

Stakeholder Engagement Plan (SEP)

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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
EU	European Union
MV	Medium-Voltage
MW	Megawatt
PV	Photovoltaic
SEP	Stakeholder Engagement Plan

1. INTRODUCTION

1.1 BACKGROUND

This document represents the Stakeholder Engagement Plan (SEP) for a portfolio of five utility-scale solar photovoltaic (PV) power plants with a combined installed capacity of approximately 450 megawatts-peak (MWp), and five co-located battery energy storage systems (BESS) with a total capacity of 250 megawatts / 1,000 megawatt-hours (MW / MWh).

The Project sites are located within the municipalities of Szihalom, Maklár and Mezőszemere in Heves County, northeastern Hungary.

The Project is developed by Renalfa IPP through its wholly owned Hungarian subsidiary Renalfa Hungary Kft (the "Company").

1.2 SCOPE OF THIS SEP

In line with international good practice, the Company recognizes that stakeholder engagement represents the basis for building constructive and strong relationships with all interested parties.

This SEP is guided by the EBRD's Environmental and Social Policy (2024) and international good industry practice. It outlines the Company's approach and commitments to engaging external stakeholders during the construction and operation of the Project.

As a living document, the SEP will be updated as the Project progresses, incorporating feedback from stakeholders and outcomes of engagement activities into the decision-making process.

1.3 STAKEHOLDER ENGAGEMENT PRINCIPLES

The key principles guiding the Company's approach to stakeholder engagement in relation to the Project are:

- to be open and transparent with the stakeholders, engaging in an open process and providing meaningful information on the Project;
- to be accountable and willing to accept responsibility as Company and to account for impacts associated with the Project activities;
- to have a relationship with stakeholders that is based on trust and a mutual commitment to acting in good faith;
- to respect stakeholders' interests, opinions and aspirations;
- to work collaboratively and cooperatively with stakeholders to find solutions that meet common interests;
- to be responsive and to coherently respond in good time to stakeholders;
- to be pro-active and to act in anticipation of the need for information or potential issues, aiming at addressing potential risks before they occur, by offering opportunities for dialogue;
- to engage with stakeholders in a way that ensures they feel treated fairly and that their concerns are given genuine and balanced consideration;

- to be inclusive and accessible to stakeholders, including vulnerable and minority groups, so that they feel able to participate, to receive and understand information, and to be heard.

1.4 STAKEHOLDER ENGAGEMENT OBJECTIVES

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

TABLE 1-1 STAKEHOLDER ENGAGEMENT OBJECTIVES

Objective	Rationale
Identify the Project stakeholders	Identify and categorize individuals or organizations that may be affected by the Project, or that may influence its implementation or operations. This is a dynamic process and should be updated throughout the Project's life cycle.
Provide accurate Project information in an open and transparent manner	Ensure that stakeholders, particularly those directly affected by the Project, are provided with timely and relevant information to support informed feedback and future planning. Clear communication helps reduce uncertainty and anxiety. Information shared should enable stakeholders to understand potential impacts, risks, and benefits. An open and transparent approach is essential to achieving this objective.
Establish partnerships that encourage constructive engagement among all parties and create opportunities for benefit-sharing.	Build trust-based relationships between the Project and stakeholders to support proactive communication and minimize the risk of conflict arising from rumours or misinformation. Early identification of mechanisms for addressing conflicts and grievances helps the Company better understand stakeholder concerns and expectations, while also enhancing its value and legitimacy within the local context.
Document meeting outcomes and respond to public concerns, issues, and suggestions.	Maintain clear records of stakeholder feedback, including concerns, issues, and suggestions, to ensure that the rationale behind Project decisions is transparent and traceable. These records support periodic reviews and audits, help identify recurring or thematic issues that may require a broader response, and facilitate more effective follow-up engagement with affected communities.
Manage stakeholder expectations	Stakeholder expectations, regardless of whether they are positive and negative, may not always be aligned with the realities of the Project. By communicating clearly and early about what the Project can and cannot deliver (e.g. in terms of employment, infrastructure, community investments, or potential disruptions), the risk of future disappointment and frustration among affected parties can be reduced. This helps prevent misunderstandings and lowers the likelihood of conflict during implementation.
Fulfil national and international consultation requirements	Ensuring compliance with legal and regulatory consultation obligations helps prevent project delays or disruptions arising from procedural shortcomings rather than substantive issues. It also supports the achievement of a social license to

Objective	Rationale
	operate and fosters effective, trust-based relationships with stakeholders.

2. BRIEF PROJECT DESCRIPTION

The Project is a renewable energy development comprising a portfolio of five utility-scale solar photovoltaic (PV) power plants with a combined installed capacity of approximately 450 megawatts-peak (MWp), and five co-located battery energy storage systems (BESS) with a total capacity of 250 megawatts / 1,000 megawatt-hours (MW / MWh).

It is being developed by Renalfa IPP through its wholly owned Hungarian subsidiary Renalfa Hungary Kft (the Company). Each of the five sub-projects is being developed through a dedicated Hungarian special purpose vehicle (SPV). The Project is financed by the European Bank for Reconstruction and Development (EBRD) and potentially other financial institutions.

The Project sites are located within the municipalities of Szihalom, Maklár and Mezőszemere in Heves County, northeastern Hungary. Each PV plant will have an installed capacity of 49.92 MW, resulting in a combined grid-connected generation capacity of 249.6 MW (AC). All BESS units will be co-located at a central site together with a new 220/33 kV substation, providing the interface to the Hungarian national grid operated by MAVIR Zrt.

Each subproject will include solar PV panels, inverters, battery energy storage systems associated electrical infrastructure, and grid connection facilities. The PV plants will be connected via 33 kV underground cables and fibre optic lines to a new 220/33 kV user substation to be constructed at the BESS site. This substation will in turn be linked to the Hungarian national grid through a newly built 220 kV switchyard and a short section of reconstructed 220 kV overhead line, which will be handed over to the Transmission System Operator, MAVIR ZRt., for operation.

A Project location map is provided in the below figure.

[illegible]

3. NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

3.1 HUNGARIAN NATIONAL REGULATIONS

The following are the main national laws and constitutional provisions governing the legal context of the Project in terms of public consultation:

According to Act LIII of 1995 on the General Rules of Environmental Protection, all individuals have the right to access environmental information held by public authorities, without being required to demonstrate a legal interest.

"Environmental information" includes any written, visual, aural, electronic, or other recorded data concerning:

- the state of the environment,
- factors affecting or likely to affect it (such as emissions, energy use, noise, radiation, or hazardous substances), and
- measures or activities undertaken to protect or manage the environment (including administrative decisions, environmental policies, and legal provisions).

3.2 HUNGARIAN PERMITTING REGULATIONS

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

- Act LIII of 1995 on the General Rules of Environmental Protection – which transposes the EU Environmental Impact Assessment (EIA) Directive and sets out the framework for environmental permitting and public participation.
- Governmental Decree No. 314/2005 (XII. 25.) on Environmental Impact Assessment and Unified Environmental Use Permits – defines procedures for screening, scoping, and conducting EIAs, including requirements for public disclosure and consultation.
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information – ensures public access to environmental and planning-related information held by authorities.
- Act CXV of 2001 on Spatial Planning – includes provisions for public participation in the development and amendment of local zoning plans.

