



Ukraine
Solar PV project

Stakeholder Engagement Plan & Grievance mechanism

ABBREVIATIONS

CLO	Community Liaison Officer
E&S	Environmental & Social
EBRD	European Bank for Reconstruction and Development
ESDD	Environmental and Social Due Diligence
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy (EBRD's, dated 2024)
ESR	Environmental and Social Requirement (as defined by the EBRD)
GrM	Grievance Mechanism
HSE	Health, Safety, Environment
O&M	Operation & Maintenance
PV	Photovoltaic
SEP	Stakeholder Engagement Plan
TL	Transmission Line

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1 Introduction

The Solar Power Project (the "Project") is a renewable energy initiative located in the Southern part of Ukraine, developed and owned by the Ukrainian group Kernel. The project involves the construction and operation of around 106 MWp solar power plant and a 110 kV connection to the grid. It aims to contribute to Ukraine's energy needs by generating approximately 147 GWh of renewable electricity annually, in line with the country's commitment to sustainable energy production and carbon reduction.

The European Bank for Reconstruction and Development (EBRD) is financing the Project. In accordance with its 2024 Environmental and Social Policy (ESP), the EBRD contracted an independent consultant to undertake an Environmental and Social Due Diligence. The Project was categorized B, as defined in the 2024 ESP.

The present Stakeholder Engagement Plan was prepared for and is implemented by Kernel to ensure compliance of the Project with the EBRD's Environmental and Social Requirement 10 (ESR 10).

2 Project overview

2.1 Project Description

The Project is located in the Southern Part of Ukraine. The Transmission Line (TL) that will be built to connect the Project to the grid will run from the PV site to an existing substation. The Project area is accessible from the centre of the region by good quality roads (few hours).

The solar panels will be fixed, mounted on metallic structures. The site will be entirely fenced. Construction is expected to be undertaken within 12 months, in 2026-2027. Solar panels will represent by far the main volume of supply for the Project during construction.

2.2 Implementation

Kernel is the owner of ENERGY RTB-2 LLC, which is the Project company. Kernel did not conduct an Environmental Impact Assessment (OVD) for the planned activity; instead, this work was supplemented by the environmental and social assessment required by the EBRD as part of its due diligence process.

It should be noted that the company plans to implement three separate projects: (1) installation of panels (the power plant as a whole), (2) construction of power transmission lines, and (3) connection to the existing substation. Depending on the technical solutions adopted for the transmission line project, it may fall under the scope of the Environmental Impact Assessment (OVD) Law. Kernel will contract an EPC contractor to deliver the Project. The relevant number of workers (during equipment installation) will be needed for the Project construction on all stages of the activities.

During operation, ENERGY RTB-2 LLC will rely on service providers for the PV site's regular or occasional Operation & Maintenance (O&M), and only a few permanent staff will be retained by ENERGY RTB-2.

2.3 Applicable Environmental & Social (E&S) requirements

The Applicable E&S Requirements are:

- Applicable local, national and regional requirements, including those related with environmental and social impact assessments;
- The EBRD's Environmental and Social Policy (ESP 2024) and the incorporated Environmental and Social Requirements (ESRs) 1 to 6, 8 and 10; and,

- Relevant international conventions and protocols relating to environmental and social issues, as transposed into national legislation.

3 Purpose of the Stakeholder Engagement Plan

In support of this project, the Stakeholder Engagement Plan (SEP) is designed to maintain open, transparent communication with all stakeholders, create trust, and build positive relationships with local communities, authorities, and other interested parties. The SEP ensures that stakeholders' concerns and expectations are addressed throughout the project's lifecycle while adhering to both national and international regulations and meeting lender requirements for environmental and social governance.

This Stakeholder Engagement Plan has been produced as a result of a due diligence process. It presents the planned stakeholder engagement activities for the project and outlines a systematic approach aimed at developing and maintaining transparent relationships with stakeholders throughout the project lifetime.

The engagement process is a continuous dialogue carried out on an on-going basis throughout the project cycles. It enables the incorporation of all relevant views of stakeholders into decision-making and Project implementation.

The SEP includes a grievance mechanism so that stakeholders can raise any concern, provide feedback and comments about the project.

