

Stakeholder Engagement Plan

Project: Dobrun 1, Dobrun 2 and Sadova Solar PV Parks (189.7 MWp),

Olt and Dolj Counties, Romania

Client: SCATEC Solar Netherlands B.V.

Prepared by Green Partners Ltd.

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DISCLAIMER: The current report includes information as made available by the project owner and its consultants, prior to the completion of the report. Any change in the technical design, or additional data available might change the results of the assessment report.





1. Introduction

The current document is developed in the framework of the Environmental and Social Assessment process prepared for the Sadova / Dobrun Solar Project (The Project), located in Dolj County and Olt County.

The Project is currently under development by Scatec Solar Netherlands B.V.. The development is supported by the Romanian Special Purpose Vehicle (SPV) companies: Energie Soleil Ltd. (Dobrun 1), RB Solar Energy Ltd. (Dobrun 2), and Solar World Ltd. (Sadova).

The Stakeholders Engagement Plan (SEP) is a management plan which will be used during the construction and operation period of the Project. The SEP includes generic and specific stakeholders' engagement actions, adapted to the project needs.

Scatec has established a comprehensive framework for stakeholder engagement and community development, aligning with international standards such as the IFC Environmental & Social (E&S) Performance Standards and the UN Guiding Principles on Business and Human Rights. The SEP is intended to align and complement the existing framework.

The SEP is a guiding document that maps the main categories of stakeholders that will be meaningfully engaged within the construction and implementation of a project. This SEP highlights the way the Project plans to communicate with these stakeholder groups who may be affected by or interested in the Project's operations and activities. It focuses on:

- Identification of stakeholders who are likely to be affected and have an interest to the project;
- Establishment of engagement methods that are suitable for each identified category of stakeholder;
- Documentation of previous engagement activities and stakeholder feedback;
- Development and implementation of the future stakeholder engagement programme, and methods of engagement;
- ❖ Introduction of the Project's grievance mechanism;
- Monitoring and evaluation of engagement actions, and;
- Roles and Responsibilities.

The development of the SEP was done following a participatory approach. Scatec's team, together with the consultants' team identified the key stakeholders relevant for this Project and defined the appropriate engagement methods for each of them.

The SEP is a 'live' document that will be progressively developed through updated versions in line with the phases of the Project. The SEP will be made publicly available on Scatec's website and will also be made accessible to local communities as part of the project information disclosure policy and programme as described below.

The project respects each stakeholder's Right to Privacy, which is relevant to this SEP in terms of handling personal or private information and ensuring the confidentiality of communications, including those related to grievances.

The current version of SEP focuses on the activities that will take place during the initial stages of the construction phase.



2. Regulations, Requirements and Practices Regarding Stakeholder Engagement

2.1. National Legal Framework

At national level, there are no specific requirements for preparing a dedicated Stakeholder Engagement Plan. Nevertheless, some provisions for stakeholder engagement are included in several regulations and procedures, including:

- The Romanian Constitution, which stipulates in article 31 (1) that "a person's right of access to any information of public interest cannot be restricted" and in article 31 (2) that "the public authorities, according to their competence, shall be bound to provide for correct information of the citizens in public affairs and matters of personal interest";
- Law no. 86/2000, for ratification of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, signed in Aarhus on 25 June 1998 (Aarhus Convention).
- ❖ Law no. 544 of October 12th, 2001 regarding the free access to information of public interest, which defines and details the free access of any person to any piece of information of public interest, which, as a general principle, constitutes one of the fundamental principles of the relationship between citizens and public authorities in accordance with the Constitution of Romania and with the international undertakings ratified by the Parliament of Romania.
- Law no. 544/2001 stipulates further that the public authorities or institutions will ensure that access to information of public interest shall be done ex officio or upon request, through the intermediary of the department for public relations or through the intermediary of the person appointed for this purpose.
- ❖ Government Decision no. 878/2005 on right to access to environmental information transposes EU Directive 2003/4/CE from 28 January 2003 (on right to access to environmental information and repealing the Directive no. 90/313/CEE) and ensures the right to access environmental information held by or for the public authorities and sets out the conditions, general terms and ways to exercise that right.
- ❖ Emergency Government Ordinance no. 195/2005, related to the environmental protection, as amended from time to time, clearly stipulates in article 5 that the state recognizes the right of any person to an "ecologically healthy and balanced environment" and for this purpose, the state warrants, inter alia, free access to environment related information, including the right of any person to be consulted during a process of making environment-related decisions (i.e. legislation, plans and programs) and the right to access to justice.
- ❖ Further, article 20 of Emergency Government Ordinance no. 195/2005 clearly stipulates that the Competent Authority for Environmental Protection together with all other local and central public authorities, if the case, will ensure proper access to information, participation of the public in specific activities related to decisions and access to justice in accordance with the requirements of the Aarhus Convention;
- ❖ Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects. In accordance with the stipulations of this Law, the relevant information has to be made publicly available by the investor and/or the national authorities during each of the EIA stages listed in article 8 of the same. Public Consultations and open disclosure of documentation connected with the Project have to be carried out and financed by the Investor in close connection with the guidance



- given by the relevant authority and consistently with the requirements of the relevant Romanian legislation (see in this respect, Section 3 Public information and participation in the environmental impact assessment procedure, art. 15 and 16 of the Law).
- ❖ Order 1825 / 2016 on the approval of the guidelines for environmental impact assessment. These guidelines have been developed for the following categories of projects: groundwater abstraction and water supply systems, wastewater treatment plants and sewerage networks, flood prevention and protection works, integrated waste management system projects, highway and road construction projects, railway construction projects, flue gas desulphurization projects for large combustion plants.
- Order 269 / 2020 on the approval of the general guide applicable to the stages of the environmental impact assessment procedure, the guide for environmental impact assessment in a transboundary context and other specific guides for different areas and categories of projects. This order sets out general guidance applicable to all stages of the environmental impact assessment procedure, including aspects related to transboundary contexts. Apart from the general guidance, it addresses municipal waste incineration, quarries and surface mining operations (including industrial installations for extraction), facilities for the intensive rearing of farm animals, hydroelectric power production facilities, and land use changes involving afforestation or deforestation.
- ❖ Order 1682 / 2023 on the approval of the Methodological Guide on the appropriate assessment of the potential effects of plans or projects on protected natural areas of community interest. Order no. 2701/2010, the Methodology regarding the mechanism of information and consultation of the public on the occasion of preparing or revising the zonal planning and urbanism plans enacted by the Ministry for Regional Development and Tourism, which provides the legal framework for performing the information disclosure and public consultation as a prerequisite for approving any urbanism and zonal planning documents.
- ❖ Law no. 52/2003 on decisional transparency in public administration. This law has the role to enhance the accountability of government to the citizen and the beneficiary of the administrative decision, and to increase the involvement of citizens in decision-making processes of the administrative and legislative drafting process, to enhance transparency across government.

