact of the transmission lines is collisions and electrocution; this type of risk can even compromise the viability of certain populations and lead to their disappearance in certain areas. However, the 200 m connection line, located entirely within the perimeter of the solar PV plant, presents only a low risk to avifauna
Social environment	Local and regional economy Stimulation of the regional and national economy through the purchase of local goods and services, generating fiscal benefits for the governorate of Gabes and providing jobs for local communities, including women, young people and the vulnerable, thus improving their living environment and well-being. Local employment As far as possible, qualified and skilled people will be hired locally. Improving access to and reliability of electricity The project makes a significant contribution to improving access to electricity and grid reliability in the region. By strengthening local production capacity through a renewable source, it diversifies supply, reduces dependence on fossil fuels, and supports the growing energy needs of neighbouring communities.
Health and safety at work	Risks to workers' health and safety include falls, working at height or in trenches, the use of tools, exposure to heat and sunlight, and electrical and burn hazards associated with live components.
Potential labor law violations in the supply chain	The use of a supply chain carries a risk of labor law violations, such as poor conditions, lack of contracts, non-compliance with health and safety standards, child labor, forced labor or other forms of exploitation.
Impacts of the electromagnetic field	The project generates electromagnetic fields (EMFs) related to the generation and transmission of electricity. In solar PV plants, the main sources of EMFs are inverters, transformers, cables, and photovoltaic modules. Planned technical measures to reduce their influence include choosing certified equipment, evenly distributing inverters under panel structures, and optimizing cabling. According to the relevant authorities, the levels measured near transformers remain well below regulatory exposure thresholds. Thus, while the health risk is low, rigorously applying standards mitigates concerns about EMF exposure for workers and the general public.

1.4 Anticipating Stakeholder Engagement Needs in the Context of Social Risk Management

- 1) Quality It is not sufficient simply to have a process in place; the quality and timing of the processes are critical. In fact, the quality may be more important to the success of stakeholder engagement than the quantity of financial resources allocated to it.
- 2) Early engagement Early engagement provides a valuable opportunity to test and promote public perception and set a positive tone with stakeholders early on. It is also important to note that building sound relationships takes time.
- 3) Integration with design processes There will often be elements of the project or program design that will need the consultation and participation of external stakeholders. This aspect of stakeholder engagement needs to be properly integrated into project planning and scheduling.
- 4) Disadvantaged and vulnerable groups Women, the disabled and ethnic minorities, for example, may be difficult to reach but can often be the stakeholders with the most to lose from a development project. Negative impacts on these groups (even if unintentional) can generate severe negative publicity over and above human costs.
- 5) Addressing key issues Where communities have issues or concerns that are important to them, it is critical that these are addressed in the engagement process even if these issues are difficult for Voltalia.
- 6) Failure to address serious concerns will compromise the stakeholder engagement process and cement negative perceptions of the project.

1.5 Voltalia's Approach

All strategic stakeholder engagement planning activities are based on an ongoing process of stakeholder identification, analysis and mapping to ensure that all relevant parties have been considered during the planning process. Voltalia implements an EBRD aligned scope to, "At a minimum, carry out stakeholder identification, determine engagement and consultation requirements, and develop and implement a grievance mechanism. Further stakeholder engagement, will be undertaken, proportionate to the nature and scale of the project, its stakeholders and its potential environmental or social risks and impacts."

Key considerations within our overall approach to stakeholder engagement include:

- Identifying the environmental and social risks (highlighted in Section 1.3 above).
- Demonstrate anticipated engagement needs in the context of the environmental and social risks identified (highlighted in **Section 1.4** above),
- Early consultation and the distribution of adequate and timely Project information to Project-affected people and other stakeholders,
- The provision of opportunities for all stakeholder groups to voice their opinions and concerns and the opportunity for these concerns to be both responded to and taken into account in Project planning decisions,
- The promotion of informed consultation and participation, allowing stakeholders to confirm a
 diversity of opinions in a suitable timeframe without forcing consensus,
- The verification of broad community support for the Project within the affected communities, and
- Accommodating for the needs of marginalised or vulnerable groups within the engagement process.

 Promoting the access of both internal stakeholders (that being, the Project's labour force), and external stakeholders (that being, communities and other interested and affected parties), to a fully functional and effective grievance redress management system.

The benefits of these approaches are that issues that may prevent the Project from proceeding are identified early in the Project lifecycle and have a greater chance of being managed throughout the ESIA and subsequent project construction. In addition, this approach will be more cost and time effective, aiming to prevent issues prior to their occurrence, and allowing the Project team to build a strong foundation to proactively manage successful stakeholder relationships and partnerships.

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2 REGULATIONS AND REQUIREMENTS

This section provides a summary of legal, regulatory, lender, and company requirements pertaining to stakeholder engagement applicable to the Project. This includes public consultation and disclosure requirements related to the environmental and social assessment (ESIA) process.

2.1 National Legislation

There is no clear and defined mechanism/framework for stakeholder involvement in Tunisia for activities related to construction or operation of a project. Since the Tunisia revolution in 2011, the National Environmental Protection Agency (ANPE) as EIA regulator, has requested a stakeholder consultation report to be appended to the Environmental Impact Assessment (EIA), although this request is not defined as a requirement in law.

Decree No. 2005 - 1991 of July 11, 2005, defines the categories of units subject to environmental impact assessment and the categories of units subject to specifications, only electricity generation units with a capacity of at least 300 MW are subject to EIA. Consequently, the project to build the solar PV plant in Menzel Habib which has a capacity of 130 MWp (less than 300 MW) does **not require an EIA**.

Analysis of the vulnerable population or an examination of gender aspects is not required by the decree or related laws. There is no obligation to publish EIA reports, nor any deadline for public consultation, unless required by donors.

2.2 Lenders Requirements

The main international guidelines applicable to Stakeholder Engagement are the Equator Principles (EP) 4, the International Finance Corporation (IFC) Performance Standard (PS) 1 and the European Bank for Reconstruction and Development's (EBRD's) Environmental and Social Requirements for Stakeholder Engagement (ESR 10). The best practice approach is that all Lender financed projects should also be benchmarked against the relevant aspects of all eight IFC Performance Standards.

2.2.1 Alignment to IFC and EBRD Lender Requirements

Principle 5 of the EP requires that, for all Category A and B Projects, the Project demonstrate effective stakeholder engagement, as an ongoing process in a structured and culturally appropriate manner, with affected communities, workers and, where relevant, other Stakeholders. All Projects affecting Indigenous Peoples will be subject to a process of Informed Consultation and Participation (IPC) and will need to comply with the rights and protections for Indigenous Peoples contained in national law and international law. In this respect, IFC PS 7 is referred to in terms of the application of Free, Prior and Informed Consent (FPIC))¹. ESIA documentation should also be made readily available to the stakeholders.

The IFC PS 1 states that where the Developer has conducted an ESIA process, the Developer must publicly disclose the ESIA document. If communities may be affected by risks or adverse impacts from the project, the Developer must provide such stakeholders with access to information on the purpose, nature and scale of the project, the duration of proposed project activities, and any risks to and potential impacts on such communities. For projects with potential adverse social or environmental impacts, disclosure should occur early in the ESIA process and before the project construction commences, and on an on-going basis.

If affected communities are expected to be subject to risks or adverse impacts from a project, the Developer must undertake a process of consultation in a manner that provides the affected communities with

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¹ It is noted that this Project does not identify Indigenous people in the Project's Area of Influence as being affected or impacted, and therefore they will be earmarked as 'other stakeholders' until such a group is identified.

opportunities to express their views on project risks, impacts, and mitigation measures, and allows the client to consider and respond to them.

The IFC's Performance Standard 1 also states that effective consultation should:

- Be based on the prior disclosure of relevant and adequate information, including draft documents and plans
- Begin early in the ESIA process,
- Focus on the social and environmental risks and adverse impacts, and the proposed measures and actions to address these,
- Be conducted on an ongoing basis as risks and impacts arise,
- Be undertaken in a manner that is inclusive and culturally appropriate, and
- Be tailored to the language preferences of the affected communities, their decision-making process, and the needs of disadvantaged or vulnerable groups if applicable.

The consultation process must also ensure free, prior and informed consultation and facilitate informed participation. Informed participation involves organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the affected communities on matters that affect them directly, such as proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The Developer must document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected communities.

The IFC had, in 2018, published "Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets" which has been consulted in developing Project strategies for Stakeholder Engagement.

PS1 requires the disclosure of relevant information access to relevant information on the purpose, nature, and scale of the project, the duration of proposed project activities, any risks to and potential impacts on such communities and relevant mitigation measures, the envisaged stakeholder engagement process, and the grievance mechanism.

PS1 also requires the use of an effective grievance mechanism that can facilitate early indication of, and prompt remediation for those who believe that they have been harmed by Project.

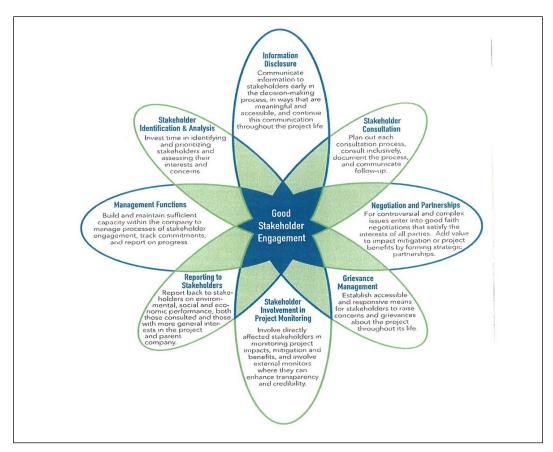
IFC Performance Standard 4 on Community health, safety and security indicates that a project is expected to evaluate the risks and potential impacts to the health and safety of the affected communities during the Project life cycle and requires establishing preventive and controlling measures consistent with good international industry practice.

IFC Performance Standard (PS) 5 is on land acquisition and involuntary resettlement. It specifies that a Project is required to develop a resettlement action plan so that physically or economically displaced individuals have their living conditions and livelihoods restored or improved. This is in tandem with the requirements of the World Bank's Environmental and Social Standard (ESS) 5 on Land Acquisitions, Restrictions on Land Use and Involuntary Resettlement, which focuses on ensuring that a development project should not leave the people poorer than when it first commenced.

Aligned to the EBRD's Environmental and Social Requirement (ESR) 10, this SEP seeks to fulfill all prescribed requirements, including the assurance of on-going reporting and feedback to relevant stakeholders, ensuring an engagement process that is gender responsive and inclusive of all relevant stakeholders, including vulnerable people and under-represented groups, and take appropriate measures to ensure the protection of personal data and the privacy of stakeholders.

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The key components of good stakeholder engagement can be found in **Figure 3** below. Each component of stakeholder engagement illustrated overlaps with the others, but each is critical in its own contribution to effective and sustainable engagement.



Source: IFC Stakeholder Engagement: A Good practice handbook for companies doing business in emerging markets, May 2007 Figure 2: GOOD STAKEHOLDER ENGAGEMENT

2.3 Voltalia Company Requirements

2.3.1 The Voltalia Engage Platform

Voltalia, in the quest to ensure consistent, tracked communication and grievances from both the labour force and community, has established the Engage Platform. The platform itself is accessed by designated Voltalia Project employees to either input information, glean statistical quantifications and track outstanding actions related to communications, disclosure and grievance resolutions.