The SEP is a living document, and is meant to be updated and developed further by Kernel as the Project progresses, particularly before the project enters the operations phase.

4 Legal disclosure requirements

Disclosure and public consultation requirements for the Project are governed by Ukrainian legislation regulating environmental protection, urban planning, and public access to information. Compliance with these requirements varies depending on the specific permitting stage and type of infrastructure involved.

Under Ukrainian law, disclosure obligations differ for the three elements of the Project:

- construction of the solar power plant (SPP),
- construction of the overhead transmission line (OHTL), and
- grid connection to the existing substation.

Ukraine's current environmental assessment framework including the Laws 'On Environmental Impact Assessment' (2017) and 'On Strategic Environmental Assessment' (2018) does not apply to this Project, as the solar power plant does not fall under the categories requiring an EIA or SEA.

Depending on the final technical routing, the OHTL component may fall under the Law of Ukraine "On Environmental Impact Assessment," which would require a formal EIA procedure, including public disclosure and consultation. As the company has not yet prepared design documentation for the OHTL, no EIA documentation exists at this stage.

For the SPP, the company holds full ownership rights to the land and the change of land use was previously approved through a public consultation process carried out in 2017 by the former land tenants, in accordance with the requirements of the Law of Ukraine "On Regulation of Urban Development Activities." Public hearings for the approval of the Detailed Territorial Plan were conducted in summer 2017, with substantial number of participants in attendance and majority support recorded in the minutes. These procedures fulfilled the legal disclosure requirements applicable at that time, as the project did not require an OVNS/EIA under the environmental legislation then in force.

The Law of Ukraine "On Access to Public Information" provides public access to urban planning and land-use decisions, including documentation related to the Detailed Territorial Plan, land ownership, and lease agreements. Relevant decisions and materials have been disclosed in local media and are available upon request from the local council.

The company maintains ongoing communication with the local authority. However, direct communication with the wider public regarding the current stage of the Project has not been undertaken, as no additional legal disclosure requirements apply at this time. Future disclosure obligations may arise once the technical design for the transmission line is completed and the applicability of the EIA procedure is confirmed.

5 Stakeholder engagement activities carried out to date

5.1 Engagement activities before the E&S due diligence

No formal or systematic stakeholder engagement activities were conducted prior to the commencement of construction. However, during the Project preparation phase, ENERGY RTB-2 held targeted interactions with several relevant parties, including nearby land users, representatives of the local municipality, and State agencies involved in the permitting process. These interactions were primarily focused on the execution of land lease agreements and obtaining approval from the Department of Infrastructure, Urban Planning and Architecture, Housing and Communal Services, and Ecology of the respective local District State Administration for the Urban Planning Conditions and Restrictions required for the design of the construction facility.

5.2 Engagement activities during the E&S due diligence

The ESDD was carried out in November 11, 2025. The assessment team engaged with a range of relevant stakeholders to gather insights and verify baseline conditions. These included:

- Deputy Director of ENERGY RTB-2 (assisting from the Company`s side);
- Head of local Village Council;
- Former Headman of neighbour Village;
- Current Headman of neighbour Village;
- Land Surveyor of the Village Council;
- Residents of neighbour Village;
- Shepherd on the project site grazing a herd of cows.

Engagement activities conducted during the site visit provided a useful overview of community perceptions, expectations, and concerns regarding the Project. Several residents demonstrated general awareness of the planned development, while some expressed reservations related to changes in land use, particularly the potential loss of informal grazing areas historically utilised by local households. Questions were also raised about the efficiency of information disclosure activities related to the public hearings held in 2017, with some community members noting limited recollection of the disclosure process.

Other stakeholders shared more positive views, highlighting anticipated benefits such as increased revenues for the local budget and opportunities for cooperation on social initiatives. Local authorities expressed strong support for the Project and a willingness to explore future community development activities in partnership with the company.

Discussions with individuals present on-site, including a shepherd and the community land surveyor, indicated differing perspectives on livestock ownership and current grazing practices, though it was confirmed that alternative grazing areas are available and that the Project site is suitable for construction.

ENERGY RTB-2 has expressed its commitment to maintaining open communication with stakeholders and considering appropriate social investment opportunities that respond to community needs.