3.3 INTERNATIONAL REQUIREMENTS

3.3.1 AARHUS CONVENTION

The Aarhus Convention (signed in 1998 and entered into force in 2001) was ratified by Hungary in 2001. The Convention establishes several rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional, or local level) will contribute to these rights becoming effective. The Convention provides for the following:

- The right of everyone to receive environmental information that is held by public authorities ("access to environmental information"). This can include information on the

state of the environment, but also on policies or measures taken, or on the state of human health and safety where this can be affected by the state of the environment. Applicants are entitled to obtain this information within one month of the request and without having to say why they require it. In addition, public authorities are obliged, under the Convention, to actively disseminate environmental information in their possession.

- The right to participate in environmental decision-making. Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organizations to comment on, for example, proposals for projects affecting the environment, or plans and programs relating to the environment, these comments to be taken into due account in decision-making, and information to be provided on the final decisions and the reasons for it ("public participation in environmental decision-making").
- The right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general ("access to justice").

3.3.2 EU DIRECTIVE 2003/35/EC FOR PUBLIC PARTICIPATION

In Hungary, the disclosure of project-related information and the involvement of the public in decision-making processes for investment projects are governed by several national laws and regulations, which transpose EU directives and establish the national framework for environmental and spatial planning procedures. Key legislation includes:

- Act LIII of 1995 on the General Rules of Environmental Protection – establishes the general framework for environmental protection, including the principles of public participation and access to environmental information. It partially transposes the EU Environmental Impact Assessment (EIA) Directive and provides the legal basis for involving the public in environmental permitting procedures.
- Government Decree No. 314/2005 (XII. 25.) on Environmental Impact Assessment and Unified Environmental Use Permits – sets out the detailed procedural rules for screening, scoping, conducting Environmental Impact Assessments (EIAs), and issuing integrated environmental permits. It includes mandatory requirements for the publication of project documents, public notification, and consultation during the EIA process.
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information – guarantees the public's right to access environmental, planning, and permitting information held by public authorities, in accordance with both national law and the Aarhus Convention.
- Act CXV of 2001 on Regional Development and Spatial Planning – provides for public involvement in the development, revision, and approval of regional, county, and municipal spatial plans, including through public announcements and consultations during planning procedures.

3.3.3 THE EBRD ENVIRONMENTAL AND SOCIAL PERFORMANCE REQUIREMENTS

The EBRD Environmental and Social Performance Requirements (ESRs) are relevant in the context of a potential finance of the Project by the EBRD.

The EBRD ESRs are considered a benchmark for good practice for environmental and social risk management in private sector developments. The ESRs require that clients engage affected

communities through disclosure of information, consultation, and informed participation, in a manner that is meaningful for stakeholders and commensurate with the risks to and impacts of the Project on the affected communities.

The EBRD ESRs include specific guidance on conducting stakeholder engagement throughout the project lifecycle. Stakeholder engagement requirements are outlined in ESR10, Information Disclosure and Stakeholder Engagement.

The key requirements for consultation and disclosure through the life of the project are summarized below.

Engagement Planning

Stakeholder engagement is an on-going process that may involve, in varying degrees, the following elements: stakeholder identification, analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and on-going reporting to Affected Stakeholders.

Disclosure of Relevant Project Information

Project information must be disclosed in a timely, accessible, and culturally appropriate manner to enable stakeholders to understand potential project risks, impacts, and benefits. Key information includes: (i) the purpose, nature, scale and duration of the project activities; (ii) Potential environmental and social risks and impacts, and proposed mitigation and management measures; (iii) The stakeholder engagement process, and opportunities for participation;; (iv) The schedule and format of planned public consultation activities, and how feedback will be recorded and considered; and (v) the process by which any grievances will be managed.

Meaningful Consultation

Consultation should be: (i) proportional to the project's risks and potential impacts (ii) inclusive and accessible, ensuring that all stakeholder groups (including women, men, vulnerable persons, and minorities) have equal opportunity to participate and provide input; (iii) free of manipulation, coercion or intimidation; (iv) initiated early and maintained throughout the project lifecycle, and (v) documented with feedback integrated into project decision-making where relevant.

To ensure inclusivity and accessibility, the Project will:

- actively encourage participation from all segments of the community, including women and minority groups, through targeted outreach.
- monitor participation in engagement activities by gender and other relevant characteristics, and adapt engagement strategies if gaps are identified.
- ensure that all information is provided in accessible formats and plain language, and that venues for meetings are physically accessible to all.

Informed Consultation and Participation

For projects with potentially significant adverse impacts on Affected Communities, enhanced engagement in the form of Informed Consultation and Participation (ICP) may be required. This includes: (i) sharing project design, mitigation, and benefit-sharing details, (ii) integrating stakeholder perspectives into project decisions, (iii) documenting consultation outcomes and demonstrating how views have been considered, and (iv) meeting applicable national legal requirements for disclosure and consultation.

Engagement During Project Implementation and External Reporting

Stakeholder engagement does not end with project approval. Project developers/owners shall: (i) continue ongoing engagement and information sharing with identified stakeholders, tailored to project changes, stakeholder concerns, and emerging risks, (ii) report regularly on implementation of mitigation measures and progress against action plans, and (iii) where appropriate, publish external E&S performance reports and make non-sensitive biodiversity data available to third-party repositories.

Grievance Mechanism

Projects shall establish a grievance mechanism that is: (i) accessible, transparent, and free to use, (ii) confidential, with protections for those fearing retaliation, (iii) scaled to project risks and tailored to local context, (iv) open to anonymous submissions, and (v) responsive and capable of tracking, resolving, and reporting on concerns related to project E&S performance.

On-going Reporting to Affected Stakeholders

Project developers/owners shall provide periodic updates to affected stakeholders on: (i) progress with mitigation measures and Action Plans, (ii) key topics raised through engagement or the grievance mechanism, (iii) any changes to project risks, timelines, or operations, and (iv) follow-up actions taken to address stakeholder concerns.

Reporting should be in plain language and accessible formats, allowing stakeholders to track the Project's environmental and social performance over time.

4. SUMMARY OF PREVIOUS ENGAGEMENT FOR THE PROJECT

Stakeholder engagement in relation to the Project was performed as part of the Project permitting process and consisted in interaction with the relevant authorities as part of the permitting procedures.

Further, direct engagement with the owners and users of the land plots affected by the Project was conducted as part of the process of securing the land rights for Project implementation and for the placement of the electrical cables.

Public disclosure of Project information was carried out in accordance with Hungarian environmental permitting regulations, as part of the construction permitting process. In line with applicable legal requirements, the Preliminary Environmental Assessment Reports (előzetes vizsgálati dokumentáció) were made publicly available by the competent authorities through its official website, enabling stakeholders to review and comment on the proposed development during the statutory public consultation period.

In addition to the formal permitting procedures, information disclosure and engagement activities have also taken place informally through existing local governance mechanisms. Notably, community forums and regular meetings organized by the municipal councils of Szihalom, Maklár, and Mezőszemere have served as platforms for sharing Project-related information with local residents. During these meetings, local community leaders communicated details regarding the Project's location, schedule, and anticipated community benefits. Residents were given opportunities to ask questions and raise concerns in an open forum.