"Engage" is designed to serve as the cornerstone of Voltalia's stakeholder and grievance management system, ensuring that our interactions with all parties are transparent, efficient, and accountable. It is our commitment to upholding the highest standards of corporate social responsibility and Engage reflects this by providing a centralized platform for managing relationships and addressing concerns. The system is integral to our compliance with the IFC's Performance Standards and other industry regulations, allowing us to monitor our performance and make informed decisions that align with our sustainability goals and ethical commitments.

Benefits of using Engage:

- Streamlined communication for quicker and more effective responses to stakeholder inquiries and grievances.
- Centralized data management to better track stakeholder interactions and grievance resolutions.
- Enhanced accountability and improved reputation management through transparent processes.
- Assistance in maintaining compliance with international standards, thereby reducing legal and reputational risks.
- Fosters stronger relationships with stakeholders through improved engagement strategies.
- Contribution to the long-term success and sustainability of renewable energy projects across the globe.

2.3.2 Whistleblowers System Procedure

Voltalia has in place a Company Whistleblowers Policy with a Whistleblowers System Procedure (CPL-PRO-005-01-AA-EN). According to Voltalia's Ethics guide any violation including Gender Based Violence Harassment (GBVH) in the project should be reported in the Whistleblower system.

(https://secure.ethicspoint.eu/domain/media/en/gui/106905/index.html). This is discussed further in Section 7, Grievance Redress Mechanism.

Any Voltalia employee and any third party may transmit an 'Alert' to the Deputy Managing Director, the Head of Human Resources and Corporate Functions or the Group Compliance Director, if the purpose of the Alert is to report one of the following elements:

- 1) A crime or offence.
- 2) A serious and obvious violation of the law or regulations,
- 3) Conduct or situations contrary to Voltalia's Code of Conduct on bribery and trading in influence.
- 4) A threat or serious harm to the public interest2.
- 5) The existence or realization of a risk of serious harm to human rights and fundamental freedoms, to the health and safety of individuals and to the environment. This risk of harm must result from the company's activities and those of the companies it controls, as well as from the activities of subcontractors or suppliers with which it has an established business relationship. A simple potential risk can thus be the subject of an alert.

Alerts are sent to: https://secure.ethicspoint.eu/domain/medi/en/qui/106905/index.html

A few points to note:

- 1) It is not an obligation, it is an option offered to all citizens to freely exercise their responsibility,
- 2) Ethical whistleblowing is based on two principles: defense of the public interest and proportionality,
- 3) The alert can be internal or external to the organization,
- 4) It must be possible to document it (writings, e-mails, interviews, witnesses), and
- 5) In the case of an alert made in the context of work, the protection of the employee guaranteed by law depends on compliance with a 3-stage reporting procedure (except in the case of serious and imminent danger or in the presence of a risk of irreversible damage).

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² The subject of the Alert may also concern: - a serious and manifest violation of an international commitment regularly ratified or approved by France; - a serious and manifest violation of a unilateral act of an international organization taken on the basis of a duly ratified international commitment; or - a breach of the obligations defined by European regulations and by the monetary and financial code, or the general regulations of the Autorité des Marchés Financiers, and which are supervised by the Autorité des marchés financiers or the Autorité de contrôle prudentiel et de résolution.

3 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Information disclosure and stakeholder consultation activities were carried out during the preparation of the ESIA report.

On August 12, 2025, a meeting was held at the Gabes Governorate with government representatives, civil society organizations and in the presence of the media. At this meeting, a visual presentation of the project (PowerPoint) was given by Voltalia, and brochures in French and Arabic were distributed to participants. On the same day, a public consultation was held with the community of El Mehemla, located some 2.3 km from the site of the photovoltaic plant. During this consultation, an oral presentation in Arabic was given jointly by Voltalia and the engineering firm EAM, and brochures in French and Arabic were also distributed. The objectives of the consultations were as follows:

- Disclose accurate information associated with the project based on available information using maps and other tools, in a culturally appropriate manner.
- Gather views and opinions on the project and use stakeholders' local knowledge and expertise to identify the main environmental and social risks and impacts that need to be considered during the ESIA.
- Discuss E&S issues associated with previous similar projects to understand how environmental
 and social aspects have been addressed, in order to provide useful information for the development
 of the ESIA.
- Identify environmentally and socially sensitive receptors or those in the vicinity of the PV plant site, which should be avoided or studied in detail, with the aim of avoiding/minimizing risks and negative impacts wherever possible.
- Understand risks to specific areas, including formal and informal land users, seasonal land use and biodiversity concerns regarding risks to avian fauna and other ecological receptors.
- Jointly identify gaps in environmental and social knowledge that need to be filled in subsequent stages of the ESIA through field surveys or similar activities.
- Gather views and opinions on local communities' likely perceptions of the project and how to manage them during the project's construction and operation phases.
- Understand future authorizations and licenses, and the standards to which the project must conform, to ensure future compliance with national legislation.

The project presentation (PowerPoint in French) and brochures in French and Arabic, including project details, the ESIA process and stakeholder engagement activities, are available on request.

The outcome of these meetings in the governorate resulted in:

- The Governor of Gabes expressed his support for the renewable energy project and stressed the importance of Corporate Social Responsibility (CSR).
- Members of parliament emphasized the region's rural specificity, expressed their support for the project and similar initiatives, and stressed the need to implement CSR and encourage local purchasing.
- The representative of the municipality pointed out that local municipalities do not benefit directly
 from industrial taxes and called for a mechanism whereby the municipality would receive a share
 of the financial spin-offs.

A summary of all meetings, including meeting objectives and outcomes, are highlighted in the below table.

 Table 3 Schedule of previous stakeholder meetings

Nr.	Organization	Meeting Date	Meeting Objective and Outcome
Region	al government and municipal	authorities (includin	g media)
	Governorate of Gabes	12/08/2025	Meeting objective Regional political authority (non-elected position). Main leader at regional level and representative of the governorate at national level. The governor's main role is to support the project by providing the necessary authorizations and support on the various issues that may be encountered during the life of the project, such as land use, security, community conflicts and grievance management, project employment priorities within the communities, health issues, social development programs. Outcome of the meeting: The Governor affirmed his usual support for renewable energy projects, while insisting on the need to take the corporate social responsibility (CSR) component seriously, pointing out that many companies sometimes make false promises.
		27/08/2025	Meeting with the Governor and the Secretary General in the Governorate of Gabes Outcome of the meeting: Presentation by Voltalia on the importance of the project and the fact that it will be financed by the IFC Lenders are particularly vigilant about environmental and social aspects as part of due diligence preparations. Strong commitment by the project to comply with international and national standards. The Governor of Gabes supports the project for Menzel Habib, a neglected area but one with a promising new vision combining agriculture and renewable energy. Role of the Governor and Secretary General: to facilitate and remove any administrative obstacles. The project is in line with the State's strategic orientation. In addition, Menzel Habib is a suitable and unspoilt region for combining agriculture and renewable energy. According to the Governor, it is important to have a local development system specific to the region. Corporate Social Responsibility (CSR): the Governor emphasises the need to develop a solid CSR policy and also: i) cooperation with legal environmental associations, ii) promoting tourism potential (guest houses in Menzel Habib), iii) sharing experience with other projects (the El Hicha (tomatoes) experience shows that, despite internal investments (nursery, buses, etc.), the community has not benefited). Iv) capacity building (schools and universities) The Governor insists on the implementation of a clear CSR policy and regular monitoring to develop a community development plan aligned with the State's priorities. The Governor requests clarification of the locations of structures within the Bouchemma—Mdhilla transmission line (140 km). These must be dealt with on a case-by-case basis, in coordination with STEG and taking legal aspects into account.
	Directorate of Equipmen Housing and Lan Development of Gabes	d	Meeting objective The Directorate of Equipment, Housing and Territorial Planning of Gabes ensures that the project complies with the land-use plan and issues the necessary authorizations for the installation of the solar PV plant and the transmission line. Its consultation helps to prevent conflicts of use and to integrate the project into the territory in a regulated manner The representative of Directorate of Equipment, Housing and Land Development of Gabes the gave no comments
3.	(ONAS)	e 12/08/2025	Meeting objective Examine the project's impact on existing sewage systems and plan measures for wastewater management during construction and operation. Ensure that the solar PV plant and transmission line do not interfere with local sewage systems. The ONAS representative gave no comments during the public consultation
	National Water Supply an Distribution Compan (SONEDE)		Meeting objective Assess water requirements for the construction and operation of the solar PV plant and transmission line. Identify possible sources of supply and ensure that the project does not compromise the distribution of drinking water in the region. The SONEDE representative gave no comments during the public consultation

Nr.	Organization	Meeting Date	Meeting Objective and Outcome
5.	Regional Commission for Agricultural Development (CRDA)	12/08/2025	Meeting objective Identify potential impacts on agriculture and land use around the site. Propose measures to minimize disruption to local crops and farming activities. The CRDA representative gave no comments during the public consultation
6.	National Heritage Institute (INP)		Meeting objective Provide technical support for the preservation of cultural and environmental heritage around the site. Identify and protect any heritage or archaeological features that may be affected by the solar PV plant plant and transmission line The INP representative gave no comments during the public consultation
		27/08/2025	INP was consulted during the due diligence phase. Outcome of the meeting The INP confirmed that it had been invited by the Governor and had taken part in the consultation session on 12 August 2025. Presence of an archaeological site located more than 2 km from the Menzel Habib PV site. Archaeological maps are available; the Mhamla site is mentioned as a Roman site. According to the INP, regardless of the value of the archaeological site, they are all considered important. Recommendation: vigilance when passing with machinery to avoid any impact on the archaeological site. Place of worship (Mzar): discuss with the local community to confirm whether it is frequented, as the site is not currently promoted.
7.	Municipality of Menzel Habib	12/08/2025	Meeting objective Discuss the project's local spin-offs, including tax and social benefits, and identify measures to enable local residents to benefit directly from the solar PV plant and transmission line. Assess the impact on municipal infrastructure and plan coordination with local services during construction and operation. Outcome of the meeting The representative referred to the fact that the municipalities where projects are located do not benefit directly, since the tax on industrial, commercial or professional establishments is paid by the company to the municipality of Tunis, thus depriving the region of any financial advantage.
8.	Parliament	12/08/2025	Meeting objective Examine the solar PV plant and transmission line project from a local development perspective, taking into account the needs of rural communities and existing agricultural projects. Discuss corporate social responsibility (CSR) measures and the integration of local raw materials to support the region's economy. Outcome of the meeting The representative of the parliament emphasized the specificity of the region, stressing that it is a rural environment. She mentioned the problem of agricultural projects being abandoned in Menzel El Hbib, due to administrative constraints and blockages. She expressed her interest in and support for this and other similar projects likely to boost the Menzel Habib region. She only mentioned her concerns about the environmental impact of the project but nevertheless remained willing to lift the constraints on its realization, as well as on other projects in the field of renewable energies, given that she is a member of the commission in charge of energy. She also stressed the importance of CSR, pointing out that it must be taken seriously by Voltalia. She added that any aid or contributions granted would have to be carefully studied and monitored. He stressed the importance of ensuring that, wherever possible, the raw materials needed to build the solar power plant are purchased locally, so that the region can benefit directly.
9.	Press and media	12/08/2025	The press and media are invited by the Governor to attend the consultation meeting. Objective of the meeting Inform the public about the solar PV plant and transmission line project, its objectives and its socio-economic and environmental impacts. Ensure transparent communication to respond to community questions and concerns and promote acceptance of the project.

