



Elementum Energy

Southern Wind Project, Ukraine

Stakeholder Engagement Plan – Construction phase

Rev003

Registered address: 75 Zhylianska Street, Kyiv, 01032, Ukraine.

Contact details:

Andrii Koval, Project Coordinator

Tel.: +38 097 857 3235

Email: akoval@elementum.energy

Valeriia Savran, ESG Manager

Tel.: +380 68 235 7512

Email: vsavran@elementum.energy

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ABBREVIATIONS

Acronyms and terms	
AWPP1	Artsyz WPP LLC
AWPP2	Artsyz WPP-2 LLC
CSR	Corporates social responsibility
CFO	Chief financial officer
CTO	Chief technical officer
EBRD	European Bank for Reconstruction and Development
ESIA	Environmental and social impact assessment
EU	European Union
GBVH	Gender-based violence and harassment
GC	General Counsel
HR	Human resources
HRDD	Human rights due diligence
IFC	International Finance Corporation
IFI	International financial institution
KWPP	Kiliya WPP LLC
LLC	Limited Liability Company
MD	Managing director
MT	Metric tons
NGO	Non-governmental organisation
PR	Performance requirement
PS	Performance standard
SEP	Stakeholder engagement plan
UNGPs	UN Guiding Principles on Business and Human Rights
WTG	Wind turbine generator
WPP	Wind power plant

1 INTRODUCTION

The Project (the “Southern Wind Power Project”) plans to initiate the construction of three wind power plants in southern Ukraine. This document constitutes the Stakeholder Engagement Plan (SEP) for the Project. It identifies key stakeholders and defines communication channels and engagement activities for the Project’s construction phase.

The SEP is developed in alignment with national legislation and international lender requirements, including the International Finance Corporation (IFC) Performance Standards and the European Bank for Reconstruction and Development (EBRD) Environmental and Social Requirements, as discussed in Section 4 on the policy, legal and institutional framework. In particular, it reflects the principles of EBRD Environmental and Social Requirement 10 on Information Disclosure and Stakeholder Engagement. It also incorporates relevant European Union directives and international good practice on information disclosure and stakeholder engagement.

Stakeholders are the various individuals, groups or communities who:

- are likely to be affected (directly or indirectly) by Elementum’s operations
- may have an interest in Elementum’s operations and/or
- may have the ability to influence the project’s outcome, either positively or negatively.

The SEP sets out an approach to consultation that is appropriate to the nature, scale and duration of the project and is structured as follows:

- introduction
- project description
- project location
- policy, legal and institutional framework
- stakeholder identification and mapping
- stakeholder engagement strategy and implementation
- stakeholder engagement activities
- public disclosure
- data management, monitoring and reporting
- grievance management procedure.

This SEP outlines the approach and engagement activities that will be undertaken during the construction phase of the Project.

As a living document, the SEP will be periodically reviewed and updated throughout Project implementation to reflect changes in Project design, newly identified stakeholders, or adjustments in engagement activities. This includes all stakeholder engagement activities that may be conducted during the operational phase later on.

1.1 Approach to stakeholder engagement

This SEP is a strategy document that will be used to outline an approach to consultation and disclosure that is both thorough and culturally acceptable. The plan establishes a clear, transparent, and culturally appropriate approach to consultation and information disclosure. Its key objectives are:

- Ensure compliance with all legal requirements related to disclosure and stakeholder consultation;
- Identify all stakeholder groups that may be affected by or have an interest in the Project;
- Facilitate meaningful dialogue with stakeholders on issues that could impact their interests;
- Maintain constructive relationships throughout the entire construction phase;
- Provide an accessible grievance mechanism for submitting complaints, inquiries, or comments, ensuring timely and effective responses;
- Conduct consultations free from pressure, manipulation, or intimidation, based on timely, relevant, and understandable information presented in an accessible format.

The SEP includes an implementation plan for stakeholder engagement (Appendix 1), which outlines specific actions for engaging stakeholders during Project execution.

2 PROJECT DESCRIPTION

The Project consists of three sub-projects with a total of nine Wind Turbine Generators (WTGs). Each sub-project includes the installation and operation of three wind turbines designed to generate electricity from wind and supply it to the regional power grid.

The installed capacity of each sub-project is approximately 19.2 MW, resulting in a total installed capacity of approximately 57.6 MW.

The wind turbines are intended to operate continuously in automatic mode. The anticipated operational lifespan of each wind farm is approximately 25 years, with the possibility of extension depending on the technical characteristics of the selected equipment. Final turbine models will be confirmed at the detailed design stage.

Associated infrastructure includes:

- Underground 35 kV cable networks laid at a depth of approximately 1.5 m;
- 35 kV substations connected to the regional electricity network in accordance with approved technical conditions;
- Access roads primarily aligned with existing agricultural and municipal routes, with limited localised improvements where necessary;
- Turbine platforms with a temporary installation footprint of approximately 0.6 ha per WTG, including crane pads and temporary working areas;
- Fibre-optic communication lines installed alongside electrical infrastructure to enable data transmission between turbines and substations.

Land plots for turbine locations are secured under long-term lease agreements. Land required for access roads and cable networks is arranged through easements or servitudes.

Due to security considerations, detailed maps, coordinates, exact distances to settlements, and specific infrastructure routing are not disclosed in this version of the document

3 PROJECT LOCATION

All wind farms are located outside residential areas within designated administrative territories in southern Ukraine. The sites are situated within predominantly agricultural landscapes characterised by open plains and gently undulating terrain.

The Project areas are accessed via existing field roads and regional transport infrastructure. Minor road improvements may be undertaken to facilitate the transport of construction equipment.

The wind farms are located outside settlement boundaries and maintain separation distances from nearby residential areas in accordance with national planning and environmental requirements.

4 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

4.1 National requirements for stakeholder engagement

This SEP has been developed to comply with the legal and national policy requirements and meet the international guidelines and standards on information disclosure, consultation, and stakeholder participation requirements.

Ukrainian legislation documents:

- Law of Ukraine "On Environmental Protection" № 1268-XII dated 26 June 1991
- Law of Ukraine "On Environmental Impact Assessment" №3505-IX dated 8 December 2023
- Law of Ukraine "On Labour Protection" 2694-XII dated 1 October 2023
- Labour Code of 322-08 dated 24 December 2023
- Law of Ukraine "On Ensuring Equal Rights and Opportunities for Women and Men" 2866-IV dated 3 August 2023
- Law of Ukraine "On Citizens' Appeals" 393/96-BP dated 31 January 2023
- Law of Ukraine "On Access to Public Information" 2939-VI dated 8 October 2023
- The Law of Ukraine "On Trade Unions, Their Rights and Guarantees of Activity" No. 1045-XIV dated September 15, 1999
- The Law of Ukraine "On Social Dialogue in Ukraine" No. 2862-VI dated December 23, 2010
- Law of Ukraine "On Public Associations" No. 4572-VI dated March 22, 2012
- The Law of Ukraine "On Citizens' Appeals" No. 393/96-VR dated October 2, 1996
- Resolution of the Cabinet of Ministries of Ukraine "On Approval of the Procedure for Conducting Public Hearings in the Process of Environmental Impact Assessment" dated 13 December 2017
- Law of Ukraine "On Information" No. 2657-XII dated October 2, 1992
- Law of Ukraine "On Child Protection" No. 2402-III dated April 26, 2001
- Law of Ukraine "On Access to Public Information" No.393/96-VR dated 13 January 2011
- Law of Ukraine "On Appeals of Citizens" No. 393/96-VR 2 October 1996
- Law of Ukraine "On Public Procurement" No. 922-VIII dated December 12 2015.

4.2 International requirements for stakeholder engagement

4.2.1 IFC Sustainability Framework

The Project is structured to comply with the IFC's Performance Standards on Environmental and Social Sustainability, including:

Performance Standard 1 (PS1): Assessment and Management of Environmental and Social Risks and Impacts.

The IFC's PS1 define stakeholder engagement as an ongoing process which involves:

- Public disclosure of appropriate information
- Meaningful consultation with stakeholders
- An effective procedure or mechanism by which people can comment or raise grievances
- The IFC requires that stakeholder engagement
- Provides affected communities and other interested stakeholders with access to timely, relevant, understandable, and accessible information in a culturally appropriate manner and free of manipulation, interference, coercion, and intimidation
- Involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders
- Be proportionate to the nature and scale of the Project and its potential adverse impacts on the affected communities, the sensitivity of the environment, and the level of public interest
- Be based on clearly defined roles, responsibilities, and authority
- Designates company personnel to implement and monitor consultation and disclosure activities.

Performance Standard 5: Land Acquisition and Involuntary Resettlement

IFC's PS5 objective is to avoid or minimise displacement, and when displacement is unavoidable, to mitigate its adverse social and economic impacts.

Stakeholder Engagement Requirement: Engage with affected communities, including those who are economically displaced, to consult on resettlement options and to ensure that affected people are informed and able to participate in decision-making processes regarding resettlement planning and implementation.

Performance Standard 8: Cultural Heritage

IFC's PS8 objective is to protect cultural heritage from adverse impacts of project activities and support its preservation.