Feedback obtained from local authorities and community representatives indicates that the Project is generally well accepted by the local population. While some farmers expressed concerns regarding the conversion of agricultural land, no major opposition or grievances have been reported. The local government representatives of all three affected municipalities have expressed strong support for the Project, emphasizing the expected increase in municipal tax revenues and the associated socio-economic benefits for these rural communities.

5. PROJECT STAKEHOLDERS IDENTIFICATION AND ANALYSIS

The objective of stakeholder identification is to determine which organizations and individuals may be directly or indirectly affected—whether positively or negatively—by the Project, or who may otherwise have an interest in its development and implementation.

Project stakeholder groups identified to date, along with the corresponding communication methods proposed for engaging with each group, are presented in Table 2 below.

Communication approaches will be tailored to the characteristics and needs of each

stakeholder group to ensure meaningful information disclosure and to enable their participation in the decision-making process.

Stakeholder identification and analysis is a dynamic and iterative process that requires regular review and refinement. As such, the list and categorization of Project stakeholders will be updated throughout the Project lifecycle, with particular consideration given to:

- The relevance of each stakeholder group for the Project, including their potential influence on, interest in, or impacts from the Project;
- Stakeholder groups that may be disproportionately or differentially affected due to their vulnerability, and who may therefore have distinct concerns, priorities, or expectations related to Project impacts, mitigation measures, or potential benefits.

In Hungary, legal and social frameworks support gender equality, and both women and men participate actively as landowners, members of the workforce, and community members.

While in rural areas of the country traditional roles persist to some extent, there are no significant legal or cultural barriers to women's participation in consultation processes. Nevertheless, the SEP remains attentive to potential barriers, such as time constraints for caregivers or generational differences in participation, and monitoring for any emerging gender-specific issues has been considered.

As part of this SEP, a preliminary mapping of the identified Project stakeholders has been performed as an exercise aimed at identifying and analysing their capacity to influence the Project, as well as their position towards the Project.

Influence is defined as the degree of orchestration with other Stakeholders and the capacity to influence and has been determined using the following criteria:

Influence Level	Description
Low	Stakeholders have limited ability to influence Project development and/or maintain few connections with other local stakeholders.
Medium	Stakeholders have a moderate capacity to mobilize and influence, and are active within social networks that connect with key local actors such as residents, workers, or local community leaders.
High	Stakeholders have a strong capacity to influence and shape Project development, and maintain extensive and influential relationships with key local stakeholders such as residents, workers, and local community leaders.

The potential stakeholders' position towards the Project was determined based on the following considerations:

Potential position	Description
In favor	Stakeholders are aware of and perceive alignment between their interests and the Project's development. They do not intend to use their influence, regardless of its extent, against the Project. Their overall perception of the Project is positive.
Neutral	Stakeholders are either unaware of or do not perceive alignment between their interests and the Project's development. They do not intend to use their influence, regardless of its extent, against the Project. Their perception of the Project is neither positive nor negative.
Against	Stakeholders are aware of and perceive misalignment between their interests and the Project's development. They may use their influence, regardless of its extent, against the Project. Their overall perception of the Project is negative.

TABLE 5 - 1 STAKEHOLDER GROUPS, ANALYSIS AND COMMUNICATION METHODS

Stakeholder Group	Stakeholders	Interest in/ influence on the Project	Impact of the Project on the stakeholder group	Envisaged level of engagement
National Government/ Regulatory Bodies	<ul style="list-style-type: none"> Ministry of Energy Ministry of Agriculture Ministry of Construction and Transport National Inspectorate for Environment and Nature (OKTVF) Hungarian Energy and Public Utility Regulatory Authority (MEKH) Hungarian National Museum MAVIR ZRt. – Hungarian Transmission System Operator 	<p>Regulatory, monitoring and compliance enforcing authorities</p> <ul style="list-style-type: none"> National government and regulatory bodies are of primary national regulatory importance to the Project in terms of establishing policy, granting permits or other approvals, and monitoring and enforcing compliance with Hungarian regulations throughout all stages of the Project life cycle. These stakeholders include authorities such as the Hungarian Environmental Authority, Ministry of Agriculture, and Bükk National Park Directorate. They are responsible for issuing construction and environmental permits, overseeing compliance with environmental, cultural heritage, and land use regulations, and ensuring that the Project aligns with national spatial planning and ecological network requirements. These authorities are also involved in the development and implementation of national strategies for renewable energy, including solar PV, and may view the Project as contributing to Hungary's national targets for renewable energy generation and greenhouse gas emissions reduction. Regulatory bodies may influence the Project through updates to legislation or permitting procedures, which could affect project timelines, costs, and technical requirements. For example, changes in ecological network classifications or biodiversity protection measures may require additional assessments or permit amendments. National authorities may also support public awareness initiatives and contribute to broader acceptance of renewable energy projects by promoting their environmental and economic benefits. 	<p>Communication with national authorities will follow established procedures in line with Hungarian regulations. This will include:</p> <ul style="list-style-type: none"> Use of official online platforms for submitting project-related documentation and updates; Formal correspondence via reports, letters, phone, or email; Scheduled meetings with representatives of permitting and environmental authorities 	Monitor/ keep informed

Stakeholder Group	Stakeholders	Interest in/ influence on the Project	Impact of the Project on the stakeholder group	Envisaged level of engagement
Regional and Local Public Administration and Regulatory Bodies	<ul style="list-style-type: none"> • Municipality of Szihalom • Municipality of Maklár • Municipality of Mezőszemere • Borsod-Abaúj-Zemplén County Government Office • Heves County Government Office • Heves County Directorate for Disaster Management • Borsod-Abaúj-Zemplén County Directorate for Disaster Management • Borsod-Abaúj-Zemplén County Government Office – Department of Agriculture, Plant and Soil Protection • Borsod-Abaúj-Zemplén County Government Office – Department of Environmental Protection, Nature Conservation and Waste Management • Bükk National Park Directorate • Dobó István Castle Museum (Eger) 	Key regulatory oversight, monitoring, and enforcement authorities <ul style="list-style-type: none"> • Key regulatory oversight, monitoring, and enforcement authorities at county and municipal level. • Local governments are responsible for implementing national legislation, issuing permits, and integrating the Project into local development plans. • Municipalities in the Project area must be kept informed to align planning and land use decisions with Project activities. • Local authorities may promote the Project through public engagement and awareness campaigns, supporting renewable energy development. • They may also help manage potential community concerns related to construction, land use, or environmental impacts. 	<ul style="list-style-type: none"> • The Project stimulates the regional and local economy by creating jobs and increasing demand for local services and products, while generating additional revenue through property taxes and land lease payments. • It creates indirect employment opportunities, which local governments can support to reduce unemployment in the area. • The Project contributes to local sustainability goals and supports GHG emissions reduction. • Cooperation with local authorities can enable community-focused programmes, enhancing public services and engagement. • Project implementation may lead to infrastructure improvements (e.g., roads, power lines), supporting local service delivery. • Increased share of renewable energy may reduce long-term energy costs, including for public institutions such as schools and municipal buildings. 	Focused engagement / Partnership
International Lenders	<ul style="list-style-type: none"> • EBRD • Other international Project lenders 	Provision of Project finance and assessment of risks <ul style="list-style-type: none"> • Provision of project finance and oversight of E&S risk management • Support for alignment with GIIP and EBRD Environmental and Social Requirements • Monitoring of compliance with applicable international E&S standards • May request corrective actions in case of deviation from GIIP or EBRD standards 	<ul style="list-style-type: none"> • Changes in renewable energy regulations, subsidies, or environmental standards may affect project bankability; lenders monitor these to manage financial risk. • The Project supports lenders' sustainability goals by contributing to Hungary's green energy transition and alignment with EU climate targets. 	Focused engagement/ partnership
Local Community Leaders/ Influential Community Members	<ul style="list-style-type: none"> • Mayors and deputy mayors of Szihalom, Maklár and Mezőszemere • Local Municipal Council Members • Leaders of local civic associations • Directors of primary schools in Szihalom, Maklár and Mezőszemere 	Champions of communication with local communities, gathering feedback from impacted society <ul style="list-style-type: none"> • Act as key intermediaries between the Project and local communities, helping to communicate project updates and gather feedback 	<ul style="list-style-type: none"> • The Project will significantly contribute to the local settlements' budget through the payment of applicable local taxes • The Project can support local education by enabling partnerships with schools for renewable energy awareness programs and site visits to the solar park. 	Focused engagement/ partnership