Nr.	Organization	Meeting Date	Meeting Objective and Outcome
10.	Tunisian Electricity and Gas	12/08/2025	• STEG was present at the public consultation in the governorate of Gabes. However, it did not comment on the project.
	Company (STEG)		
		26/08/2025	STEG was consulted during the due diligence phase.
			Outcome of the meeting
			- STEG has a legal department to deal with cases involving buildings close to transmission lines.
			- It is requesting validation of the E&S studies currently underway.
			- STEG manages future projects, and since the Bouchemma–Mdhilla line is already in operation, it is necessary to communicate directly
			with the operations department.
			- This is the first time STEG has allowed a developer to make improvements to an existing line.
		25 (00 (2025	- STEG is in the process of setting up a dedicated management system.
		27/08/2025	Meeting with STEG - Bouchamma substation during the due diligence phase
			Outcome of the meeting
			- The schedule has not yet been prepared. It will be proposed by the EPC.
			 The operation of the line is separate from that of the thermal power station. STEG plans to add two cabinets and two control cabinets to the existing old room (low-voltage section).
			- STEG plans to add two capinets and two control capinets to the existing old room (low-voltage section) The technical specifications for the equipment will be provided by STEG's equipment department.
			- The procedure and operating mode must be validated in advance by STEG.
			- The "Bouchemma – Mdhilla" line begins at pylon no. 9, as the line starts before the Gannouch 150 kV substation, which is now
			decommissioned. There are eight unconnected pylons before pylon no. 9.
			- The addition of new pylons on the STEG side must be confirmed with Voltalia.
			Monitoring and maintenance of the Bouchemma – Mdhilla line:
			- Daily status checks and regular inspections once every six months.
			- For avifauna: no incidents involving large birds (storks) have been reported on this line. The main cause of damage remains humidity.
			- At each visit, a written report must be sent to the legal district in the event of construction or intervention within the line's right-of-way.
11.	Société Nationale des Chemins	s28/08/2025	The National Railway Company of Tunisia (SNCFT) was consulted during the due diligence phase.
	de Fer Tunisiens (SNCFT)		Outcome of the meeting
			Project to increase the capacity of the railway line
			- Change from 4 pairs (8 return trips) to 5 pairs, using the same corridor.
			- No impact of the planned works on the Voltalia project facilities.
			- Railway area: 34 m.
			- Platform and rail renewal works scheduled for 2026, 2027 and 2028.
			- Signing of EPC contracts scheduled for November 2026
			- Coordination required in terms of scheduling, prevention plan and actions to be implemented.
			Incidents and safety
			- On average, one derailment incident per year (caused by track anomalies or livestock crossing the tracks). Latest cases in 2017 and 2018. Current speed limited to 60 km/h (or even 40 km/h in some places) compared to 80 km/h, due to the condition of the track (in use for
			over 30 years).
			- Preventive maintenance required every 20 to 25 years.
			- No night-time lighting on the track for Voltalia.
			Other technical considerations
			- Hydraulic structures to be replaced and reinforced (study in progress).
			- Transport of wet phosphate.
			- Height of cable above railway line: 11 m.
			- Pylon distance: 30 m.

Nr.	Organization	Meeting Date	Meeting Objective and Outcome
			In the event of future electrification of the track, the height will need to be increased to 20 m (very long-term project, 30-year horizon).
12.	Delegate of Menzel Habib	27/08/2025	- The Menzel Habib delegation is known for its pastures and olive trees.
			- The project environment is calm.
			- The solar PV plant project is welcomed as an opportunity for development, in line with Tunisia's strategy of achieving 30% renewable
			energy.
			- An information day was organised to present the 130 MW project on 12 August 2025, with strong local participation.
			 Subcontracting and recruitment must comply with new Tunisian legislation and the labour code. The project presents an opportunity for local employment, even without prior experience.
			- The project presents an opportunity for local employment, even without prior experience. - The majority of people hired for the Scatec Project (60 MW PV plant) are from Menzel Habib (minimum 100 people). The workforce is
			available and trained.
			- It should be noted that the roads in Menzel Habib are used by Scatec to transport components for the PV project and also to transport 40
			tonnes of phosphate.
			- A study is currently underway for two corridors linking the port of Gabes to the Bou Chabka border post via Menzel Habib. The project is
			currently being financed for work in 2027 and 2028.
13.	Representative of the local	127/08/2025(during	Consultation of the Representative of the local community of El Mehemla
		ESDD)	Outcome of the meeting
		,	- Presence of a mosque, Mohamed ben Salem, in the village of El Mehemla (approximately 2.3 km from the PV site)
			- Pupils have to walk to school
			- The archaeological site, which is a Roman site, is frequented by local community
	unity groups, leaders and orga		
14.	Community of El Mehemla	12/08/2025	Objective of the meeting
			The objective of consulting the community is to ensure the social acceptability of the project, anticipate negative impacts, and identify the
			concerns and expectations of residents.
			Outcome of the meeting
			 El Mehemla region is experiencing significant population migration due to a lack of employment opportunities and amenities. The percentage of women in the population is higher than that of men, due to the departure of men to work in other regions.
			- The percentage of women in the population is higher than that of then, due to the departure of their to work in other regions. - There are no recorded conflicts between the inhabitants of the region.
			- The majority of the population is unemployed. The main local activities, such as olive cultivation and grazing, are facing difficulties due
			to drought and low incomes.
			- The three main vital needs expressed are: employment opportunities, a local health centre lacking equipment and permanent medical
			staff, and concerns about the closure of the Mehemla school, which has only about 10 pupils.
			- An agricultural track crosses a wadi, making it difficult to pass during sandstorms.
			- The electricity supply is satisfactory, but there is a lack of street lighting.
			- The quality of the water supplied by SONEDE is poor. Residents use water from the Majel or filtered water, as it is cheaper than bottled
			water.
			- There is no public landfill in the region; each resident manages their own waste.
			- ONAS does not provide connections in the region, and residents use septic tanks.
			- The community is not opposed to the project, particularly because the land is privately owned. Some have expressed a desire for
			employment opportunities for women.
15	Group of women	28/08/2025	The women were not informed about the concultation day on 12 Average 2025
15.	Group of women		 The women were not informed about the consultation day on 12 August 2025. Several women do not wish to participate in public meetings due to a male-dominated mentality and gender inequality.
<u> </u>		(during ESDD)	- Several women do not wish to participate in public meetings due to a male-dominated mentanty and gender mequality.

Nr.	Organization	Meeting Date	Meeting Objective and Outcome
			Example of good practice: in the Scatec project, a participation day was organised with first aid training and rewards. Women now prefer social media (Facebook) as their source of information. The population of Menzel Habib has grown recently, with some residents returning after leaving the region (previously, many left for Ghannouch). The women present have university degrees and local training: Studies in solar energy (IA, Gabes multimedia faculty). Training in industrial IT (bac +3). Internships at the Chemical Group (bachelor's and master's degrees). Training in industrial electronics, electrical systems control, law, early childhood education, administration. The agricultural sector is dominant. Women are very involved in this sector, have an income and are gaining financial independence. Transport issues: previously, women did not have access to means of transport. Today, they public transport to travel to Gabes. In the agricultural sector, transport is often provided by vehicles (D-Max) managed by a local manager. However, a serious accident 3-4 years ago caused the death of 7 women. The most vulnerable populations are found in isolated mountainous areas (lack of resources for children's education, poverty, unemployed graduates with disabilities). Access to healthcare is limited: in the event of a serious accident, it takes around an hour for help to arrive. The nearest health centre is in Ouedbref, with limited facilities. Child health is linked to family stability and parental behaviour. Violence and gender equality No violence related to foreigners has been reported (project currently under construction by an Egyptian EPC contractor). Frequent cases of domestic violence (physical, psychological, financial). Local NGOs (JSF, Jeunesse sans frontieres) organise awareness-raising campaigns on women's rights, the fight against violence and existing remedies (complaints, shelters). Olocal economic development and improved living conditions. Olocal economic development (e.g. new olive-grow
16.	Landowner of the solar PV plant and neighbouring landowners	12/08/2025	Objective of the meeting Consultation with landowners aims to ensure that their land rights are respected, to explain how the land will be used, and to negotiate fair compensation. It also helps prevent disputes and preserve their livelihoods by taking their concerns into account. Outcome of the meeting They all own plots with proper ownership documents. Currently, these lands are not cultivated, as farming them is not profitable. They were previously partially used for large-scale crop cultivation, but today they are used only for grazing. They stated that their quality of life has declined in recent years due to drought, which has impacted their livelihoods. They proposed drilling wells to use for agricultural irrigation.

Nr.	Organization	Meeting Date	Meeting Objective and Outcome
			 They all confirmed that their lands are not being used by any third parties, with or without authorization, and noted that the area does not experience any conflicts. They indicated that their lands do not contain any residences or Majel. Finally, they expressed their satisfaction with the project, believing that it will provide both them and their region with direct and indirect benefits.
		27/08/2025	The Landowner was consulted during the due diligence phase
			 Outcome of the meeting The owner has more than 400 hectares of land. The plots leased for the PV site are in the process of receiving land titles. The OTC visited the site. The owner employs a shepherd to look after his livestock. The length of employment can vary from 3 months to 10 years. The land adjacent to the PV site is used by the owner for agriculture and is equipped with a water well approximately 60 m deep.
1.5	TT 1	27/09/2025 (4	- No informal shepherds farm the land belonging to the owner.
15	Herder	27/08/2025 (during ESDD)	 The herders were consulted during the due diligence phase Outcome of the meeting The herders live in accommodation provided by the owner for 26 days, then is absent for 4 days. A total of 3 people are employed by the owner to manage the pastures and olive groves. The herders sometimes use the train track; the train's passage is signalled in advance by an alarm to avoid any risk. He has been employed on the site for 3 months. His family includes two boys and two girls, originally from El Hamma. Previously, he worked as a day labourer in other agricultural activities, including driving tractors