Stakeholder Engagement Requirement: Engage with affected communities to identify and manage cultural heritage, incorporating their views and knowledge into the project planning and implementation processes.

4.2.2 UN Guiding Principles on Business and Human Rights (UNGPs)

The UN Guiding Principles on Business and Human Rights (UNGPs), endorsed by the UN Human Rights Council in 2011, provide a global framework for preventing and addressing human rights impacts linked to business activities.

The framework is built on three core pillars:

- the state's duty to protect against human rights abuses
- the corporate responsibility to respect human rights
- the need for access to effective remedy for affected individuals and communities.

A central requirement of the UNGPs is meaningful stakeholder engagement, which is essential for identifying, assessing, and mitigating human rights risks. This engagement should be inclusive, culturally appropriate and sensitive to the needs of vulnerable groups, including women, and persons with disabilities. It must be guided by informed expertise and designed to overcome language or accessibility barriers.

The UNGPs also emphasise the importance of accessible grievance mechanisms, which must be fair, transparent, and rights-compatible, allowing communities to raise concerns and seek redress. Additionally, the integration of environmental considerations into human rights due diligence (HRDD) is increasingly recognised, highlighting the intersection of environmental and human rights impacts. By adopting such practices, businesses can contribute to global efforts toward fostering dignity, equity, and accountability in their operations and supply chains.

4.2.3 EBRD Environmental and Social Policy

The Project is structured to comply with the EBRD Environmental and Social Policy (2024) and its Performance Requirements, which are aligned with the IFC Sustainability Framework and international good practice.

EBRD requires that projects identify, assess and manage environmental and social risks and impacts through a proportionate and risk-based approach. A central requirement of the EBRD framework is meaningful stakeholder engagement, defined as an ongoing process which includes:

- Public disclosure of appropriate information
- Meaningful consultation with affected communities and other interested stakeholders
- An effective grievance mechanism through which stakeholders can raise concerns

EBRD requires that stakeholder engagement:

- Provides stakeholders with timely, relevant, understandable and accessible information in a culturally appropriate manner
- Is free of manipulation, interference, coercion and intimidation
- Is proportionate to the nature and scale of the Project and its potential impacts
- Is based on clearly defined roles, responsibilities and authority

- Includes stakeholder identification and analysis, engagement planning, disclosure, consultation, a grievance mechanism and ongoing reporting

The Project is required to implement a SEP and grievance mechanism in accordance with EBRD Performance Requirement 1: Assessment and Management of Environmental and Social Impacts and Issues.

5 STAKEHOLDER IDENTIFICATION AND MAPPING

The primary objective of stakeholder engagement is to identify and engage key stakeholders to gather input, concerns and feedback, and to provide opportunities for them to express opinions and recommendations related to the project and the ESIA.

Additional aims of engagement are to:

- provide stakeholders with timely, relevant and culturally appropriate information about the Project and planned construction activities, including the stakeholder engagement approach and the grievance mechanism
- facilitate dialogue with stakeholders on issues related to construction activities, including potential disturbances, access arrangements, health and safety considerations and mitigation measures
- identify and respond to stakeholder concerns related to construction impacts and activities within the Project area
- ensure that stakeholder feedback is considered in the management of construction activities, where relevant and feasible
- support the management of stakeholder expectations, including those related to construction scheduling, access restrictions, employment opportunities and engagement with local businesses

5.1 Stakeholder identification

Stakeholder identification is an analysis of all existing individuals and organisations that interact with the Project throughout its life cycle, considering its geographical location and the impact of activities on the regional socio-economic situation.

Stakeholders are defined within the following groups:

- External stakeholders – individuals or groups who are not directly involved in the Project but may influence its progress or be affected by it.
- Internal stakeholders – individuals or groups who are involved in the Project's activities from within and directly participate in operational processes, decision-making, and the achievement of strategic objectives.

These stakeholder groups have been identified, including an analysis of the best ways to engage with them. The Company actively involves a diverse array of stakeholders, both directly and indirectly, to convey the Company's sustainability commitments and gain insights into the significant concerns affecting the business and supply chains. The identified stakeholders and their corresponding engagement methods are presented in Table 5.1 below.

Table 5.1: Identified stakeholders and communication methods

Groups of stakeholders	Examples of stakeholders	Communication method
External stakeholders		
Central public authorities (government, ministries, national agencies)	<ul style="list-style-type: none"> • Ministry of Energy of Ukraine • Ministry of Economy, Environment and Agriculture of Ukraine • National Commission for State Regulation of Energy and Utilities • State Service of Ukraine for Geodesy, Cartography and Cadastre. 	<ul style="list-style-type: none"> • Individual meetings • Information campaign materials • Official letters • E-mail • Reporting • Website • Consultations.
Local public authorities (city and village councils)	<ul style="list-style-type: none"> • City and Village Councils 	<ul style="list-style-type: none"> • Individual meetings • Information campaign materials • Official letters • Corporate email • Reporting • E-mail • Website • Consultations.
Investors/shareholders and developing financial institutions	<ul style="list-style-type: none"> • IFC, EBRD, EIFO, banks and other financial institution 	<ul style="list-style-type: none"> • Contractual obligations • E-mail • Individual meetings • Official letters • Corporate email • Video conferences; • Website • Reporting.
Landowners and land users	<ul style="list-style-type: none"> • Private landowners • Leaseholders • Farmers and agricultural cooperatives. 	<ul style="list-style-type: none"> • Individual meetings • Public hearings / community meetings • Official letters • Corporate email • Video conferences • Company / Project website • Grievance mechanism.
Suppliers and service providers	<ul style="list-style-type: none"> • WTG Supplier - Vestas Mediterranean A/S • Local contractor for transportation and commissioning - Vestas Ukraine LLC. 	<ul style="list-style-type: none"> • Contractual obligation; • Technical coordination meetings; • Corporate e-mail; • Phone; • Video conferences • Website.
Contractors and subcontractors	<ul style="list-style-type: none"> • TEM Energo LLC – General contractor 	<ul style="list-style-type: none"> • Contractual obligation; • Site coordination meetings

Groups of stakeholders	Examples of stakeholders	Communication method
	<ul style="list-style-type: none"> • Navitas Renewables Ukraine LLC – responsible for turbine installation • Subcontractors. 	<ul style="list-style-type: none"> • E-mail • Phone • Video conferences • Website • Grievance mechanism for contractors employees.
Energy companies	<ul style="list-style-type: none"> • NPC Ukrenergo • Regional grid operators. 	<ul style="list-style-type: none"> • Technical consultation • Written approvals and permitting correspondence • Engineering coordination meetings operation reporting • E-mail • Phone • Website.
Local focus groups / associations	<ul style="list-style-type: none"> • Farmers' association • Local business groups • Informal community representatives. 	<ul style="list-style-type: none"> • Public hearings • Website • Corporate e-mail • Phone • Social media, grievance mechanism, press releases, public hearings.
Consulting companies	<ul style="list-style-type: none"> • NVP "Ecozakhyst" LLC 	<ul style="list-style-type: none"> • Phone • E-mail • Video Conferences • Contractual obligations.
Media, including local media	<ul style="list-style-type: none"> • Print and online newspapers. 	<ul style="list-style-type: none"> • E-mail • Press releases • Briefings • Social media • Public hearings.
Local communities/ Neighbor community	<ul style="list-style-type: none"> • Residents of the wider project area 	<ul style="list-style-type: none"> • Website • Social media • Phone • E-mail • Information materials of the Company; • Grievance mechanism • Press releases • Communication via NGOs and Associations.
Directly affected residents	<ul style="list-style-type: none"> • Households located closest to construction and transport routes 	<ul style="list-style-type: none"> • Website • Social media • Phone

Groups of stakeholders	Examples of stakeholders	Communication method
		<ul style="list-style-type: none"> • E-mail • Formal letter • Information materials of the Project/Company • Grievance mechanism • Press releases • Communication via NGOs and Associations • Informing about Project activity.
Vulnerable groups	<ul style="list-style-type: none"> • Women, children, elderly people, disabled people. 	<ul style="list-style-type: none"> • Website • Social media • Phone • E-mail • Information materials • Grievance mechanism • Press releases • Communication via NGOs and Associations.
Internal stakeholders		
Board of directors	<ul style="list-style-type: none"> • VR Capital Group. 	<ul style="list-style-type: none"> • Strategic reporting • Executive briefings • Formal meetings and approvals.
Executive/ top management	<ul style="list-style-type: none"> • Executive directors (MD, CFO, CCO, CBDO, CTO, GC). 	<ul style="list-style-type: none"> • Management meetings • Progress reporting.
Project team	<ul style="list-style-type: none"> • Project Coordinator • Site Manager • Contract Manager • Procurement Manager • Technical Supervision (2) • Author Supervision (2) • Land manager • Technical Lead • HR Lead • On-site Safety Manager • HSE Lead • ESG Lead • ESG Manager • CSR Manager. 	<ul style="list-style-type: none"> • Operation meetings • Site coordination • Internal instruction and reporting.
Internal E&S and HSE team	<ul style="list-style-type: none"> • ESG Manager • HSE Manager • CSR Manager. 	<ul style="list-style-type: none"> • Compliance reporting • ESHS coordination meetings • Audit and monitoring reviews.

