



Georgia
Veli Solar Projects

Stakeholder Engagement Plan & Grievance mechanism

Date: June 2026

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

Veli LLC is a company established in Georgia that develops, owns and operates solar power plants (SPP). Veli owns presently 5 SPPs (total installed capacity: 12 MW) commissioned in December 2025, and is developing 5 more, thus targeting a portfolio of 12 SPPs.

The European Bank for Reconstruction and Development (EBRD) is considering providing financing to this portfolio. Solar power plants are located in Kakheti, Eastern Georgia, with a total installed capacity of 52.5MW (all together referred to as the "Project").

The project is expected to be developed under EPC contract. O&M will be managed through an O&M contract.

The Project was categorized B in accordance with EBRD's 2024 Environmental and Social Policy. An Environmental and Social Due Diligence of the Project was undertaken in January 2026, in order to structure the Project as per EBRD's Environmental and Social Requirements (ESR).

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

2 Project overview

2.1 Project Description

The Project is located in Easter Georgia. It consists of 10 solar plants in different locations, as presented in Table 1 and Figure 1.

Table 1 - List of solar plants that for the Project

Project name	Output (MW, DC/AC)	Coordinates	Commissioning date
01 Jughaani	2.7/1.75	41°36'4.67"N 46° 0'3.88"E	December 2025
02 Khirsa	2.3/1.75	41°32'11.17"N 46° 5'48.18"E	
03 Kistauri	2.4/1.75	42° 1'1.42"N 45°16'31.47"E	
04 Kedi	2/1.75	41°25'0.44"N 46°24'4.27"E	
05 Gamarjveba	2.7/1.75	41°29'31.72"N 45°57'27.37"E	
06 Patardzeuli 1	2/1.75	41°43'33.18"N 45°14'9.83"E	Tentatively: February 2027
07 Patardzeuli 2	2/1.75	41°43'50.58"N 45°12'55.57"E	
08 Badiauri	2/1.75	41°37'49.39"N 45°32'53.63"E	
09 Sagarejo 1	2/1.75	41°40'18.20"N 45°24'24.36"E	
10 Patardzeuli	32.5/25	41°37'2.45"N 45°13'27.38"E	Tentatively: December 2027

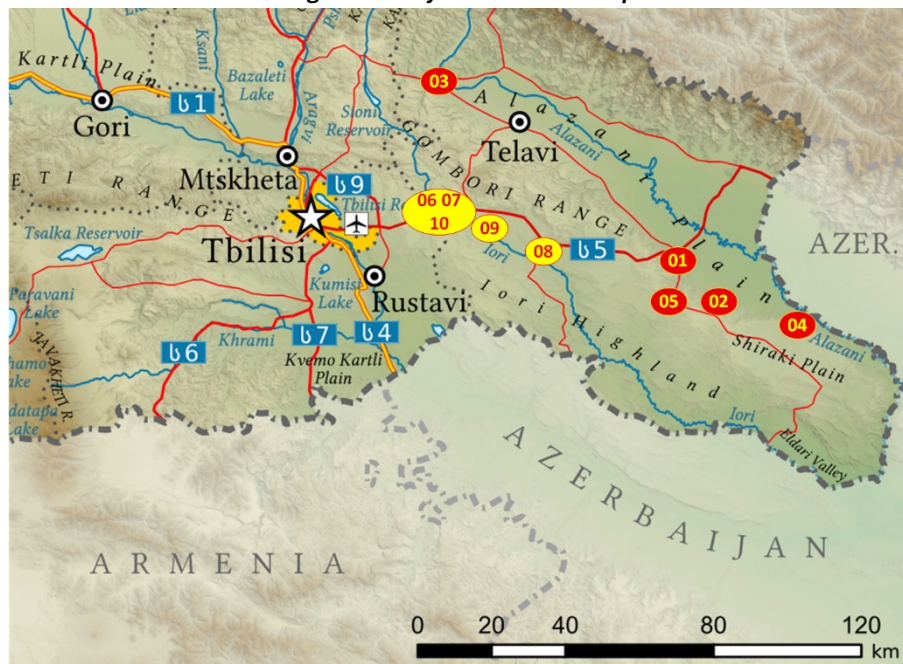
The 9mall¹ Solar Power Plants (SPPs) are readily accessible from nearby asphalted roads – eventually with a final access through an earth road.

The 10th and largest site, Patardzeuli has the longest access road. This earth road is around 10km. To the difference with the 9 small sites that can be reached by foot from the closest asphalted road in case of harsh winter conditions, Patardzeuli site is not readily accessible all year long.