Table 4 - ESIA stakeholder engagement meetings

Nr	Requirement	Identified Stakeholders	Engagement					
	1		Method	Tools	Date	Outcomes & Follow up Action		
1	Early ESIA Project disclosure	Governor, Secretary General, First Delegate, Delegate for Economic Affairs, Delegate for Social Affairs. The delegates, District Manager of STEG, Regional representative of the ANPE, Regional Director of State Property and Land Affairs President of the municipality Regional Director of the Regional Commissariat for Agricultura Development (CRDA), Regional Director of Equipment and Infrastructure, SONEDE, ONAS Regional Director of Employment Representatives to the Assembly of People's Representatives for the governorate and National Guard.	tMeetings in the governorate of Gabes will be scheduled to finform project stakeholders about the fESIA process and take into account their concerns and comments regarding the project.	An official letter signed by Voltalia will be sent to the governor to organise a meeting at the governorate headquarters.		Stakeholders were informed about the project and the scope of the ESIA through a meeting held in the governorate; the comments and feedback gathered will be taken into account in the ESIA report.		
Baseli	ne Studies (Physical E	nvironment)	•	•				
2	Soil and geology	CRDA	Field surveys and consultation meetings			Recommendations for foundations included in the ESIA		
3	Geo/ hydrogeology	ONAS, SONEDE, CRDA	Field surveys and consultation meetings	Hydrogeology map	12/08/2025	Availability and quality of groundwater assessed, amount of water used during construction and operation, and method used for cleaning panels during operation.		
4	Surface drainage	CRDA, Municipal authorities.	Field surveys and consultation meetings	GIS maps, drainage models, soil permeability studies, geotechnical studies, flood risk studies	12/08/2025	Surface water flows identified; mitigation measures incorporated into the ESIA.		
5	Air quality	Local community, environmental NGOs	Field surveys and consultation meetings	Information meetings about the project during the public consultation scheduled in the El Mehemla community		Documented baseline air quality; Mitigation measures identified in the ESMP during the construction and operation phases of the project		

Nr	Requirement	Identified Stakeholders	Engagement						
	, î		Method	Tools	Date	Outcomes & Follow up Action			
6	Noise & vibration	Local community, environmental NGOs	consultation meetings	project during the public consultation scheduled in the El Mehemla community		Documented baseline air quality; Mitigation measures identified in the ESMP during the construction and operation phases of the project			
7	Climate	National Institute of Meteorology		Bibliography and climate study of the study area	12/08/2025	Climate data compiled; monitoring: integration into project design			
Baselir	ne Studies (Biological E	nvironment)				•			
8	Ecology, birds and bats	ONG environmentalists, local community, ANPE, representative of the Ministry of the Environment	biodiversity study report	site visit by an ornithology expert, biodiversity expert, and ecologist, species inventories		IUCN species classification; mitigation measures for fauna, flora, and avifauna during the construction and operation phases of the project, and biodiversity monitoring			
Baselir	ne Studies (Social Envir	onment)							
9		Regional government and municipal authorities Community groups, leaders and organizations (including co-operatives	meetings	Bibliography, Information meetings about the project	12/08/2025	Socio-economic baseline documented; impacts on livelihoods and land use assessed; mitigation measures proposed			
10	Health	regional representative, Ministry	Consultation meetings in the governorate		12/08/2025	Health risks identified; mitigation measures included in ESMP (dust, noise, water, labor conditions)			
11	Archaeology and cultural heritage	National Heritage Institute, local authorities, community elders	Site visits, consultation meetings	inventory, archaeological report of the project		Cultural and archaeological sites identified; protection and chance-find procedures included in ESMP			
12	Human rights	Local authorities, community representatives, NGOs	Consultation meetings,	Human rights assessment,	12/08/2025	Risks to human rights identified (e.g., land access, labor); mitigation measures included in ESIA			
ESIA I	Disclosure								
13	Draft ESIA disclosure		Public consultation meetings, document dissemination	Draft ESIA report, meetings	·	Stakeholders informed; comments collected for final ESIA			
14			Official submission and disclosure	Final ESIA report	will be planned	ESIA officially submitted; disclosure to lenders completed; follow-up actions documented			

4 PROJECT STAKEHOLDERS

Guidance: List the key stakeholder groups who will be informed and consulted about the project (or the company's operations). These should include people or groups who:

- Are directly and/or indirectly affected by the project (or the company's operations)
- Have "interests" in the project or parent company that determine them as stakeholders
- Have the potential to influence project outcomes or company operations (Examples of potential stakeholders are affected communities, local organizations, NGOs, and government authorities.
 Stakeholders can also include politicians, other companies, labour unions, academics, religious groups, national social and environmental public sector agencies, and the media.)

4.1 Stakeholder Identification, Analysis and Mapping Approach

Stakeholder identification, analysis and mapping will take place during the ESIA scoping and is described in **Section 4.2.** Information collected during scoping will establish a framework for the development of a Stakeholder Engagement Plan (SEP) for the ESIA and provide the broad framework, targets and objectives for all engagement activities.

The objective of the stakeholder analysis is to categorise the identified stakeholders and determine which:

- Are directly and/or indirectly affected by the project (or Project's operations),
- Have interests in the project or present companies that determine them as stakeholders, and
- Have the potential to influence projects' outcomes or Project's operations.

Stakeholder interest is defined as the extent to which the interests of a stakeholder are affected by the Project, either due to the Project's direct impact on them or because of political, financial, social, cultural, scientific or technical interests in the Project. These interests can either be positively or negatively affected leading to either an improvement or deteriorations in a stakeholder's baseline conditions.

Stakeholder influence refers to the power that a stakeholder has over the Project's outcomes. Influence can be direct or indirect. Indirect influence derives, for example, from a stakeholder's ability to influence others or their access to important information. Formal influence may derive from their ability to directly affect decision making through, for example, the issue of government approval and permitting decisions.

A common approach for the identification of the importance of stakeholders is to map the stakeholder's impact on the Project against the extent to which the Project may impact the stakeholder. A matrix is illustrated below in **Figure 4.**

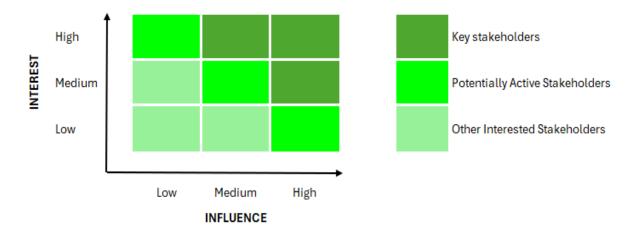


Figure 3: ILLUSTRATIVE INTEREST/INFLUENCE MATRIX

The table below reflects three levels of stakeholder categories and outlines the engagement approach and corresponding objective of stakeholder consultation, per category of stakeholder.

Table 5 - Engagement approach and objectives per stakeholder category

Stakeholder category	Engagement approach	Engagement objective	Strategy / main actions		
Key	Participation	To arrive at a mutually satisfactory way	 Maximum feedback importance 		
Stakeholders		forward through dialogue; building a	 Personal, frequent contact 		
(KS)		strong relationship with the relevant	Priority for information sharing		
		stakeholders and including them in the	 Regular communiqué regarding GRM 		
		processes of analysis and decision-			
		making.	,		
Potentially	Consultation	A flow of information between the Project	Maintain regular contact		
Active		and the public to obtain stakeholder input	 Closely monitor level of interest and 		
Stakeholders		and feedback; this provides opportunities	involvement		
(PAS)		for the public to express views and issues.	<u> </u>		
			needed		
			 Regular communiqué regarding GRM 		
			availability		
Other Interested	Information	A one-way flow of information from the	Maintain brief and informed contact		
Parties (OIP)		Project to the public. In international best	Occasional contact		
		practice this is sometimes termed	Discreet monitoring		
		"disclosure" and is not considered a	 Occasional communiqué regarding 		
		sufficient approach to real stakeholder			
		involvement. However, it's essential in	-		
		conjunction with consultation.			

Higher levels of disclosure and consultation correspond to the provision of more detailed project information and more in-depth discussion in relation to project impacts. Lower levels of disclosure and consultation represent more limited project information and discussion and are generally less technical and less specific in nature.

Stakeholders that have both high influence and high impact will be continuously engaged and kept fully informed throughout the Project. Those with high influence include both 'decision-makers' and 'opinion leaders' and are thus considered 'Key Stakeholders'. Stakeholders that have low influence, but high interest will also be kept well informed and involved in a process of informed consultation and participation, so that their views are taken into account in project decision making and are therefore considered 'Potentially Active Stakeholders'. Those stakeholders with a low level of influence and interest are categorised as 'Other Interested Parties.'

4.2 Project Stakeholder Identification, Analysis and Mapping

It is anticipated that as part of the baseline data acquisition process national, regional and local stakeholders will be consulted as follows:

- National and Regional Meetings where individual meetings with key national and regional stakeholders (e.g. government departments and agencies and international or national organisations such as NGOs and other interested parties with information of the area) will be undertaken to obtain baseline data (e.g. location of heritage sites/ cultural sites).
- Local Meetings to gather information at the local level will be held with representatives of the directly affected communities and any local Non-Governmental Organisation (NGOs).

At this point, the stakeholders that are identified include:

A- Regional government and municipal authorities (including media)

- Governorate of Gabes
- Delegation of Menzel Habib
- Municipality of Menzel Habib
- Regional district STEG
- National Agency for Energy Conservation (ANME)
- Ministry of the Environment / ANPE
- Regional Commission for Agricultural Development (CRDA)
- Department of Equipment, Housing and Regional Planning (MEHAT)
- Regional Department of State Domains and Land Affairs
- SONEDE
- ONAS
- National Guard
- Professional Training and Employment Department
- National Heritage Institute (INP)
- Protection civile
- · Assembly of People's Representatives Governorate of Gabes
- Regional Council
- Livestock and Pasture Office (OEP)
- Member of local and regional parliament (Menzel Habib, and Gabes Governorate)
- Office de Développement du Sud (ODS)
- Press and media

B- Civil society organizations:

- NGO "Les Amis des Oiseaux" (AAO), BirdLife International Partner
- NGO Tunisian Red Crescent

C- Affected communities, including displaced persons:

- Local communities (e.g. El Mehemla)
- Vulnerable groups
- Landowners and land users (formal, informal and seasonal)

The following is a presentation of the level of influence and interest of stakeholders in this Project. The analysis shows the category of stakeholders after using the approach as captured in **Section 4.1** above.

Table 6 - Stakeholder analysis

Stakeholder Identification	Stakeholder Name/ Title	Role in Project	Analysis: Level of Influence	Analysis: Level of Interest	Stakeholder category
Regional government and municipal authorities (including media).	Governorate of Gabes	Regional political authority (non-elected position). Main leader at regional level and representative of the governorate at national level. The governor's main role is to support the project by providing the necessary authorizations and support on the various issues that may be encountered during the life of the project, such as land use, security, community conflicts and grievance management, project employment priorities within the communities, health issues, social development programs.	High	High	
	Menzel Habib Delegation	Delegate (non-elected position). Head of delegation and delegation representative at regional level. He oversees local administrative services.	High	High	
	Menzel Habib municipality	Mayor: President of the municipal council, responsible for business, managing municipal interests and contributing to the social, economic and cultural of the municipality. He/she issues permits for all construction. He/she oversees solid waste management during the construction and operation phases. And he/she coordinates the Developer and its contractors on solid waste disposal.	High	High	
	STEG regional district	STEG's regional district will liaise with the STEG's national management for connection to the national grid. Monitoring and maintenance of the existing 150 kV transmission line Bouchemma – Mdhilla line (140 km)	High	High	
	Ministry of the Environment (ME)	The ME is represented at regional level by the ANPE, which is responsible for monitoring the implementation of the environmental management plan (EMP) by the Developer.	High	High	
	National Tunisian Railway Company (SNCFT)	The Tunisian National Railway Company (SNCFT) is a non-administrative public institution responsible for the management, operation and maintenance of the Tunisian railway network. The railway line connecting Gabes to Gafsa is operated by the Gafsa Phosphate Company (CPG) for the transport of phosphate. It runs along the southern part of the site for approximately 1.9 km. The Developer must consult with SNCFT to verify whether any reinforcement or modernisation work on the railway line is planned in the project area. This consultation will ensure compatibility between the solar PV plant work and any maintenance or improvement projects on the railway network, thereby guaranteeing the safety and compliance of the infrastructure.	High	High	