Groups of stakeholders	Examples of stakeholders	Communication method
Internal corporate support function	<ul style="list-style-type: none"> • Business development Department • Construction Department including Procurement function • Legal & Regulatory Department including Compliance and ESG functions • Finance Department • People and Culture Unit. 	<ul style="list-style-type: none"> • Internal communication • Cross-department coordination • Procedure implementation and reviews.
Employees	<ul style="list-style-type: none"> • Corporate and site-level employees, including employees of contractors and subcontractors. 	<ul style="list-style-type: none"> • Information in contract • Staff meetings • Company announcements • Phone • E-mail • Grievance procedure with anonymity option.

Vulnerable groups

Vulnerable groups identified as separate stakeholder categories.

In the context of the Project, vulnerable groups are defined as those members of the population who may experience a disproportionate impact from Project activities or who may have limited access to information, participation mechanisms, or grievance procedures.

The vulnerable groups within the Project area include:

- Elderly people
- Persons with disabilities
- Single-person or single-parent households
- Women, including pregnant women
- Children and youth
- Low-income households

Considering potential barriers (language, social, physical, or informational), engagement with these groups will be conducted using adapted communication approaches, including:

- Clear, accessible and simplified information materials
- Availability of offline communication channels (information boards, local administrations, community offices)
- Use of local intermediaries and communication channels (social workers, NGOs, community representatives)
- Accessible grievance mechanisms, allowing submission by phone, in writing, or anonymously.

The Project commits to identifying, supporting and engaging vulnerable groups throughout all phases of implementation - from preparation and construction to operation-ensuring inclusiveness, equal access to information, and non-discrimination.

5.2 Stakeholder analysis and mapping

5.2.1 Stakeholder mapping

This section describes the approach used to assess and categorise stakeholders based on their influence on the Project and their level of interest in its development and implementation.

Stakeholder assessment allows the Project to prioritise engagement activities and select appropriate communication methods for each stakeholder group. The mapping matrix is developed using two parameters:

Level of influence

Represents how much a stakeholder group can affect the Project or influence its outcomes.

High	Stakeholder can significantly influence key decisions or Project outcomes
Medium	Stakeholder can influence the Project indirectly or through specific Project components
Low	Stakeholder has limited influence and is unlikely to affect Project decisions or implementation

Level of interest

Represents how strongly a stakeholder group is affected by or concerned about the Project.

High	Stakeholder is significantly affected by the Project and expects regular engagement and information
Medium	Stakeholder is moderately affected and expects engagement mainly during key Project phases.
Low	Stakeholder has general interest and is informed mainly through public information channels.

Stakeholder Classification by Level of Influence and Interest

To ensure effective stakeholder engagement management, the Company applies a Power–Interest Matrix, which helps define communication and engagement priorities.

1. High Influence / High Interest

These are key stakeholders who make strategic decisions and have a significant impact on the Project's success.

Engagement Strategy: maximum efforts to meet their expectations, regular consultations, transparent communication, and involvement in decision-making.

2. High Influence / Low Interest

Stakeholders with substantial power to influence outcomes but limited interest in the Project.

Engagement Strategy: keep them satisfied, provide essential information, and prevent conflicts or negative impacts.

3. Low Influence / High Interest

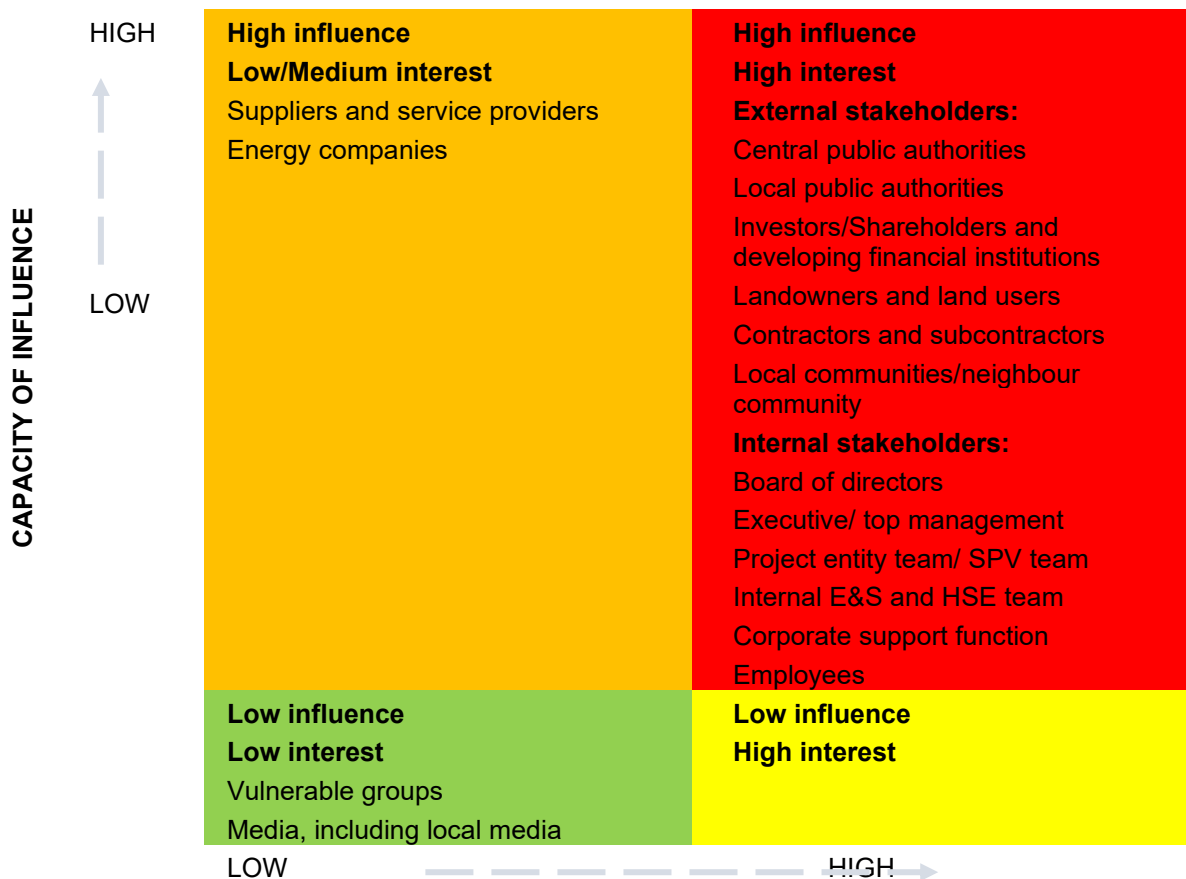
Stakeholders who show strong interest but lack sufficient resources or authority to influence the Project.

Engagement Strategy: ensure access to information, involve them in consultations, and leverage their support to build a positive reputation.

4. Low Influence / Low Interest

Stakeholders with minimal interest and limited ability to influence the Project.

Engagement Strategy: periodic information sharing and monitoring to prevent potential risks. Stakeholder engagement is directly proportional to the influence of the activity, and as the level of influence on the stakeholder group increases, or as the level of influence of a particular stakeholder on the Project increases, interaction with this particular group should increase and deepen in terms of frequency and intensity of engagement. Accordingly, the priority of each stakeholder or stakeholder group should be managed relatively. The stakeholder mapping below is used to prioritise stakeholders during the Project or operational activities.



DEGREE OF INTEREST

Figure 5-1: Stakeholder mapping

A stakeholder mapping exercise was carried out according to the identified stakeholder groups and their impacts. The mapping presents the stakeholder identification and analysis and prioritises them for future engagement (see Appendix 2).

6 STAKEHOLDER ENGAGEMENT STRATEGY AND IMPLEMENTATION

This section details the stakeholder engagement planning that will be conducted throughout the construction phase.

6.1.1 Engagement methods and materials

Information disclosure is necessary to ensure ongoing interaction with stakeholders to inform them about the Project current activities. The information to be disclosed is governed by Ukrainian national law and international guidelines and standards, such as IFC PSs.

The Company has a list of topics for disclosure related to the Project. These topics determine the most relevant information to be shared as part of the stakeholder engagement process.

The Company has communication channels through which it publishes up-to-date information and actively informs the public about current and planned activities through official channels. These channels include:

- [The official Elementum Energy website;](#)
- [The corporate Elementum Energy Facebook;](#)
- [The corporate Elementum Energy LinkedIn.](#)

The list of information to be disclosed as part of the annual [Sustainability Report](#) is presented in Table 6.1.

Table 6.1: List of information to be disclosed

Theme	Topic
Activities related to the Project	<ol style="list-style-type: none"> 1. Financial Performance 2. Climate Action 3. Energy Efficiency 4. Waste Management 5. Biodiversity Management 6. Pollution Prevention 7. Business ethics 8. Human Rights, Diversity and Inclusion 9. Talent Cultivation and Development 10. Occupational Health and Safety 11. Responsible Supply Chains 12. Corporate Governance 13. Employee 14. Risk Management and Security 15. Community Health and Safety 16. Grievance Mechanism.