A visit to the adjacent neighbouring Solar Power Plant was also conducted to understand any past natural disaster impacts in the wider area; no such events affecting the neighbouring facility were reported. Stakeholder identification and analysis

The following table provides an overview of the project stakeholders, and of the type of stakeholder engagement actions that should be put in place and maintained with these stakeholders, essentially during the construction period.

Table 1 - Project stakeholders

Stakeholder (group)	Relation to / interest in the project
Potentially affected parties	
Town and settlement in the surroundings of the project	<ul style="list-style-type: none"> • Affected by the increased traffic during supply. • May seek employment opportunities • General interest in Project details and progress. • Access to the grievance mechanism
Stakeholders whose animals used to graze on the land plot	<ul style="list-style-type: none"> • Information about the established public pastures (hayfields) Access to the grievance mechanism • General interest in Project details and progress. • Loss of grazing resources for livestock
Stakeholders who use the roads around the PV site	<ul style="list-style-type: none"> • Interested to know the duration and period of works • Interested in temporary closures or deviations. • Interested in the risk of damage to roads.
Municipal and local governing bodies	
Representatives of the local administration and municipality level	<ul style="list-style-type: none"> • Need to be informed about the Project (general timeline and organization) • Can participate in social problem solving
Governmental authorities and State companies	
Police	<ul style="list-style-type: none"> • Traffic regulation, especially in case of foreseeable traffic congestion • Access to the site in case of incident • Can participate in social problem solving
Firemen, first aid services	<ul style="list-style-type: none"> • Access to the site in case of emergency
Other stakeholders	
CSOs, scientists	<ul style="list-style-type: none"> • Possible interest in the Project. • Outcomes of biodiversity monitoring/research work • Project to keep open communication with CSOs and scientists.
Business at the local and regional level	<ul style="list-style-type: none"> • Providers of construction materials, catering services, utility services: waste removal, electricity, gas, water supply, transport of workers, accommodation facilities for visitors etc.

Stakeholder (group)	Relation to / interest in the project
Mass media: Internet-portal; radio and newspapers, etc.	<ul style="list-style-type: none"> • Interest in general information and project updates
Jobseekers / Employment agencies	<ul style="list-style-type: none"> • Employment opportunities
Internal stakeholders	
Foreign workers	<ul style="list-style-type: none"> • Access to project information in a language they understand
Workers	<ul style="list-style-type: none"> • Interest in working conditions and grievance mechanism, compliance with health, safety and conduct procedures. • Access to the grievance mechanism • Protection against military risks and aerial threats
Vulnerable groups or stakeholders	
Stakeholders in close proximity to the site with limited mobility or access to Project (disabled or impaired persons, elderly persons etc..)	<ul style="list-style-type: none"> • Access to information through direct and adapted engagement by the CLO

6 Stakeholder engagement activities

6.1 Organisation

Environmental and Social Action Plan

As required by EBRD for all projects it finances, an Environmental and Social Action Plan (ESAP) was prepared for the Project. The implementation of the ESAP is a mandatory requirement for ENERGY RTB-2, as part of the financing agreement with EBRD.

The ESAP includes the obligation for ENERGY RTB-2 to (i) implement the SEP, and (ii) to designate a Community Liaison Officer (CLO) who will be responsible for organizing and delivering the implementation of the SEP during construction

The CLO will:

- Ensure that information is provided to / received from stakeholders as per the SEP;
- Ensure that all incoming communications (via email, telephone or in person) from external stakeholders are responded;
- Keep regular contact with key stakeholders;
- Collect feedback in order to improve the SEP for the operation phase;
- Participate in grievances resolution.

Disclosure of Information

The types of information disclosed and the specific methods of communication to be undertaken for this project are summarised in the Stakeholder Engagement Programme in chapter 6.3 below. The objectives of external communications are to provide regular engagement with affected people and other relevant stakeholders and to inform them about the existing activities, performance, development and implementation of the Project. The information to be disclosed publicly is governed by EBRD's ESP, EBRD ESR 10 and Ukrainian national legislation.