Stakeholder Group	Stakeholders	Interest in/ influence on the Project	Impact of the Project on the stakeholder group	Envisaged level of engagement
	<ul style="list-style-type: none"> Leaders of local civic associations 	<ul style="list-style-type: none"> Hold formal or informal leadership roles and can shape public opinion and acceptance of the Project Can influence how local residents perceive the Project's benefits and potential concerns Provide valuable insights into local needs, social priorities, and vulnerable groups May support the design and implementation of community initiatives and promote local employment opportunities 	<ul style="list-style-type: none"> May contribute to community development through support for school infrastructure, cultural initiatives, or local events. Can help create local employment opportunities in construction, maintenance, and environmental monitoring, which community leaders can promote. 	
Local Community Members	<ul style="list-style-type: none"> Landowners and land users in the Project area (including both women and men) Residents of Szihalom, Maklár and Mezőszemere (including both women and men) Residents of nearby communities hosting construction workforce accommodation (e.g., Zsóri and/or Mezőkövesd) (including both women and men) Households along the local roads used for construction and maintenance traffic Owners of businesses operating in Szihalom, Maklár and Mezőszemere (including both women and men) 	<p>Subject to direct or indirect impacts from Project operations</p> <ul style="list-style-type: none"> Residents and land users may be directly or indirectly affected by the Project through land use changes, construction activities, or increased traffic. Key stakeholder group for maintaining the Project's social license to operate; concerns or negative perceptions may lead to local resistance. Their feedback is important for identifying local priorities, addressing potential grievances, and ensuring community support. Can influence broader public opinion and acceptance of the Project through informal networks and local dialogue. Women, as landowners, workers, or community members, may have specific perspectives or needs, particularly regarding participation in engagement activities. 	<ul style="list-style-type: none"> Landowners hosting solar infrastructure may receive lease payments, providing additional household income Properties near the Project may be affected by maintenance works or accidental damage during construction or operation The Project may influence property values—positively through infrastructure upgrades or negatively due to perceived impacts Residents close to the site and Project-used access roads may experience temporary noise or visual disturbance during construction Local roads may be improved, enhancing access to homes and businesses The Project creates direct and indirect job opportunities, benefiting local workers and service providers While no significant gender-based barriers have been identified in the local context, the SEP will ensure that engagement activities are accessible and inclusive for both women and men (e.g., by considering meeting times, communication channels, and encouraging women's participation). 	Consult/ Seek feedback
Vulnerable Persons/Groups	<ul style="list-style-type: none"> Low-income households in Szihalom, Maklár and Mezőszemere Female-headed households, including single mothers and widows Unemployed youth 	<p>Potentially subject to disproportionate E&S impacts; limited capacity to access Project benefits</p> <ul style="list-style-type: none"> Vulnerable groups may be affected by the project or activity by virtue of their physical disability, social or economic standing, limited education, lack of employment or access to land. 	<ul style="list-style-type: none"> The operation of the Project creates new jobs in the region, which is especially important for the unemployed. They can find employment in various sectors related to the Project, such as engineering, service and maintenance. The Company can offer training programs and internships, targeting the unemployed, people with disabilities and minorities, which can increase their skills and employability. 	Monitor/ Keep informed

Stakeholder Group	Stakeholders	Interest in/ influence on the Project	Impact of the Project on the stakeholder group	Envisaged level of engagement
	<ul style="list-style-type: none"> Children attending schools and kindergartens near construction or transport routes Ethnic and national minority groups (e.g., Roma communities) Pensioners and retired farmers Persons with disabilities 	<ul style="list-style-type: none"> These stakeholders may benefit from community funds and initiatives supported by revenues generated from the Project. 	<ul style="list-style-type: none"> The Project provides improvements in local infrastructure, which can facilitate access to services and jobs for people with disabilities. New roads, public transportation, and facilities can improve the quality of life for these people. The Project can support local social initiatives that promote the integration of ethnic minorities, people with disabilities, and the unemployed. These can include educational, cultural, sports or health programs. People employed by the Project can be encouraged to volunteer and get involved in local community projects, which can help build stronger social ties. The Company may offer grants and scholarships to national minorities, people with disabilities and the unemployed, supporting their education, professional development and community projects. 	
Non-Governmental Organizations (NGO's)	<ul style="list-style-type: none"> The Clean Air Action Group (Levegő Munkacsoport) Association of Hungarian Conservationists (Magyar Természetvédők Szövetsége) Environmental Management and Law Association (EMLA) Greenpiece Hungary Humusz Waste Prevention Alliance Hungarian Environmental Partnership Foundation WWF (World Wide Fund For Nature) Hungary Hungarian Water Association <p>Szihalom:</p> <ul style="list-style-type: none"> Szihalom Volunteer Fire Department Foundation for the Szihalom Parish (Szihalmi Egyházközségért Alapítvány) SZIMOBÉ Red Cross Unit <p>Maklár:</p>	<p>Interest in environmental and social issues</p> <ul style="list-style-type: none"> NGOs may raise concerns regarding biodiversity, landscape alteration, or impacts on protected species and habitats. Can influence the Project through public campaigns, media, or engagement with authorities. May provide valuable ecological data and support for mitigation or monitoring efforts. Early engagement can reduce reputational risks and foster transparency and collaboration. 	<ul style="list-style-type: none"> The Project can offer financial support to NGOs through grants, sponsorships, or joint initiatives aligned with environmental and social goals. Collaboration with NGOs can support educational programs on renewable energy for local communities, schools, and businesses. Nature conservation NGOs can be engaged to monitor biodiversity, bird migration, and ecosystem health during construction and operation. Partnerships with NGOs can enhance transparency, build trust, and contribute to the Project's long-term sustainability. 	Consult/ Seek feedback