2.2. EBRD Requirements

Due to the fact that this Project is co-financed with the financial support of International Financing Institutions, their requirements and social policies, especially the ones on stakeholders' engagement are also applicable. The stakeholder engagement is important for building strong, constructive and response relationships with all interested and impacted persons/institutions. **EBRD's Environment and Social Requirements 10 (ESR10)** states that national laws and regulations regarding public information disclosure and consultation must always be considered when developing and implementing a project. Also, EBRD's Environment and Social Requirements 8 (ESR8) states that consultation with stakeholders and affected communities should be made in the context of cultural heritage issues.

In the event that national laws are insufficient or there are significant discrepancies between national and ESR 10 provisions, then the following principles will be considered:



- Promoting transparent communication between the project promoter, its workforce, the local communities directly affected by the project, and other interested stakeholders;
- ❖ The involvement of the stakeholders has to be a process free of manipulation, interference, coercion and intimidation.
- The involvement of the stakeholders has to be adapted on the basis of the project impacts over them (direct/indirect) and their level of influence and interest towards the project. Vulnerable groups will be identified, and specific actions will be undertaken to ensure that the Project will not contribute to the existing vulnerabilities and possible barriers to their participation in the engagement process are eliminated;
- The involvement of stakeholders is a process which must take place in the early stages of the project, and continue throughout the entire life of the project; and
- Ensuring access to an appropriate, fair complaints management mechanism for stakeholders to submit their questions, concerns or grievances about the project.

2.3. Company Practices

Scatec's approach to stakeholder engagement is defined by a structured and inclusive framework aligned with international sustainability standards. As detailed in its 2024 Annual Integrated Report, the company engages with stakeholders through ongoing processes at corporate, national, and project levels, aiming to ensure that perspectives from affected and interested parties are taken into account throughout the project lifecycle.

Stakeholders are identified and prioritized according to their level of influence on, and interest in, Scatec's activities. These include local communities, employees, investors, public authorities, civil society organizations, suppliers, and partners. Engagement is designed to be context-specific, enabling Scatec to respond to the needs and expectations of different stakeholder groups in a targeted and effective manner.

A central component of this engagement framework is the application of double materiality assessments, which help determine key sustainability issues by considering both the impact of the company's activities on people and the environment, and how such issues may affect the company itself. Stakeholder input is incorporated into these assessments to inform strategic priorities and sustainability reporting.

Scatec utilizes a range of methods to support stakeholder engagement, including formal consultations, grievance mechanisms, community liaison officers, stakeholder surveys, and partnerships with non-governmental or local institutions. These mechanisms are intended to facilitate dialogue, address concerns, and contribute to risk management.

The integration of stakeholder feedback into project development and operational processes is part of Scatec's broader ESG approach. Engagement activities are intended to inform decision-making, support regulatory compliance, and contribute to the long-term viability and acceptance of the company's renewable energy projects.

The company notes that stakeholder engagement and transparent communication play an important role in maintaining operational continuity and meeting its environmental and social commitments across diverse geographic contexts.



3. Project Description

3.1. Brief Project Description

The Project involves the development of three photovoltaic (PV) parks across two locations in Olt and Dolj County: Dobrun and Sadova. In Dobrun, two separate solar parks—Dobrun 1 and Dobrun 2—will be developed across seven land plots, while the Sadova solar park will be constructed across ten plots. Each park will use aluminum-mounted, single-axis tracking PV panels, paired with string inverters rated at 352 kW. No electricity storage is planned. The total installed DC capacity will be approximately 189.7 MWp across all three parks. (figures 1 and 2).

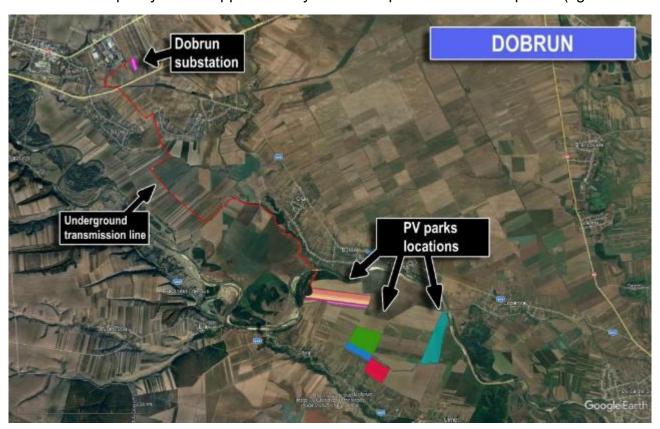


Figure 1 Project location in Dobrun



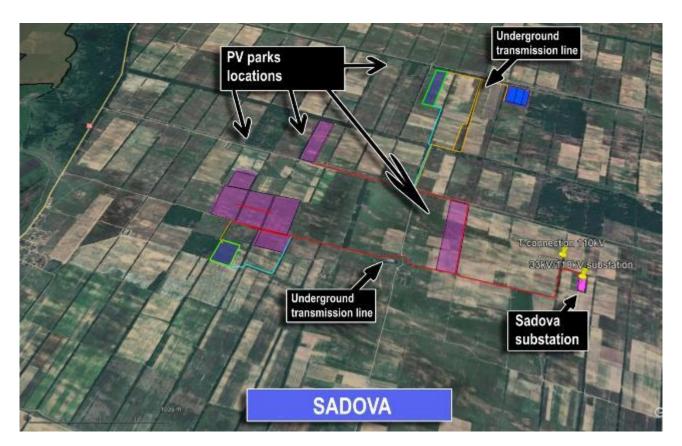


Figure 2 Project location in Sadova

Electricity generated at the sites will be transmitted via 33 kV underground transmission lines (UTLs) to newly constructed 110/33 kV substations at each location. Dobrun 1 and 2 will each include a transformer substation equipped with a 63 MVA transformer, protection systems, and auxiliary services. A similar 110/33 kV substation will be developed for Sadova, featuring an additional 3 MVAr compensation coil and underground connection to the Dăbuleni–Bechet 110 kV overhead line.