When access roads are in good conditions, it takes 30 minutes to 2 hours to reach the sites, depending on their distance to Tbilisi.

¹ those with an AC capacity of 1.75 MW, corresponding to the first 11 projects in Table 1

Figure 1 - Project's location map



2.2 Implementation

Solar Power Plants:

All **5 existing SPPs** were built by Peri, a large Georgian construction company, and are also being operated & maintained by Peri, through a dedicated O&M contract. Veli owns the land and the assets.

The rest **5 under development SPPs** will be engineered, built and operated & maintained by Peri. Veli will own the land and the assets, and manage procurement. Given their limited size, all greenfield sites can be built within a few months, and in any case in much less than one year.

Connection to the grid:

All **9 small SPPs** are/will be connected to the closest substation through an underground cable. Meters are installed inside the substation; they mark the limit between assets owned and operated by the grid operator, and assets owned by Veli. The underground cable remains under the property of Veli.

The **large SPP**, Patardzeuli, will have a substation within its territory that will be connected to a nearby 110 kV line through an overhead loop-in loop-out. The overhead line will be built by a contractor selected and supervised by the grid operator (GSE), and will later be operated & maintained by GSE, without any intervention by Veli.

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 Veli as the Project progresses, particularly before the project enters the operations phase.

4 Legal disclosure requirements

In accordance with the requirements of national environmental legislation, the Solar Power Plants under 2WM were exempt from EIA process and only Patardzeuli 31MW SPP underwent an Environmental Impact Assessment (EIA) screening process. Following the review of project documentation, the competent authority under the Ministry responsible for environmental protection concluded that a full EIA was not required for either SPP, as the anticipated environmental and social impacts were considered limited and manageable within standard permitting conditions.

On the 5 existing SPPs, the neighbouring population is de facto aware of the projects. For the greenfield sites, no formal public consultation meeting was organised as part of the screening procedure.

5 Stakeholder engagement activities carried out to date

5.1 Engagement activities before the E&S due diligence

For the five existing projects, Veli held targeted interactions with several relevant parties, including nearby land users, representatives of the local municipality, and State agencies involved in the permitting process as soon as the land acquisition process was completed. The primary stakeholders were the nearby landowners, as the plants are distant from villages. The nearby landowners were informed about the planned works, and consultations resulted in tangible benefits: assisting with clearing wastelands in Jughaani and Khirsa, improving access roads to their lands, and allowing shepherds to use of the plant territories for grazing during the winter–spring period when they are present.

5.2 Engagement activities during the E&S due diligence

The Environmental and Social Due Diligence (ESDD) was carried out in January 2026. While no formal public meeting was organised as part of the ESDD process, the assessment team engaged with a range of relevant stakeholders to gather insights and verify baseline conditions. These included: (i) Veli management and technical staff, who participated in the field visit; (ii) local residents encountered near the PV sites, primarily farmers and shepherds; and (iii) O&M already mobilised on sites under operation.

Discussions with external stakeholders were constructive and focused primarily on practical matters related to land access and the continuation of traditional livestock grazing routes. In instances, community members highlighted the importance of maintaining access to pasture land and, in Patardzeuli, shepherds required ensuring that the traditional transhumance corridor leading towards Kakheti—running adjacent to the Project’s fenced boundary—remains open and functional: the Project was designed in a way that allows meeting this requirement.

The engagement allowed for a clear understanding of local concerns, which helped informing the Project’s stakeholder engagement and land management practices. Veli has expressed its commitment to working with local communities.

6 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 2 - Project stakeholders

Stakeholder (group)	Relation to / interest in the project
Potentially affected parties	
Town and settlement in the surroundings of the projects	• 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	• Agrivoltaics – criteria and rules to access to the PV plot for grazing
Users of the transhumance corridor	• Risk of cattle movement disruption or incidents in relation with the Project's traffic and TL construction
Stakeholders who use the earth roads to the PV site	• Interested to know the duration and period of works • Interested in temporary closures or deviations. • Interested in the risk of degradation of earth roads.
Municipal and local governing bodies	
Representatives of the local administration and municipality level	• Need to be informed about the Project (general timeline and organization) • Can participate in social problem solving
Governmental authorities and State companies	
Police	• Traffic regulation, especially in case of foreseeable traffic disruptions • Access to the site in case of incident • Can participate in social problem solving
Firemen, first aid services	• Access to the site in case of emergency
Other stakeholders	
CSOs, scientists	• 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	• Providers of construction materials and services.
Mass media: Internet-portal; radio and newspapers, etc.	• Interest in general information and project updates
Jobseekers / Employment agencies	• Employment opportunities
Internal stakeholders	
Workers	• Interest in working conditions and grievance mechanism, compliance with health, safety and conduct procedures. • Access to the grievance mechanism
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..)	• Access to information through direct and adapted engagement by the CLO

7 Stakeholder engagement activities

7.1 Organisation

Environmental and Social Action Plan

As required by EBRD, an Environmental and Social Action Plan (ESAP) was prepared for the Project. The implementation of the ESAP is a mandatory requirement for Veli, as part of the financing agreement with EBRD.