Stakeholder Identification	Stakeholder Name/ Title	Role in Project	Analysis: Level of Influence	Analysis: Level of Interest	Stakeholder category
	Agricultural Development (CRDA)	Resources and Fisheries (MARHP) at regional level. The CRDA manages floods and watercourses in the project area. It is also responsible for authorizing the drilling of water wells.	Medium	Medium	
	Housing Equipment Department an land use planning	Representative of the Ministry of Equipment, Housing, and Regional Planning (MEHAT) at the regional level.	Medium	Medium	
	Renewable Energy (DGEER)	Authorizes local and foreign investors to create and sell on the electricity grid. Implementation of electricity transmission projects. Implementation of related energy saving programs. The DGEER is responsible for planning and implementing renewable energy programs in coordination with other relevant national institutions (ANME and STEG) within the framework of its mandate.	High	High	
		ANME is a member of the commission responsible for authorizing the implementation of ER projects	High	High	
		Under the supervision of the Ministry of State Domains and Land Affairs. It is responsible for the control, management and use of movable and immovable property belonging to the State, the design of State policy relating to public and private domains, and the acquisition and expropriation of real estate for the benefit of the State and public administrative establishments at their request, in collaboration with the relevant ministries.	Low	Low	
	National Company of Exploitation and Distribution of Water (SONEDE)		Medium	Medium	
		ONAS is a public establishment of an industrial and commercial status. It is placed under the supervision of the Ministry of Local Affairs and the Environment. ONAS is the main actor in the protection of the water environment and the fight against all sources of pollution.	Medium	Medium	
	National Guard	The National Guard is the national gendarmerie (i.e. a police force with military status) of Tunisia. It is distinct from the armed forces in that it is part of the Ministry of the Interior. It serves both as a defence force against external threats and as a security force against internal threats. Within the territorial limits of its jurisdiction, the National Guard is responsible for: 1) maintaining public order; 2) preserving the safety of people and property; 3) protecting land	Medium	Medium	

Stakeholder Identification	Stakeholder Name/ Title	Role in Project	Analysis: Level of Influence	Analysis: Level of Interest	Stakeholder category
		and sea borders; 4) <u>road and freeway traffic</u> , safety and control; 5) public safety, recording offences and tracking down their perpetrators; 6) judicial investigations, assisting in the enforcement of judicial decisions and administrative regulations; 7) intelligence on all aspects of political,			
		economic, social and cultural life; 8) tourism safety; 9) control of explosive and hazardous materials; 10) mobilization and incorporation, and gradual intervention in the first and second degree throughout the territory of the Republic ³ . Representing the Ministry of Vocational Training and			
	Department of Vocational Training and Employment	Employment (MFPE) at regional level. Provides skilled and unskilled manpower requirements.	Medium	Medium	
	National Heritage Institute (INP)	The National Heritage Institute (INP) is a public administrative institution with legal personality and financial autonomy. It is a scientific and technical institution responsible for establishing the inventory of cultural heritage, archaeological, historical, civilizational and artistic, of his study, his Safeguard and its development.	Medium	Medium	
	Civil protection	It is responsible, throughout the territory of the Republic, for all missions and interventions required for the rescue of people and the protection of property from various accidents, calamities and disasters, and for the safety of public and private establishments and companies, whatever their nature (Decree no. 2006-1164 of April 13, 2006, on the special status of civil protection corps agents).	Medium	Medium	
	South Development Office (ODS)	Regional development support, investment facilitation	Medium	Medium	
	Assembly of People's Representatives for the governorate of Gabes	It has been the lower house of the Tunisian Parliament since the promulgation of the Constitution on August 16, 2022. It shares legislative power with the National Council of Regions and Districts and oversees government action.	High	High	
	Regional Council	Regional Councils in Tunisia are autonomous local authorities responsible for coordinating regional development, representing citizens at regional level, and promoting equity between regions. They participate in planning, gather recommendations from the communes, and meet regularly to decide on local priorities.	High	High	
	Office of Livestock and Pastures	The Office of Livestock and Pastures (OEP) is responsible for promoting and developing the livestock sector. It is responsible for the following tasks: (1) developing livestock	Low	Low	

³ https://www.force-publique.net/wp-content/uploads/2023/05/2023-Tunisie-fr-1.pdf

Stakeholder Identification	Stakeholder Name/ Title	Role in Project	Analysis: Level of Influence	Analysis: Level of Interest	Stakeholder category
		productivity, (2) developing forage and pasture resources, (3) promoting livestock farming techniques, (4) monitoring the sector and contributing to its economic development and generally carrying out all the specific tasks entrusted to it by the State with a view to developing the sector.			
	Press and Media	The press and media will be invited by the Governor to attend the consultation meeting. Enable the dissemination of information about the project to a wide audience, including those who do not directly take part in public meetings.	Medium	Medium	
Community Groups	Local communities (El Mehemla)	The nearest local community to the project is El Mehemla, as it is the closest at around 2,3 km.	High	High	
	Vulnerable groups	Vulnerable groups may be disproportionately impacted by the Project through changes in access to land and associated impacts to livelihoods, from increased road transport movements, and from the presence of an incoming and predominately male workforce.	High	High	
Local NGOs		The association contributes to the conservation, proper management and enhancement of Key Biodiversity Areas (KBAs) in Tunisia.	Low	Low	
	NGO – Tunisian Red Crescent	The protection of women amongst local communities from negative interactions with the incoming project workforce. The protection of women in the workplace. The provision of assistance to women of economically displaced households.	Medium	Medium	
	Environmental NGO in Gabes	 Act as a liaison between project developers, authorities, and local communities. Participate in public consultations to voice environmental and social expectations and concerns. Contribute to improving the project's acceptance among the local population. 	Medium	Medium	

5 STAKEHOLDER ENGAGEMENT PROGRAMME AND TIMETABLE

Full and formal engagement will take place and is tentatively planned for *October to December 2025 during the disclosure session and pre-construction phase, during the construction phase from January 2025 to June 2027 and every 6 months during operational phase.* The main purpose of the engagement programme is to keep the engagement momentum (post ESIA) by actively managing the flow of accurate and consistent information to and from stakeholders and streamline an efficient and transparent stakeholder engagement process. The overall engagement objective is to inform, listen, consult, involve and collaborate.



Figure 4: Stakeholder engagement momentum

For each stakeholder (individuals or groups), the following will be maintained:

- The **engagement method** (e.g., one-on-one meeting, focus group, workshop),
- The **frequency of engagement** required for each stakeholder (for example once-off, weekly, monthly, quarterly, annually),
- Schedule with dates and locations where stakeholder engagement activities will take place,
- The engagement tools (material/information) required for each engagement activity, and
- For each engagement activity, the allocated resource (designated activity owner).

The comprehensive stakeholder engagement programme is presented in Table 8, below. As information disclosure is a pillar of successful engagement, an understanding of such disclosure that will be conducted during each phase of the Project, is also presented in the table below. Evidence of all disclosure at various Project phases is found in **Appendix D**.

Table 7 - Stakeholder engagement program

	Engagement Programme and Disclosure in each Project Phase								
Nr	Identified stakeholders	Method/s	Frequency	Schedule	Tools/Content	Resource			
Phase	e: Pre-construction (early works) (October							
1	government agencies, regional government, municipal authorities, and the press and media. Environmental and	IFC/EBRD website and the Developer's	Once before ESIA	ESIA phase before construction	Ministries, national government agencies, regional government, municipal authorities, and Environmental and social NGOs: An official letter from the Developer inviting them to review the contents of the disclosure file and a printed copy of the NTS using an electronic link to large, printed maps showing the location of the solar PV plant and the ESIA Report, NTS,. Al files/maps to be available in French. Consultation with Press and media An online briefing will be organized for the press and active media to present the contents of the NTS. Copies of the key Project documentation including the maps will be made available using the electronic link.				
2	landowners and land users, and livestock		Once before construction	ESIA phase before construction	 Large, printed maps showing the location of the solar PV plant. A Project Information Leaflet. Printed copies comment forms to be used adjacent to comment boxes. All available in Arabic. A public meeting to provide a summary of the main findings of the ESIA to local men and women in the El Mehemla community, plus a separate public meeting with local women. Additional engagements with vulnerable people living in Mehemla community which include elderly people and others who are not likely to attend the public meetings. Small group meeting with landowner of the solar PV plant leasing the land, plus land users (the herder) to discuss the findings of the ESIA. 				

	Engagement Programme and Disclosure in each Project Phase									
Nr	Identified stakeholders	Method/s	Frequency	Schedule	Tools/Content	Resource				
Phase	e: Construction (Jan	uary 2026 - June 2027								
1	Ministries, national government agencies, regional government, municipal authorities, and the press and media;	upcoming start of the construction phase in order to provide	The letter to be issued at least 3 months before the start of construction work, followed by an ongoing engagement by letter every 6 months until the completion of construction work.		 A link to the latest set of GIS maps available for the project, to be published on the Developer's website (Arabic and French). Project Information Leaflet to be available (Arabic and French). Press and media A briefing will be organized for the press and active media to present the content of the NTS, share maps, and provide details on the progress of the work 					
2	Local communities, vulnerable	A public meeting in the community of El Mehemla, including a separate public meeting with local women. Meetings with vulnerable people living in the community of El Mehemla, including the elderly and others who are unlikely to attend public meetings. Meetings in local schools to inform young people about the risks to the health	construction phase	Construction phase	 A link to the latest set of GIS maps available for the project, to be published on the Developer's website (Arabic and French). Project Information Leaflet to be available (Arabic and French). Press and media A briefing will be organized for the press and active media to present the content of the NTS, share maps, and provide details on the progress of the work The activities to discuss the following topics using maps and the Project Information Leaflet: A brief summary of the construction stage including installation of the perimeter fences and the presence of the workforce. This will include the future restrictions on land access within the solar PV plant. Community health and safety risks associated with people trying to enter the construction site. The process used to recruit local people during the construction stage. The grievance mechanism that can be used to raise a concern including the use of CLOs to help the developer interact with the community, and also for the community to raise concerns about the project should they wish to do so. This will also include details of the male and female CLOs that are to be available. The controls used to ensure that all road movements are completed safely. 	Social advisor/CLO				

				Engagement l	Programme and Disclosure in each Project Phase	
Nr	Identified stakeholders	Method/s	Frequency	Schedule	Tools/Content	Resource
		and safety of the community.			 The Projects use of water and the generation of wastewater, and the controls to prevent pollution. The projects generation of waste and the controls to prevent pollution. The potential future generation of noise and air emissions including dust. The presence of the worker camp if required and the Worker Code of Conduct to ensure responsible behaviour of the workforce at all times. A time for questions and answers. 	
3			employment &		 Induction slide presentation Refresher slide presentation Oral presentation of site works and orientation of site location and access points in case of emergencies 	HSE Manager/CLO
Phas	e: Operation (From J	June 2027)				
1	Ministries, national government agencies, regional government, municipal authorities, and the press and media. Environmental and social NGOs	Individual meetings	and social report Every 6 months individual meetings		 Submission of an annual environmental and social performance report available in French and Arabic. Individual meetings with stakeholders when necessary. An information session will be organized for the press and media to present the content of the annual environmental and social performance report and raise awareness of the complaint management mechanism. 	Social advisor/CLO
	Local communities	Summary of the annual environmental and social report	Every 6 months, individual meetings with landowners	Operation phase	 Summary of the annual environmental and social report integrated into a 3-4 pages printed summary to provide details on the risks and impacts of operational communities, and to raise awareness of the complaint management mechanism. 	Social advisor/CLO

ESG-TEM-002-01-AA-EN: Stakeholder Engagement Plan

5.1 Engagement with Minorities and the Vulnerable

The ESIA identified minorities and vulnerable people in the region as belonging to the community closest to the solar PV plant, which is El Mehemla, located approximately 2.3 km away.