Stakeholder Group	Stakeholders	Interest in/ influence on the Project	Impact of the Project on the stakeholder group	Envisaged level of engagement
	<ul style="list-style-type: none"> Maklár School Talent Development Foundation (Maklár Iskolai Tehetséggondozásért Alapítvány) Maklár Catholic Parish (Maklári Katolikus Egyházközség) Maklár Traditional Heritage House Foundation (Maklári Hagyományörzők Tájháza Alapítvány) <p>Mezőszemere:</p> <ul style="list-style-type: none"> Mezőszemere Civil Guard Association (Mezőszemerei Polgárőr Egyesület) Mezőszemere Civil Association (Mezőszemerei Civil Egyesület) Kéknefelejcs Seniors Club (Kéknefelejcs Nyugdíjas Klub) 			
Cultural and sports associations	<p>Szihalom:</p> <ul style="list-style-type: none"> Szihalom Sports Club Szihalom Orchestra (Szihalmi Fuvósok) <p>Maklár:</p> <ul style="list-style-type: none"> Maklár Motorbike Friends Association (Maklári Motoros Baráti Társaság Egyesület) Maklár Sports Association (Maklári Sport Egyesület) Mezőszemere: Kéknefelejcs Folk Song Circle for Preserving Traditions (Kéknefelejcs Hagyományörző Népdalkör) 	<p>Interest in environmental and social issues</p> <ul style="list-style-type: none"> Cultural and sports associations are key community actors with strong local networks and influence over public perception. These groups may act as informal opinion leaders, shaping attitudes toward the Project through events, dialogue, and community presence. Their support can contribute to the Project's social license to operate, while lack of engagement may lead to reduced community interest or passive resistance. Collaboration with these associations can enhance the Project's visibility, promote local ownership, and support inclusive community development. 	<ul style="list-style-type: none"> The Project can offer financial support to cultural and sports associations through sponsorships, donations, or joint community programs, helping them sustain and expand their activities. The Project can collaborate with local associations to organize cultural events, sports competitions, or educational campaigns promoting renewable energy and environmental awareness. The Project can support infrastructure improvements (e.g., sports fields, community centers) used by these associations, enhancing local recreational opportunities. Engagement with cultural and sports associations can strengthen community ties, promote positive visibility of the Project, and contribute to inclusive local development. 	Monitor/ keep informed
Media National and local media	<ul style="list-style-type: none"> Heves Megyei Hírlap Kossuth Rádió Petőfi Rádió M1 – Magyar Televízió 1 Duna TV Hír TV ATV 	<ul style="list-style-type: none"> National and regional media outlets (TV, radio, online platforms) can shape public perception and influence stakeholder attitudes toward the Project. Local newspapers and radio stations may serve as key channels for community-level communication and feedback. 	<ul style="list-style-type: none"> The Project may become a source of news and public interest, attracting media attention during planning, construction, and operation phases. Companies associated with the Project may invest in local media through advertising, sponsorships, or public announcements, contributing to media revenue. 	Monitor/ keep informed

Stakeholder Group	Stakeholders	Interest in/ influence on the Project	Impact of the Project on the stakeholder group	Envisaged level of engagement
		<ul style="list-style-type: none"> Media coverage can amplify both support and concerns, making proactive engagement relevant. 	<ul style="list-style-type: none"> Media outlets may benefit from access to exclusive content, interviews, or educational materials related to renewable energy and sustainability. 	
Social media groups	Groups on: <ul style="list-style-type: none"> Facebook Instagram YouTube X 	Sharing content related to the Project <ul style="list-style-type: none"> Possibility of constructing positive or negative Project publicity with the potential to create positive or negative emotions among stakeholders. Social media can act as a platform for local community members to express their concerns, and for supporters to express opinions promoting benefits and positive aspects of the Project. 	<ul style="list-style-type: none"> Social media may be used by the Company to convey project-related information to specific groups or stakeholders including to address concerns in relation to the Project. The Project can be used as an example to educate the public about the benefits of renewable energy sources. Renewable energy-related organizations can conduct outreach campaigns on social media to promote awareness of PV technology, sustainability, and environmental protection. The Project can use social media to respond to community questions and concerns. Transparency and open communication can help build trust and community support. Social media offers a platform to gather community feedback and engage in dialogue with residents and other stakeholders. 	Monitor/ keep informed
Public Utilities Operators Government-funded and/or private enterprises acting as utility services providers and infrastructure operators	<ul style="list-style-type: none"> MVM ÉMÁSZ Áramhálózati Kft. MVM NET Zrt. MAVIR Zrt. ÉRV Zrt. (Northern Hungary Regional Water Utility) Local Waste Management Providers 	<ul style="list-style-type: none"> Operators of public utilities infrastructure (e.g. electrical grid, water, sewage, drainage systems, public roads) may have an influence on the Project through their assets and operations, especially where underground pipelines or overhead lines cross the Project area. These entities may be involved in permitting, technical coordination, or relocation of infrastructure. Interest in the Project may arise from direct commercial relationships, such as grid connection agreements, water supply coordination, or waste management services. Their cooperation is important for ensuring uninterrupted service provision and compliance with technical and safety standards. 	<ul style="list-style-type: none"> Ongoing relationship between the Project and public utilities operators on a contractual basis and associated communication on services supply matters. The Project may require coordination with utility operators for grid connection, water supply, drainage, or waste management infrastructure. The Project contributes to the energy transition by bringing lower-cost renewable energy to the transmission system, which may support national and regional energy objectives. Infrastructure upgrades or adjustments may be needed in collaboration with utility providers, creating opportunities for technical cooperation and long-term partnerships. 	Monitor/ keep informed

Stakeholder Group	Stakeholders	Interest in/ influence on the Project	Impact of the Project on the stakeholder group	Envisaged level of engagement
Local emergency response services	<ul style="list-style-type: none"> • Heves County Directorate for Disaster Management (Heves Vármegyei Katasztrófavédelmi Igazgatóság) • National Ambulance Service (Országos Mentőszolgálat) • Heves County Police Headquarters (Heves Vármegyei Rendőr-főkapitányság) • Szihalom Volunteer Fire Department 	<p>All emergency response services regarding activities in cases of emergency, such as injuries and accidents of Project workers, fire, construction accidents</p> <ul style="list-style-type: none"> • Interest related to H&S within the Project area in cases of emergency response due to incidents at the Project. 	<ul style="list-style-type: none"> • The Project can collaborate with and support local emergency services by funding training programmes, providing equipment and supporting initiatives to improve safety through the local community improvement initiatives. • The Project may cooperate with local emergency services in the frame of common drills or intervention training. • The development of solar panels often involves upgrading or building new access roads, which can improve overall infrastructure and potentially benefit emergency response services by providing better routes to remote areas. 	Monitor/ keep informed

6. ENGAGEMENT PLAN

This SEP outlines the stakeholder engagement activities, Project information disclosure and provides a high-level outline of the engagement to be implemented at current Project stage. As the Project progresses the SEP will be updated to reflect evolving engagement needs as needed and particularly at the stage when the Project transitions into the commissioning and operational phases.

The proposed Engagement Plan is outlined in Table 6.1. and is to be further elaborated and adjusted as necessary to:

- Incorporate additional activities aimed at disclosing information related to the Project's environmental and social (E&S) performance and potential impacts;
- Enable stakeholders to clearly understand understanding of the risks, impacts, and opportunities associated with the Project;
- Provide communities with feedback, at appropriate levels, on how their views and input have been considered by the Company, and manage their expectations with respect to the Project.

