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SZYMANKOWO WIND FARM STAKEHOLDERS ENGAGEMENT PLAN

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1. INTRODUCTION

Polenergia S.A. (the Company) is developing via its daughter company a wind farm near Szymankowo village (the Project), Miłoradz commune, malborskie county (powiat), Pomorskie Voivodeship (województwo), in northern Poland.

The Project will consist of 11 wind turbine generators (WTGs); hub height 134 m, rotor diameter 132 m, nominal capacity 3.465 MW. The total installed capacity will be then 38.115 MW. The Project consists also of an underground infrastructure of power transmission and control cables, roads and assembly yards as well as dedicated main electrical substation (MES) in the Małowy Mały village, commune of Miłoradz. The underground power transmission line (PTL) will be developed by Polenergia for transmission of power generated by the Szymankowo Wind Farm to the MES.

The Project will be developed on a green fields used for agricultural purposes but dedicated in the local zoning plan of the commune for development of wind farm facilities. The Local Zoning Plan was issued on June 23, 2010, it was changed additionally in August 12 2013 and the same year its unified version was published.

In the environmental impact assessment (EIA) report¹ for the Project, there was assumed using WTGs 3.5 WM capacity each, without defining the exact model. According to document approving (as non-significant) qualification of the design's change, in 2018 the Siemens SWT-3.3-130 IEC-S HH135M (200 m height) were replaced by the model Gamesa G132-3.45MW HH134M. As already indicated in the report, the entire capacity of the Szymankowo WF will be 38.115 MW

The Project was also granted construction permits, the permit application process commenced in December, 2012. Such decision was granted to the project on February 2, 2015.

On 23 May, 2016 the Malbork County Head issued a decision changing building permit design approval and changing construction permit of the Szymankowo WF (decision no. AB.6740.123.2016.BP), comprising: 20 WTGs for the Szymankowo WF, with internal connections between the turbines, an underground power line, main electrical substation (MES), access roads and power line for MES emergency energy supply, construction of culverts.

On 21 April 2018 Ekoprojekt Company issued a document (approved by the licensed architect) presenting qualification of the design's change as non-significant (in 2018 the Siemens SWT-3.3-130 IEC-S HH135M (200 m height) were replaced by the model Gamesa G132-3.45MW HH134M).

This stakeholder engagement plan aims at identification of the project stakeholders at different stages of development and establishment of the rules for management of exchange of information between the company and the stakeholders.

¹ „Raport o oddziaływaniu na środowisko przedsięwzięcia pn.: Farma wiatrowa „Delta” w gminie Miłoradz (pow. malborski, województwo pomorskie)” (Environmental impact assessment report of „Delta” wind farm in the Miłoradz commune (Malbork county, pomorskie voivodeship)), in Polish, Proeko, June 2014

2. REQUIREMENTS

Public disclosure of the project related information is required for newly developed projects at the stage of their environmental impact assessments (EIAs). The scope of disclosed information includes among others general presentation of the project, its expected environmental and social impacts - including these on Natura 2000 protected areas, and measures necessary to mitigate these impacts. Disclosure of such information and securing public participation in the EIA process is managed by the authorities in charge of the EIA procedures. The authorities are also obliged by law to make all resolutions and decisions taken within the procedure available for public review and manage comments and grievances submitted by the interested parties. The EIA process for the projects of similar nature to the subject one is conducted at least once, prior to the environmental decision is granted to the project.

The procedure can be repeated then, if, e.g. detailed solutions adopted by the building design differ significantly from these considered at the stage of application for the environmental decision. In such case, the second EIA procedure is conducted by the authorities prior the building permit is being granted to the project. The second procedure is also open to public participation and requires in a wide range disclosure of the project related information.

Under Polish law, the companies are not legally obliged to publish any environmental or social reports on their environmental and social performance. Such information, however, can be included as a part of annual reports to stockholders or in other form, governed e.g. by Corporate Social Responsibility (CSR) or other internal policies.

Although not legally required, some project stakeholders, such as e.g. the lenders, may have certain requirements with respect to stakeholders engagement and project-related information disclosure. In particular, EBRD requires under Performance Requirement (PR) 10 of Environmental and Social Policy (2014) "Information Disclosure and Stakeholder Engagement" a systematic approach to stakeholders engagement at all stages of project development. Such approach allows for meaningful consultations, building constructive relationship with the stakeholders and in particular with the local communities, directly affected by the projects. The stakeholders engagement should have different forms and channels of communication. These include direct consultations, meetings with interested/involved stakeholders, disclosure of project related information via media, websites or information boards, but also direct approach of particularly affected communities, groups of people or individuals.