Disclosure of Information about established public pastures (hayfields) within the territory of the local Village Council

Prior to the commencement of construction works and throughout their duration, the Company will inform the local population about the availability of public pastures (hayfields) within the territory of local Village Council (outside populated areas), which can be used as an alternative to the land occupied by the Project.

For effective disclosure, the Company will cooperate with the community administration to disseminate information through community notice boards, the official website of the Village Council, and on the fence of the construction site. The announcement will include details on alternative land plots designated for grazing, the reason for occupying the current land, and contact information for inquiries. To enhance clarity for all stakeholders, the notice will be accompanied by a visual map, given that cadastral identifiers are not easily understood by the general population, including contracted herders with limited literacy or non-Ukrainian language proficiency.

6.2 Stakeholder engagement programme

The following table provides a stakeholder engagement programme consistent with the stakeholder identification and analysis presented in chapter 0.

The Stakeholder Engagement Programme envisages that consultation meetings will take place with relevant interested parties during the project implementation. Consultation and engagement activities are required to address current stakeholder suggestions, ideas or concerns. In order to receive their full engagement, stakeholders will be able to use several channels (phone, e-mail, and website) for receiving more details about the project or state their comments, ideas throughout the project life cycle. Non-Governmental Organisations (NGOs) are recognised as potentially relevant stakeholders, particularly where their areas of focus relate to the Project's environmental, social, or community aspects. It is considered good practice to include NGOs in the SEP to ensure that opportunities for engagement remain open throughout the project lifecycle.

Table 2 - Project stakeholders and information disclosure methods

Stakeholder	What to disclose	How	When
<p>All stakeholders, national and regional level</p>	<p>General information about the Project, and company's contact for more information Access to the grievance mechanism</p>	<p>The Stakeholder Engagement Plan (SEP) and the Non-Technical Summary (NTS) will be disclosed through appropriate and legally permissible channels. Disclosure on the Project's webpage will be undertaken where and when allowed by regulatory requirements.</p> <p>Due to the ongoing war and applicable regulatory restrictions, including limitations related to operation under an NEURC licence, the publication of detailed information about energy generation facilities on publicly accessible websites may not be permitted. In such cases, alternative disclosure measures will be applied to ensure transparency and access to information for affected stakeholders.</p> <p>In line with international good practice, the following disclosure methods will be used:</p> <ul style="list-style-type: none"> • Provision of paper copies of the SEP and NTS at publicly accessible locations (e.g. local council offices or other agreed community venues); • Communication of key project information to local communities, including clear instructions on how to submit comments and grievances; • Display of the official construction passport at the construction site in accordance with Ukrainian legal requirements; • Disclosure of contact details (email/phone) for the Community Liaison Officer (CLO) and the grievance mechanism. 	<p>Prior to EBRD's Board and during construction / operation</p>

Stakeholder	What to disclose	How	When
		Monitoring information on SEP implementation and grievance handling will be made available through the same channels, subject to regulatory and security constraints.	
Stakeholders whose animals used to graze on the land plot	Information about the established public pastures (hayfields) within the territory of the local Village Council (outside the boundaries of populated areas).	The information will be provided in cooperation with the community administration, through notice boards, by posting on the community's website, and later on the fence of the construction site.	Before the start of construction works and during their execution.
Road police	Planned traffic congestion	Visit	Two weeks before the planned congestion
	Accidents or incidents requiring police action	Phone call	When deemed necessary
Firemen or first aid services	Access to the site in case of Emergency	Invite the relevant emergency service to the site so that they know the way	At the beginning of construction
Local authorities and population representatives	Information on the project key steps.	Quarterly brief during construction	During the construction period
Suppliers of works, goods and services	1. Project procurement schedule 2. Information on obligation to meet EBRD performance requirements	1. Through the webpage 2. Through bidding documents and contract terms	1. Before construction starts 2. During tender process
Job seekers	Information about vacancies. Information that positions are open to both men and women	Official job announcement tools agreed with contractor and the population representatives	During Project implementation
Workers	Working conditions and grievance mechanism, compliance with health, safety and conduct procedures. Access to the grievance mechanism	Written contract terms and induction/training	At recruitment
Vulnerable stakeholders	Access to Project construction information for stakeholders with limited access to Project (elderly, disabled...): Grievance mechanism, Temporary impacts mitigation (traffic, noise, vibration, dust etc.), Restrictions or diversions caused by Project-related activities; SEP, NTS; Opportunities for inclusion (employment, training)	One-on-one consultations, direct engagement. Tailored assistance All consultations and meeting minutes should be recorded.	During Project implementation, as soon as such stakeholders are identified