Information about the Project activities is available on the official [Elementum Energy website](#) and the project-specific website will be launched in 2026.

Social media channels and corporate e-mail are mostly used to engage the stakeholders. Company uses its official website as the main source of communication.

6.1.2 Arranging the meetings

Engagement with stakeholders (including state and local authorities, local communities, landowners, investors, contractors, and employees) is organised by the project team of the companies. Designated representatives of the companies are responsible for planning, coordination, logistics and facilitation of meetings. If necessary, a CSR Manager, representatives of local communities or relevant technical and environmental-social specialists will be involved.

6.1.3 Conducting the meetings

Meetings are conducted according to a structured agenda, which typically includes a project presentation, an explanation of the purpose of the meeting, discussion of key issues, a Q&A session and information on the grievance mechanism and next steps.

Depending on the topic and stakeholder group, meetings will typically involve 2-4 representatives of the companies, including the:

- facilitator (CSR Manager or authorized representative)
- project representative or technical specialist
- ESG manager
- person responsible for recording the meeting outcomes.

6.1.4 Recording the meetings

The results of the meetings are documented using in all material respects the sample format for documenting engagement activities (Appendix 5), which reflects key issues, comments and agreed actions. Photo, audio, or video recording is carried out only when necessary and solely with the prior consent of the participants.

6.1.5 Overview of responsibilities for stakeholder engagement implementation

1. *Executive management:*
 - Approve the Stakeholder Engagement Plan;
 - Approve other documentations.
2. *ESG manager:*
 - Identify and analyse stakeholders;
 - Oversees stakeholder engagement
 - Develop and review SEP;
 - Collaborate and communicate with CSR Manager;
3. *CSR manager:*
 - Communicate with communities and other stakeholders;
 - Organise meeting with communities and other stakeholders;

- Record and document the process of communication and report to affected communities and other stakeholders.
 - Other communication and documentation tasks.
4. Elementum Energy office administrator:
- Receive, register and direct all official external communication.

7 **STAKEHOLDER ENGAGEMENT ACTIVITIES**

At the time of preparation of this SEP, no formal records of stakeholder engagement activities undertaken to date have been included in the EIA documentation. This SEP therefore focuses on establishing a structured approach to stakeholder engagement for the construction phase of the Project.

Engagement planning involves identifying appropriate formats and communication tools for each stakeholder group, taking into account the specific characteristics of the Project's business processes.

Information disclosure channels for stakeholders are various means that the Company can use to communicate and share relevant information with its stakeholders. Adequate information disclosure is critical for building transparency, trust, and maintaining positive stakeholder relationships.

Below, Table 7.1 represents the goal of engagement and information for disclosure within the Company's activities.

At this stage, it is also essential to identify that some stakeholders can or want to use different information channels. This behaviour may be driven by personal preference, influenced by factors such as age or gender, determined by financial resources, influenced by the individual's literacy or auditory capabilities, or motivated by other various causes. Therefore, several different methods of disseminating the information should be used to promote transparency and inclusion.

Table 7.1: Communication methods and information for disclosure within the Project's activity

Stakeholder	Goal of Engagement	Information to be Disclosed	Timeframe	Responsibility
External stakeholders				
<ul style="list-style-type: none"> Central public authorities (Government, Ministries, National agencies) 	<ul style="list-style-type: none"> Ensure compliance with national renewable energy regulations, environmental standards, land use and grid connection requirements, and maintain cooperation on permitting milestones, inspections and reporting obligations relevant to the construction of the renewable energy facility. 	<ul style="list-style-type: none"> Details on Project activities Permits and approvals status. 	<ul style="list-style-type: none"> During the mobilisation and construction phases 	<ul style="list-style-type: none"> Regulatory Manager; CTO, GC and CBDO; Legal & Regulatory Department/Permitting specialists.
<ul style="list-style-type: none"> Local public authorities (City and Village councils) 	<ul style="list-style-type: none"> Maintain transparent cooperation on construction activities, road access, traffic management, local workforce opportunities, public safety considerations, and timely notification of construction schedules affecting the municipality. 	<ul style="list-style-type: none"> Details on Project activities Construction schedule and timelines Traffic and access arrangements Local employment opportunities Health and safety measures. 	<ul style="list-style-type: none"> During the mobilisation and construction phases 	<ul style="list-style-type: none"> Project Coordinator; Site Manager; Land Manager; HR Lead; ESG Manager.
<ul style="list-style-type: none"> Investors/Shareholders and developing financial institutions 	<ul style="list-style-type: none"> Provide regular updates on construction progress, ESG compliance, milestones, risks, timelines and budget status to ensure investment confidence and alignment with sustainability financing requirements and IFC PSs. 	<ul style="list-style-type: none"> Details on Project activities Economic Indicators Investment data; Financial reporting ESG data Stakeholder engagement activities planned and conducted. 	<ul style="list-style-type: none"> During the mobilisation and construction phases 	<ul style="list-style-type: none"> Project Coordinator ; ESG Manager; Finance Department; Lenders' ESG Coordinators; All departments engaged in conducting due diligence.

Stakeholder	Goal of Engagement	Information to be Disclosed	Timeframe	Responsibility
<ul style="list-style-type: none"> Landowners and land users 	<ul style="list-style-type: none"> Maintain trust and open communication regarding land access, agricultural disruption, compensation processes (if applicable), construction timing, safety requirements, and resolution of concerns related to noise, dust, vibration or transportation impacts. 	<ul style="list-style-type: none"> Details on Project's activities Land access arrangements and compensation Planned Stakeholder engagement activities and grievance mechanism Short-term impacts (traffic, noise, dust) Occupational safety Emergency procedure. 	<ul style="list-style-type: none"> During the mobilisation and construction phases 	<ul style="list-style-type: none"> Project Coordinator ; ESG Manager; Land Manager; Legal & Regulatory Department.
<ul style="list-style-type: none"> Suppliers and Service providers 	<ul style="list-style-type: none"> Ensure transparent communication regarding procurement requirements, delivery schedules, contract obligations, ESG expectations (including compliance with IFC standards), and timely coordination to avoid delays, quality issues or safety-related risks during construction. H&S and E&S requirements applicable to supplier employees 	<ul style="list-style-type: none"> Details on Project's activities Procurement requirements Contractual obligation Planned Stakeholder engagement activities and grievance mechanism Labour and working conditions standards applicable to supplier employees Occupational safety Emergency procedures. 	<ul style="list-style-type: none"> During the mobilisation and construction phases 	<ul style="list-style-type: none"> CTO; Project Coordinator; Legal & Regulatory Department; Procurement Manager; ESG Manager; HSE Lead.
<ul style="list-style-type: none"> Contractors and subcontractors 	<ul style="list-style-type: none"> Foster effective coordination on construction activities, health and safety standards, labor practices, environmental compliance, working conditions, grievance mechanism access (including GBVH-sensitive channels), and alignment with project timelines, quality 	<ul style="list-style-type: none"> Details on Project activities Contractual obligation Labour and working conditions standards applicable to contractors and subcontractors employees Environmental requirements (waste 	<ul style="list-style-type: none"> During the mobilisation and construction phases 	<ul style="list-style-type: none"> Site Manager; On-site Safety Manager; Project Manager; ESG Manager; ESG Lead; HR Lead.

Stakeholder	Goal of Engagement	Information to be Disclosed	Timeframe	Responsibility
	requirements and community interaction protocols.	management, dust, noise, spill prevention) <ul style="list-style-type: none"> Planned Stakeholder engagement activities and grievance mechanism Occupational safety Emergency procedures. 		
<ul style="list-style-type: none"> Energy Companies 	<ul style="list-style-type: none"> Maintain coordination and transparent communication regarding grid connection requirements, technical parameters, permitting, operational timelines and safety measures to ensure uninterrupted integration of the renewable energy facility into the regional energy system. 	<ul style="list-style-type: none"> Details on Project's activities Key grid connection parameters Key grid-related risks and mitigation measures Contractual obligation Planned Stakeholder engagement activities and grievance mechanism Occupational safety Emergency procedures. 	<ul style="list-style-type: none"> During the mobilisation and construction phases 	<ul style="list-style-type: none"> Project Coordinator; Technical Manager; ESG Manager; Legal & Regulatory Department.
<ul style="list-style-type: none"> Local focus groups / Associations 	<ul style="list-style-type: none"> Ensure ongoing dialogue and participation in decision-making related to local socio-economic impacts, community concerns, and mitigation measures, while promoting collaboration and maintaining social license to operate through inclusion and responsiveness to community needs. 	<ul style="list-style-type: none"> Information on local employment and contractor engagement opportunities Project investment in local economy Planned Stakeholder engagement activities and grievance mechanism Social programmers or initiatives Emergency procedures. 	<ul style="list-style-type: none"> During the mobilisation and construction phases 	<ul style="list-style-type: none"> CSR Manager; ESG Manager.
<ul style="list-style-type: none"> Media, including local media 	<ul style="list-style-type: none"> Ensure accurate, transparent, and timely communication about the Project's activities, progress, 	<ul style="list-style-type: none"> Overview of Project activities and progress 	<ul style="list-style-type: none"> During the mobilisation and 	<ul style="list-style-type: none"> CSR Manager; ESG Manager.