The ESAP includes the obligation for Veli 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 7.2 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 Georgian national legislation.

7.2 Stakeholder engagement programme

The following table provides a stakeholder engagement programme consistent with the stakeholder identification and analysis presented in chapter 6.

The Stakeholder Engagement Programme envisages that consultation meetings will take place with relevant interested parties and stakeholders 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..

Table 3 - Project stakeholders and information disclosure methods

Stakeholder	What to disclose	How	When
All stakeholders, national and regional level	General information about the Project, and company's contact for more information Access to the grievance mechanism	SEP and NTS disclosed on Veli's webpage (to be developed) SEP/Grievances monitoring reports on the webpage	Prior to EBRD's Board and during construction / operation
Regional mass media	Information on project	Use targeted and accessible communication channels , including social media platforms, local notice boards, and community networks, to disclose Project information and maintain engagement.	Within one month of signing the financing agreement with EBRD
Stakeholders whose animals used to graze on the land plot	Agrivoltaics – transparent criteria and rules to access to the PV plot for grazing	Direct engagement with the nearby stakeholders, starting from the closest ones	Site by site, before project operation starts – limited to sites where there is a grazing potential
	Agrivoltaics – safety training for the shepherds that will be allowed to graze within the PV site	Direct engagement	Before grazing activity starts
Users of the transhumance corridor and of the nearby farm (Patardzeuli site only)	Access to the CLO and/or to the grievance mechanism in case of problem	Information signs on site	During construction
Drivers that cross the transhumance corridor at the transhumance period	Considerate and careful driving	Road signs (warnings and speed limits)	During construction
Road police	Accidents or incidents requiring police action	Phone call	When deemed necessary
Army / military services (Patardzeuli site only)	Supply and construction schedule	Provide the schedule. Direct engagement to prevent any conflict with military exercises planning	Two weeks before the beginning of construction Correspondence with relevant stakeholders
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.	Brief updates to relevant parties	During the construction period
Job seekers	Information about vacancies. Information that positions are open to both men and women	job announcement tools will be agreed with contractor and the population representatives. Announcements will be limited to the neighbouring communities.	During Project implementation

Stakeholder	What to disclose	How	When
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

7.3 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. 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 Community Liaison Officer 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 Georgian, shared online or in print as relevant to each project's context, and distributed through community channels.

Additional updates will be issued as needed at key project stages such as construction commencement, and operational launch.

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 visits to the Project webpage.
 - 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

8 Grievance redress mechanism

8.1 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 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.

8.2 Monitoring, Reporting and Feedback Mechanisms

Veli will monitor the communication channels and will provide feedback as appropriate. A complaint box at each 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 Veli office in Tbilisi. 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 3.

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 Veli's submission of the Annual E&S Report, EBRD will also annually assess the SEP implementation.

8.3 Grievance Mechanism Submission Process

Veli 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 Veli Headquarters office in Tbilisi.

The grievance form and information on the procedure (including contact persons) will be made available on the Project website and during engagement activities. An information banner will be placed on designated noticeboard 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 Veli representatives**
- **Via partner institutions or trusted** 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 (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

8.4 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.

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

In line with international good practice, Veli's 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 Veli 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, Veli 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.

This approach reinforces Veli's commitment to a safe, inclusive, and respectful environment for all individuals involved in the Project.

8.6 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 and refer to the Georgian legislation in case his/her complaint was not resolved through either Stage 1 or Stage 2, or directly without use of the grievance mechanism.

8.7 Roles and Responsibilities

Veli 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 GM to ensure it is implemented in line with Georgian 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.

Veli 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 Georgian legislation as well as EBRD's Environmental & Social Policy:

- Nino Mateshvili, (+HSE Manager (on-site), Veli LLC, Telephone +995 577 314 117 Email: info@veli.com.ge)
- Nino Mateshvili – Community Liaison Officer (on-site), Veli LLC, Telephone: +995 577 314 117 Email: info@veli.com.ge

Annex 2 Veli 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