6.3 Internal monitoring and reporting

The project will apply a systematic approach to monitoring stakeholder engagement activities, ensuring that commitments are fulfilled and that feedback is used to improve performance over time. A dedicated team, led by the Community Liaison Officer, will track consultations, document community feedback, and review the effectiveness of engagement measures on a regular basis.

Monitoring efforts will include the maintenance of detailed records of all meetings, outreach materials, grievances, and correspondence. Stakeholder feedback will be analysed to identify recurring themes or concerns and inform any necessary adjustments to engagement strategies. The team will also conduct internal reviews to evaluate the responsiveness and inclusiveness of the engagement process. Progress and outcomes will be communicated through annual stakeholder reports, which will summarize engagement activities, grievance trends, and environmental and social performance. These reports will be made available in Ukrainian, shared online and in print, and distributed through community channels.

Additional updates will be issued as needed at key project stages such as construction commencement, operational launch, and preparation for decommissioning. The CLO will organize and monitor the effective implementation of the SEP and will provide annual reporting to EBRD during the construction phase.

Annual reporting will include:

- Description of stakeholder engagement actions undertaken during the reporting period, with reference to the SEP;
- Statistics for the reporting period:
 - Number of queries received by phone, email or directly at the company premises.
 - Main topics of queries
 - Number of complaints.
 - Main topics of grievances

Stakeholder engagement activities will be recorded in a log, in order to allow traceability and statistics. The following table provides an example of format for this log:

#	Name / address	Question /Grievance	Answer media	Answer provided	Status	Is the stakeholder satisfied
2026.10.22.01 (stand for first question on October 22nd 2026)			(letter, phone call...)		reply date, closed etc.	yes, no, unknown

7 Grievance redress mechanism

7.1 Introduction

A grievance is considered to be any complaint or comment (including questions or suggestions) about the way the Project is being implemented. Grievance management is an important component of the Project's implementation and is guided by a well-developed process that includes clear communication to stakeholders, proper documentation and tracking of complaints, and well-defined responsibilities for resolution.

The grievance mechanism for the Solar Power Plant Project is outlined in this SEP and will be developed and implemented with the following aims:

- To address concerns promptly and effectively, in a transparent manner that is free from manipulation, interference, coercion, intimidation, or retribution, and is readily accessible to all affected parties at no cost.
- To ensure handling of grievances in a culturally appropriate manner that is discreet, objective, sensitive and responsive to stakeholders' needs.
- To guarantee that there will be no retaliation or discrimination against those who raise grievances, and that all grievances will be treated with confidentiality.
- To allow for anonymous submissions, and to ensure regular updates to complainants about progress.
- To ensure that this mechanism does not prevent access to formal judicial or administrative remedies.

7.2 Monitoring, Reporting and Feedback Mechanisms

ENERGY RTB-2 will monitor the communication channels and will provide feedback as appropriate. A complaint box at the project site will be available for stakeholders during the construction phase and complaints can also be submitted by emailing the HSE Manager / CLO or visiting the ENERGY RTB-2 office. Any complaints will be registered in a log (see Annex 2) for complaints by the HSE Manager / CLO who will also be the key contact person responsible for managing the grievance mechanism. The contact details of the HSE Manager / CLO will be shared to stakeholders during the engagement activities listed in Table 2.

In order to monitor the implementation of this SEP and the functioning of the grievance mechanism, the HSE Manager / CLO will confirm to EBRD that the arrangements are in place and operating during the early stages of construction. This will include the sharing

of notes, minutes and/or documentation on engagement activities undertaken, including all information disclosure undertaken as part of the SEP. In line with ENERGY RTB-2' submission of the Annual E&S Report, EBRD will also annually assess the SEP implementation.