3. SUMMARY OF PREVIOUS STAKEHOLDERS ENGAGEMENT ACTIVITIES

The stakeholder engagement activities conducted to date comprised:

- Communication with landowners at the sites, negotiations of land lease contracts and signing the contracts – undertaken in 2008 and 2010.
- Formal contacts with the communes and environmental authorities within the local zoning plan establishments and EIA procedures – between 2008 and 2018.
- Formal contacts with Energy Regulatory Office while applying for promises for energy generation concessions.
- Formal contacts with road, water management, aviation and other authorities and organizations while applying for acceptances or approvals necessary for wind farms and their infrastructure designing.

As a part of the EIA procedures a disclosure of project related information and securing of public participation in the procedures was maintained by the commune authorities, i.e. Miłoradz Commune Office. During the public consultations the EIA report with all appendixes was available for review to every interested stakeholders so they were informed on potential impacts associated with the investment, in particular impacts on landscape, acoustic environment and shadow flicker phenomena. There were no complaints or protests against the planned investments.

The procedures were conducted in line with the environmental law; in particular the environmental reports and other documents were available for review by interested stakeholders who had also a right to submit their concerns. The authorities disclosed information according to the following milestones:

- On December 11, 2012 the Miłoradz Commune Head issued a notification No. R.6220.V.1.2012 and R.6220.V.2.2012 on commencement of the procedure concerning environmental decision for the Project; also informing all interested stakeholders about possibility to submit comments and review files. The notification was posted on the commune website and on information boards in the commune headquarters and in the villages of Bystrze, Gnojew, Kończewice, Mątowy Małe, Mątowy Wielkie, Miłoradz, Pogorzała Wieś, Stara Kościelnica and Stara Wisła.
- On December 11, 2012 the Miłoradz Commune Head applied to the State Sanitary Inspectorate in Malbork and to the Regional Director for Environmental Protection in Gdańsk for an opinion on the necessity to develop an environmental impact assessment of the Szymankowo WF.
- After receiving opinions of the State Sanitary Inspectorate in Malbork and the Regional Director for Environmental Protection in Gdańsk, on 26 February, 2013 the Miłoradz Commune Head issued a statement No. R.6220.V.10.2013 on development an environmental impact assessment of the Szymankowo WF and determined the scope of the environmental impact assessment report and disclosed this statement on the commune website and on information boards in the commune headquarters and in the villages of Bystrze, Gnojew, Kończewice, Mątowy Małe, Mątowy Wielkie, Miłoradz, Pogorzała Wieś, Stara Kościelnica and Stara Wisła.
- After submission of the EIA report, on June 7, 2013 the Miłoradz Commune Head issued a decision on continuation of the EIA procedure and informed in the same manner the Project stakeholders. The same day, the Head applied to the State Sanitary Inspectorate in Malbork and to the Regional Director for Environmental Protection in Gdańsk for opinion and approval of the environmental decision.

- The final Project disclosure period during the EIA procedure was announced by the Head on October 15, 2014 and was informed to the stakeholders in the same manner as previously. As required by law, the interested stakeholders had 21 days for submission of concerns and comments. No such concerns or comments were submitted.

No comments, applications for clarifications or grievances from ecological organizations (NGOs) or other stakeholders were submitted during the EIA procedures.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1 Stakeholders Identification

The following major stakeholders groups were identified:

Societies and individuals:

- Residents of Miłoradz municipality;
- Land owners of investment site;
- Residents along transportation roads;
- Employees of the company and contractors of the civil works and wind farm operation;
-

Commercial organizations:

- Distribution Service Operator;

Administrative stakeholders:

- Ministry of Economy;
- Ministry of Environment;
- Voivodeship Office (*Urząd Wojewódzki*);
- Energy Regulatory Office (*Urząd Regulacji Energetyki*);
- RDOŚ - Regional Directorate of Environmental Protection (*Regionalna Dyrekcja Ochrony Środowiska*);
- Pomeranian Voivodship Monuments Conservator;
- State Labour Inspectorate (*Panstwowa Inspekcja Pracy*);
- Construction Inspectorate (*Inspektorat Nadzoru Budowlanego*);
- Voivodeship Marshalls (*Marszałek Województwa*);
- State Sanitary and Epidemiological Inspectorate (*Państwowy Inspektorat Santarno-Epidemiologiczny*);
- Voivodeship Inspectorate of Environmental Protection (*Wojewódzka Inspekcja Ochrony Środowiska*);
- Local, self-governmental administration (i.e. Miłoradz Commune Office and commune villages offices);
- Road administration at commune, county, Voivodeship and national level;
- Police;
- Fire brigades;

Non-Governmental Organizations:

- Local, regional, national and worldwide avifauna protection organizations;
- Local, regional, national and worldwide ecological organizations;

Organizational stakeholders:

- Contractors and subcontractors of the construction works;
- Equipment suppliers;

Lenders:

- International Finance Institutions financing the project.

Review of the information available about the village of Gnojewo (which will be crossed during delivery of WTGs elements and likely also trucks delivering building materials/transferring off the soil) and other villages in the vicinity of the Project site did not indicate presence of any vulnerable groups or objects of special interest, such as hospitals, nursing homes etc.

4.2 Stakeholder Characteristics

Characteristic of the stakeholders is provided in the following table:

Societies and individuals			
Residents of places where investment works will be implemented	The project is being developed in the commune of Miłoradz, in Malbork county, which occupies app. 93,75 km ² and have app. 3 600 inhabitants. Szymankowo WF is planned to be situated in the area delineated by the villages of Gnojewo (northern corner), Stara Kościelnica (eastern corner), Miłoradz (southeastern corner) and Bystrze (western corner).		
Land owners of investment sites	Land owners come from the villages of Subkowy, Gnojewo and Miłoradz		
Residents along the transportation roads.	Before commencement of the construction works and elaboration of a Traffic Management Plan for the construction period the only identified residents are these living in the village of Gnojewo.		
Employees of the company and contractors of the civil works and wind farm operations.	The construction works and then operations of the wind farm will be outsourced to external contractors.		
Commercial organizations			
Distribution System Operator	<p>Polskie Sieci Elektroenergetyczne Operator S.A. ul. Warszawska 165 05-520 Konstancin-Jeziorna Tel.: 022 242 26 00 Fax.: 022 242 22 33 www.pse-operator.pl</p> <p>ENERGA Operator S.A. o/Gdańsk ul. Marynarki Polskiej 130 80-557 Gdańsk tel.: +48 58 527 95 95 faks: +48 58 527 95 17 operator.gdansk@energa.pl</p>		
Administrative Stakeholders			
Ministry of Economy / Ministry of Environment / Ministry of Transport, Engineering and Marin Economy	<p>Ministerstwo Gospodarki 00-507 Warszawa, pl. Trzech Krzyży 3/5 Tel.: 22 693 50 00 Fax.: 22 693 40 48 mg@mg.gov.pl www.mg.gov.pl</p>	<p>Ministerstwo Środowiska 00-922 Warszawa, ul. Wawelska 52/54 Tel.: 22 579 29 00 Fax.: 22 579 22 24 info@mos.gov.pl www.mos.gov.pl</p>	<p>Ministerstwo Transportu, Budownictwa i Gospodarki Morskiej. 00-928 Warszawa ul. Chałubińskiego 4/6 Tel.: 022 6301000 ,</p>