Stakeholder	Goal of Engagement	Information to be Disclosed	Timeframe	Responsibility
	<p>environmental and social commitments, safety measures, and community programs, while supporting public awareness and reducing misinformation risks.</p>	<ul style="list-style-type: none"> • Key environmental and social commitments • Social programmers and community initiatives • Planned Stakeholder engagement activities and grievance mechanism. 	<p>construction phases</p>	
<ul style="list-style-type: none"> • Local communities/Neighbor community 	<ul style="list-style-type: none"> • Ensure open, respectful, and proactive communication about construction and operational impacts (noise, shadow flicker, traffic, safety), provide timely responses to concerns, enable participation in consultation processes, and ensure fair access to the grievance mechanism and mitigation measures. 	<ul style="list-style-type: none"> • Non-technical details of the Project's activities • Potential social and environmental impacts during mobilisation (noise, traffic, dust, vibration) and planned mitigation measures • Mobilisation and construction schedule and periods of increased activity • Information on local employment and contractor engagement opportunities; • Project investment in local economy • Planned Stakeholder engagement activities and grievance mechanism • Social programmers or initiatives • Emergency procedures. 	<ul style="list-style-type: none"> • During the mobilisation and construction phases 	<ul style="list-style-type: none"> • CSR Manager; • ESG Manager; • Site Manager; • Project Coordinator.
<ul style="list-style-type: none"> • Directly affected residents 	<ul style="list-style-type: none"> • Ensure open, respectful, and proactive communication about construction and operational impacts (noise, shadow flicker, 	<ul style="list-style-type: none"> • Non-technical details of the Project's activities • Potential social and environmental impacts 	<ul style="list-style-type: none"> • During the mobilisation and construction phases 	<ul style="list-style-type: none"> • CSR Manager; • ESG Manager; • Land Manager

Stakeholder	Goal of Engagement	Information to be Disclosed	Timeframe	Responsibility
	<p>traffic, safety), provide timely responses to concerns, enable participation in consultation processes, and ensure fair access to the grievance mechanism and mitigation measures.</p>	<p>during mobilisation (noise, traffic, dust, vibration) and planned mitigation measures</p> <ul style="list-style-type: none"> • Employment opportunities • Social programs • Charitable projects • Grievance mechanism • Emergency procedures. 		<ul style="list-style-type: none"> • Site Manager; • Project Coordinator.
<ul style="list-style-type: none"> • Vulnerable groups (women, children, elderly people, disabled) 	<ul style="list-style-type: none"> • Ensure equitable access to information and engagement opportunities through adapted formats, minimise disproportionate impacts, and ensure safe and inclusive communication channels, including confidential grievance mechanisms for sensitive cases (e.g., GBVH), while promoting participation in benefits where applicable. 	<ul style="list-style-type: none"> • Non-technical details of the Project's activities • Employment opportunities • Social programs • Charitable projects • Planned Stakeholder engagement activities • Grievance mechanism, including confidential and safe channels for sensitive cases (including GBVH); • Emergency procedures. 	<ul style="list-style-type: none"> • During the mobilisation and construction phases 	<ul style="list-style-type: none"> • CSR Manager; • ESG Manager; • Land Manager; • Site Manager; • Project Coordinator.
Internal stakeholders				
<ul style="list-style-type: none"> • Board of Directors 	<ul style="list-style-type: none"> • Ensure informed decision-making and alignment of strategic objectives, compliance requirements, financial commitments, sustainability policies and IFC/EBRD standards throughout project development and operations. 	<ul style="list-style-type: none"> • Overview of Project activities and key milestones • Strategic progress and performance updates • Compliance status with regulatory, IFC and EBRD requirements • Key environmental, social and operational risks and mitigation measures 	<ul style="list-style-type: none"> • During the mobilisation and construction phases 	<ul style="list-style-type: none"> • Board of Directors; • Executive/Top Management;

Stakeholder	Goal of Engagement	Information to be Disclosed	Timeframe	Responsibility
		<ul style="list-style-type: none"> • Financial performance and investment updates • Sustainability initiatives • Stakeholder engagement and grievance management overview; • HR and workforce matters (at a strategic level). 		
<ul style="list-style-type: none"> • Executive/ Top management 	<ul style="list-style-type: none"> • Ensure informed decision-making and alignment of strategic objectives, compliance requirements, financial commitments, sustainability policies and IFC/EBRD standards throughout project development and operations. 	<ul style="list-style-type: none"> • Project implementation status and progress against plan • Regulatory and lender compliance status • Key risks, incidents and corrective actions • Environmental, social and H&S performance indicators • Stakeholder engagement and grievance trends • Financial and operational performance updates • Key management decisions and action items. 	<ul style="list-style-type: none"> • During the mobilisation and construction phases 	<ul style="list-style-type: none"> • Executive/Top Management; • <i>Operational:</i> <ul style="list-style-type: none"> - Project Coordinator; - ESG Manager; - CSR Manager; - HR Lead; - ESG Lead; - Land Manager; - HSE Lead; • <i>Supporting:</i> <ul style="list-style-type: none"> - Finance Department; - Legal & Regulatory Department.
<ul style="list-style-type: none"> • Project team 	<ul style="list-style-type: none"> • Coordinate operational planning, reporting, risk management, regulatory compliance, construction oversight and timely implementation of project milestones. 	<ul style="list-style-type: none"> • Detailed information on Project activities • Project milestones and implementation schedule • Planned Stakeholder engagement activities and grievance mechanism • Social issues and working conditions • Occupational safety 	<ul style="list-style-type: none"> • During the mobilisation and construction phases 	<ul style="list-style-type: none"> • Project Coordinator; • Technical Lead; • Site Manager; • Contract Manager; • Procurement Manager; • Technical Supervision; • Author Supervision;

Stakeholder	Goal of Engagement	Information to be Disclosed	Timeframe	Responsibility
		<ul style="list-style-type: none"> Emergency procedures. 		<ul style="list-style-type: none"> On-site Safety Manager; Manager; HSE Lead; Safety Manager; Land Manager; ESG Manager; CSR Manager.
<ul style="list-style-type: none"> Internal E&S and HSE Team 	<ul style="list-style-type: none"> Ensure compliance with environmental and social standards, occupational health and safety requirements, contractor supervision, stakeholder engagement implementation, monitoring and reporting. 	<ul style="list-style-type: none"> Environmental and social requirements and applicable standards Occupational health and safety requirements and procedures Contractor E&S and HSE obligations and supervision arrangements Monitoring results, incidents, and corrective actions Stakeholder engagement and grievance management data Reporting requirements and timelines Emergency procedures. 	<ul style="list-style-type: none"> During the mobilisation and construction phases 	<ul style="list-style-type: none"> ESG Manager; HSE Lead; On-site Safety Manager; CSR Manager.
<ul style="list-style-type: none"> Internal corporate Support Function 	<ul style="list-style-type: none"> Ensure efficient cross-department collaboration, contract management, regulatory compliance, timely procurement, transparent communication, and alignment with organisational governance principles. 	<ul style="list-style-type: none"> Contractual and procurement requirements Regulatory and compliance obligations Internal policies and procedures relevant to Project implementation 	<ul style="list-style-type: none"> During the mobilisation and construction phases 	<ul style="list-style-type: none"> All relevant Company departments

Stakeholder	Goal of Engagement	Information to be Disclosed	Timeframe	Responsibility
		<ul style="list-style-type: none"> • Roles and responsibilities of corporate functions • Cross-department coordination and reporting requirements • Stakeholder engagement and grievance management data. 		
<ul style="list-style-type: none"> • Employees 	<ul style="list-style-type: none"> • Maintain transparent internal communication, ensure awareness of job responsibilities, workplace safety, company policies, grievance mechanism access, and promote engagement, morale, and long-term retention. 	<ul style="list-style-type: none"> • HR Policy and internal procedures • Training and development programs • Working conditions • Occupational safety • Social programs and employee benefits • Stakeholder engagement and grievance management data • Emergency procedures. 	<ul style="list-style-type: none"> • During the mobilisation and construction phases 	<ul style="list-style-type: none"> • HR Lead/ People and Culture Unit

8 PUBLIC DISCLOSURE

Public disclosure during the construction phase will focus on providing stakeholders with timely, relevant and accessible information about Project activities, planned construction works and associated engagement arrangements.

The objectives of public disclosure during the construction phase are to:

- provide stakeholders with clear information on construction activities, schedules and potential short-term impacts
- explain the measures in place to manage and mitigate construction-related impacts
- communicate the stakeholder engagement approach and the grievance mechanism
- ensure stakeholders are aware of how to raise questions, concerns or complaints during construction
- support transparency and maintain open communication with affected stakeholders throughout construction.