7.3 Grievance Mechanism Submission Process

ENERGY RTB-2 will operate a Grievance Mechanism, established in-line with international best practice. Any comments or concerns can be brought to the attention of the company verbally (in person or over the phone) or in writing by email or filling in a grievance form (see Annex 1). The grievance form can be submitted in person in the complaint's boxes at the ENERGY RTB-2 office.

The grievance form and information on the procedure (including contact persons) will be made available on the Project website and during engagement activities. Information banners will also be placed on designated noticeboards around the site perimeter.

How to Submit a Complaint

Stakeholders can submit grievances through any of the following channels:

- **In person**, by speaking directly with project staff on-site or during scheduled community meetings.
- **By phone or email**, using contact information made available on public notices or at the project site.
- **Via the CLO.**
- **By completing a grievance form available at the project site office or from ENERGY RTB-2 representatives**
- **Via partner institutions or trusted intermediaries**, such as local NGOs or community leaders, particularly in cases where direct submission may be difficult or sensitive.

These options are designed to make the grievance mechanism accessible, inclusive, and easy to use for all community members, including vulnerable groups.

Grievance Record-Keeping and Tracking

All grievances, including anonymous submissions, will be recorded in the grievance mechanism log. The Project Manager and HSE Manager / CLO will cooperate closely, sharing all information regarding any complaints or dissatisfaction. The grievance log will store the following information on the complaints received:

- Complaint number
- Category (aka subject of the grievance)
- Name of complainant (if provided)
- Complainant address and contact details
- Date of complaint receipt
- How complaint was received
- Who received the complaint
- Description of the issues/complaints
- First time or repeat grievance
- Date of response
- Date of final resolution
- Entities involved
- Status of the issue
- Notes on status e.g. resolution activities planned and progress
- Number of days between complaint receipt and complaint acknowledgement
- Number of days between complaint receipt and complaint resolution

7.4 Guiding Principles of the Grievance Mechanism

The grievance mechanism for this project is designed to be accessible, transparent, and fair, following international best practices. It is governed by the following key principles:

- **Accessibility:** The mechanism is available to all stakeholders, including individuals and groups, without cost or discrimination.
- **Anonymity:** Complaints can be submitted anonymously, and no identifying information is required unless voluntarily provided.
- **Non-retaliation:** Complainants are protected against any form of retaliation. The project proponent is committed to ensuring a safe environment for raising concerns.
- **Confidentiality:** All grievances, especially those involving sensitive matters (e.g. GBVH), will be handled with strict confidentiality.
- **Timely resolution:** Grievances will be acknowledged, assessed, and resolved promptly within defined timeframes.
- **Responsiveness and fairness:** All concerns will be considered objectively, and responses will be communicated clearly and respectfully.

These principles aim to ensure trust in the grievance process and promote constructive dialogue with affected communities.

7.5 Gender-Based Violence and Harassment (GBVH) under the Grievance Mechanism

In line with international good practice, ENERGY RTB-2' grievance mechanism adheres to the principles of accessibility, anonymity, non-retaliation, confidentiality, and sensitivity in handling Gender-Based Violence and Harassment (GBVH)-related cases.

The prevention of GBVH in the workplace is a priority for ENERGY RTB-2 and its senior management. The grievance mechanism is designed to address all types of grievances, including those related to GBVH, and allows for the anonymous submission of complaints.

To ensure a safe and appropriate response to such sensitive issues, ENERGY RTB-2 will designate a trained female staff member to act as a Gender Focal Point. This individual will be responsible for engaging with GBVH complainants and ensuring that grievances are raised and managed in a safe, confidential, and survivor-centred environment.

All GBVH-related complaints will be handled with strict confidentiality. The identity of complainants will be protected at all times, and retaliation of any kind will not be tolerated. When necessary, GBVH cases will be referred to qualified personnel, including legal, psychosocial, and child-protection specialists. Only trained investigators will handle these cases, and serious incidents may be referred to relevant national authorities or external service providers for further action.

This approach reinforces ENERGY RTB-2' commitment to a safe, inclusive, and respectful environment for all individuals involved in the Solar Power Plant Project.