Grid connection for Dobrun will be established at the 110 kV voltage level via existing infrastructure on the Otelarie–Bals overhead line, which will be upgraded with new poles. For Sadova, a short 110 kV underground connection (approx. 100 m) will link the substation to the national grid via a newly installed pole.

Construction activities will be carried out through four separate construction sites—one for each solar park and one for each substation. Works include terrain preparation, infrastructure installation, fencing, and transformer foundation construction with oil retention and separation systems for environmental protection.

During construction, hazardous materials such as fuel and oil will be used but not stored on-site; these will be managed by licensed third-party providers. In the operational phase, limited



quantities of such substances may be present for equipment maintenance and backup generation. All handling will comply with Romanian legislation regarding storage and labeling.

The project's technical design and construction will conform to applicable national standards and permitting conditions, ensuring safety, environmental protection, and grid integration readiness.

3.2. Activities Foreseen for 2025

During the coming year (2025) the project is expected to enter in its final construction stages, with the connection of the project to the national grid expected to be completed by 2026.

The table below presents the scheduled activities for 2025.

Table 1 Activities planned for 2025

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Activity	Jul	Aug	Sept	Oct	Nov	Dec
1.	Preparation of proper documentation Dobrun 1&2	Submission, Review and Approval of Concept Design PV Park Dobrun 1&2	Submission, Review and Approval of Detail Design Dobrun 1&2	Submission, Review and Approval of General Submission Docs Dobrun 1&2	Installation of Laydown Area Dobrun 1&2	Installation of Fence Dobrun 1&2
2.	General Submissions Dobrun 1&2	Preparation of Detailed Design Dobrun 1&2	Submission, Review and Approval of Detail Design HV General Packages Dobrun 1&2	Procurement of Laydown Area Equipment Dobrun 1&2	Provision of Utilities Dobrun 1&2 (Water, Power, Internet, Waste)	Drainage, road and infrastructure works Fence Dobrun 1&2
3.	Preparation of Concept Design PV Park Dobrun 1&2	PV Early Works Package Dobrun 1&2	Submission and Review of Detail Design HV Dx Control Building Packages Dobrun 1&2	Approval of Detail Design HV Dx Control Building Packages Dobrun 1&2	H&S - Set Up Dobrun 1&2	Primary Equipment Foundation Works Dobrun 1&2
4.	Preparation of Concept Design PV Park Sadova	PV Fencing Package Dobrun 1&2	Submission, Review and Approval of Concept Design HV - Substation & Transmission Line Dobrun 1&2	Submission, Review and Approval of Detail Design HV Dx Primary Plant Packages Dobrun 1&2	Site Prep & Leveling Works, Site Access Roads Dobrun 1&2	Site Perimeter Fencing Dobrun 1&2
5.	General Submissions Sadova	Procurement of necessary equipment Dobrun 1&2	Submission, Review and Approval of Detail Design PV Early Works Package Dobrun 1&2	Submission, Review and Approval of Detail Design HV Dx Secondary Plant Packages Dobrun 1&2	Approval of Detail HV Dx Civil Work Packages Dobrun 1&2	Miscellaneous Civil Works Dobrun 1&2
6.		Submission, Review and Approval of Concept Design PV Park Sadova	Submission, Review and Approval of Detail Design PV Fencing Package Dobrun 1&2	Submission, Review and Approval of Detail Design HV OHL Packages Dobrun 1&2	Approval of Detail Design PV Scada Package Dobrun 1&2	Building Foundation Dobrun 1&2

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7.		Preparation of Detailed Design Sadova	PV Civil Package Dobrun 1&2	Submission and Review of Detail HV Dx Civil Work Packages Dobrun 1&2	Review and Approval of Detail Design PV Studies Package Dobrun 1&2	Transmission Line - Trenching Works & Overhead Works Dobrun 1&2
8.		PV Early Works Package Sadova	PV Electrical Package Dobrun 1&2	Submission, Review and Approval of Detail Design PV Civil Package Dobrun 1&2	Review and Approval of Detail Design SMDL Package Dobrun 1&2	Installation of Fence Sadova
9.		PV Fencing Package Sadova	Submission, Review and Approval of Detail Design PV Early Works Package Sadova	Submission, Review and Approval of Detail Design PV Electrical Package Dobrun 1&2	Approval of Detail Design Connection Point Renovation Works (TR) Dobrun 1&2	Drainage, road and infrastructure works Sadova
10.			Submission, Review and Approval of Detail Design PV Fencing Package Sadova	O&M Building Package Dobrun 1&2	Procurement of Connection Point Renovation Works (TR) Dobrun 1&2	Primary Equipment Foundation Works Sadova
11.			PV Civil Package Sadova	Submission, Review and Approval of Detail Design O&M Building Package Dobrun 1&2	Approval of Detail Design PV Scada Package Sadova	
12.			PV Electrical Package Sadova	PV Scada Package Dobrun 1&2	Review and Approval of Detail Design PV Studies Package Sadova	
13.			Submission, Review and Approval of Concept Design HV - Substation & Transmission Line Sadova	Submission and Review of Detail Design PV Scada Package Dobrun 1&2	Review and Approval of Detail Design SMDL Package Sadova	

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14.	Submission, Review and Approval of Detail Design HV - Substation & Transmission Line Sadova	PV Studies Package Dobrun 1&2	Procurement of necessary equipment Sadova
15.	Submission and Review of Detail Design HV Dx Control Building Packages Sadova	Submission of Detail Design PV Studies Package Dobrun 1&2	Site Access Roads Sadova
16.		SMDL Package Dobrun 1&2	Site Prep & Leveling Works Sadova
17.		Submission of Detail Design SMDL Package Dobrun 1&2	Approval of Detail Design HV Dx Civil Work Packages Sadova
18.		Submission and Review of Detail Design Connection Point Renovation Works (TR) Dobrun 1&2	Approval of General Submission Docs Sadova
19.		Submission, Review and Approval of Detail Design PV Civil Package Sadova	Civil Works and Switchyard Sadova
20.		Submission, Review and Approval of Detail Design PV Electrical Package Sadova	Site Perimeter Fencing Sadova
21.		O&M Building Package Sadova	Miscellaneous Civil Works Sadova