Public disclosure activities will build on earlier engagement undertaken during project development and environmental assessment and will be adapted as construction progresses.

8.1 Public disclosure methodology

Information will be disclosed using appropriate and accessible formats and channels, taking into account the needs of different stakeholder groups. Disclosure materials may include written notices, information sheets, public notices and updates shared through meetings or other agreed communication channels.

Engagement will involve stakeholders identified during earlier phases as well as any newly identified stakeholders relevant to construction activities. Feedback received during disclosure activities will be recorded and addressed through the Project's stakeholder engagement and grievance management processes.

Public disclosure and consultation activities during construction will be carried out in compliance with applicable national legislation and international good practice on information disclosure and stakeholder engagement.

9 DATA MANAGEMENT, MONITORING, AND REPORTING

This section outlines the data management, monitoring and reporting protocols applied to stakeholder engagement activities. Information relating to stakeholders and engagement meetings is documented using standardised templates to ensure consistency and completeness. All engagement records, including meeting minutes, correspondence, enquiries, notes and transcripts, are securely stored in a centralised stakeholder engagement database. Microsoft SharePoint is used as the primary platform for storing and managing these records, with access restricted to authorised personnel only.

Minutes are recorded for all engagement meetings using a standard format that clearly captures stakeholder inputs and the corresponding responses provided by the project team or its appointed consultants.

The data management process comprises three key steps: collection of stakeholder engagement data using digital tools and standard templates (such as field guides, attendance registers and meeting minutes); compilation of data through synchronisation of field-based inputs or post-fieldwork entry; and analysis of data once uploaded to the central database.

Following data entry, stakeholder engagement information is analysed to identify trends, key issues and variations in concerns or contributions across different stakeholder groups. The findings are presented in stakeholder engagement and environmental and social assessment reports using tables, charts or other appropriate visual formats.

During engagement activities, stakeholders are informed that their personal data is collected, stored and managed in accordance with applicable data protection and privacy legislation. Personal information is treated as confidential and disclosed only where legally required.

The stakeholder engagement database supports the ongoing monitoring of issues, comments and questions raised throughout the engagement and assessment processes. Matters requiring follow-up by the project team or its appointed consultants are flagged within the system and assigned to the relevant parties to ensure timely responses and effective issue management.

10 GRIEVANCE MANAGEMENT PROCEDURE

The grievance mechanism is a structured communication tool established by the Company to allow stakeholders to express concerns regarding the potential, current, or past impacts of the Company's activities. Its purpose is to identify issues at an early stage, before they escalate, and to implement corrective measures. These measures include resolving the specific concern raised and developing actions to prevent similar occurrences in the future.

Elementum Energy (Ukraine) LLC has implemented and maintains a [*Grievance Redress Mechanism for Local Communities and Employees Engaged in the Project*] applicable to the Project, which includes methods to:

- receive and register external messages from the public and employees;
- screen and assess the issues raised and determine appropriate ways to address them;
- provide, track, and document responses;
- adjust the management program, as necessary;
- evaluate the effectiveness of actions and the level of satisfaction among
- the public, employees, or other stakeholders.

Elementum Energy communication is carried out through:

- Written forms (hard copies and electronic media): grievances, requests, inquiries, claims, replies to inquiries, reports, documents, data, etc.;
- Oral forms (by telephone or verbally): meetings, dialogues, discussions, interviews, presentations, etc

10.1 Roles and responsibilities

Any Company Employee engaged in the Project:

- adhere to policies and ethical standards of the Company
- report any alleged violations
- participate in internal surveys
- undergo training on the process of submitting grievances.

Responsible Employee:

- receive, check and process Messages within the deadlines and make them available for the Coordinator (usually ESG Lead) and General Counsel
- ensure an impartial and ethical investigation under the guidance of the Coordinator
- report a conflict of interest, if any
- guarantee confidentiality.

Coordinator:

- organise the process of gathering and considering Messages
- monitor provision of the timely feedback
- ensure compliance with internal procedures and confidentiality
- ensures the Register of the Messages is properly kept
- ensures that confidentiality instructions provided by GC are adhered to by limiting access, periodic checks, etc.

Team members:

- perform tasks within the scope of granted access
- adhere to impartiality, ethics, and confidentiality
- report conflicts of interest
- participate in training.

Company Management:

- make final decisions based on the results of the review and the Coordinator's suggestions
- refer the case to state authorities as necessary
- analyse statistics of the Messages annually; guarantee a zero tolerance policy to corruption.

General Counsel:

- determine the Coordinator
- ensure conduct of a legal assessment of violations
- suggest to the Company Management the transfer of cases to state authorities, where necessary
- agree on a replacement of the Employee working on specific Message in case of a conflict of interest.

10.2 Grievance mechanism process

The grievance procedure applies to:

- Internal stakeholders (employees)
- External stakeholders (local communities, suppliers and other interested parties)
- All notifications related to violations, incidents, risks, environmental/health/safety impacts, social issues, and ethical breaches, including GBVH (Gender-Based Violence and Harassment).

Local communities or any Employee Engaged in the Project can submit a Message as follows:

- personal appeal (in writing or in any form) to authorized persons or in case of Elementum Energy employee – to the management (MD or GC);

- postal delivery to the Company's address: LLC "Elementum Energy (Ukraine)", address: Zhylyanska 75, Kyiv, 01032, Ukraine;
- in person during public hearings or meetings with Elementum Energy representatives;
- by writing an appeal to the mailbox — Messages@elementum.energy;
- official phone number — +380 44 363 0016 — the number is published in accessible locations at Company sites and on the website. Working hours: 10:00 a.m. – 5:00 p.m., Monday–Friday (excluding air alert periods in Kyiv and public holidays), with a lunch break from 1:00 p.m. to 2:00 p.m.
- hotline number — 0800353142 where an automated voice system will be available, allowing callers to leave a voice message. All messages will be promptly forwarded to the Coordinator;
- the Company also considers establishing grievance boxes:

For communities — the boxes are placed in safe, well-lit areas within the premises of village and city councils and are checked weekly.

For employees — the boxes are placed in staff premises located within the construction site and are checked weekly.

The grievance mechanism procedure is presented below:

10.2.1 Message intake and registration

Messages received by mail are registered by the Responsible Person as incoming correspondence of the Company and forwarded to the Coordinator and GC, and then to the assigned Team Member for review. In order to receive feedback on such Messages, it is recommended for the Applicant to provide their contact details.

All Messages are recorded in the Grievance Log (Appendix 6) with the following details:

- date of receipt
- contact details of the complainant (if consent is given)
- description of the grievance / message
- channel through which it was received.

All *Messages*, regardless of the channel through which they are received, are of equal importance to the Company and are treated with equal care. For non-anonymous Messages, the Applicant will always receive feedback through the same channel through which the original *Message* was sent, unless otherwise specified by the Applicant.

After registration in the “Grievance Log” system each Message receives its own unique number (Message number) and is processed in accordance with the established procedure, as detailed below.

Access to Grievance log is granted to Responsible Person, Coordinator, ESG Manager, CSR Manager, GC, MD and CTO.

10.2.2 Acknowledgement of receipt

The Applicant is sent an acknowledgment of receipt within 10 working days, unless the Message is anonymous.

The acknowledgment includes:

- Grievance registration number
- Brief description of the grievance handling process
- Estimated timeframe for preparing the reply and considering the matter raised.

A Responsible Employee or team is appointed by the Coordinator to handle the message.

10.2.3 Investigation and proposed resolution

To ensure a thorough and impartial review of the Messages, the following steps are undertaken:

- Facts are collected and consultations are held with the relevant departments
- If the grievance involves a third party (such as a contractor), their representatives are engaged
- A proposal for resolving the issue is developed.

During the investigation, particularly for grievances involving GBVH issues, the Company considers engaging external organisations specializing in GBVH, vulnerable groups, and community social projects (such as NGOs and social organisations) as part of the investigation team or in subsequent processes. Involving third parties can help build community trust and address certain limitations of project-level mechanisms, such as lack of transparency, insufficient corporate resources, potential conflicts of interest, and bias — provided these organisations are perceived as impartial and independent by both the Company and the communities.

The Investigation Report in the form as outlined in (Appendix 7) must be prepared within 30 days from the date of receipt of *Message* and submitted to the GC and MD for approval, where resolution requires additional funds or the alleged violation requires additional investigation.

10.2.4 Implementation of resolution actions

The approved resolution is implemented within the established timeframe (30 days) from the date of the Investigation Report issuance date, unless it is objectively impossible to implement the resolution on such a short notice.

The non-anonymous Applicant is informed about:

- Actions taken;
- Expected outcome;
- Implementation timeline.

Based on the results of considering the Report, the Company's Management may make one of the following decisions:

- take disciplinary measures against persons whose actions/inaction contain signs of violation of the Company's internal policies;
- initiate additional internal review or investigation;
- provide recommendations for improving internal processes or policies;

- close the consideration of the report due to the lack of confirmation of the stated facts;
- transfer materials to relevant state authorities in cases provided for by law.