7.6 Grievance Resolution

If grievances are submitted on site, the Contractor will be responsible for logging complaints which will then be solved by the HSE Manager / CLO according to Stage 1 of the Grievance Mechanism process (see below the description of stages 1 and 2). In case the HSE Manager / CLO cannot solve the complaint, further information is requested from the complainant and a grievance meeting with the Contractor and the HSE Manager / CLO will be established as described in Stage 2. Stakeholders can use one of the stages for submitting grievances. They can directly apply to Stage 2.

All verbal or written complaints or grievances will be logged immediately after they are received by the HSE Manager / CLO. Complaints will be acknowledged and responded to (first response) within 5 working days. Resolution will be proposed within 10 working days for Stage 1 and 30 working days for Stage 2 from acknowledgement of the grievance, however the HSE Manager / CLO will aim to respond to complainants and resolve the issues as quickly as possible from the date of receipt. Individuals can request the right to

have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

Grievances submitted will be solved and followed-up in accordance with the procedures given below:

- Stage 1 – HSE Manager / CLO receives and solves complaints. If at Stage 1 the complainant’s grievance is not solved, he/she will be informed about grievance resolution procedures of Stage 2. The complainant has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. The Project Manager will be aware of all the grievances submitted at Stage 1 through the grievance log and will monitor their resolution remotely.
- Stage 2 – The HSE Manager / CLO receives and solves complaint. A Grievance Meeting attended by the HSE Manager / CLO and Project Manager will be set up to resolve complaints.

The Complainant has the right to apply to the Court in case his/her complaint was not resolved through either Stage 1 or Stage 2, or directly without use of the grievance mechanism.

7.7 Roles and Responsibilities

ENERGY RTB-2 will ensure that one individual is appointed to take on the role of Community Liaison Officer (CLO) to facilitate all engagement and to ensure the requirements of this SEP are implemented adequately. The CLO role may be performed by the HSE Manager or a newly appointed CLO, provided that the individual has adequate expertise and capacity. The HSE Manager / CLO will maintain overall responsibility for the implementation of the SEP. The site HSE Manager will oversee the GrM to ensure it is implemented in line with Ukrainian legislation and EBRD requirements. This includes logging all grievances upon receipt, acknowledging each grievance within the defined timeframe, and monitoring grievance trends over time to identify any emerging key issues that need to be addressed.

The HSE Manager / CLO will play an important role in maintaining relations with the local communities and other stakeholders by facilitating engagement as per Table 3 of this plan. In cases where sensitive grievances have been raised (i.e., in relation to GBVH risks), the HSE Manager / CLO is also responsible for ensuring that each case is handled sensitively and confidentially.

ENERGY RTB-2 has overall responsibility for project implementation and safeguard compliance. The contact below is responsible for ensuring all Project-related grievances are carried out in accordance with Ukrainian legislation as well as EBRD’s Environmental & Social Policy:

- Serhii Ross, HSE Manager (on-site), Energy RTB-2, LLC,
Telephone: +380 50 416 95 78 Email: s.ross@kernel.ua
- Serhii Khrystiuk – Community Liaison Officer (on-site), Energy RTB-2, LLC
Telephone: +380 66 134 9377 Email: s.khrystiuk@kernel.ua

Annex 1 Grievance Form (Template)

Reference No.	
Full Name (optional):	
Please indicate if you require confidentiality during the grievance process	<input type="checkbox"/> Yes, I request confidentiality. <input type="checkbox"/> No, confidentiality is not required.
Contact Information Please mark how you wish to be contacted and add contact details	<input type="checkbox"/> By Post: <input type="checkbox"/> By Telephone: <input type="checkbox"/> By E-mail: <input type="checkbox"/> Other (please specify):
Description of Concern, Incident or Grievance	What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of concern, incident, or grievance	
<input type="checkbox"/> One-time incident/grievance (date) <input type="checkbox"/> Happened more than once (how many times?) <input type="checkbox"/> On-going (currently experiencing problem)	
What would you like to see happen to resolve the problem?	
Signature: Date:	
Please insert this form in one of the grievance boxes	

Annex 2 ENERGY RTB-2 Grievance Log Sheet (Template)

No .	Date of complaint receipt	Grievance Channel	Name and Contact Information	Grievance Category	Description of Grievance	Person Responsible for Resolution	Date of Communication of Solution	Status