The Project recognizes the disadvantaged position of these stakeholder groups and has therefore integrated engagement with them in the engagement program reflected above. Should women's groups, elderly people, youth and cultural groups be available in the form of associations, collectives or working groups, but only be identified during the roll-out of the engagement program, the Project will include interfacing and interaction with them. The engagement program is not finalized in this SEP but will be expanded and updated as the Project progresses.

Should no such representative groups be in existence, the Project will, at public meetings, target these groups for separate focus group meetings at a date and time by agreement. As a further strategy, key informants on the Project may be able to assist in identifying individuals that could form such groups to be engaged.

This allows for a more transparent information sharing process with a more balanced and representative engagement process.

5.2 Engagement with Non-Governmental Organizations

Community based organization (CBO's) and non-governmental organizations (NGO's) have the ability to share community knowledge, needs and desires with the Project based on their close relationship with people at a grassroots level. Not only do they work to deliver sustainable solutions but cover the broad range sector-knowledge such as healthcare, agriculture, education and training needs that the Project may require for its community investment programs.

It is to the Project's benefit to involve them in the engagement process as early as possible.

5.3 Incorporating Engagement Outputs into the Environmental and Social Management System (ESMS)

The purpose of the SEP is much broader than presenting a firm grounding for current and future collaboration with both interested and affected parties, but also to ensure that the output of such engagement features in the site-level ESMS and Voltalia's Health, Safety, Environment and Social Management Plan (HSESMP).

Engagement with stakeholders may further inform site level practices such as the deployment of the grievance redress mechanism, and management plans such as the emergency response plan, the worker accommodation management plan, the biodiversity management plan and of course, this SEP.

All valuable local knowledge on how to better respond to emergencies given the local context, how to treat workers and manage worker conduct, and how to better plan for the local biodiversity which has been a shared resource by local communities for many years, will be transferred into the site-based HSESMP.

The HSESMP will always seek enhancement from the knowledge gleaned from local practices.

6 RESOURCES AND RESPONSIBILITIES

In this section, the organizational structure and management functions within Voltalia that are responsible for the stakeholder engagement activities outlined in this SEP are described.

During the ESIA process, the E&S consultant prepares the first version of the SEP and is responsible for directly performing or supporting Voltalia in performing engagement activities. Note that this may include the Grievance Mechanism. Generally, this is an externally sourced E&S consultant who will provide support to Voltalia in the initial phases of engagement. At the end of the ESIA process, the E&S consultant will prepare an updated version of the SEP which will include main outcomes of engagement activities performed during this phase. The format of these outcomes must align with the Engage templates for upload to the platform. The Engage Platform itself will not be accessible to 3rd parties.

Voltalia will assume responsibility for the regular updates of the SEP prior to and during the Construction phase of the project, and again during the Operation and Maintenance phase of the project.

Other contractors and sub-contractors will not be allowed to run or organize engagement activities autonomously. In addition, workers of contractors and subcontractors will not be allowed to collect grievances from individuals or groups but will instead have to redirect them to the official submission channel. Workers will have to be properly informed of this expectation during induction training. Contractors and sub-contractors may however be involved by Voltalia in specific engagement activities on an as-needed basis and in the implementation of resolution measures within the grievance mechanism.

The roles and responsibilities outlined below can be adapted to the organizational structure of Voltalia's on site presence during construction, notwithstanding that all the tasks indicated are properly assigned to a responsible person. The operation of the Project will fall under the responsibility of Voltalia. All staff appointed for stakeholder engagement activities will have to be qualified for the tasks they are undertaking. If necessary, staff will be provided with appropriate training to ensure they are fit for the job.

The **Project's E&S Manager** is responsible for overseeing and coordinating all activities associated with stakeholder engagement, including supporting the implementation of the Projects external grievance mechanism (EGM) that targets external stakeholders such as communities, and presented indoc code; and the Project's internal grievance mechanism '(IGM) that targets all labour, led by the Projects EPC and presented indoc code).

Responsibilities include:

- Support the implementation of the Internal Grievance Mechanism (IGM) and External Grievance Mechanism (EGM),
- Ensure that all stakeholder engagement aspects are a permanent item on all high-level management agendas, and that all actions arising from management decisions are implemented aligned to stakeholder participation,
- Determine necessary resources for effective implementation of this SEP,
- Attend stakeholder meetings with technical team members and ensure feedback of stakeholder responses and requests to technical teams are responded to within agreed timescales, and
- Follow-up on any grievances and non-conformities, non-compliance or deviation from the requirements of this SEP.

Specific grievance managements tasks include:

- Ensure confidentiality of the Complainant from the lodging of a grievance onwards and inform the Complainant that the grievance can also be lodged anonymously should the complainant prefer it,
- Ensure that the complaint/grievance is clearly defined/verified and fully understood without any ambiguity,
- Identify the root cause of the grievance, investigate if the grievance is correct or not, identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable),
- In case of high sensitivity grievances, the Social Advisor shall hold the power to escalate,
- Ensure all project personnel, including EPC Contractor/Subcontractors, are trained on the contents of this procedure,
- Ensure the community and project-affected stakeholders are made fully aware of the contents of this procedure, including the process for submitting a grievance,
- Mediate in all grievances received on the site through proper channels, and
- If grievance is unresolved, present opportunities for the Complainant to find resolution. Note-VLT will no longer be responsible to grievances that progress from a site-based grievance to an external dispute mechanism, such as the court system.

The **Project (VLT) Community Liaison Officer (CLO)** will act as a focal point of contact with the local communities, leaders and other stakeholders for the purpose of building effective communication and enhancing relationships between the communities and Voltalia projects. The CLO provides support in the development, management and facilitation of the community engagement strategy, plan of action and related field activities for each project. Additionally, the VLT CLO is responsible for the maintenance and upkeep of the External grievance mechanism targeting communities and other interested and affected parties. Tasks include:

- Assist with the development of various programs to educate community members about the projects and to support active community participation during different various project phases,
- Work closely and effectively with other personnel in Voltalia E&S Manager in sensitizing communities on various aspects of the projects,
- Work closely with study consultants and other contractors to ensure that communities are aware
 of their activities and the expectations for public participation as needed,
- Provide on-going feedback to Voltalia and Social advisor on new and emerging community issues and concerns and recommend strategies and interventions for addressing such issues and concerns,
- Prepare and submit regular reports and updates on community issues to Voltalia and Social advisor, project contractors and other interested parties as necessary,
- Carry out regular spot checks in the project areas with project officers to feed into progress reports,
- Participate in milestone meetings for monitoring the progress of the projects,
- Perform other duties as may be assigned from time to time by Voltalia.

Specific grievance managements tasks include:

- Receive, log and process the complaints/grievances,
- Contact the Complainant in case further clarification is required.

- Explain to the Complainant the process and timelines for the remaining steps in the procedure and inform on how the complaint will be handled,
- Liaise with the Complainant from the moment the grievance is retrieved (reception) until grievance close-out.
- Ensure that the complaint/grievance is clearly defined/verified and fully understood without any ambiguity,
- Communicate/Verify with the Complainant based on the preferred method of communication as specified by the complaint in the grievance form,
- Prepare and file all grievance forms,
- Mediate in all grievances received by the site through proper channels,
- · Provide all information necessary according to this procedure whenever there is a grievance, and
- Ensure easy, fast and conclusive resolution of grievances.

The Contractor (**EPC**) **Community Liaison Officer (CLO)** is responsible for implementing engagement activities and plays a critical role as an internal agent for social and stakeholder related matters in the Contractor (EPC) organisation and for its sub-contractors. The CLO will be on site on a daily basis during construction particularly due to the responsibility to implement the Internal grievance mechanism for the labour force. If possible, the CLO should be a member of the local community, to ensure easier communication and relations with local workers. The responsibilities of the CLO include the following:

- Liaise with workers and Project CLO to ensure their overall engagement in line with indications in this Plan.
- Organise and participate in all engagement activities performed.
- Provide briefings and support to technical teams for meetings with workers.
- Implement and coordinate the internal grievance mechanism and oversee its practical day to day running.
- Prepare weekly grievance reports (and updated grievance database) for submission to the Voltalia E&S Manager.

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GRIEVANCE REDRESS MECHANISM

The Project's grievance redress mechanism applies to the Project's design, construction, operation and maintenance activities. It includes the grievance procedures for processing grievances filed by any affected or interested person or member of the workforce that wishes to file complaints/grievances or raise concerns, claims or suggestions regarding the Project's activities or on the Project's footprint (within and beyond the Social Area of Influence (AoI)⁴ and allow for their timely resolution.

The Project allows for two types of grievances process and management systems:

- The Project's External Grievance Mechanism (EGM) targeting communities and other stakeholders. The EGM can be viewed as a Voltalia produced proceduredoc code.......
- The Project's Internal Grievance Mechanism (IGM) targeting the Project's labour force. This includes VLT own site personnel, the EPCs site personnel and all site based contractors and subcontractors. The IGM can be viewed as a Voltalia produced proceduredoc code.......

All workers will have access to a fully functioning grievance redress system, as per the IGM. All stakeholders, whether interested or affected, and not part of the Project's labour force will have access to a fully functioning grievance redress system, as per the EGM.

VLT will have a responsible person on site at all times, as will any EPC Contractor. Grievances will be received by the EPC's E&S Manager and/or the CLO, who will formally lodge, and track grievances, while the EPC's E&S Manager will investigate and resolve grievances (possibly with the assistance of other relevant senior management). At the end of each week, the Voltalia CLO and Voltalia E&S Manager will receive a report and updated grievance database from the EPC so that all outstanding grievances can be monitored by Voltalia, and intervention taken where necessary. It is expected that the updated grievance database received from the EPC contractor will be in the Voltalia provided grievance template reflected in Appendix E.

All sensitive grievances, such as those relating to GBV-H are to be directly uploaded to the Voltalia Ethics Portal (https://secure.ethicspoint.eu/domain/media/en/gui/106905/index.html), as reported in Section 2.3.2 of this SEP. The upload may be undertaken by the EPC's E&S Manager, the CLO, or directly by the complainant. In such case, it must also be reported to the Voltalia E&S Manager with the appropriate reference number supplied by Ethicspoint. Once a sensitive grievance is lodged via Ethicspoint, Voltalia's Ethics Committee (which functions at Corporate level) will fast-track the case for resolution. While under investigation, the Ethics Committee will provide the site-based grievance case with interim mitigatory measures to ease the physical, mental and emotional duress experienced by complainants/survivors and alleged perpetrators alike.