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22.			Submission, Review and Approval of Detail Design O&M Building Package Sadova	Control Building and Building Foundation Sadova
23.			PV Scada Package Sadova	Transmission Line - Trenching Works and Overhead Works Sadova
24.			Submission and Review of Detail Design PV Scada Package Sadova	
25.			PV Studies Package and Submission of Detail Design Sadova	
26.			SMDL Package and Submission of Detail Design Sadova	
27.			Submission, Review and Approval of General Submission Docs Sadova	
28.			Procurement of necessary equipment Sadova	
29.			Approval of Detail Design HV Dx Control Building Packages Sadova	

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30.	Submission, Review and Approval of Detail Design HV Dx Primary Plant Packages Sadova	
31.	Submission, Review and Approval of Detail Design HV Dx Secondary Plant Packages Sadova	
32.	Submission, Review and Approval of Detail Design HV OHL Packages Sadova	
33.	Submission and Review of Detail Design HV Dx Civil Work Packages Sadova	
34.	Submission and Review of General Submission Docs Sadova	

3.3. Institutional Setup for Project Development and Implementation

The project is owned by Scatec Solar Netherlands B.V. and Emsolt Investment B.V., and will be developed via three SPVs: Energie Soleil Ltd. (Dobrun 1), RB Solar Energy Ltd. (Dobrun 2), and Solar World Ltd. (Sadova).

The institutional structure which will be used during the construction phase includes the following entities:

- The three SPVs (Energie Soleil Ltd. (Dobrun 1), RB Solar Energy Ltd. (Dobrun 2), and Solar World Ltd. (Sadova))— engaged in obtaining all the permits, engaged in Engineering, Procurement and Construction (EPC), Operation and Maintenance (O&M) and procurements agreements for the project and will also supervise the construction works;
- Scatec ASA, through Scatec Solar Netherlands B.V. decision makers and project owners (65% shares in each SPV).
- Emsolt Investments B.V. decision makers and project owners (35% shares in each SPV); .
- EPC contractor Defic Globe Romania Ltd. responsible for the construction of the solar parks + under/above ground transmission lines + the SSs. Defic Globe is an independent power producer (IPP) and EPC contractor owned by Yeo Teknoloji A.S. and Emsolt Investments B.V.

4. Stakeholder Identification and Analysis

Stakeholder identification is a key step in managing the stakeholder engagement process. The objective of this task is to identify which groups, organizations and individuals may be affected by the project or have interest in the development of the project.

Taking into consideration the status and scope of the project, the categories of identified stakeholders are detailed in the upcoming table. Based on the interaction between the Project and the stakeholders this list will be updated, if necessary, during the annual SEP update.

Stakeholder analysis is achieved by assessing the position of each stakeholder in the context of the project preparation phase.

Each identified stakeholder has been analysed from following perspectives: the project impacts on them, their estimated interest in the project and their potential influence over the project. To determine engagement priority levels (High, Medium, Low), stakeholders were assessed based on two core criteria:

- 1. **Degree of Impact** the extent to which the stakeholder is directly or indirectly affected by project activities (e.g., land use, access disruption, noise, safety risks).
- 2. **Interest in the project** the stakeholder's level of interest in the Project and their potential influence on its successful implementation (e.g., land rights, regulatory authority, community leadership).

Based on this assessment, stakeholders were categorized as follows:

• **High Priority**: Stakeholders likely to experience direct, significant, or sustained impacts from the project and/or who have strong influence or decision-making power. This includes neighbouring landowners, vulnerable community members, and permitting



authorities. These groups require regular, direct, and proactive engagement (e.g., one-on-one meetings, safety briefings, targeted consultations).

- Medium Priority: Stakeholders with moderate impact or influence, such as local businesses or general community members not directly affected by construction. These groups are engaged through periodic updates, group meetings, and grievance mechanisms.
- **Low Priority**: Stakeholders with limited impact or interest, typically with indirect or no exposure to project impacts. These are informed primarily through public communications and have access to the grievance mechanism if needed.

The below table presents the main outcomes of this analysis.

Table 2 Stakeholder categories

Category of stakeholders	Stakeholders	Interest in the project	Potential impacts	Engagement Priority
Authorities	National/ Regional Authorities – that already granted a permit for the project or will grant one in the future.	Interested that the Project is developed and implemented according to national regulations and the specific provisions included in the granted permits.	Reputational or compliance risks if project obligations are not met.	High engagement priority Regular coordination, timely updates, and formal communication throughout the construction phases.
	Transelectrica – public utility company responsible for the electrical transmission lines for the entire territory of Romania.	The project will connect to Transelectica's electrical transmission infrastructure, as well as hand over to the company the poles developed for the overhead line (OHL) connecting the Project to the national grid. Also, the company has a direct interest in the project, especially related to the electrical station and the connection point with the main transmission lines. These are critical infrastructure elements which need to be constructed according to the regulation provided by Transelectrica.	The connection will have a direct impact on one of the transmission lines operated by Transelectrica. The connection will have a direct impact on the landowners and land users on the land plots required for the construction of the OHL.	High engagement priority The project will have to be permanently in touch with Transelectrica especially when the connection will take place, but also during construction and operation of the poles and the station, to ensure any impact on the local stakeholders is adequately and timely addressed.
	Local Authorities from ATUs where PV parks and station are located – Dobrun, Bals, Barza, Parscoveni, Sadova, Calarasi	Interested that the Project respects the local construction permit issued by them. Interested in obtaining benefits for the general public via corporate social responsibility programmes.	Reputational or compliance risks if project obligations are not met.	High engagement priority Structured collaboration, regular updates, and opportunities to align on local development goals and community relations.