If the Message contains information about a violation that may have signs of an administrative or criminal offense, after conducting an internal investigation and upon the recommendation of the GC, the Company's Management may decide to notify the relevant state authorities for the purpose of investigating the facts set forth in the Message.

10.2.5 Monitoring and closure

The effectiveness of the implemented resolution is verified by the Coordinator. If the issue is resolved, the *Message* is closed in the log. If not, an additional action plan is developed.

10.2.6 Feedback and improvement

The Applicant is sent a notification confirming the closure of the Message. Where possible, a survey is conducted to assess satisfaction with the grievance resolution process.

The results of consideration of all Messages and statistics of appeals are confidential information and are provided by the Coordinator to the MD and GC at least once a year.

Below is a flowchart of the grievance mechanism procedure.



Figure 10-1: Process flow of the grievance mechanism

Employee complaints and claims may relate to the following issues (the list may be extended depending on specific circumstances):

- Violation of labour rights related to the individual employment contract;
- Occupational health and safety;
- Bullying and/or harassment;

- Working atmosphere and conditions;
- Equality of opportunities;
- Other reasons related to professional activity.

Anonymous complaints may be submitted and reviewed under certain circumstances to reduce anxiety and encourage employees to communicate and participate more actively.

Depending on the nature of the issue, grievance is treated seriously and confidentially. The Company reserves 30 working days to investigate the matter and provide a response to the complainant regarding the submitted grievance or suggestion, regardless of whether the decision is favourable or unfavourable.

11 MONITORING, EVALUATION AND REPORTING FRAMEWORK

The Company plans to regularly monitor, evaluate, and report on the stakeholder engagement process within the Project, including collecting data for reporting under GRI standards.

11.1 Monitoring

The Company regularly monitors, evaluates, and reports on the stakeholder engagement process and publicly discloses information in GRI reports.

The Company tracks the number of grievances received, their types, and the methods of resolution.

The effectiveness of the grievance mechanism is assessed through:

- direct surveys of the public or employees regarding satisfaction with grievance resolution;
- periodic meetings and discussions with the communities or employees;
- employee satisfaction surveys;
- monitoring trends in complaints from the communities and employees.

The grievance mechanism is reviewed during periodic site visits. Corrective measures are implemented if improvement opportunities are identified.

Indicators for evaluating stakeholder engagement effectiveness:

- Stakeholder meetings: number of meetings and presentations conducted, and types of stakeholders engaged;
- Media relations: number of published articles and/or announcements in mass media;
- Web and social media presence: number of visitors, inquiries, and comments submitted on websites and social media pages.

11.2 Performance evaluation

The Company conducts monitoring and evaluation of stakeholder engagement performance, including a review of the extent to which the activities outlined in the Stakeholder Engagement Plan (SEP) have been completed. Evaluation results are documented, and the conclusions drawn are incorporated into SEP updates. The monitoring and evaluation framework presented in (Appendix 5) is applied for this purpose.

APPENDIX 1: STAKEHOLDER IMPLEMENTATION PLAN

Action	Content	Timing	Responsibility	Targeted Stakeholder Group
<ul style="list-style-type: none"> Information about Company is available on the Company website 	<ul style="list-style-type: none"> Information about the Project activities should be available on the Company website. Financial, environmental, and social reporting, corporate policies, and the Stakeholder Engagement Plan should be available on the website. The grievance mechanism and information disclosure process should be specified and announced. Grievance mechanism and information disclosure process should be specified and announced. 	<ul style="list-style-type: none"> Before mobilisation 	<ul style="list-style-type: none"> Responsible coordinators Public relations department 	<ul style="list-style-type: none"> All stakeholders
<ul style="list-style-type: none"> Public relations campaigns and press releases 	<p>Information for dissemination shall contain:</p> <ul style="list-style-type: none"> non-technical information about the Company/Project activities and/or projects available grievance mechanism and communication channels any changes in providing services that may take place. 	<ul style="list-style-type: none"> During early construction 	<ul style="list-style-type: none"> Responsible coordinators Public relations department 	<ul style="list-style-type: none"> Local communities Directly affected residents Vulnerable groups Media
<ul style="list-style-type: none"> Direct communication 	<ul style="list-style-type: none"> Government bodies, state institutions, local authorities, and IFIs should be directly informed about the Company activities. Local communities should be informed about the Project activities and non-technical details. 	<ul style="list-style-type: none"> Before mobilisation 	<ul style="list-style-type: none"> Responsible coordinators Public relations department 	<ul style="list-style-type: none"> Local authorities and government bodies Investors and international financial institutions (IFIs) Local communities
<ul style="list-style-type: none"> Distribution of the information to vulnerable groups 	<ul style="list-style-type: none"> Inform vulnerable individuals living within the area affected by the Project of any changes of working activity. 	<ul style="list-style-type: none"> During early construction 	<ul style="list-style-type: none"> Responsible coordinator Public relations department 	<ul style="list-style-type: none"> Vulnerable groups

APPENDIX 2: PRELIMINARY STAKEHOLDER MAPPING

Stakeholder	Interests and Concerns	Possible Positive Impacts	Possible Negative Impacts	Influence	Interest	Priority
External Stakeholders						
<ul style="list-style-type: none"> Central public authorities (government, ministries, national agencies) 	<ul style="list-style-type: none"> Legal compliance with environmental, H&S, social, and technical requirements Permits alignment Reporting. 	<ul style="list-style-type: none"> Grant permits and licenses Contribution to renewable energy; development and national energy security. 	<ul style="list-style-type: none"> Refusal to issue permits, regulatory delays, administrative fines for non-compliance. 	High	High	
<ul style="list-style-type: none"> Local public authorities (city and village councils) 	<ul style="list-style-type: none"> Legal compliance with environmental, H&S, firefighting, and social requirements; Traffic management and public safety; Protection of local infrastructure. 	<ul style="list-style-type: none"> Grant permits and licenses Facilitate coordination with local services (roads, emergency response). 	<ul style="list-style-type: none"> May refuse to grant licenses/permits. Escalation of community complaints Restriction on construction activities. 	High	High	
<ul style="list-style-type: none"> Investors/shareholders and developing financial institutions 	<ul style="list-style-type: none"> Profit Environmental and social performance Risk management. 	<ul style="list-style-type: none"> Investment opportunities; 	<ul style="list-style-type: none"> Financing delays or suspension Increased project risk due to E&S non-compliance. 	High	High	
<ul style="list-style-type: none"> Landowners and land users 	<ul style="list-style-type: none"> Access restriction during construction Compensation for temporary and permanent land use Protection of crops, soil, and access roads. 	<ul style="list-style-type: none"> Lease payments and compensation Temporary employment opportunities Improvements to roads and local infrastructure. 	<ul style="list-style-type: none"> Land disputes 	High	High	

Stakeholder	Interests and Concerns	Possible Positive Impacts	Possible Negative Impacts	Influence	Interest	Priority
<ul style="list-style-type: none"> Suppliers and service providers 	<ul style="list-style-type: none"> Clear contractual obligations Timely payments Safe working conditions. 	<ul style="list-style-type: none"> Contribute to the successful operation of the Company, while supplying materials and complying with obligations Provide quality services in full scope Employment and service provision. 	<ul style="list-style-type: none"> Refusal to supply materials or delays in delivery, causing operational disruptions Supply of poor-quality products and violation of environmental and occupational safety requirements Discontinuation of services or provision of services of inadequate quality or volume 	High	Medium	
<ul style="list-style-type: none"> Contractors and subcontractors 	<ul style="list-style-type: none"> Employment opportunities Prompt payments safe working conditions Safe working conditions. 	<ul style="list-style-type: none"> Local employment and income generation Improved local infrastructure Improved community relation. 	<ul style="list-style-type: none"> Breach of contractual terms and irresponsible performance of duties 	High	High	
<ul style="list-style-type: none"> Energy companies 	<ul style="list-style-type: none"> Timely construction and commissioning of the WPP Compliance with technical, environmental and contractual requirements. 	<ul style="list-style-type: none"> Stable cooperation and long-term contractual relations Positive feedback in public and professionals sources 	<ul style="list-style-type: none"> Contractual claims or delays in case of non-compliance Negative feedback in public 	High	High	
<ul style="list-style-type: none"> Local focus groups / associations 	<ul style="list-style-type: none"> Employment opportunities Noise, dust, traffic and road safety 	<ul style="list-style-type: none"> Local employment and income generation Improving local infrastructure (roads, services). 	<ul style="list-style-type: none"> Complaints related to construction impacts Disagreement with construction. 	Medium	Medium	