TABLE 6-1 ENGAGEMENT PLAN

Type of Activity	Target Stakeholder Groups	Engagement activity/measures	Timing	Responsibility
Resources Allocation	Residents of Szihalom, Maklár, Mezőszemere, Zsóri and Mezőkövesd	Appoint a Community Liaison Officer (CLO) and deploy/ensure regular presence in the affected communities.	As soon, Q3, 2025	Company management
Project Information Disclosure	All stakeholders	<p>Disclose Project information on the Project webpage including:</p> <ul style="list-style-type: none"> • Project Non-Technical Summary – in Hungarian and English; • SEP, including the Grievance Mechanism – in Hungarian and English; <p>Provide on the Project webpage clear instructions for grievances submissions including:</p> <ul style="list-style-type: none"> • A downloadable Grievance Form • Postal address for submitting grievances in paper format • An online interface for direct grievance submission, provided if technically feasible 	As soon, Q3, 2025	Company management
	Residents of Szihalom, Maklár, Mezőszemere, Zsóri and Mezőkövesd	<p>Non-Technical Summary and SEP made available for consultation locally (in Hungarian language only).</p> <p>Posters or fliers containing key Project information, such as a brief Project</p>	As soon, Q3, 2025	CLO, Company management

Type of Activity	Target Stakeholder Groups	Engagement activity/measures	Timing	Responsibility
		description, main implementation milestones, contact details for the Community Liaison Officer (CLO), and available grievance channels, will be displayed on existing municipal notice boards within the affected communities.		
	Residents of Szihalom, Maklár, Mezőszemere, Zsóri and Mezőkövesd	Install Notice Boards at the construction sites. In addition to the regulatory-required content, include information on: <ul style="list-style-type: none"> • Contact details of the CLO • Available grievance submission channels 	At construction initiation	Company management
Stakeholder Engagement	Residents of Szihalom, Maklár, Mezőszemere, Zsóri and Mezőkövesd	Hold an initial Project Open Day/Public meeting in the communities to: <ul style="list-style-type: none"> • Provide an overview of the Project and its key implementation milestones • Explain potential impacts on local communities (including those associated with workforce housing in community) and how these will be managed • Highlight anticipated benefits of the Project for local residents • Introduce the CLO and explain how they can be contacted • Indicate the planned Project information disclosure channels • Explain the grievance mechanism and available grievance submission channels • Answer questions and address community members' concerns • The meeting will be scheduled at times convenient for both women and men. Participation by gender will be monitored and, if gaps are identified, additional outreach will be considered. 	Before main construction works initiation	CLO, Company management
	Residents of Szihalom, Maklár and Mezőszemere	Install grievance boxes at accessible community locations (e.g. Mayor's Office, local school, community cultural houses, church etc.). Boxes should be regularly monitored, at least every other day, to collect and address submissions in a timely manner.	Before main construction works initiation (boxes installation) Ongoing boxes attendance	CLO, Company management
	Former Project landowners and owners of land along the electrical cable routes	<ul style="list-style-type: none"> • Upfront notification of works start, planned properties access and provision of information on duration of works. 	Before initiation of works affecting the properties.	CLO

Type of Activity	Target Stakeholder Groups	Engagement activity/measures	Timing	Responsibility
		<ul style="list-style-type: none"> • Provision of information on grievance mechanism and available grievance channels. • Ongoing engagement during construction. 	Ongoing during construction stage.	
	Residents of Szihalom, Maklár and Mezőszemere	Provide advance notice prior to major equipment deliveries through local communities, including: <ul style="list-style-type: none"> • Expected transportation routes • Planned schedule and duration • Anticipated disruptions (e.g. traffic delays, noise) • Reminder of available Project communication channels for questions or concerns 	In due time prior to major supplies	CLO
	Residents of Szihalom, Maklár and Mezőszemere	Periodic community meetings (preferably held semiannually): <ul style="list-style-type: none"> • Organized either as dedicated Project meetings or integrated into regular municipality-held public forums (<i>lakossági fórumok</i>) • Intended to provide updates on Project progress, gather community feedback, respond to questions, and address concerns • Meetings will be inclusive and accessible for both women and men. Feedback from women will be specifically sought to ensure their perspectives are considered in project decision-making. 	Periodic/ semi-annually	CLO, Company management
	Szihalom, Maklár and Mezőszemere Mayors, local community leaders	Ongoing proactive communication and consultation	Ongoing	CLO, Company management

7. EXTERNAL GRIEVANCE MECHANISM

7.1 PURPOSE

The purpose of the external Grievance Mechanism (GM) is to establish a fair, accessible, effective, timely and formalised process (identification, tracking and redress) for stakeholder concerns, complaints/grievances to be raised and managed /resolved in a systematic and transparent manner, without risk of discrimination or retaliation. The GM enables any stakeholder to raise a grievance in relation to project operations. The grievance mechanism is intended to ensure that all comments, questions and complaints regarding the project are addressed and appropriate corrective action is taken. Grievances may take the form of specific complaints for damages/injury, concerns about routine project activities, or perceived incidents or impacts or may only represent requests for information of stakeholders' concern.

The GM should address grievances expressed both verbally and/or in writing, and grievances that are communicated indirectly (i.e. Through intermediaries), including those raised anonymously.

However, the stakeholders always have the right to complain to the relevant authorities or the legal system, in accordance with the existing legislation in Hungary.

Company commits to process any grievance received in timely manner, via a procedure that is transparent, culturally appropriate, and without any retaliation towards the party submitting a grievance.

7.2 PRINCIPLES UNDERPINNING THE GRIEVANCE MECHANISM

The GM is based on the following principles:

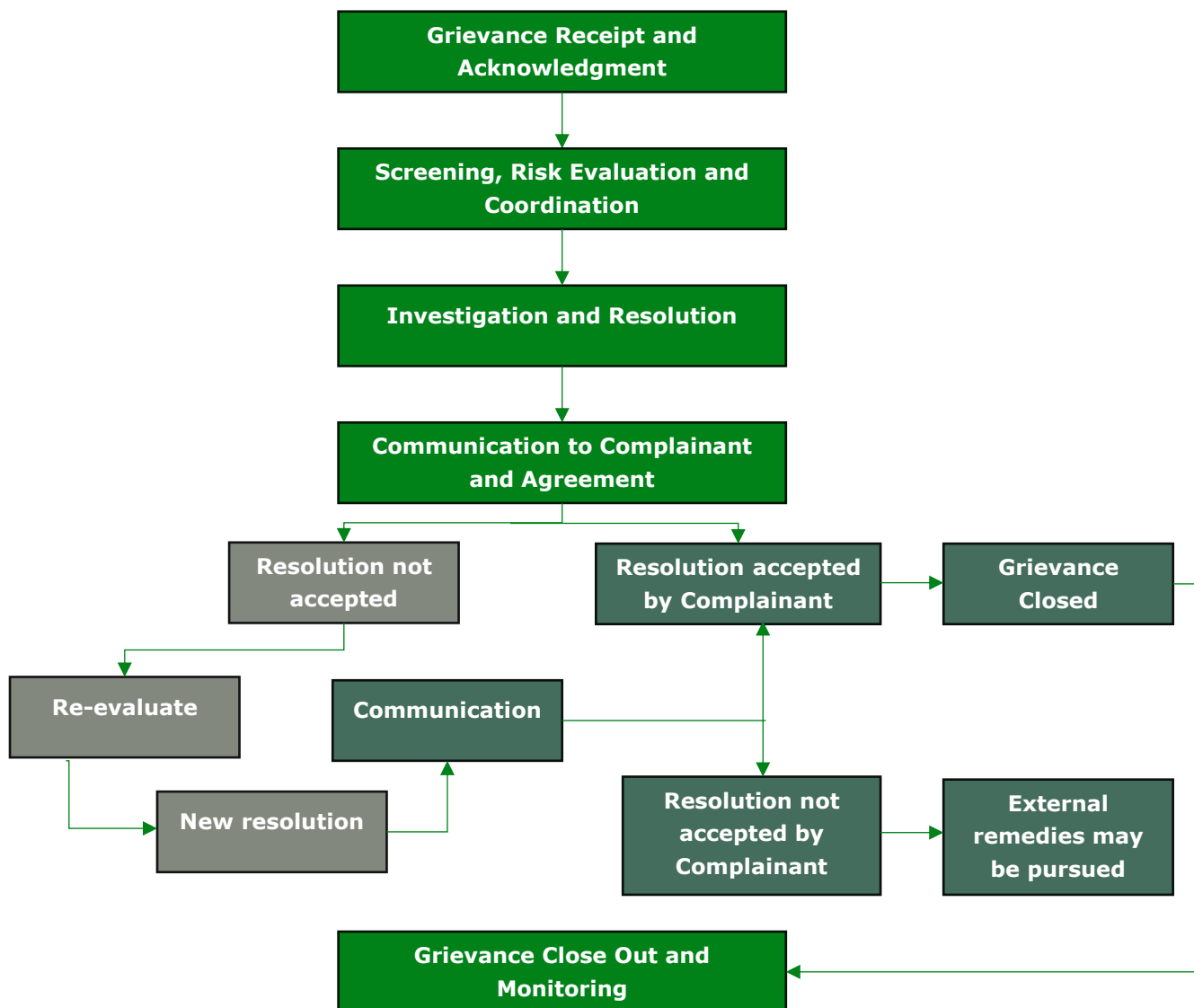
- **Stakeholders face no barriers in accessing and using the GM.** The Company ensures an easily accessible process for receiving, investigating, and responding to concerns and complaints from external stakeholders, in an effective and timely manner;
- **The mechanism is culturally appropriate.** It takes into account local and cultural, context, without restriction or discrimination of any stakeholder submitting a grievance;
- **The mechanism is based on a transparent process.** The steps followed in the grievance resolution process along with the associated timeframe are disclosed through means easily accessible to all stakeholders.
- **The mechanism ensures confidentiality of complainants' personal data.** The GM is safeguarding the personal data collected in relation to a complaint, protects privacy and handles personal data and sensitive information in accordance with applicable standards and laws.
- **The option to submit grievances anonymously is available,** and such grievances are processed in accordance with the same established procedures as those submitted with identifying information.
- **Grievance resolution bears no cost to complainants.** No fees or financial burdens are imposed at any stage of the grievance process, including submission, investigation, or resolution. This applies to all Project-related activities, regardless of whether the issue involves the Company directly or its contractors, subcontractors, or employees.

7.3 GRIEVANCE PROCEDURE

The steps of the implemented grievance procedure are outlined in figure 71 and detailed further in the subsections below.

Roles and responsibilities in relation to the implementation of the gm are provided in section 8 of this SEP.

FIGURE 7-1 GRIEVANCE PROCEDURE DIAGRAM



Step 1: Grievance receipt and acknowledgement

Grievances and complaints can be submitted:

- in person (verbally or in writing) to the Community Liaison Officer:
- verbally through the Grievance Mechanism telephone hotline: +3620 219 0094
- in writing through the Grievance Form (available for download and print from the Project webpage: please provide link) as follows:
<https://www.renalfaipp.com/sustainability>

- printed versions sent via post - to the following address: : 1026, Budapest, Riado u. 1-3
- electronic version sent via email at: laszlo.modos@renalfa.com
- Through grievance boxes available in local municipalities, using either the grievance form or free-handwritten letters (currently planned; grievance boxes locations will be provided once established).

The Grievance Form developed for the Project is provided in Appendix A.

The Grievance collected by the CLO or by other Company's representative (employee) will be immediately (24h) directed to the Grievance Manager who will record it in the Grievance Log – see Appendix B.

The Grievance Log records the following information:

- Grievance No.;
- Date lodged by complainant;
- Date received by Grievance Manager;
- Grievance Acknowledgement Date;
- Contact details of complainant;
- Brief summary of grievance;
- Grievance Risk/Priority Level;
- Grievance Resolution Summary;
- Response Channel
- Date of response to Complainant;
- Grievance Close Date.

The Grievance Manager formally acknowledges receipt of the grievance to the complainant, via a personal meeting, phone call, email, or letter, as appropriate, within one working day of receipt. If the grievance is unclear or additional information is needed, the Grievance Manager may request clarification from the complainant at this stage.

Step 2: Risk Evaluation

Depending on the nature of the grievance received, the Grievance Manager is responsible for identifying the relevant department or personnel within the Company to address the issue raised and for forwarding the grievance to the appropriate party.

Within three working days of internal communication of the grievance, the Grievance Manager, with support from the responsible party, categorizes the grievance and assigns it a risk level (Low, Medium, or High) based on its severity, following the guidance provided overleaf.

Grievances classified as Medium or High risk are also forwarded by the Grievance Manager to all members of the Grievance Committee to inform them of the issue and to notify them of their expected involvement in subsequent stages of grievance resolution.



Step 3: Investigation and Resolution

The responsible party will investigate the received grievance and, with the support of the Grievance Manager, will propose appropriate responses and/or measures to address the issue, as well as identify the parties responsible for implementing them.

Based on this, the Grievance Manager may directly inform the complainant of the resolution outcome for Low-risk grievances (see Step 4).

Medium- and High-risk grievances will be reviewed during a Grievance Committee meeting, where the necessary measures to address the grievance will be agreed upon, and the response to be provided to the complainant confirmed.

Grievances will be investigated with the aim of reaching a prompt resolution, allowing for a formal response to the complainant within one month from the date of acknowledgement.

Within one week of acknowledging receipt, the complainant will be informed of the investigation timeline and the expected date for receiving a response regarding the proposed resolution.

Step 4: Communication to Complainant and Agreement

As indicated above, the Grievance Manager or a designated member of the Grievance Committee will respond to the complainant and communicate the outcome of the grievance resolution within 30 days of acknowledging the grievance.

For complex grievances requiring additional time for resolution, a response indicating the expected timeline for resolution will be provided as early as feasible, but no later than one month from the date of acknowledgement.

The grievance resolution response will also inform the complainant of their right to either accept or disagree with the proposed measures and resolution outcome. It will further highlight the opportunity to provide feedback or a formal response to the Company in this regard.

Anonymous grievances will be addressed in accordance with the procedures outlined above. A summary of the grievance and the resolution measures implemented will be communicated locally to ensure transparency.

If the complainant is not satisfied with the resolution, their feedback will be reviewed by the Grievance Committee, and further actions or modifications will be agreed upon and communicated by the Grievance Manager.

Should the complainant remain dissatisfied following this process, they may choose to escalate their concerns through an external dispute resolution mechanism, including legal proceedings, outside the Company's grievance mechanism.

Step 5: Grievance Close Out and Monitoring

The Grievance Manager will record the response and all actions taken in the Grievance Log, clearly indicating the resolution status and date of closure.

All grievance-related correspondence and documentation will be retained on file, organized in a structured database with entries numbered and aligned with the Grievance Log.