A QR Code for all grievances is available to all internal (labour) and external (all other interested and affected parties not part of the labour force). The QR code is publicized in on site and off-site awareness and training campaigns as well as GRM and GBV-H poster notifications.

⁴ According to the ESIA, the Social AoI is the area with a radius of 3 km of the project site, and which includes all social receptors.



Figure 5 : QR CODE FOR DIRECT ACCESS TO THE GRM

A similar grievance resolution process is utilized for both the IGM and EGM. A flow chart is presented below, showing expected activity and responsible persons, grievance process and the anticipated timeline to resolutions.

ACTIVITY & RESPONSIBILITY

GRM Awareness Building
EPC CLO & EPC E&S/ IR/ HR Manager CLO & Social Advisor

Receive, Register, Categorise, Acknowledge

EPC CLO & EPC E&S/ IR/ HR Manager Voltalia CLO & Social Advisor/ HR Coordinator (Corporate)

Review and Investigate Internal GRM

EPC E&S/ IR/ HR Manager Voltalia HR Co-ordinator (Corporate) **External GRM** Voltalia Social Advisor & Management

Develop resolutions options, respond to grievance, re-evaluate where necessary, obtain sign-off if accepted.

Internal GRM EPC E&S/ IR/ HR Manager Voltalia HR Co-ordinator (Corporate) **External GRM** Social Advisor in collaboration with Voltalia Management)

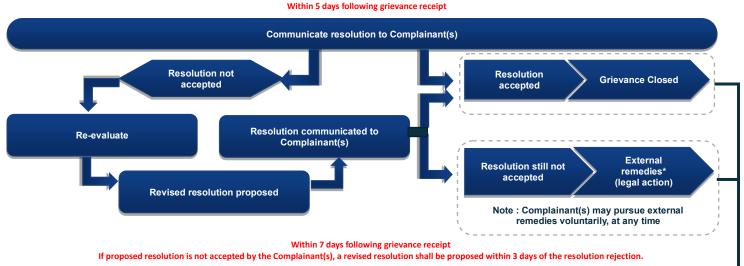
Monitor and Support Resolution Implementation (EPC E&S Manager & Voltalia Social

Advisor)

PROCESS AND TIMELINE

Promote the availability and use of the Internal and External GRM. For workers, appropriate induction & training, GRM boxes and availability of personnel to be communicated. For communities and others, workshops, poster notifications, announcements and GRM boxes and availability of personnel to be communicated.





Within 10 days following the grievance receipt, Close out or mark as Unresolved_ External remedy sought

Figure 6: GRIEVANCE MANAGEMENT PROCESS

7.1 Grievance Severity Level

Once a grievance is received and registered, it will be assessed and categorised to determine the severity level of that grievance. The table below is a preceding action to categorising the severity level of a grievance. The grievance typology reflected as IG (Internal Grievance) or EG (External Grievance) 1, 2, 3, or 4 denotes the content characteristic of the grievance. The significance of the grievance is determined according to 'low, medium' or 'high.'

Table 8 - Grievance typology and significance

IG/ EG 2	IG/ EG 3	IG/ EG 4										
oncern, unhappiness, or	<u>Protests</u> by either the work force or external stakeholders	Complaints (includes but not limited to) pay and benefits, bullying, work conditions, discrimination, behaviour of contractors, damage to property										
Significance of Grievance												
oncern, claim or grievance rovided.	regarding a lack of in	formation or unclear information										
Concern, claim or grievance from the workers (individual or as a group) or from external stakeholders (individual or as a group) that could compromise the projects development in the short to medium term.												
Concern, claim or grievance involving the workers, collective group of workers or external stakeholders. Relevant to: • Contractor or Company breach of the Code of Conduct, • Violations/ transgression of human rights, • Contractor or Company breach of the country labour law, • Non-compliance to the principles enshrined in international E&S standards. Poses a short- and long-term risk to the project continuity.												
o xt e	ncern, claim or grievance ovided. ncern, claim or grievance ernal stakeholders (individually elopment in the short to notern, claim or grievance ernal stakeholders. Relevantal stakeholders. Relevantal elopment in the short to notern, claim or grievance ernal stakeholders. Relevantal elopment in the short to note in the short to note in the short in the s	ncern, claim or grievance regarding a lack of invided. ncern, claim or grievance from the workers (invernal stakeholders (individual or as a group) that velopment in the short to medium term. ncern, claim or grievance involving the workers ternal stakeholders. Relevant to: Contractor or Company breach of the Code Violations/ transgression of human rights, Contractor or Company breach of the courting the courting transgression of human rights, Non-compliance to the principles enshrine										

The cross assessment of the **grievance typology** and the **grievance significance** result in a grievance **Severity level** categorization. The severity level of grievance directs those investigating and responding to the urgency and possible need for grievance to be escalated for address by both the EPC and Voltalia. All grievances that are categorized as a **Severity level 3** are automatically escalated for Voltalia intervention.



IG/ EG 1	Level 1	Level 1	Level 1
IG/ EG 2	Level 1	Level 1	Level 1
IG/ EG 3	Level 1	Level 2	Level 2
IG/ EG 4	Level 1	Level 2	Level 3

Table 9 - Categorisation of the grievance severity level

Appropriate grievance investigation methods and resources to undertake the investigation are determined once the categorization of grievance is completed.

- A **Level 1** grievance requires the CLO/ E&S Manager to respond to grievant/ complainant's request for information or request for clarification, which can be quickly addressed with an official dispatch of a written letter and supporting documentation, where available,
- A Level 2 grievance includes concern/s, claim/s or discontent expressed by complainant(s)
 (individual or as a group) that could compromise the projects progress in the medium term. Such
 grievances require the E&S Manager to inform the Project Manager immediately about the potential
 Level 2 grievance and start collaborating with the EPC E&S Manager, Site Manager and Human
 Resources Manager (as necessary), in order to resolve the issues in a timely manner.
- A Level 3 grievance entails the highest severity level and could involve disciplinary cases or the need for deeper or extended investigation activities. In all of the below, it is crucial that the EPC management, Voltalia site management be kept informed of developments via the Voltalia E&S Manager:
 - The need to involve witnesses,
 - The need to use closed circuit television video (CCTVs) and other audio/ visual recording devices as part of the evidence-gathering exercise, and
 - The mobilization of further resources (as in the case of psycho-social harm on the survivor of abuse) for treatment purposes. All grievances of a sensitive nature (as with those logged through Voltalia's Ethicspoint presented in Section 2.3.1 of this SEP) would require the involvement of VLT's Compliance Department. In extreme circumstances, it may require the need for an external, independent investigator to gather information in an effort to conduct an independent Root-cause analysis.

The grievance database template that will be utilized for this Project is found in **Appendix E**.

8 MONITORING AND REPORTING

It is vital to keep meticulous records of the stakeholder engagement activities and associated communications throughout the lifecycle of the Project. Solid record keeping not only provides a robust

reflection of the process followed but also serves as an indicator of the stakeholder engagement process compliance with the required regulatory framework, policies, and Voltalia's Engage platform.

Voltalia will be responsible for keeping track of all activities performed as per commitments in this SEP. The record keeping process will include the following aspects:

- Stakeholder identification and mapping, periodically updated,
- Stakeholder engagement activities register, with an indication for each activity performed, including the and location, participants, information disclosed and outcomes of the activity. If agreed by stakeholders, pictures of each activity will be taken and appropriately stored,
- Copies of all the communication material distributed to stakeholders,
- Periodic reports prepared, and
- Updated SEP versions.

The Stakeholder Engagement Program, formulated and presented in **Section 5** will serve as the backdrop to the Project's engagement reporting. All project impacts and mitigations applied during the project will constitute part of the content of information transfer from the Project to stakeholders. Collaboration between the Project and stakeholders on further opportunities and strategies for mitigation will be an on-going effort, much of it being the result of the on-going stakeholder engagement. Evidence of such collaboration will be in the form of meetings minutes (MoM) that would provide evidentiary data of such collaboration.

Voltalia releases a yearly Corporate Sustainability Report that comprehensively shows stakeholder engagement as one of the reporting parameters. The Sustainability Report is made available on the Company website and is for open access.

8.1 SEP Monitoring

Monthly key performance indicator (KPI) reporting will include specific KPI's related to stakeholder engagement and monitoring of stakeholder grievances and grievance close-out. See **Table 9** below.

Table 10 - SEP key performance indicators

Nr	KPI	Target	Data Collection Frequency	Monitoring Measures	Resource/ Responsibility			
1	significant ⁵	No significant environmental or major social incident	Weekly	Number of significant Environmental and Social incidents	EPC E&S Manager			
2	(community) grievances	All external community grievances aimed to be resolved within 10 days	Weekly	Grievance Log (number of community grievances closed / number of community grievances received)	CLO and VLT E&S Manager			
3		All external community grievances aimed to be resolved within 10 days	Weekly		EPC CLO and E&S Manager			
4	Stakeholder Engagement	100% Stakeholder Engagement Activities as per SEP	Monthly	Stakeholder Engagement Log - (% stakeholder engagement activities (number of stakeholder engagement activities conducted / number of stakeholder engagement activities planned)				
5	Community feedback	Social suggestions	Monthly	# of social suggestions or feedback from the local community	CLO and VLT E&S Manager			

⁵ 'Significant' would refer to those incidents that would likely to change the Project's risk scenario from a 'low/ medium" to 'high'

9 MANAGEMENT FUNCTIONS

The full oversight of the SEP will be administered by the Project E&S Manager / Social Advisor. The Voltalia CLO will report directly to the Voltalia E&S Manager or Social Advisor while also maintaining a link with reporting from the EPC CLO. The EPC CLO is responsible for reporting to the EPC E&S Manager, who in turn also reports back to the Voltalia E&S Manager/ Social Advisor. In the case of this Project, Voltalia has also tasked an advisory role to its offshore resource that acts in the capacity of Regional E&S Advisory Support. This is captured in the report-line illustration below.



Figure 7: SEP MANAGEMENT FUNCTION

Appointed SEP management roles include:

Voltalia E&S Manager/ Social Advisor :Name...

Voltalia E&S Advisor (regional) :Name...

Voltalia CLO:Name...

EPC E&S Manager :Name...

EPC CLO:Name...

9.1 Internal Communication of the SEP

The Voltalia E&S Manager will, during the course of weekly Project meetings, communicate completed and outstanding tasks of the Project's SEP. Specific challenge areas will be highlighted where further assistance may be required from the Projects on site management. As per standard work procedures, the Project Manager and Site Manager for both the Voltalia and EPC teams are required to be fully knowledgeable about both internal and external engagement activities and potentially offer support at predetermined meetings where their attendance is required.

9.2 Management Tools

As reported in Section 2.3.2, Voltalia has an established digital platform (the Engage Platform) that comprehensively captures all information on the project (including communications, engagement, complaints/ grievances) in the project impacted local communities, broader communities, and the labour workforce. The information to populate the Engage platform flows from two streams. The first is for all

labour-related components, where information compiled by the EPC is transferred to the Voltalia CLO and Voltalia E&S Manager. The second, is directly from the information compiled by the Voltalia CLO (for all community and broader stakeholder interaction), to the Voltalia E&S Manager/ Social Advisor. In both cases, the CLOs for both EPC and Voltalia are trained on how to use the Engage workbook templates for quick transference of data onto the Engage platform.