Fax.: 022 6301116
info@transport.gov.pl
www.transport.gov.pl

Voivodeship Office	Pomorski Urząd Wojewódzki w Gdańsku Ul. Okopowa 21/27 80-810 Gdańsk Tel.: 58 30 77 695 Fax.: 58 30 77 317 www.gdansk.uw.gov.pl
Energy Regulatory Office /Urząd Regulacji Energetyki/	Grants concessions, approves of energy tariffs, counter works market monopoly. Urząd Regulacji Energetyki ul. Chłodna 64, 00-872 Warszawa Tel.: 22 661 61 07, 22 661 61 66, Fax.: 22 661 61 52 e-mail: ure@ure.gov.pl www.ure.gov.pl
Wojewódzki Inspektorat Ochrony Środowiska w Gdańsku	Electromagnetic fields monitoring Trakt św. Wojciecha 293D 80-001 Gdańsk Email: sekretariat@gdansk.wios.gov.pl Tel. 58 309 49 11, 58 309 49 12, 58 309 49 13
GDOŚ /General Directorate of Environmental Protection/	Generalna Dyrekcja Ochrony Środowiska w Warszawie ul. Wawelska 52/54 00-922 Warszawa e-mail: kancelaria@gdos.gov.pl
RDOŚ /Regional Directorate of Environmental Protection/	Regionalna Dyrekcja Ochrony Środowiska w Gdańsku ul. Chmielna 54/57, 80-748 Gdańsk Tel.: 58 68 36 800 Fax.: 58 68 36 803 e-mail: sekretariat.gdansk@rdos.gov.pl
State Labour Inspectorate	Państwowa Inspekcja Pracy / Główny Inspektorat Pracy ul. Barska 28/30 02-315 Warszawa Tel.: 22 391 82 15 Fax.: 22 391 82 14
Pomeranian Voivodship Monuments Conservator/Pomorski Wojewódzki KonserwatorZabytków	Pomorski Wojewódzki Konserwator Zabytków Wojewódzki Urząd Ochrony Zabytków w Gdańsku ul. Dyrekcyjna 2-4 80-852 Gdańsk Tel. 58 301 62 67; 58 320 32 87, 58 305 22 56

	<p>e-mail: gdansk@zabytki.mail.pl</p>
Construction Inspectorate /Inspektorat Nadzoru Budowlanego/	<p>Główny Urząd Nadzoru Budowlanego ul. Krucza 38/42 00-926 Warszawa Fax.: 22 661-81-42</p> <p>Powiatowy Inspektorat Nadzoru Budowlanego w Malborku Plac Słowiański 17 82-200 Malbork Tel. (55) 646 04 44, 646 04 45, 646 04 46, 646 04 70 e-mail: pinb.malbork@gda.winb.gov.pl</p>
State and Province Sanitary and Epidemiological Inspectorate	<p>Wojewódzka Stacja Sanitarno-Epidemiologiczna w Gdańsku ul. Dębinki 4, 80-211 Gdańsk Tel.: 58 776 32 00, 58 344 73 00 e-mail: poczta@wsse.gda.pl, wsse.gdansk@pis.gov.pl</p> <p>Powiatowa Stacja Sanitarno Epidemiologiczna w Malborku ul. Juliusza Słowackiego 64, 82-200 Malbork Tel.: 55 647 25 55 e-mail: psse.malbork@pis.gov.pl</p>
Voivodeship Marshall	<p>Urząd Marszałkowski Województwa Pomorskiego w Gdańsku ul. Okopowa 21/27, 80-810 Gdańsk Tel.: 58 32 68 555 Fax.: 58 32 68 556 e-mail: info@pomorskie.eu</p>
Local, self-governmental administration	<p>Urząd Gminy Miłoradz ul. Żuławska 9 82-213 Miłoradz Tel.: 55 271 15 31, 55 272 04 94, 55 271 14 69, 55 272 04 96 Fax.: 55 271 15 65 e-mail: ugimz@go2.pl</p> <p>Starostwo Powiatowe w Malbork Plac Słowiański 17, 82-200 Malbork Tel.: 55 646 04 00, Fax.: 55 272 34 62 e-mail: sekretariat_gdansk@gddkia.gov.pl</p>
Road Administration	<p>Generalna Dyrekcja Dróg Krajowych i Autostrad- oddział w Gdańsk</p>

ul. Subisława 5
80-354 Gdańsk
tel. 58 511 24 00
email: kancelaria@gddkia.gov.pl
Zarząd Dróg Wojewódzkich w Gdańsku
ul. Mostowa 11a,
80-778 Gdańsk
Tel.: 58 32 64 997
Fax: 58 32 64 999
e-mail: sekretariat@zdwgdansk.pl
Zarząd Dróg Powiatowych w Malborku
Plac Słowiański 17
82-200 Malbork
Tel.: 55 273 45 42
www.bip.zdp.powiat.malbork.pl

Police Police stations at Voivodeship, county and commune level.

Fire brigades Fire brigades stations at Voivodeship, county and commune level.