Category of	Stakeholders	Interest in the project	Potential impacts	Engagement Priority
stakeholders		and project		
Local communities	Members of local communities situated in the proximity of the Project sites, namely: Dobrun, Bals, Barza, Parscoveni, Sadova, Calarasi	Interested on the development of the project and potential impacts on the general population, both positive and negative. Interested in employment opportunities. Interested on the corporate social development programmes developed and implemented by the company.	Community members may be affected by construction-related disturbances such as noise, dust, traffic, and temporary access restrictions, as well as long-term visual and land-use changes.	High engagement priority Ongoing communication, public meetings, and accessible channels for feedback and grievances to ensure concerns are addressed and benefits are shared transparently.
	Vulnerable persons living in the communities situated in the proximity of the lands where construction works will take place. This is mostly visible on the land where the transmission lines connecting the PV parks with the substation will be installed.	Vulnerable groups refer to individuals and groups who by virtue of their characteristics may be more likely to be adversely affected by the project activities. The interest of vulnerable person is in understanding and acknowledge the limitations imposed during constructions and the safety measures taken in order to avoid any accidents.	Vulnerable individuals may face disproportionate risks related to safety, restricted mobility, and access limitations during construction activities. The following potential vulnerable categories have been identified in relation to the proposed project activities – especially construction works for the transmission lines: • Children – unsupervised children can be subjected to risks when construction work is taking place in the vicinity of inhabited areas • Elderly – the elderly can be disproportionately impacted during the construction phase of the project due to their restrains on mobility, in particular the instalment of	High engagement priority Targeted communication and collaboration with local authorities, adapted safety messaging, and proactive mitigation to avoid exacerbating existing vulnerabilities.



Category of stakeholders	Stakeholders	Interest in the project	Potential impacts	Engagement Priority
			the transmission line through inhabited areas and increased traffic related to the project. • Persons with disabilities – as in the case of the elderly, they can be disproportionately impacted by during the construction phase of the project by various limitations imposed by construction activities in inhabited areas.	
	Neighbours – owners and users - of the land plots and the access roads used for the project	Interested in understanding the actions which will take place on the neighbouring lands. The owners/users are interested in understanding if there will be any restriction or disruptions on access roads used for agricultural activities and for PV parks construction.	Restricted access, increased traffic, noise, and disruption to agricultural or commercial activities due to construction on or near their land or roads they use.	High engagement priority One-on-one meetings, clear communication of schedules and impacts, and prompt resolution of any access-related grievances.
	Owners and users of the land plots used for the OHL	The owner/user are interested to understand the restrictions imposed by the OHL and the potential impacts generated by maintenance works on the line and the mitigation measures.	May be impacted by land use restrictions, visual intrusion, and the need to accommodate construction and long-term maintenance of transmission infrastructure on their property.	High engagement priority Direct engagement, clear explanation of rights and obligations under superficies or easement agreements, and access to the grievance mechanism.
	Neighbouring sheep famers	Interested in the project's construction timeline and the restrictions imposed by the project. Interested in continuing gazing activities.	Temporary restrictions on grazing routes, access to pasture, and disturbance to livestock due to noise, fencing, or vehicle movement.	Medium engagement priority Targeted discussions to coordinate grazing schedules, explain access limitations, and explore coexistence options where feasible.



Category of stakeholders	Stakeholders	Interest in the project	Potential impacts	Engagement Priority
	Community Based Organisations (CBOs) – from ATUs where the project will be located	The main interest of local CBOs is related to the development of local communities, support for vulnerable persons and other activities aiming at community welfare and environmental protection. The CBOs could be potential beneficiaries / partners in the implementation process of any social responsibility programmes which will be developed by the Company.	CBOs may be concerned with how the project affects local development, environmental quality, vulnerable groups, and whether community benefits are equitably distributed.	Medium engagement priority Regular dialogue, involvement in CSR planning, and opportunities to partner on community-focused programs.
Businesses	Businesses nearby the land plots used for the project.	Interest in understanding if there will be any limitations or disturbance due to project activities, especially during construction but also during operation.	Disruptions due to construction noise, dust, limited access for clients or deliveries, or general changes to the local operating environment.	Medium engagement priority Advance notice of construction schedules, direct meetings to address specific concerns, and access to the grievance mechanism for issue resolution.
Shareholders and IFIs	EBRD, EIB and BCR	The main interest of the shareholders and IFIs is that the Project is implemented timely and effectively and in line with all the provisions established in the permits and other compliance documents.	Reputational or compliance risks if project obligations are not met.	High engagement priority Regular coordination, timely updates, and formal communication throughout the construction phases.
Contractors and suppliers	All contractors (including consultancy consultants) engaged in the project implementation and provision of materials	Interested in performing the work for which they were contracted.	Potential impact over the project's implementation timeline, quality of work performed and relation with local community.	High engagement priority Structured coordination meetings, clear communication of responsibilities, and integration into the project's environmental and social standards framework.



Category of stakeholders	Stakeholders	Interest in the project	Potential impacts	Engagement Priority	
Employees of contractors	All persons engaged in the project development and construction are considered as stakeholders	Interested in good working conditions and timely work payments.			
Media	Regional and following the Project.		Media plays a key role in shaping public perception and disseminating information.	Medium engagement priority Timely media updates at key milestones, and access to spokespersons.	
	Social media	Interest in posting on social media information about the project development and implementation.	Media plays a key role in shaping public perception and disseminating information.	Medium engagement priority Timely media updates and access to spokespersons.	
Other stakeholders	National and / or international NGOs	Monitoring the international financed projects for compliance with IFIs standards	NGOs may raise concerns about the project's environmental and social impacts, compliance with international standards, and the protection of community and ecological rights.	Medium engagement priority Targeted communication, openness to third-party monitoring, and constructive dialogue on potential concerns or improvement areas.	
	Community of practitioners – other energy producers	Sharing experience and knowledge, especially when participating at different events	Other energy producers are not directly affected by the project but may have concerns related to grid access, regulatory consistency, or competition for local resources.	Low to medium engagement priority Occasional participation in industry events, forums, or information exchanges to promote transparency and sector dialogue.	
	Public at large	Interest in obtaining information regarding the project outcomes and key milestones achieved.	The general public is indirectly affected and may have broad concerns about environmental	Low to medium engagement priority	



Category of stakeholders	Stakeholders Interest in the project		Potential impacts	Engagement Priority	
			impacts, energy transition, land use, or public benefits of the project.	Public access to key documents, periodic updates through accessible channels, and the availability of a clear grievance mechanism.	

5. Previous Engagement Activities

The project developer has undertaken a public consultation process as part of the permitting process. As part of the Environmental Impact Assessment (EIA) screening the Project documentation has been made available for public consultation at the Environmental Protection Agency's (EPA) headquarters and its website, and announcements have been published in local newspapers as seen in **Error! Reference source not found.** No grievances have been received during the process.

Project documents have been made available for the public on the Municipality's website as part of the stakeholder engagement process during the permitting phase.