A grievance will be considered closed only when it has been fully resolved. For example, if mitigation activities are still ongoing, such as remediation of property damage, the grievance will remain open until those actions are fully completed. The Grievance Manager will monitor the implementation of these measures to ensure that all resolution commitments are fulfilled.

All members of the Grievance Committee and relevant responsible parties will be notified in the event of any breach or deviation from the grievance resolution process..

8. ROLES AND RESPONSIBILITIES

Table 9-1 summarizes the key roles and responsibilities in relation with the management and implementation of the SEP and Grievance Mechanism (GM).

Roles and responsibilities will be reviewed and adjusted to meet the Project and related engagement needs, in line with the Company's management system provisions.

TABLE 9-1 KEY ROLES AND RESPONSIBILITIES FOR SEP AND GRIEVANCE MECHANISM IMPLEMENTATION

Function	Roles and Responsibilities
Company Management	<ul style="list-style-type: none"> • Overall accountability for stakeholder engagement and grievance management. • Ensures allocation of required resources for SEP and GM implementation. • Coordinate relationships with authorities and key institutional stakeholders.
SEP Coordinator and Grievance Manager Role – Módos László	<ul style="list-style-type: none"> • Coordinate SEP and GM implementation. • Acting as Grievance Manager. • Monitor local/community developments with potential to impact Project activities, and reports on these to Company Management. • Responsible for the Project general information disclosure, mass media coverage/press releases. • Take active role in the identification of community needs and assist in the decision process regarding Company community investment program. • Works closely with Corporate CSR, Social Performance and Sustainability teams to prepare/validate communication materials aligned with Company standards and ensure messaging, branding, reputation management. • Ensures that stakeholder engagement activities are documented and records are kept on file. • Coordinate and manage implementation of the Grievance Mechanism. <ul style="list-style-type: none"> ◦ Coordinates responses to Complainants and agree content with other members of the Company Grievance Committee; ◦ Responsible for ensuring responses to Complainants are provided in line with the Grievance Mechanism provisions; ◦ Reports to Company Management on grievance management.
On-site Representative – acting Community Liaison Officer (CLO)	<p>Stakeholder engagement role</p> <ul style="list-style-type: none"> • Under the direction of the SEP Coordinator, maintain a continuous presence in the Project area to build trust and relationships with key stakeholders and affected communities. • Ensures that affected communities are informed about the Project, its activities, and its impacts, ensuring that stakeholders' comments/questions and their concerns are considered and answered. • Acts as local liaison between the community/stakeholders and Company and maintain positive relationship with them. • Monitors local developments with potential to impact the Project. Report to Public Affairs & Manager on potential issues in local communities and contribute to implementing specific measures to prevent and mitigate risks. • Takes active role in the identification of community needs and assist in the decision process regarding Company's community investment program. <p>Grievance management role</p> <ul style="list-style-type: none"> • Supports with the Grievance Mechanism implementation at local level.

Function	Roles and Responsibilities
	<ul style="list-style-type: none"> • Collects grievances submitted locally (e.g. through grievance boxes or directly to CLO) and communicate them internally in line with the Grievance Mechanism. • Supports with communicating grievance resolution to local Complainants.
Grievance Committee	<ul style="list-style-type: none"> • Permanent Committee consisting of the Grievances Manager and appointed management-level members. • Reviews potential options for grievance resolution and provides all necessary support to facilitate effective resolution. • Oversees GM implementation and conducts periodic reviews to assess performance and identify areas for improvement. • Acts as the decision-making body for the resolution of medium and high-risk grievances.

9. MONITORING, EVALUATION AND REPORTING

9.1 OVERVIEW

To assess the effectiveness of this SEP and associated community engagement activities, the Company will establish and maintain a data management and monitoring process, as outlined in this section. This process will also facilitate transparent reporting to external stakeholders, serving as a key step in strengthening local trust and fostering shared value.

9.2 MONITORING AND EVALUATION ACTIVITIES

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

The following documentation will be maintained by the Company throughout the Project execution:

- *Stakeholder Dialogue Log*: Used to store, analyse and report on stakeholder dialogue activities. It will be populated with details on information presented, audience questions, Company responses and actions, and meeting evaluation results, when appropriate. The database will also be used to track frequency of meetings over the life of the Project.
- *Meeting Minutes Template*: used to capture and structure minutes from stakeholder meetings; to be filed within the stakeholder database and SEP updates.
- *Stakeholder List*: Continuously updated to include newly identified stakeholders, including key contact information (e.g., phone numbers, email addresses).
- *Grievance Log* used to record all grievances received, actions taken in response, and whether the grievance was resolved to the complainant satisfaction.

All records will be reviewed quarterly to ensure they are properly maintained and up to date. Commitments and action items resulting from stakeholder engagement activities will also be reviewed regularly to ensure appropriate follow-up and implementation.

10.3. REPORTING TO STAKEHOLDERS

10.3.1. INTERNAL REPORTING

The following internal reports will be developed:

- **Red Flag Reports**: these reports will cover urgent matters such as critical grievances, major concerns or incidents of significant nature. Red flag reports will be prepared by the Grievance Manager or the CLO and submitted to the Company management team.
- **Quarterly Progress Reports**: internal quarterly progress reports will be prepared by the CLO. These reports will review:
 - Stakeholder engagement activities conducted: stakeholders met, key topics discussed, main concerns and expectations, positioning towards Project activities;
 - Grievance mechanism performance: participation levels, grievances reported, progress summary (actions to be taken and status);
 - Risks to the Project;
 - Limitations (e.g. resources, internal coordination challenges);

- Priorities/planned activities for next quarter.

These reports will be discussed by the CLO and the Project team, and be circulated internally as needed.

10.3.2. EXTERNAL REPORTING

In addition to the reporting required under the grievance mechanism, the Company will publish annually on the Project website reports on the on environmental and social performance of the Project including on performed stakeholder engagement.

11. APPENDIX A SAMPLE GRIEVANCE FORM

Reference No:

Full Name

First name _____

Last name _____

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent

☐ I wish to raise my grievance anonymously

☐ I request not to disclose my identity without my consent

Contact Information

Please mark how you wish to be contacted (mail, telephone, e-mail).

☐ By Post: Please provide mailing address:

☐ By Telephone:

☐ By E-mail

Preferred Language for communication

☐ Hungarian

☐ English

Description of Incident or Grievance:

What happened? Where did it happen? Who did it happen to?
What is the result of the problem?

Date of Incident/ Grievance

☐ One time incident/grievance (date _____)

☐ Happened more than once (how many times? _____)

☐ On-going (currently experiencing problem)

What would you like to see happen to resolve the problem?

Signature: _____

Date: _____

Please return this form to: Renalfa Hungary Kft/Renalfa IPP GmbH

Address: 1026, Budapest, Riado u. 1-3

Tel.: +3620 219 0094

E-mail: laszlo.modos@renalfa.com

12. APPENDIX B SAMPLE GRIEVANCE REGISTER

Grievance Mechanism - External stakeholders												
Logging and Tracking Grievances												
Grievance reference	Category of issue	Complainant's Name	Grievance Date	Date of receipt	Grievance Acknowledged /Date	Summary of grievance	Priority Level	Assigned to	Resolution Summary	Status	Response chanel	Final resolution date
# of grievance received	Accidental property damage		2025-10-01	2025-10-01		What/Where/Impact of the issue	Medium			Open	Letter	