Non-Governmental Organizations

NGOs – birdlife associations local and international	OTOP - Ogólnopolskie Towarzystwo Ochrony Ptaków BirdLife International OTOP ul. Odrowąża 24 05-270 Marki k. Warszawy tel:0-22 761 82 05 faks: 0-22 761 90 51 biuro@otop.org.pl	World Wildlife Fund, WWF Polska ul. Wiśniowa 38 02-520 Warszawa tel. (22) 849 84 69 / 848 73 64 tel. (22) 848 75 92 / 848 75 93 fax (22) 646 36 72
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Local ecological NGOs None identified.

Organizational stakeholders

Construction companies Equipment suppliers Transport companies	Construction works, equipment supply and transport services will be conducted by reputable companies, experienced in this kind of assignments selected on the basis of tender procurements.
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Lenders

International Finance Institutions	European Bank for Reconstruction and Development One Exchange Square London EC2A 2JN United Kingdom tel. +44 020 7338 6000 www.ebrd.com
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and other commercial banks providing financial service to the company

5. DISCLOSURE OF INFORMATION

Disclosure of information and further proper communication with the stakeholders is an important measure to identify issues that could affect Project development or environmental or social issues that should be taken into account to meet the good management practice rules. Given that the Project is far advanced in its development, i.e. is in possession of necessary permits to commence the construction works and then operation, the disclosure of information will be tailored for proper stakeholders engagement in these development phases.

In order to meet the highest international standards, following the good management practice as well as in order to meet specific requirements of the lenders, the Company will maintain transparency procedures of information disclosure during the whole Project lifetime, which will comprise among others:

- Active communication with local communities and authorities
- Presentation of the Annual EHS reports on the Company environmental, social, and health and safety practices and performance on the company webpages and in the annual CSR reports;
- At the discretion of the company, PR actions in local newspapers and nationwide, radio (e.g. Polish Radio programs 1 and 3) and TV (e.g. TVP1, TVP2, Polsat, TVN);
- Direct communication with affected and interested stakeholders, as appropriate,
- Distribution of the Project related information among the own employees and employees of the external companies through internal mechanisms.

Prior to commencement of the construction works the Company will:

- Open an information point in the Commune Office in Miłoradz. Project related documents, including EIA report, administrative permits, NTS, grievance form and this SEP as well as contact details to Project Manager and Manager of the Environment and Sustainable Development of the Company will be available there to any interested individuals. This information point will be maintained during the whole Project lifetime.
- For the construction period - open of an information point at the construction camp office before commencement of the construction works, with participation of the Manager of the Environment and Sustainable Development, Project Manager, Construction Manager and other responsible people. This staff will be presented as responsible for communication with the stakeholders, also grievance mechanism will be described. Construction manager will be obliged to pass all grievances to the Manager of Environment and Sustainable Development for further processing and recording.

The Company also plans to maintain active communication with the local communities. Therefore, along with opening of the information point at the construction camp the Company will arrange a meeting with local communities during which people will be informed about Traffic Management Plan, grievance mechanism and other projects developed and operated by the Company. Presentation of the Polenergia's practice of cooperation with local communities and authorities will be given. Information about the meeting and opening of consultancy points will be distributed with use of the local media (e.g. daily newspaper Dziennik Bałtycki with issued every Friday annex of Dziennik Malborski, local internet television TV Malbork (www.tvmaplbork.pl) and/or the Portal Na Plus (<https://portalnapius.pl/>) website).

Communication with the organizational stakeholders will be conducted following the existing routines and procedures. The communication channels comprise regular meetings, reporting and day-to-day exchange of information via personal or mail contacts at different organizational levels between the involved parties. Meetings may also be arranged on request.

Disclosure of information to the administrative stakeholders will be based on formal notifications, applications and reporting – as required by law and ongoing investment process. The formal communication regarding environmental issues, as well as other issues including development and health and safety subjects, will be conducted by the Company.

Internal stakeholders (workers/employees) will be informed using the existing communication channels and following the internal rules . The routine communication channels comprise: periodical meetings, announcements, information letters and notifications posted on information boards, trainings, flow of information through the management chain. The Project related information, including updates on the construction works progress will be distributed among the employees via a newsletter sent via email to all employees.

The Company has adopted the Corporate Social Responsibility Strategy which addresses the four key areas (ethical business, H&S of Employees and Partners, environmental protection and client and local societies). One of the key goals of the Strategy is to maintain a good relationship with the stakeholders, among others by providing information about Company performance and key environmental and social achievements.