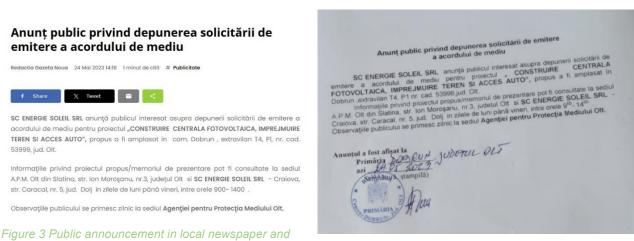


Figure 3 Public announcement in local newspaper and Dobrun Mayor Hall about the EIA process

The land required for the Dobrun 1, Dobrun 2, and Sadova solar parks was secured primarily through superficies agreements negotiated with private landowners, enabling the developer to use the land while ownership remained with the original titleholders. For the development of the underground transmission lines (UTL) and associated infrastructure, agreements were concluded with local authorities, particularly for public land. These agreements were facilitated through direct consultations and one-on-one meetings with affected landowners and institutional stakeholders, aimed at ensuring clarity on land use terms, timelines, and potential access restrictions.

As part of this Due Diligence process, the consultant team has also engaged with the local representatives of Dobrun and Sadova to discuss the conditions within the community, as well as their perception on the Project.



The general perception of the Project in the community is positive, and it is expected to generate additional tax revenues, create local employment opportunities, and contribute to the improvement of agricultural road infrastructure. During the permitting phase, community members did not raise any concern regarding the Project.

A dedicated section for the project has been established on the Defic Globe website, serving as

a platform for disseminating updates, key project milestones, and relevant documents. In parallel, all key project documents have been published on the websites of the relevant Municipalities as well as the Environmental Protection Agencies (EPAs) of Olt and Dolj counties. This approach was designed to ensure accessibility during the environmental permitting phase and to promote informed public participation.

To further strengthen stakeholder relations and provide a direct point of contact for the local community, a Community Liaison Officer (CLO) has been appointed. The CLO plays a key role in managing ongoing community interactions, addressing concerns, and ensuring that local voices are heard and integrated into project planning and implementation.



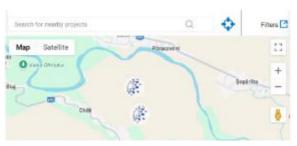


Figure 4 Project on the DEFIC Global website

6. Stakeholder Engagement Plan

The Stakeholder Engagement Plan (SEP) will serve as the framework for the stakeholder engagement process developed for the Project. The following action plan is developed for the year 2025, which coincides with the initial stages of the Project's construction phase. The objective of these external communications is to provide continuous engagement with identified stakeholders to inform them about the activities, performance, development and investment plans and their implementation. The exact dates and venues of the proposed activities will be communicated with the stakeholders prior to and during construction and operation phases.

The tables below include information on engagement actions to be performed by Scatec and the EPC contractors during the construction period. This plan will be updated at least once per year, or according to the project needs and the achieved results.

Table 3 Stakeholder Engagement Plan

Activity	Stakeholders	Purpose of	Information	Estimated	Responsibility
	targeted	Engagement	Disclosed	Timeline	
Publishing the SEP on the company website	All stakeholders	Dissemination of key project information	of Stakeholders Q3 2025 Engagement Plan		Scatec
Project Announcement			Project overview, location, timeline, environmental commitments		Scatec
Grievance Mechanism Rollout	All stakeholders	Enable feedback, manage complaints	Grievance procedure, contact points, response timelines	Prior to construction start Scatec are EPC Contractor	
Local Employment Campaign	Employment of local labour r Campaign		Job requirements, recruitment process, training programs	Prior to construction start	EPC Contractors
Community Information Materials	formation schools, interest and trust		Employment opportunities, safety measures, timeline updates	Ongoing	Scatec and EPC Contractors
Engagement with local, regional and national authorities for any permit which might be needed	agement Local / regional or national authorities onal norities for permit ch might be		Information required for obtaining the permits	Ongoing	Scatec and EPC Contractors
Conduct direct meetings for discussing the work conditions and timeline	Businesses located in the proximity of the project	Avoid complaints related to disturbances	Project information regarding the construction works, type, timeline, restrictions if any	Ongoing	Scatec and EPC Contractors
		Start of work	Ongoing	Scatec	



Activity	targeted Engagement		Information Disclosed	Estimated Timeline	Responsibility
			Expected construction duration Impacted area Positive		
			impacts of the project		
Publishing project updates	All stakeholders Dissemination of key project milestones information			Ongoing	Scatec
One-on-one Meetings	Affected landowners and farmers	wners and access and acquisition		Ongoing	Scatec and EPC Contractors
Door-to-door engagement			Start of work Expected construction duration Impacted area	Ongoing	CLO
Reporting IFIs Update on investment progress		Status of construction activities Status of company activity	End of 2025	Scatec	

7. Enhancing Disclosure and Consultation Methods

While direct engagement with key stakeholder groups is already planned as part of this SEP, a more thorough breakdown of disclosure and consultation methods is provided below to strengthen transparency, accessibility, and inclusivity—especially for vulnerable and hard-to-reach stakeholders. This chapter outlines both digital and in-person communication tools, and the benefits and limitations of digital channels.

7.1. Communication Channels

To ensure timely, transparent, and inclusive stakeholder engagement, the project employs a combination of digital and non-digital communication methods. These channels are selected based on their suitability for different stakeholder groups, with particular attention to accessibility for vulnerable or rural populations.

The use of multiple formats ensures that all project-affected people have the opportunity to receive information, ask questions, and provide feedback in a manner that is convenient and meaningful for them.

Digital Communication Tools

The project will make use of a range of digital tools to disseminate information and enable feedback:

- Company website: For regular updates, document disclosure (e.g., EIA, SEP), and contact information
- Social media (Facebook): To provide real-time updates and facilitate informal communication
- **Email**: For official communication with authorities, NGOs, and individual stakeholders who request digital correspondence

In-Person and Non-Digital Methods

To ensure inclusivity and accessibility, these tools will be maintained in parallel:

- Public meetings and community briefings
- Printed materials (leaflets, posters) distributed at key locations such as town halls
- Community noticeboards in each project-affected administrative unit
- **Direct engagement** through door-to-door visits by the Community Liaison Officer (CLO)

7.2. Benefits and Limitations of Digital Tools

Digital communication tools offer important benefits in stakeholder engagement, particularly in terms of speed, reach, and convenience. They allow for the rapid dissemination of updates, cost-effective messaging over time, and easier documentation and archiving of interactions. Digital platforms can also be adapted to support multiple languages and formats, potentially broadening accessibility across diverse stakeholder groups.