Stakeholder	Interests and Concerns	Possible Positive Impacts	Possible Negative Impacts	Influence	Interest	Priority
	<ul style="list-style-type: none"> Access to land and agricultural activities. 					
<ul style="list-style-type: none"> Consulting companies 	<ul style="list-style-type: none"> Compliance with sustainability standards and regulations 	<ul style="list-style-type: none"> Provide strategic guidance to enhance ESG practices Assist in reporting and compliance with frameworks like GRI, ESRS. 	<ul style="list-style-type: none"> Provide negative ESG ratings that deter sustainability-focused investors Highlight gaps in ESG compliance, which may lead to reputational risks. 	Low	Low	
<ul style="list-style-type: none"> Media, including local media 	<ul style="list-style-type: none"> Availability of clear and timely information 	<ul style="list-style-type: none"> Positive media coverage can improve the public image of the Company and the Project. 	<ul style="list-style-type: none"> Negative or inaccurate coverage may negatively affect the reputation of the Company. 	Low	Low	
<ul style="list-style-type: none"> Directly affected residents 	<ul style="list-style-type: none"> Access to good quality services and infrastructure Employment opportunities Concerns related to noise, dust, traffic and safety during construction. 	<ul style="list-style-type: none"> Able to offer local labour and assistance for the project Improved local socio-economic conditions. 	<ul style="list-style-type: none"> Complaints related to construction impacts Reputational risks and potential delays if grievances are not addressed. 	High	High	
<ul style="list-style-type: none"> Local communities/ Neighbour community 	<ul style="list-style-type: none"> Employment opportunities Noise, dust, traffic and road safety Access to land and agricultural activities. 	<ul style="list-style-type: none"> Availability of local workforce Improved local infrastructure (roads, services). 	<ul style="list-style-type: none"> Complaints or collective actions, forming a negative image of the Company or disturbing the Project timeline. 	High	Medium	

Stakeholder	Interests and Concerns	Possible Positive Impacts	Possible Negative Impacts	Influence	Interest	Priority
<ul style="list-style-type: none"> Vulnerable groups (women, children, elderly people, disabled) 	<ul style="list-style-type: none"> Employment opportunities Noise, dust, traffic and road safety Health and Safety requirements 	<ul style="list-style-type: none"> Availability of local workforce; Improved local infrastructure (roads, services). 	<ul style="list-style-type: none"> Can complain and organise strikes, forming a negative image of the Company or disturb the Project timeline. 	Low	Low	
Internal Stakeholders						
<ul style="list-style-type: none"> Board of Directors 	<ul style="list-style-type: none"> Strategic guidance, oversight Corporate governance. 	<ul style="list-style-type: none"> Ensure long-term success and sustainability of the Company. 	<ul style="list-style-type: none"> Poor decision-making can lead to loss of direction and operational issues 	High	High	
<ul style="list-style-type: none"> Executive/ Top management 	<ul style="list-style-type: none"> Operational efficiency Meeting targets Maintaining standards. 	<ul style="list-style-type: none"> Effective local decision-making and implementation of strategies. 	<ul style="list-style-type: none"> Poor management can lead to operational inefficiencies and failure to meet targets. 	High	High	
<ul style="list-style-type: none"> Project team 	<ul style="list-style-type: none"> Project implementation within the agreed timeframe and budget Compliance with environmental, social, and occupational health and safety requirements Coordination of contractors Implementation of ESMP / C-ESMP. 	<ul style="list-style-type: none"> Efficient management of construction activities. Ensuring compliance with lenders' requirements and legislation. 	<ul style="list-style-type: none"> Construction delays. 	High	High	
<ul style="list-style-type: none"> Internal E&S and HSE Team 	<ul style="list-style-type: none"> Compliance with occupational health and safety requirements Environmental and social risk management 	<ul style="list-style-type: none"> Management and mitigation of social and environmental risks Improving engagement with communities. 	<ul style="list-style-type: none"> Increased risk of incidents and grievances in the event of inadequate oversight 	High	High	

Stakeholder	Interests and Concerns	Possible Positive Impacts	Possible Negative Impacts	Influence	Interest	Priority
	<ul style="list-style-type: none"> • Develop and Implementation of ESMP / C-ESMP. 					
<ul style="list-style-type: none"> • Employees 	<ul style="list-style-type: none"> • Employment opportunities • Salary and benefits • Safe working conditions • Implementation of ESMP / C-ESMP. 	<ul style="list-style-type: none"> • Improved coordination and decision-making during the construction phase. 	<ul style="list-style-type: none"> • Reduced operational efficiency in case. 	High	High	

APPENDIX 3: STAKEHOLDER ENGAGEMENT ATTENDANCE SHEET

Date:

Stakeholder meeting:

Location of meeting (village/town/district):

Total number of attendees:

Data Protection Disclaimer: In accordance with applicable national data protection and privacy legislation, as well as relevant international data protection standards, any personal data collected (including name, organisation and contact details) will be used solely for the purpose of documenting attendance and managing stakeholder engagement activities for the project. Personal information will be stored securely and will not be shared beyond the project team or its appointed representatives without prior consent, unless disclosure is required by law.

To participants: Please note that photographs will be taken throughout the event which may be included for promotional material and publications to include ESIA and social media and LinkedIn for which may be suitable. Please contact the event organiser if you do not give consent for your photograph to be used for these purposes.

No.	Name	Gender	Position/role and Residency (Village, Town, District)	Contact Details	Signature
1					
2					
3					
4					

5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					

APPENDIX 4: GENERAL DATA PROTECTION REGULATION CONSENT FORM

11.3 Data Protection Consent Form for Stakeholder Engagement Activities

Elementum has been appointed by the project proponent to support stakeholder engagement activities in accordance with applicable regulatory requirements and relevant international standards. All stakeholder data will be processed in compliance with the Law of Ukraine 'On Personal Data Protection' and other relevant national and international data protection laws and standards.

This data protection consent form outlines the obligations of the consultancy under applicable national data protection and privacy legislation.

11.3.1 1. Personal Data Collected

- Personal data processed as part of stakeholder engagement activities may include, but is not limited to:
 - Personal information such as name, contact details, title, role or position, and general location.
 - Photographs (individual or group).
 - Information relating to the nature and purpose of engagement with the project team or its appointed consultants.

11.3.2 2. Data Protection Principles

- The consultancy and any approved subcontractors will comply with applicable data protection principles. This ensures that personal data is:
 - Processed fairly, lawfully and transparently.
 - Collected and used only for specified and legitimate purposes related to stakeholder engagement and assessment activities.
 - Adequate, relevant and limited to what is necessary, and retained only for as long as reasonably required.
 - Accurate and, where necessary, kept up to date.
 - Stored and handled securely to prevent unauthorised access, loss, misuse, alteration or disclosure.

Photographs taken during engagement activities may be used for reporting, internal communications or external communications purposes. Where used, such materials will be retained in accordance with applicable data protection requirements. Stakeholders who do not wish to be photographed or featured in any materials should inform the organising team.

11.3.3 3. Data Handling and Confidentiality

- Any personal data or information collected during stakeholder engagement and social baseline activities will be handled as follows:

- Access to electronic databases will be restricted to authorised personnel involved in stakeholder engagement activities.
- Hard-copy records will be securely stored and managed by Elementum.
- Data will be presented anonymously in publicly disclosed reports unless explicit consent has been provided otherwise.
- Personal data will not be shared with individuals or organisations not directly involved in stakeholder engagement activities.
- Use or processing of data for purposes unrelated to stakeholder engagement or assessment activities is prohibited.
- Stakeholders will be informed of their data protection rights prior to being asked to provide consent.

By signing this data protection consent form, you acknowledge that you have read, understood and agreed to the information set out above.

I, _____, hereby acknowledge and agree to the above.

Date: _____

Signature: _____

APPENDIX 7: GRIEVANCE INVESTIGATION REPORT TEMPLATE

Summary Report of Investigation for Grievances (including Gender-Based Violence and Harassment cases)

Introduction	Investigation authorised by: [Name and role]
	Investigator: [Name and role]
	Date investigation began:
	Background to the investigation: [Brief overview of the matter]
Process of investigation	The investigation process: [Explain how the investigation was authorised]
	Evidence collected: [List all evidence collected]
	Evidence not collected: [List all evidence that could not be collected and why]
	Persons interviewed: [List all people interviewed]
	Persons not interviewed: [List any witnesses that could not be interviewed and why]
	Anonymised statements: [If any, explain why and provide details of any enquiries into witness]
The investigation findings	Summary of written and physical evidence: [name and summarise each document contained, set out how the evidence supported or did not support your findings and why]
	Summary of witness evidence: [name and summarise each witness statement, quote from statement where relevant, set out how the witness statement supported or did not support your findings and why]
	Facts established: [detail what the investigation has established]
	Facts that could not be established: [detail any part of the investigation that was inconclusive]

	<p>Mitigating factors: [detail if there were any mitigating factors uncovered that are relevant to the investigation]</p>
	<p>Other relevant information: [detail any other information that is relevant to the matter]</p>
<p>Conclusion</p>	<p>Recommendation: Formal action/Informal action/No action required</p>
<p>[if required]</p>	<p>Further details on recommendation: [such as the type of action suggested for example, formal disciplinary meeting, and if there are any other recommendations related to the matter. In disciplinary matters, the investigator should not recommend a possible sanction. This should only be considered at a disciplinary hearing]</p>
	<p>Investigator's signature:</p> <p>Date:</p>
<p>Supporting documents</p>	<p>[List all documents collected as part of investigation and included in report]</p>