In line with CSR strategy, the Company will disclose environmental and social information and inform affected and interested stakeholders about the Project development. A non-technical summary, a list of administrative decisions related to the Project and annual Project – related reports will be published on the Company's and project's website (www.polenergia.pl). Relevant information will be published in "Market News" and CSR sections.

6. STAKEHOLDER ENGAGEMENT PROGRAM

The consultations with the stakeholders will be conducted by Mrs. Marta Porzuczek, Head of Environment Protection and Sustainable Development Department with co-operation with the Company Managers.

Consultations with the administrative stakeholders will follow the project assumed time schedule. At this stage it is assumed, that these stakeholders will be informed in advance of the planned project milestones, i.e. commencement and completion of the construction works. Commencement of the construction works will depend on availability of project financing by the lenders.

Consultations with the internal stakeholders will follow the current routine of the company. This will include among other regular meeting of the Project management team with Company management as well as exchange of information between the employees involved in the Project development. The Project related information will be posted on the informational boards at the company headquarters.

Information on the Project milestones will be published in advance on the Company website at www.polenergia.pl to be available for the public and non-governmental organizations. Moreover, the disclosure information package which will comprise:

- Non-technical summary;
- Administrative decisions related to the project;
- Annual project-related reports;

will be made available for the public review at the commune authorities offices.

Should any issues be raised by the stakeholders, the Company management will react accordingly in the shortest possible time.

All meetings and other forms of communication will be documented and registered by the Company.

Below there is a summary of consultation activities that the Company will undertake as part of the Engagement Plan:

Stakeholders:	Consultation, communication method and objective	Proposed milestones	Responsibility
<i>Directly or indirectly influenced by the Program</i>			
Residents of places where investment works will be implemented	Company and local administration websites Direct contacts initiated by residents Information meeting with local communities before commencement of the construction works.	Commencement and completion of the construction works and in reaction to submitted grievances during and after the investment process	The Company Commune administration

Land owners of investment sites	Company and local administration websites Direct contacts with residents Information meeting with local communities before commencement of the construction works.	Commencement and completion of the construction works and in reaction to submitted grievances during and after the investment process	The Company Commune administration
Company employees	E-mail Meetings	Continuously	In line with existing routines
Commercial organizations			
Power distribution system operators	E-mail and regular mails Meetings	On as needed basis during the project lifetime	Company Management, Project Managers
Administrative Stakeholders			
Ministry of Economy Ministry of Environment Ministry of Transport, Engineering and Marine Economy	Formal letters	In accordance with the requirements of administrative procedures	Company and project management
Energy Regulatory Office /Urząd Regulacji Energetyki/	Exchange of documentation and correspondence regarding the projects	During the project lifetime, following legal requirements	Company Management
RDOS /Regional Directorate of Environmental Protection/	Submission of monitoring reports. Mail exchange. Meetings	After completion of the construction works	Company Management Environmental Specialist
State Labour Inspectorate /Państwowa Inspekcja Pracy/	Consultation meetings – information, exchange of documentation and correspondence regarding the projects	During the project lifetime, following legal requirements	Company Management
Construction Inspectorate /Inspektorat Nadzoru Budowlanego/	Consultation meetings – information, exchange of documentation and correspondence regarding the projects	Continuous process during construction works and commissioning	Project Managers
Sanitary Inspectorate	Exchange of documentation and correspondence regarding the projects	During the project lifetime, following legal requirements	Project Managers
Province Marshals	Notifications, formal letters, submission of information on use of the environment	During the project lifetime, following legal requirements	Project Managers Environmental Specialist

Local government administration	Consultation meetings – information, exchange of documentation and correspondence regarding the projects	Continuous process - in accordance with the requirements of administrative procedures	Project Managers
Road Administration	Consultation meetings – information, exchange of documentation and correspondence regarding the projects	During the construction works	Project Managers
Police	Consultation meetings – information, exchange of documentation and correspondence regarding the projects	Continuous process - in accordance with the requirements of administrative procedures	Project Managers
Fire Brigade	Consultation meetings – information, exchange of documentation and correspondence regarding the projects	Continuous process - in accordance with the requirements of administrative procedures	Project Managers
Non-Governmental Organizations			
NGOs – birdlife associations local and international, local ecological NGOs	Company website and answers to direct questions or complaints	During the project lifetime	Project Managers Environmental Specialist
Organizational Stakeholders			
Construction companies Equipment suppliers Security companies	In accordance with agreements between the company and construction companies, equipment suppliers and security companies	Before commencement and during construction works	Project Managers
Lenders			
International Finance Institutions	Consultation meetings – information, exchange of documentation and correspondence regarding the projects.	Continuous process - in accordance with the loan contract.	Company Management