However, these tools are not without limitations. In rural areas, such as those surrounding the Dobrun and Sadova project sites, internet connectivity may be poor or unreliable, and not all



residents may have access to smartphones or be familiar with digital platforms. Vulnerable groups—such as the elderly, persons with disabilities, or individuals with low literacy—may face additional barriers to using these channels. Moreover, informal platforms like WhatsApp or social media can spread misinformation if not carefully monitored, and it is often difficult to confirm whether messages sent digitally have been received, understood, or acted upon.

As such, while digital tools are valuable, they must be complemented by in-person engagement, printed materials, and trusted local communication channels to ensure no stakeholder is left behind.

8. Grievance Mechanism (GM)

Scatec manages community grievances through formal, transparent, and accessible grievance mechanisms integrated into its Environmental and Social Management Systems (ESMS). These mechanisms are implemented at the project level and are designed to ensure that community members and other affected stakeholders can raise concerns or complaints related to the company's activities.

Each project includes a locally adapted grievance mechanism that allows stakeholders to submit complaints in a confidential, culturally appropriate, and easily accessible manner. These systems are intended to resolve issues early and at the lowest possible level, ideally before they escalate.

8.1. What is Considered a Grievance

A grievance can be a complaint, concern, question, suggestion, or other comment about the Project and how it is implemented.

It is important to keep in mind that submitting a grievance is the first condition and also a necessary tool for Scatec, to know any concerns and to meet them. In this regard, the project companies undertake full responsibility and impartiality in managing all grievances received, the responses submitted and in conducting an open and trustworthy dialogue with all stakeholders.

The Project's grievance mechanism is designed to address a wide range of issues, including concerns related to land access, use restrictions, and compensation.

Affected landowners, tenants, and users may submit grievances if they believe that construction or operational activities have adversely impacted their land rights or if they have concerns regarding the terms or adequacy of compensation. These grievances will be treated with the same procedural rigor and impartiality as other types of complaints and will follow the standard steps of acknowledgment, investigation, resolution, and documentation.

For cases involving legal or contractual disputes over compensation, the project team will coordinate with relevant authorities and legal advisors to ensure appropriate referral and resolution, while maintaining transparency with the complainant throughout the process.

8.2. The Grievance Management Process

Scatec handles grievances—especially from community stakeholders—through a structured process aimed at timely, respectful, and transparent resolution, following the steps described in the table below. The company enforces a strict non-retaliation policy. Employees reporting concerns are protected from dismissal, demotion, or disciplinary actions, even if investigations do not substantiate the claims



Table 4 Grievance Management

Step	Description				
1. Submission	Grievances can be submitted through physical drop boxes, phone, email, or in-person discussions with the Community Liaison Officer.				
2. Acknowledgment	Grievance is acknowledged within approximately 10 working days. The complainant is informed about the process and expected timelines.				
3. Assessment & Investigation	The issue is logged and assessed by the responsible team. Investigations may include field visits or consultations to understand the grievance fully.				
4. Response & Resolution	Simple grievances are resolved within ~30 working days. Complex ones may take longer. The company maintains communication throughout.				
5. Feedback to Complainant	The resolution is communicated to the complainant. If unsatisfied, the issue can be escalated for further internal review.				
6. Monitoring & Documentation	All grievances are registered, tracked, and analyzed for trends. The insights are used to improve future stakeholder engagement, operational practices and to address systemic issues.				

To submit a grievance to Scatec, community members and other stakeholders can use several channels:

- 1. **In person** By speaking directly with Community Liaison Officer or Project representatives on site.
- 2. **Grievance boxes** Located in accessible areas near project sites where written grievances can be deposited. Grievance boxes should be located outside of the scope of security cameras, so as to ensure the possibility of submitting anonymous grievances.
- 3. **Email** Grievances can be submitted electronically to designated company addresses (these are usually provided during public consultations or on project-specific communication materials).
- 4. **Phone** Through numbers communicated by Scatec, particularly by local site teams.
- 5. **Letter or mail** Formal grievances can also be submitted in writing and sent to Scatec's headquarters or project office.

Grievance submission is open to any stakeholder, including individuals, groups, or institutions who may be affected by the company's operations or activities. Submissions can be **anonymous**, though providing contact details allows for feedback and resolution updates.

8.3. Gender-Based Violence and Harassment (GBVH) Grievances

Gender-Based Violence and Harassment (GBVH) refers to a range of harmful behaviours directed at individuals based on their sex or gender identity, including but not limited to sexual harassment, sexual assault, bullying, intimidation, physical or verbal abuse, and exploitation. GBVH can occur in the workplace, in project-affected communities, or in other contexts related to the implementation of the project.

For the purpose of this SEP, a GBVH complaint is defined as:



Any concern, allegation, or report made by a worker, contractor, community member, or other stakeholder regarding actual or perceived gender-based violence or harassment linked to the project's activities, personnel, or contractors.

GBVH complaints are handled with specialized care due to the sensitive nature and the need for survivor-cantered care, confidentiality, and legal compliance.

Guiding principles:

- ❖ Confidentiality Information is shared only on a need-to-know basis with the informed consent of the survivor.
- ❖ Non-discrimination All individuals—regardless of gender, ethnicity, age, disability, or any other status—are treated with equal respect and dignity.
- ❖ Non-retaliation No person who makes or supports a GBVH complaint shall face retaliation or discrimination.
- Survivor-centred The rights of GBVH survivors will be prioritised, and survivors will be treated with dignity and respect.

All GBVH complaints will be:

- Logged securely in a confidential grievance register
- Monitored for resolution and systemic risk trends
- Reported in aggregate form (without identifying details) to E&S management and to the EBRD.

Lessons learned will inform continuous improvement of prevention and response measures, including further training, policy adjustment, and stakeholder engagement.

Survivors will be provided with, or referred to, appropriate support services, including medical care, psychosocial counselling, legal advice, and safe shelter if required. To ensure timely and effective assistance, referral contacts and agreements will be established in advance with qualified local service providers and relevant non-governmental organizations.

8.4. Contact Details

The current Grievance Mechanism is designed to enable Project Affected Persons to submit complaints, concerns, questions, suggestions or other comments about the Project and its implementation. This mechanism is in place for the whole life of the Project; PAPs are able to submit a grievance related to the Project at any time, free of charge.