The Voltalia E&S Manager are the only licensed operators of the Engage platform, therefore have ultimate authority to review and adjust information before and after data collection and upload to the platform. This information that is uploaded can be extrapolated from the platform at any stage to provide tracking and monitoring information as required. This would present the computed data that can be incorporated into periodic engagement reports for the Project, using the Stakeholder engagement programme presented in **Section 5** as the indicators against which to report.

9.3 Managing Contractor Relationships

As with most Voltalia Projects, the lead EPC is often engaging with a number of sub-contractors in order to fulfil their contractual obligations with Voltalia. Voltalia through its E&S Manager/ Social Advisor maintains oversight of local stakeholder relationships with contractors, particularly when local service provider procurement and recruitment is sought. Every action executed by the EPC and its sub-contractors is reported in advance at the weekly Project team meetings and should any of these actions require the setting up of local meetings, it is the Voltalia CLO that will assist. As the EPC CLO is tasked with maintaining internal (labour) stakeholder relationships, it is the Voltalia CLO that is tasked with maintaining external (local and broader) stakeholder relationships with the support of the Voltalia E&S Manager.

At no point will meetings with local representatives take place without the Voltalia CLO in attendance, be it by the EPC or its sub-contractors. All meetings will result in a minuted record of discussions and results will be immediately forwarded to the Voltalia E&S Manager for his/her attention.

APPENDIX A:

Meeting records – Past Engagement and Disclosure

Meeting record in Gabes governorate

Date Time Location Purpose People present 12/08/2025 10h00

Gabes Governorate

130 MWc Solar Photovoltaic Project in Menzel el Habib Gabes-Tunisia

- Governor
- Prime delegate
- Members of parliament
- 04 representatives of EAM
- 03 Voltalia representatives
- Secretary general of the municipality
- Representatives from the following departments
 - ✓ ONAS
 - ✓ SONEDE
 - ✓ CRDA
 - ✓ Ministry of Equipment
 - ✓ INP
 - ✓ Municipality

Meeting

A consultation with the main governmental and regional entities took place on August 12, 2025, in the governorate of Gabes. The objective of the consultation was to:

- Informing stakeholders about the project;
- Disseminate accurate information about the project in an open, transparent and culturally appropriate manner;
- Involve stakeholders in the preparation of the ESIA process;
- Provide feedback and raise any questions or concerns regarding the project and ESIA by stakeholders
- Maintain a productive relationship between the project and stakeholders
- During the consultation session that took place in the governorate, a leaflet was prepared and distributed to stakeholders. It contains key information, notably on the context and objectives of the project, the description of the project and the strengths of the project.

Table 11 - Main outcomes of the consultation meeting in the governorate of Gabes

Stakeholders	Summary of issues raised for consideration under ESIA
Location: Gabes Governorate	te on August 12, 2025: 17 people, including the governor of Gabes, 1st delegate, 2 representatives from Voltalia, and 4 representatives from the EAM engineering firm.
Governor of Gabes	He affirmed his usual support for renewable energy projects, while insisting on the need to take corporate social responsibility (CSR) seriously, pointing out that some companies sometimes make false promises.
Member of Parliament 1	 She emphasized the specific nature of the region, highlighting that it is a rural area. She raised the issue of agricultural projects being abandoned in Menzel El Habib due to administrative constraints and obstacles. She expressed her interest in and support for this project and other similar projects that could boost the Menzel El Habib region. She only mentioned her concerns about the environmental impact of the project but remains willing to lift the constraints on its implementation, as well as on other renewable energy projects, given that she is a member of the energy committee. She also emphasized the importance of CSR, stating that it must be taken seriously by Voltalia. She added that any aid or contributions granted will have to be carefully studied and monitored.
Member of Parliament 2	 He emphasized the importance of CSR and indicated that an agreement should be established between Voltalia and the governor to ensure that it is taken into account and effectively implemented. He stressed the importance of purchasing the raw materials needed to build the solar PV plant locally, as far as possible, so that the region can benefit directly.
Municipal representative	He mentioned that municipalities where projects are located do not derive any direct benefits, since the tax on industrial, commercial, or professional establishments is paid by the company to the municipality of Tunis, thus depriving the region of any financial advantage.

Publication in the press and media concerning the project





Official Facebook page of the Menzel Habib delegation.



جلسة عمل حول مشروع لانتاج الطاقة الشمسية بمنزل الحبيب أشرف والي قابس السيد رضوان نصيبي يوم 12 أوت 2025 بحضور السيدة والسادة المعتمد الأول مصطفى مسعدي وعضوي مجلس نواب الشعب نور الهدى سبائطي وثامر مزهود على جلسة عمل حول مشروع انتاج الطاقة الشمسية المزمع انجازه من قبل شركة فولتاليا تونس في منطقة المهاملة من معتمدية منزل الحبيب.

وتم في هذه الجلسة التي ضمت بالخصوص المسؤولين عن شركة فولتاليا تونس ومختلف الأطراف المحلية والجهوبة المعنية عرض نتائج الدراسة الخاصة بالآثار البيئية والاجتماعية لهذا المشروع. يسميتد هذا المشروع الذي قدر انتاجه ب 130 ميغاوات على مساحة 200 هكتارا ويتضمن في مكوناته محطة لتوليد الطاقة الشمسية ومحطة فرعية لنقل الطاقة المولدة الى الشبكة الوطنية للكهرباء التابعة للشركة التونسية للكهرباء والغاز.

وستنطلق أشغال هذا المشروع ً وفق الرزنامة المعلنة من قبل الشركة التي ستنفذه في جانفي 2026 للتتواصل على امتداد 18 شهرا لتبدأ مرحلة الانتاج الفعلي في جوان 2027 وذلك لمدة 25 سنة.

Official Facebook page of the governorate of Gabes.



Publication de Neji Jeridi

منوال تنموي بمعتمدية منزل الحبيب من ولاية قابس بعيد كل البعد على الخصوصية الفلاحية لهذه المنطقة :

معتَّمدية منزَل الحبيب معتَمدية فلاحبة بإمتياز ، ومشاريع الطاقة الشمسية يقع تركيزها في مناطَّق صحراوية قاحلة

Neji Jeridi est avec وزارة البيئة-تونس Ministère de l'Environnement-Tunisie et 4.



جلسة عمل حول مشروع لانتاج الطاقة الشمسية بمعتمدية منزل الحبيب أشرف والى قابس رضوان نصيبي صبيحة اليوم اللائاناء 12 أوت 2025 يقاعة الاجتماعات بمقر ولاية قابس و بحضور المعتمد الأول مصطفى مسعدي وعضوي مجلس نواب الشعب نور الهدى سيائطي وثامر مزهود علا جلسة عمل حول مشروع انتاج الطاقة الشمسية المزمع انجازه من قبل شركة فولتاليا تونس في منطقة المهاملة من معتمدية منزل الحبيب.

وتم في هذه الجلسة التي ضمت بالخصوص المسؤولين عن شركة فولتاليا تونس ومختلف الأطراف المحلية والجهوية المعينة عرض نتائج الدراسة الخاصة بالثار البيئية والاجتماعية لهذا المشروع المرافقة وسيمند هذا المشروع الذي غير انتاجه 200 مياوات إلى مساحة 200 مكتاراً ويتضمن في مكوناته محطة التوليد الطاقة الشمسية ومحطة فرعية لنقل الطاقة المولدة الى الشبكة الوطنية للكهرباء التابعة للشركة التوليد الطاقة الكدياء القائد

و من المنتظر أن تنطلق أشغال انجاز هذا المشروع وفق الرزنامة المحلنة من قبل الشركة التي ستنفذه في -جانفي 2026 للتنواصل على امتداد 18 شهرا لتبدأ مرحلة الانتاج الفعلي في جوان 2027 وذلك لمدة 25 سمة (و تحدر الاشارة الى ان كامل القريق المعنى باحداث المشروع المذكور سيتحول عشية هذا اليوم بمعية السلطة الجهرة و الادارات الجهوية المعنية للقيام بزيارة ميدانية لمنطقة المهاملة-معتمدية منزل الحبيب حيث سيتم انجاز هذا المشروع!

🖋 شوقي حارسٌ 🎟 أماني عبد القادر

Facebook page of radio Elyssa FM Gabes

Photo of the meeting with stakeholders in the governorate of Gabes





Meeting record – consultation with a group of men from the local community of El Mehemla

The consultation was organised during an event held by the developer on 12 August 2025 at Mehemla Primary School, in the presence of the delegate of Menzel Habib, the Omda, representatives of parliament, landowners and community residents. The main objective of this meeting was to present the project, detail its various aspects and hear the concerns and opinions of the participants. Several issues were addressed during the session, and the following points were particularly highlighted:

- El Mehemla region is experiencing significant population migration due to a lack of employment opportunities and amenities.
- The percentage of women in the population is higher than that of men, due to the departure of men to work in other regions.
- There are no recorded conflicts between the inhabitants of the region.
- The majority of the population is unemployed. The main local activities, such as olive cultivation and grazing, are facing difficulties due to drought and low incomes.
- The three main vital needs expressed are: employment opportunities, a local health center lacking equipment and permanent medical staff, and concerns about the closure of the Mehemla school, which has only about 10 pupils.
- An agricultural track crosses a wadi, making it difficult to pass during sandstorms.
- The electricity supply is satisfactory, but there is a lack of street lighting.
- The quality of the water supplied by SONEDE is poor. Residents use water from the Majel or filtered water, as it is cheaper than bottled water.
- There is no public landfill in the region; each resident manages their own waste.
- ONAS does not provide connections in the region, and residents use septic tanks.
- The community is not opposed to the project, particularly because the land is privately owned. Some have expressed a desire for employment opportunities for women.





2. Photos of the public consultation with the community of El Mehemla (Source: Photo EAM)

Meeting record - Landowner consultation

A consultation was held with landowners, in the presence of Voltalia representatives.

Questions were addressed to the participants, and the main points raised were as follows:

- They all own lots with proof of ownership. At present, the land is not being farmed, as it is not profitable to do so. In the past, some of the land was used for arable farming, but today it is used only for grazing.
- They said that the quality of life has deteriorated in recent years due to drought, which has had an impact on their livelihoods. They proposed drilling wells to be used for agricultural irrigation.
- They all assured us that their land is not exploited by any third party, with or without authorization, and specified that the region is free of conflicts.
- They also stated that there are no houses or Majels on their land.
- Finally, they expressed their satisfaction with the project, believing that it will bring direct and indirect benefits to both themselves and their region.

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APPENDIX C:

Summary of Meetings – ESIA Impact Assessment Phase

APPENDIX D:

Stakeholder Engagement Program – Meetings and Disclosure Records

APPENDIX E:

Grievance Database Template

						Date of event	Method of receipt	Received by	Date/ time received	Observations of												Close-out comments Close out - Grievant	its Documents
remain anonymous) rem	nain anonymous)	(in full)	village)	(managing grievance)	investigators					receiving officer	acknowledged	date	categories	priority	type	description	response	actions	completion date	resolution date/time	resolution type	by responsible person feedback	