7. GRIEVANCE MECHANISM

The company will implement a routine to manage the grievances submitted by the Project stakeholders. The grievances will be addressed in a first instance to a respective daughter company Polenergia Farma Wiatrowa Szymankowo Sp. Z o.o.). As a general rule, response to any grievance will be given within 14 days or, alternatively, if due to complexity of the case response will not be possible within that time, the complainant will be informed within 14 days in writing on the expected date of response and steps taken in order to address the complaint. All of the grievances together with information on a measure applied to address them will be reported to the company headquarters and recorded in a grievance register including stakeholder name and contact details, details of the grievance and how and when it was submitted, acknowledged, responded to and closed out. The receipt of the grievances submitted by email will be acknowledged within 5 working days.

The anonymous grievances will be processed as other submitted, however, there will be no ability to provide a specific response.

The grievance form will be available at the Company website and in the consultations points arranged by the Company at the Miłoradz Commune Office and during construction works also at the Construction Camp. The Company will instruct the local authorities in the commune office about the grievance mechanism and provide them with contact details on which grievances can be submitted. The grievance mechanism will also be presented during the meeting with the local communities arranged during opening of the consultation point at the Construction camp.

All grievances should be addressed to:

Marta Porzuczek
Head of Environmental Protection and Sustainable Development Department
24/26 Krucza Str., Warsaw
Phone: +48 22 522 38 00
e-mail: Marta.Porzuczek@polenergia.pl

Tomasz Brzeski
Project Manager
24/26 Krucza Str., Warsaw
Phone: +48 22 522 38 81
e-mail: tomasz.brzeski@polenergia.pl

Adrian Detmer
O&M Technician
Telefon: +48 722 020 380
e-mail: Adrian.Detmer@polenergia.pl

The Public Grievance form already adopted by the Company is presented below. The form (both in English and Polish) will be posted in the shortest possible time on the Company website, together with the description of the grievance response mechanism and will be available at the consultation points.

Table. Proposed Public Grievance Form.

Reference No:	
Full Name	
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____
	By Telephone: _____
	By E-mail _____
Preferred Language for communication	Polish English
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

8. MONITORING, RESOURCES AND RESPONSIBILITIES

This SEP will be implemented by the employees of the Company and with allocation of the Company financial and manpower resources. SEP will be regularly updated (at least on annual basis or in case of and published along with that actualization.

Responsibility for the plan implementation will bear Mrs. Marta Porzuczek Head of Environmental Protection and Sustainable Development Department .

The SEP implementation will be monitored by a person assigned by the Company management. The monitoring will cover:

- Timely disclosure of information;
- Records of consultations with the stakeholders and measures taken to address issues identified as important for the Project, local communities or other stakeholders;
- Records of submitted grievances, how and when these were addressed and whether undertaken mitigations measures are adequate.

9. TIMETABLE

The following milestones of the SEP implementation and Project development are expected:

- Project Disclosure Package posting on the Company website – mid-July 2019.
- Arrangement of the Project consultation point at the Commune Office – beginning of August 2019.
- Arrangement of the Project consultation point at the Construction Camp – prior to commencement of the construction works.
- Meeting with the affected communities to present the Project and grievance mechanism – the same time as arrangement of the consultation point at the Construction Camp.
- Maintaining communication with administrative stakeholders during the construction works: these will be commenced within 3 months after Project financing is secured by the lenders – likely in 2019.
- Update of the Project related information at the Company website (e.g. information on the commencement or completion of construction works, start and commencement of post-construction monitoring, post-construction monitoring reports presentation etc.) – along with the achievement of the consecutive Project milestones.
- CSR reporting – annually, in line with the Company standards.

Presentation of EH&S reports on the Project performance – on annual basis, starting a year following commissioning of the wind farm.