PAPs can submit grievances, questions, requests, etc. either by phone, post or email, at the contact details below:

Community Liaison Officer (CLO)

Contact person: Laura Diaconescu

Tel: +40728074376

E-mail: laura.diaconescu@scatec.com



All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy (2024). In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by PAPs, and civil society organisations about EBRD financed projects among project stakeholders or to determine whether the EBRD has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the EBRD.

9. Implementation, Monitoring and Evaluation

To ensure effective and responsive stakeholder engagement throughout the project lifecycle, this plan outlines a staged approach to communication, consultation, and monitoring, closely aligned with the construction schedule and the varying levels of impact on different stakeholder groups. Priority is given to those most likely to experience direct impacts.

Engagement activities will be tailored to the specific construction phase, with emphasis on anticipated impacts and required mitigation:

Table 5 Engagement activities and construction stages

Construction Phase	Key Activities	Engagement Focus
Pre-Construction (Site Prep)	Site demarcation, mobilisation	Information disclosure, direct engagement with affected landowners, finalisation of access agreements, dissemination of GM
Early Construction	Ground works, access road upgrades, fencing	Intensive engagement with neighbouring land users and local businesses regarding access and mobility
Mid-Construction	Panel installation, cabling, substation works	Continued dialogue on work schedules, safety measures, grievance handling
Late Construction & Commissioning	Testing, landscaping, grid connection	Closeout communication, feedback collection, employment transition planning

Engagement frequency is developed based on stakeholder risk exposure:

Table 6 Engagement frequency

Stakeholder Group	Engagement Frequency	Type of engagement		
Neighbouring landowners/users	Monthly	One-on-one meetings, site visits		
Vulnerable persons project location	Monthly	Collaboration with local authorities, targeted briefings, door-to-door engagement by the CLO for elderly or immobile persons explaining impacts and obtaining feedback on accessibility issues		
Local businesses and CBOs	Quarterly or as needed	Small group discussions, written updates		
Local and regional authorities	Monthly / milestone-based	Formal meetings, joint inspections		



Stakeholder Group	Engagement Frequency	Type of engagement		
General public / community members	Quarterly	Public notices, community briefings		
Contractors and workers	Weekly	Progress update meeting, periodic internal audits		
NGOs, media, and sector peers	Milestone-based	Targeted briefings, press kits		

Monitoring activities will be commensurate with the environmental and social impacts and issues associated with the project. They may also reflect any significant stakeholder concerns and include an environmental and social project completion review or audit, where relevant.

In the monitoring and evaluation process for stakeholder engagement, all the consultations undertaken, all the issues raised, and the actions taken will be recorded. Also, this process implies the description of the lessons learned and any changes to the consultation process.

All queries in relation to the project will be filed in the comments registry, analysed and reported by the project implementation team to management team on a two-month basis during project implementation.

The results and feedback from information disclosure and public consultation will be documented and reported as appropriate. Summary reports – in both English and Romanian - will contain details about suggestions or concerns raised by stakeholders and how their comments have been considered.

The project companies will constantly monitor the engagement level of their stakeholders by developing a set of indicators which will include at least the following items:

- Number of communications;
- Type of communications:
- Frequency of communications;
- Number of valid complaints (and number rejected as unclear, problematic or dubious):
- Type of complaints;
- Sources of complaints;
- Number of resolved complaints;
- Average time for resolution of complaints;
- Number of presentations on environmental, social and economic status of the company;
- Number of mass media articles and / or announcements;
- Number of stakeholders involved per action;
- Level / degree of involvement for each stakeholder;
- Number of visitors on the websites; and
- Number of requests for information via websites.

A clear record of all these indicators will be kept. Where possible the indicators shall be differentiated by gender and type of stakeholder, according to the categories defined in the Stakeholder Analysis chapter.



Another important aspect is the way the public is informed about the SEP. The Project companies will make publicly available the SEP on its website. Also, the SEP will be part of the annual environment and safety report of Scatec.

10. Reporting

External reporting will include timely updates to relevant stakeholders regarding Project advancement. The following activities (or some of them) shall be undertaken as part of the external reporting process:

- Public disclosure of the SEP
- Environmental reporting to national and local authorities
- Annual E&S report for IFIs
- Mass media reports including:
 - Public announcements regarding the beginning of the construction, the implementation of certain activities, restrictions, and the ceasing of certain activities
 - o Press releases
 - Social media updates

11. Roles and Responsibilities

Scatec through the CLO will be the main entity responsible for implementing this Stakeholder Engagement Plan. The responsibilities in relation to the SEP include:

- Overall SEP implementation: monitoring and reporting
- ❖ Stakeholder Engagement: Acts as the main point of contact between the project and local communities, ensuring inclusive, timely, and accessible communication.
- Grievance Management: Oversees the community grievance mechanism by receiving, tracking, and coordinating responses to concerns, ensuring transparency and timely resolution.
- Monitoring and Reporting: Gathers community feedback, monitors social risks, and maintains documentation to support compliance with EBRD's environmental and social performance requirements.
- ❖ Website: Provide access to relevant information about the project
- Mass media coverage/ Press releases/ Information disclosure: offer relevant information to the mass media and third parties
- Grievance mechanism:
 - Grievances received or identified, including filling out case details (General Information, Reported Party and Incident or claim Description/consequences sections)
 - o Maintain central log of all grievances ensuring it is kept up to date
 - Issue all responses to grievance raisers and ensure the Management Team are informed.



Annex 1 – Grievanc	e Form				
PUBLIC GRIEVANCE FORM					
Reference No (for internal p	urpose):				
Full Name:	First name				
	Last name				
	☐ 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	□ Romanian				
communication	☐ Other, please specify				
Description of Grievance:					
If Grievance is related to a specific event/Incident;					
Date of Incident					
☐ One time incident/grievan	nce (date)				
☐ Happened more than onc	ce (how many times?)				
☐ On-going (currently exper	riencing problem)				
Signature:	Date:				
Please return this form to: La	aura Diaconescu				

Tel: +40728074376

E-mail: laura.diaconescu@scatec.com



Annex 2 – Grievance Log

1	2	3	4	5	6	7	8	9	10
No	Incoming letter registratio n No. and date of receipt	Type and form of grievanc e	Full name of individua I. Name of the company for legal entity	Appeal essenc e	Solution of the grievanc e	Measure s taken	No. of outgoin g letter and date of mailing	Perso n in charg e	Grievanc e open or closed?